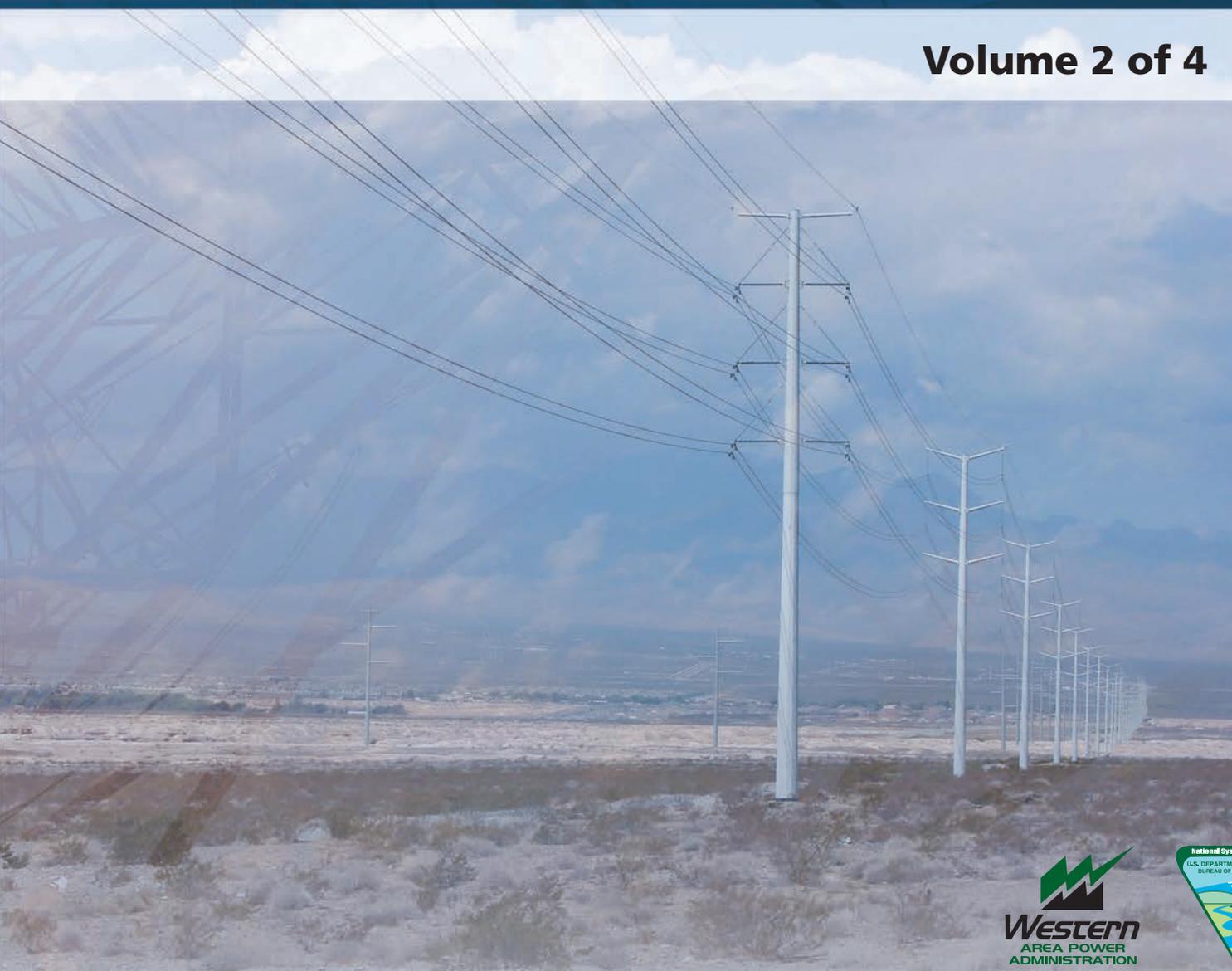


Proposed Southline Transmission Line Project

Draft Environmental Impact Statement and Draft Resource Management Plan Amendment

Volume 2 of 4

BLM/NM/PL-14-01-1610 · DOE/EIS-0474



March 2014



BLM MISSION STATEMENT

The Bureau of Land Management is responsible for stewardship of our public lands. The BLM is committed to manage, protect, and improve these lands in a manner to serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield of our Nation's resources within the framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife habitat, wilderness, air, and scenic quality, as well as scientific and cultural values.

WESTERN MISSION STATEMENT

Western Area Power Administration's mission is to market and deliver reliable, renewable, cost-based hydroelectric power and related services.

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VOLUME SUMMARY

- Volume 1 – Executive Summary, Chapters 1, 2, and 3
- Volume 2 – Chapters 4, 5, 6, and 7
- Volume 3 – Appendices A through G
- Volume 4 – Appendices H through L

1 Chapter 4

2 ENVIRONMENTAL CONSEQUENCES

3 4.1 INTRODUCTION

4 This chapter presents the results of the environmental impact analysis for the various resources introduced
5 in chapter 3 of this EIS.

6 4.1.1 Impact Assessment

7 The proposed Project outlined in chapter 2 may cause, directly or indirectly, changes in the human
8 environment. This DEIS assesses and analyzes these potential changes and discloses the effects on the
9 decision-makers and public. This process of disclosure is one of the fundamental goals of the NEPA
10 process. The no action alternative is also described. The no action alternative forms the baseline against
11 which the potential impacts of the Proponent Preferred alternative and the other action alternatives are
12 compared.

13 *Effects/Impacts*

14 The terms “effect” and “impact” are synonymous under NEPA. Effects may refer to ecological, aesthetic,
15 historical, cultural, economic, social, or health-related phenomena that may be caused by the Proponent
16 Preferred alternative or action alternatives. Effects may be direct, indirect, or cumulative in nature.
17 Cumulative effects are analyzed at the end of this chapter.

18 Effects, or impacts, can be beneficial or adverse, result from the action directly or indirectly, and can be
19 long term, short term, temporary, or cumulative in nature. A direct effect occurs at the same time and
20 place as the action. Indirect effects are reasonably foreseeable effects that occur later in time or are
21 removed in distance from the action. Direct and indirect effects are discussed in combination under each
22 affected resource. Short-term effects, or impacts, result in changes to the environment that are stabilized
23 or mitigated rapidly and without long-term effects; these changes typically occur during construction, or
24 may be sporadic maintenance events during the life of the proposed Project. Long-term impacts are
25 defined as those that would remain substantially for the life of the proposed Project, or beyond short-term
26 impacts.

27 *Mitigation and Residual Impacts*

28 The analysis takes into account the proponent-committed measures and BMPs described in table 2-7
29 and the laws, ordinances, regulations, and standards described under each resource. These proponent-
30 committed measures have been built into the proposed Project to minimize impacts to the extent
31 practicable by project design.

32 Mitigation measures are a means with which to address environmental impacts that are applied in the
33 impact analysis to reduce the intensity or eliminate potential impacts. To be adequate and effective, CEQ
34 rules (40 CFR 1508.20) require that mitigation measures fit into five broad categories: avoid the impact,
35 minimize the impact, rectify the impact through repair and/or rehabilitation, reduce or eliminate the
36 impact, or compensate for the impact. Where applicable, additional mitigation measures are provided in
37 this document.

1 If residual effects remain after the mitigation is applied, those effects are described. The residual impacts
2 section addresses impacts that cannot be avoided by the application of mitigation measures and discloses
3 the effectiveness of additional mitigation measures provided for each resource.

4 ***Impacts of Decommissioning***

5 The term of the BLM ROW grant to allow use of Federal land would be limited to 50 years, although the
6 useful life of the Project facilities is projected to be at least 50 years and up to 75 years. As discussed in
7 “Decommissioning” in chapter 2, if the ROW and facilities are no longer needed, the transmission lines
8 and associated facilities would be decommissioned. Subsequently, conductors, insulators, concrete pads,
9 and hardware would be dismantled and removed from the ROW. All areas of permanent disturbance
10 would be restored in accordance with a decommissioning plan, to be developed by the ROW grant holder
11 (Southline) and approved by the BLM Authorized Officer.

12 Impacts resulting from the decommissioning process would be similar in scope to the impacts that would
13 occur during construction of the proposed Project. The amount of ground disturbance for access to the
14 proposed Project facilities would be within the amount of land disturbed during construction. Impacts
15 associated with decommissioning are anticipated to be similar to the impacts during construction in terms
16 of the extent of disturbance. However, potential impacts and the timeframe for decommissioning are so
17 far in the future that determining or estimating the impacts would be speculative. Therefore, the impacts
18 of decommissioning cannot be meaningfully analyzed within each resource section. The Project
19 Decommissioning Plan, discussed in chapter 2, would include procedures that would be implemented
20 under the direction of the land management agencies or landowners, in compliance with applicable
21 regulations and guidelines.

22 **4.1.2 Cumulative Effects**

23 Effects on a resource are considered cumulative when the effects from the Project are added to the
24 potential effects from other past, present, or future projects in the analysis area. Cumulative effects are
25 discussed in detail in section 4.20.

26 **4.1.3 Significance and Impact Indicators**

27 Significance is defined by the CEQ as a measure of the intensity and context of the effects of an action
28 on, or the importance of that action to, the human environment. Significance is a function of the beneficial
29 and adverse effects of an action on the environment.

30 *Intensity* refers to the severity or level of magnitude of impact. Proximity to sensitive areas or protected
31 resources, public health and safety, level of controversy, unique risks, or potentially precedent-setting
32 results are all factors considered in determining the intensity of the effect. This DEIS uses the terms
33 major, moderate, or minor/negligible in describing the intensity of effects.

34 *Context* means that the effect(s) of an action must be analyzed within a framework or within physical or
35 conceptual limits. Resource disciplines, location, type, or size of area affected (e.g., local, regional,
36 national), and affected interests are all elements of context that ultimately determine significance. Both
37 short- and long-term impacts are relevant.

38 Use of the term *significant* when referring to resource impacts indicates that some threshold was exceeded
39 for a particular impact indicator. Impact indicators are the consistent parameters used to determine
40 quality, intensity, and duration of change in a resource. Working from an established existing condition
41 (i.e., the baseline conditions described in chapter 3), one or more condition indicators are used to predict

1 or detect change in a resource related to causal impacts of proposed Project actions. These thresholds are
2 consistent with CEQ’s guidance on the criteria for a significant impact. Table 1-8 in chapter 1 lists the
3 key issues for analysis, as derived from public scoping and agency input, and the sections in which these
4 issues are analyzed in the DEIS.

5 The following categories of magnitude and duration are presented to define relative levels of effects and
6 to provide a common language when describing effects. The definitions in table 4.1-1 below are general.
7 Descriptors are specifically defined for certain resources when the general definitions presented in this
8 table are inadequate.

9 **Table 4.1-1. Standard Resource Impact Descriptions for Magnitude and Duration**

Description Relative to Resource	
Magnitude	
No Impact	Would not produce obvious changes in baseline condition of the resource.
Minor/ Negligible	Impacts would occur, but resource would retain existing character and overall baseline conditions.
Moderate	Impacts would occur, but resource would partially retain existing character. Some baseline conditions would remain unchanged.
Major	Impacts would occur that would create a high degree of change within the existing resource character and overall condition of resource.
Duration	
Short term	During construction and up to 5 years (from when ground-disturbing activities begin, through reclamation when vegetation has been reestablished in construction areas).
Long term	More than 5 years, life of the Project.

10 **4.1.4 Analysis Approach Summary**

11 The information available for the proposed Project is preliminary and is subject to change during the
12 detailed design process. This DEIS has been developed based on available information deemed adequate
13 to characterize expected impacts to the extent that the intensity, context, magnitude, and duration are
14 understood for each affected resource.

15 A representative ROW was identified for the Project’s New Build and Upgrade Sections, where the
16 majority of ground disturbance resulting from the Project is expected to occur. The representative ROW
17 for the proposed New Build Section of the Project is 200 feet wide; this includes the Proponent Preferred
18 alternative and all subroutes, segments, and local alternatives. The representative ROW for the Upgrade
19 Section of the Project is 150 feet wide; this includes the Proponent Preferred alternative and all subroutes,
20 segments, and local alternatives.

21 The Project design is preliminary. Therefore, the ground disturbance that could occur from the proposed
22 Project, whether in the representative ROW or from disturbance areas outside the representative ROW,
23 has been estimated based on typical design characteristics of the Project as described in the July 2013
24 POD. These estimates include assumptions for typical structure types, a range of structure types needed
25 per mile, structure foundations, staging areas, pulling and tensioning sites, access road types, and spur
26 access routes. It is important to note that not all areas in the ROW or along access roads would be
27 completely disturbed.

28 The average disturbance acreage per mile for both temporary and permanent ground disturbance within
29 the representative ROW was calculated for both the New Build and Upgrade sections of the Project.
30 Temporary disturbance per mile within the ROW was estimated based on assumptions for structure work

1 areas, wire pulling and tensioning sites, wire splicing sites, and cross-country travel access to structure
2 sites. Permanent disturbance within the ROW was estimated based on assumptions for structure base and
3 on improving or constructing new access roads.

4 In addition, there may also be ground disturbance outside the representative ROW from staging areas and
5 substation expansion. The temporary disturbance from staging areas was estimated based on typical
6 staging area needs described in the POD. Substation expansion would result in both temporary and
7 permanent ground disturbance based on preliminary designs in the POD, which is subject to change
8 during the detailed design process. Estimates for both temporary and permanent ground disturbance
9 outside the representative ROW are presented as acreage in table 2-8 in chapter 2.

10 **4.2 AIR QUALITY**

11 **4.2.1 Introduction**

12 This section describes the impacts to air quality associated with the construction, operation and
13 maintenance of the transmission line, substations, and ancillary facilities. Impacts to air quality are
14 discussed in terms of proposed Project emissions of criteria air pollutants, HAPs, and GHGs on a
15 subroute basis. In addition to quantifying the proposed Project emissions on a mass basis, a general
16 screening-level impact analysis has been conducted to predict ambient concentrations of air pollutants for
17 proposed Project-related activities that have the greatest potential to exceed applicable ambient air quality
18 standards.

19 For the purposes of the analysis, emission estimate summaries for each of the subroutes under
20 consideration have been compared with general conformity threshold levels, while predicted ambient air
21 concentrations have been compared with the SILs. Where predicted exceedances to an SIL exist, the
22 predicted ambient concentration plus the representative background concentration have been compared
23 with the applicable national or State ambient air quality standards. Impacts to air quality related values
24 (AQRVs) in relation to Class I areas (national parks) and impacts to climate change are also discussed in
25 a qualitative manner.

26 All action alternatives would result in emissions of criteria pollutants, HAPs, and GHGs. Only the no
27 action alternative would result in no Project-related emissions or impacts.

28 Operational emissions and impacts would be much lower than construction phase emissions; therefore,
29 impacts have not been quantified (with the exception of SF₆) from the circuit breakers). Operation and
30 maintenance emissions would include vehicle exhaust from travel to substations and the transmission line
31 for routine inspection, as well as SF₆ emissions from operation of the gas-insulated circuit breakers in the
32 switchyards. The sources of emission categories that have been considered include the following:

- 33 • Fugitive dust from earth-moving associated with construction activities in support of the upgrade
34 and new build of the transmission lines and substations;
- 35 • Fugitive dust from vehicle movement on paved and unpaved roads accessing various segments of
36 the line route;
- 37 • Engine exhaust (tailpipe emissions) from both on-road and non-road vehicles/equipment,
38 including construction worker commuting, delivery of materials and supplies, and onsite
39 construction activities;
- 40 • Emissions from concrete batch plants used to mix the concrete for structure and substation
41 equipment foundations; and

- SF₆ emissions from gas-insulated circuit breakers in the switchyards.

Decommissioning activities could also potentially result in air emissions. Impacts resulting from decommissioning activities would be similar in scope to impacts from construction. While impacts are anticipated to be similar in nature, the potential timeframe for decommissioning activities (at least 50 years out) renders the consideration of impacts to air quality from decommissioning activities highly speculative. By the time decommissioning of the line takes place, decommissioning techniques and requirements could have changed, as well as the legal and regulatory setting requirements. Therefore, impacts to air quality from decommissioning activities are not addressed.

This analysis assumes that proposed Project design details would be employed as required by the States of New Mexico and Arizona for fugitive dust for land-clearing, road construction, and construction activities associated with construction of the line. In addition, fugitive emissions would be controlled on unpaved roads to the extent required by the States.

The impacts described in this section are based on data provided in “Southline Transmission Project Resource Report 1: Air Quality and Climate Change” (CH2M Hill 2013a) and described in chapter 3, section 3.2.

4.2.2 Methodology and Assumptions

This section describes the air quality analysis area, the assumptions and methodology used to calculate air pollutant emissions, and the approach to identifying significant impacts and identifies what would be considered a significant air quality impact from the construction, operation, and maintenance of the transmission lines and substations.

Analysis Area

As described in chapter 3, the air quality analysis area for both the New Build and Upgrade sections and the alternative routes and segments is a 50-km radius (approximately 31 miles) along the centerline of the proposed Project (see figure 3.2-1). The 50-km radius was used for consistency with minimum air quality analyses required by PSD guidelines, if applicable, and the ADEQ and New Mexico Department of Environmental Quality modeling guidelines.

Analysis Assumptions

Emissions were calculated to estimate ambient air impacts from construction and, where appropriate, operation and maintenance of the transmission lines, substation, and ancillary equipment associated with the proposed Project. Emission inventories were developed using published and agency-accepted values, such as from emission factors from AP-42, MOBILE6.2, and NONROAD. PM₁₀ and PM_{2.5} emissions were quantified for fugitive dust from earth-moving and construction activities that would be associated with construction of the transmission line and substations, including fugitive dust from concrete batch plant construction and operation; fugitive dust from vehicles traveling on paved and unpaved roads accessing various segments of the line route during construction; criteria air pollutants, HAPs, and GHGs resulting from engine exhaust from worker commutes, delivery trucks, and construction equipment during construction; and SF₆ emissions from operation of the gas-insulated circuit breakers in the switchyards. The assumptions used to calculate emission estimates from the proposed Project and alternatives are discussed further in appendix B.

1 **Impact Indicators**

2 Proposed Project emissions of air pollutants for each of the subroutes under consideration are calculated on
3 an annualized basis for the purposes of comparison between the various alternatives and local alternatives.
4 Proposed Project emission estimates are then evaluated to determine compliance with conformity thresholds,
5 and, via an analysis of AERSCREEN (the EPA-preferred screening dispersion model) results from
6 comparable projects, the NAAQS. A significant impact would result should proposed Project emissions
7 and/or pollutant concentrations be anticipated to exceed any of the significant impact criteria outlined in
8 “Significant Impacts.” A significant impact would constitute a “major” impact according to the impact
9 description provided in table 4.1-1. The other impact descriptions provided in table 4.1-1 are also used herein
10 for impacts less than major. The proposed Project would result in emissions of air pollutants during the
11 construction and, to a lesser extent, the operations of the proposed Project transmission lines, substations, and
12 ancillary facilities. GHG emissions have also been quantified, where feasible (SF₆ emissions from substation
13 circuit breakers). Due to the comparatively low level of proposed Project emissions (i.e., below the general
14 conformity threshold levels), AQRVs such as acid rain deposition and visibility impacts to Class I areas are
15 not quantified. Instead, a qualitative discussion of proposed Project impacts to these AQRVs is provided.

16 With the exception of GHG emissions from circuit breakers, emissions from transmission line and
17 substation operation have not been quantified. Emissions from operations would be similar to those from
18 construction, but would be emitted in much smaller amounts. Proposed Project operational activities
19 would include vehicular use for routine maintenance and emergency repair activities.

20 **Significant Impacts**

21 Proposed Project construction and, to a lesser extent, operation would result in some increase to ambient
22 air pollutant concentrations, even though construction emissions would be temporary in nature.
23 The primary indicators for determining whether or not proposed Project emissions would result in a
24 significant impact to air quality are as follows:

- 25 • Estimated proposed Project emissions exceed conformity de minimis thresholds; and/or
- 26 • The increase in ambient pollutant concentrations for a particular area as a result of proposed
27 Project emissions would result in an exceedance of the NAAQS for that area.

28 A conformity determination is required for each criteria pollutant or precursor where the total of direct
29 and indirect emissions of the criteria pollutant or precursor in a Federal nonattainment or maintenance
30 area would equal or exceed specified annual emission rates (referred to as “de minimis” thresholds) or
31 would be “regionally significant.” A project’s direct and indirect emissions are regionally significant if
32 they exceed 10 percent or more of a nonattainment or maintenance area’s emissions inventory for that
33 pollutant. For ozone precursors (volatile organic compounds (VOCs) and nitrogen oxides (NO_x)), Pb,
34 PM₁₀, and PM_{2.5} the de minimis thresholds depend on the severity of the nonattainment classification.
35 For other pollutants, the threshold is set at 100 tpy.

36 As discussed in section 3.2, the analysis area for the proposed Project is within the boundaries of the
37 nonattainment and/or maintenance areas provided in figure 3.2-3 in section 3.2. The conformity
38 de minimis thresholds are provided in table 4.2-1 for each criteria pollutant for which nonattainment
39 or maintenance is at issue. The proposed Project would lie within the boundaries of two
40 nonattainment/maintenance areas regardless of the action alternative chosen: the Rillito PM₁₀
41 nonattainment area and the Tucson CO maintenance area. The proposed Project would be outside of the
42 remaining nonattainment and/or maintenance areas analyzed; however, these nonattainment and/or
43 maintenance areas could lie within the air quality analysis area of 50 km, depending on the alternative
44 chosen.

1 **Table 4.2-1. Project Conformity Thresholds**

Nonattainment or Maintenance Area/Pollutant	Conformity de Minimis Level (tpy)
Anthony, New Mexico, PM ₁₀ Moderate Nonattainment Area	100
Sunland Park, New Mexico, O ₃ Nonattainment Area (VOCs and NO _x)*	100
Grant County, New Mexico, SO ₂ Maintenance Area	100
Douglas, Arizona, SO ₂ Maintenance Area	100
Ajo, Arizona, PM ₁₀ Moderate Nonattainment Area	100
Ajo, Arizona, SO ₂ Maintenance Area	100
Tucson, Arizona, CO Maintenance Area	100
Rillito, Arizona, PM ₁₀ Moderate Nonattainment Area	100
Phoenix, Arizona, PM ₁₀ Serious Nonattainment Area	70
Phoenix-Mesa, Arizona, O ₃ Marginal Nonattainment Area (VOCs and NO _x)	100
San Manuel, Arizona, SO ₂ Maintenance Area	100
Hayden, Arizona, SO ₂ Nonattainment Area	100
Hayden, Arizona, PM ₁₀ Moderate Nonattainment Area	100
West Central Pinal, Arizona, PM _{2.5} Nonattainment Area [†]	10
Miami, Arizona, PM ₁₀ Moderate Nonattainment Area	100

2 * As discussed in section 3.2, the Sunland Park Ozone Nonattainment Area is currently proposed; since the proposed Project would lie outside the
 3 boundaries of this nonattainment area (but is within the analysis area), the de minimis levels conformity level for areas outside the transport region of
 4 the nonattainment area was used.

5 [†] The EPA has not published de minimis conformity determination levels for PM_{2.5}; therefore, the cut-off for Federal "significant" emissions of PM_{2.5}
 6 was used (40 CFR 51.165-166).

7 For nonattainment and maintenance areas, proposed Project emissions are compared by route group with
 8 the appropriate conformity de minimis thresholds outlined in table 4.2-1. For areas that are in attainment
 9 with respect to a pollutant, the de minimis threshold for the criteria pollutant for which the area is in
 10 attainment is assumed at 100 tpy, with the exception of PM_{2.5}, which is assumed at 10 tpy.

11 Although there are no conformity standards for HAPs, as discussed in section 3.2, there are significant
 12 threshold levels for permitting purposes. Proposed Project HAP emissions are therefore compared with
 13 the significant threshold level of 25 tpy of combined HAPs.

14 Likewise, conformity standards do not exist for GHGs; therefore GHG emissions are compared against
 15 the reporting thresholds outlined in 40 CFR Part 98, Subpart A of 25,000 metric tons per year (a metric
 16 ton is the equivalent of approximately 1.1 short tons). Additionally, CEQ draft GHG guidance states that
 17 NEPA environmental assessment and EIS documents for proposed Federal actions resulting in direct
 18 GHG emissions of 25,000 metric tons per year should include a GHG emissions analysis of alternatives
 19 (CEQ 2012).

20 Screening methods such as the EPA-approved AERSCREEN can be used to predict concentration levels
 21 of criteria pollutants to demonstrate compliance with the NAAQS, increment thresholds, and SILs.
 22 Construction emissions are not fixed to any one point, but range over a wide geographic area. Therefore,
 23 proposed Project emissions would already be widely dispersed. Additionally, construction emissions are
 24 transient in nature, and any impacts to air quality from construction sources would disappear along with
 25 these sources. Operational emissions would be significantly lower than those of construction emissions.
 26 Nevertheless, the BLM has conducted recent screening level analyses for transmission line construction
 27 projects of comparable or greater-sized projects. The screening level modeling is presented for each

1 individual route group and compared with the SIL for various air pollutants and short-term averaging
 2 periods. If the dispersion modeling impacts are predicted to exceed the applicable SIL, or if there is
 3 not a defined EPA SIL, the proposed Project impact has been added to a representative background
 4 concentration and the total has been compared with the applicable ambient standards (Federal or State)
 5 (BLM 2013a, 2013n).

6 **4.2.3 Impacts Analysis Results**

7 ***No Action Alternative***

8 Under the no action alternative, the BLM would not issue a ROW permit and Western would not
 9 participate in the Project or allow upgrading of its transmission lines. Impacts to air quality from
 10 construction and operation and maintenance of the proposed Project transmission line and associated
 11 activities and facilities would not occur. Under the no action alternative, air quality conditions would
 12 likely continue at current levels and trends, although it is uncertain whether other changes may occur that
 13 affect conditions.

14 Even under the no action alternative, Western still plans to upgrade the existing lines between the Apache
 15 and Saguaro substations within the next 10 years, in accordance with Western’s 10-year capital
 16 improvement plan (Western 2012a).

17 ***Impacts Common to All Action Alternatives***

18 **CONSTRUCTION**

19 Substation construction activities would result in air pollutant emissions from equipment exhaust, vehicle
 20 exhaust from travel to and from substations, and fugitive dust from soil disturbance. Table 4.2-2 presents
 21 the estimated total criteria, HAPs, and GHG emissions that would occur from construction of the
 22 substations for the New Build Section.

23 **Table 4.2-2.** Estimated Substation Construction Criteria and GHG Pollutant Emissions (tpy)

	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Route Group 1 – Afton Substation to Hidalgo Substation								
Afton Substation Expansion	0.13	0.87	1.47	<0.01	0.32	0.15	273	0.0004
Proposed or Alternative Midpoint Substation	0.16	1.04	1.85	<0.01	0.67	0.25	345	0.0004
Hidalgo Substation Expansion	0.19	1.17	2.15	<0.01	0.69	0.27	460	0.0004
Route Group 2 – Hidalgo Substation to Apache Substation								
Apache Substation Expansion	0.21	1.30	2.40	<0.01	0.69	0.27	501	0.0004

24

1 **Table 4.2-2.** Estimated Substation Construction Criteria and GHG Pollutant Emissions (tpy), Continued

	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Route Group 3 – Apache Substation to Pantano Substation								
Adams Tap Substation Expansion	0.06	0.37	0.75	<0.01	0.14	0.08	134	<0.0001
Pantano Substation Expansion	0.04	0.23	0.47	<0.01	0.15	0.06	83	<0.0001
Route Group 4 – Pantano Substation to Saguaro Substation								
Vail Substation Expansion	0.14	0.87	1.75	<0.01	0.25	0.16	314	<0.0001
Nogales Substation Expansion	0.10	0.62	1.27	<0.01	0.21	0.12	233	<0.0001
Del Bac Substation Expansion	0.06	0.38	0.78	<0.01	0.17	0.08	139	<0.0001
Tucson Substation Expansion	0.08	0.46	0.95	<0.01	0.15	0.09	194	<0.0001
DeMoss Petrie Substation Expansion	0.13	0.71	1.48	<0.01	0.11	0.11	300	<0.0001
Rattlesnake Substation Expansion	0.07	0.38	0.80	<0.01	0.17	0.08	162	<0.0001
Marana Substation Expansion	0.07	0.38	0.80	<0.01	0.17	0.08	162	<0.0001
Saguaro Substation Expansion	0.07	0.40	0.82	<0.01	0.21	0.09	166	<0.0001
Tortolita Substation Expansion	0.07	0.42	0.87	<0.01	0.09	0.07	175	<0.0001

2 Substation construction and expansion is not specific to any subroute or alternative chosen; however, for
 3 the purposes of determining whether or not significant air impacts would occur from proposed Project
 4 construction, estimated emissions from the various substations constructed have been added to those of
 5 the route group they are located within. Emissions related to the construction of the transmission lines are
 6 discussed in the individual route group sections below. These total construction emissions are then
 7 compared with the significant impact thresholds in the analysis of the individual route groups presented
 8 below.

9 To determine whether the proposed Project’s construction emissions would have an impact to the ambient
 10 air, the expected Project-related impacts are first compared to respective SILs. Table 4.2-3 compares the
 11 screening level maximum short-term (e.g., 1-hour and 24-hour) pollutant concentrations from
 12 transmission line and substation construction to the respective SIL.

13 As shown in table 4.2-3, the expected emissions of CO and SO₂ would be below the SILs that are used to
 14 define impacts that are considered to be negligible or de minimis and would not cause or contribute to an
 15 exceedance of the NAAQS. Calculated pollutant concentrations for NO₂, PM₁₀, and PM_{2.5} are over their
 16 respective SILs and require a more thorough analysis. For each route group, the maximum 1-hour
 17 AERSCREEN concentration and the representative background concentration for those pollutants are
 18 summed and compared to the applicable ambient air quality standard. Those comparisons are found under
 19 each route group section that follows.

1 **Table 4.2-3.** Transmission Line and Substation Construction: Comparison of Estimated Maximum Air
2 Pollutant Concentrations with Significant Impact Levels

Pollutant	Averaging Period	Maximum 1-hour AERSCREEN Concentration ($\mu\text{g}/\text{m}^3$)*	SILs ($\mu\text{g}/\text{m}^3$)	Pollutant Over the SIL?
NO ₂	1-hour	59.91	7.5	Yes
	24-hour	59.91	–	–
PM ₁₀	24-hour	80.32	33	Yes
PM _{2.5}	24-hour	10.98	1.2	Yes
CO	1-hour	90.21	2,000	No
	8-hour	90.21	1,034	No
SO ₂	1-hour	0.96	7.9	No
	3-hour	0.96	25	No
	24-hour	0.96	5	No

3 Note: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

4 * Maximum AERSCREEN concentrations obtained from comparable and larger transmission line/substation construction projects (BLM 2013a, 2013n).

5 Construction of the proposed Project would emit low levels of NO_x and SO₂, which are the potential acid-
6 producing pollutants emitted from mobile sources during construction and operation and maintenance.
7 However, by providing a conduit and contributing a portion of the power from renewable sources
8 (i.e., solar and wind power) to the Southwest region, the net impact of the proposed Project would be to
9 improve atmospheric conditions to the extent that the generation of electricity from renewable sources
10 would avoid the use of electricity generated in fossil fuel-fired power plants and their associated acid-
11 producing pollutants.

12 The closest Class I area to the Proponent Preferred route and/or local alternatives is the Saguaro National
13 Park outside Tucson, Arizona, located approximately 1 mile from the proposed route. Background visibility
14 data for this park are available. The data demonstrate that visibility is of concern for the Saguaro National
15 Park; however, visibility has showed trending improvement from 1990 to 2008 (NPS 2010b). Proposed
16 Project construction emissions, particularly PM₁₀ and PM_{2.5}, could impact visibility in this national park and
17 in other nearby Class I areas; however, as demonstrated herein, proposed Project construction emissions are
18 below de minimis thresholds and would only represent a temporary impact to visibility. Other Class I areas
19 that are within the area of analysis for the proposed Project include the Chiricahua National Monument and
20 the Chiricahua Wilderness Area, located as near as approximately 15 miles from the proposed Project or
21 alternatives, and the Saguaro Wilderness Area, located as near as 5 miles from the proposed Project or
22 alternatives. Impacts to visibility to these Class I areas would likely be lower than impacts to the Saguaro
23 National Park due to their increased distance from the proposed Project and alternatives; therefore, as with
24 impacts to the Saguaro National Park, proposed Project construction emissions would be temporary in
25 nature and below de minimis thresholds. Proposed Project operational emissions would be substantially
26 lower than those of construction emissions.

27 Federal land managers have visibility protection responsibility under 40 CFR 51.307 (New Source
28 Review), which spells out the requirements for SIP visibility protection programs, as well as 40 CFR 52.27
29 (Protection of visibility from sources in attainment areas) and 40 CFR 52.28 (Protection of visibility from
30 sources in nonattainment areas). These three provisions, taken together along with the SIP-approved rules,
31 establish the visibility protection program for new and modified sources throughout the country. Section
32 165 (42 U.S.C. 7475) of the CAA requires the EPA, or the State/local permitting authority, to notify the
33 Federal land manager if emissions from a proposed project may impact a Class I area. The permitting
34 authority should forward PSD applications to the Federal land manager for review and analysis as soon as
35 possible after receipt, giving the Federal land manager an opportunity to review the application

1 concurrently with the permitting authority. The proposed Project does not constitute a major PSD source
 2 and therefore does not require notification to the Federal land manager regarding visibility impacts.

3 **OPERATION AND MAINTENANCE**

4 As already noted, because operational emissions and impacts would be much lower than construction
 5 phase emissions and impacts, they have not been quantified (with the exception of SF₆ from the circuit
 6 breakers). Operation and maintenance emissions would include vehicle exhaust from travel to substations
 7 and the transmission line for routine inspection, as well as SF₆ emissions from operation of the gas-
 8 insulated circuit breakers in the switchyards. An additional source of air emissions would be the ozone
 9 generated from the operation of the line; however, transmission lines do not generally represent a
 10 significant source of ozone emissions and therefore ozone emissions from line operation would be
 11 expected to be minimal. Emissions from vehicle travel during operation and maintenance would be
 12 minimal, and mileage for vehicle travel to substations and the transmission line for routine inspection
 13 would be much less than during construction. Emissions from vehicle exhaust during operation and
 14 maintenance would therefore be less than those from construction.

15 Table 4.2-4 presents the potential SF₆ emissions from circuit breaker leakage from each substation during
 16 operation and maintenance. As shown in the table, these operation emissions would be minimal and are
 17 below the GHG reporting thresholds as outlined in “Significant Impacts.” Therefore, using the
 18 significance criteria outlined in the beginning of this chapter in table 4.1-1, impacts to air quality
 19 resources would be minor (i.e., impacts would occur but air quality would not be impacted) but long-term
 20 (i.e., greater than 5 years in duration). Operational GHG emissions from substations would occur
 21 regardless of the action alternative chosen.

22 **Table 4.2-4.** Estimated SF₆ Emissions from Substation Circuit Breaker Leakage during Operation

Substation	Emissions (as metric tons CO ₂ e per year)
Route Group 1 – Afton Substation to Hidalgo Substation	
Afton Substation Expansion	910.48
Proposed Midpoint or Alternative Substation	1,040.54
Hidalgo Substation Expansion	1,560.82
Route Group 2 – Hidalgo Substation to Apache Substation	
Apache Substation Expansion	1,268.16
Route Group 3 – Apache Substation to Pantano Substation	
Adams Tap Substation Expansion	97.55
Pantano Substation Expansion	65.03
Route Group 4 – Pantano Substation to Saguaro Substation	
Vail Substation Expansion	390.20
Nogales Substation Expansion	195.10
Del Bac Substation Expansion	65.03
Tucson Substation Expansion	292.65
DeMoss Petrie Substation Expansion	121.40
Rattlesnake Substation Expansion	97.55
Marana Substation Expansion	97.55
Southline Saguaro Substation Expansion	109.47

23

1 **Table 4.2-4.** Estimated SF₆ Emissions from Substation Circuit Breaker Leakage during Operation
2 (Continued)

Substation	Emissions (as metric tons CO ₂ e per year)
Tortolita Substation Expansion	812.93
Total Emissions	7,124.46
GHG Reporting Threshold	25,000
Exceeds Threshold?	No

3 **Route Group 1 – Afton Substation to Hidalgo Substation**

4 Table 4.2-5 presents the estimated total fugitive dust, criteria, HAP, and GHG potential air emissions
5 from the construction of the transmission lines from the Afton Substation to Hidalgo Substation
6 (route group 1). For route group 1, fugitive dust from transmission line, staging area, and access road
7 construction earth-moving and grading activities; off-road construction vehicle and commuter, vendor,
8 and haul truck traffic exhaust emissions; and fugitive dust from vehicle travel on both paved and unpaved
9 roads are all estimated on an annualized basis in table 4.2-5. Estimated emissions from various proposed
10 construction scenarios and local alternative routes are presented for comparative purposes.

11 **Table 4.2-5.** Route Group 1 Estimated Transmission Line Construction Annualized Emissions by
12 Emission Source (tpy)

	Subroute 1.1, Proponent Preferred	Subroute 1.2, Proponent Alternative	Route Group 1 Local Alternatives				
			DN1	A	B	C	D
Total Miles	146.9	141.2	42.5	17.5	12.2	9.0	22.8
Fugitive Dust from Earth- moving and Grading Activities							
PM ₁₀	1.00	0.96	0.21	0.12	0.08	0.06	0.15
PM _{2.5}	0.20	0.21	0.06	0.03	0.02	0.01	0.03
Construction Equipment Exhaust Emissions							
VOCs	1.09	1.06	0.35	0.13	0.09	0.07	0.17
CO	5.09	4.90	1.63	0.60	0.42	0.31	0.79
NO _x	13.79	13.26	4.43	1.64	1.15	0.84	2.14
SO ₂	0.03	0.03	0.01	<0.01	<0.01	<0.01	<0.01
PM ₁₀	0.97	0.94	0.32	0.12	0.08	0.06	0.15
PM _{2.5}	0.97	0.94	0.32	0.12	0.08	0.06	0.15
CO ₂	2,714	2,609	872	323	226	166	421

13

1 **Table 4.2-5.** Route Group 1 Estimated Transmission Line Construction Annualized Emissions by
 2 Emission Source (tpy), Continued

	Subroute 1.1, Proponent Preferred	Subroute 1.2, Proponent Alternative	Route Group 1 Local Alternatives				
			DN1	A	B	C	D
Fugitive Dust from Access Road Construction							
PM ₁₀	4.25	3.89	1.87	0.34	0.13	0.11	0.54
PM _{2.5}	0.89	0.82	0.39	0.07	0.03	0.02	0.11
Fugitive Dust from Travel on Paved and Unpaved Roads							
PM ₁₀	0.54	0.52	0.17	0.06	0.05	0.03	0.08
PM _{2.5}	0.12	0.12	0.04	0.01	0.01	0.01	0.02
Traffic Exhaust Emissions							
VOCs	0.03	0.03	0.01	<0.01	<0.01	<0.01	<0.01
CO	0.47	0.44	0.16	0.06	0.04	0.03	0.07
NO _x	0.10	0.11	0.04	0.01	0.01	0.01	0.02
SO ₂	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM ₁₀	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM _{2.5}	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
CO ₂	45	43	15	5	4	3	7
HAPs	0.0017	0.0016	0.0006	0.0002	0.0001	0.0001	0.0003

3 Temporary portable concrete batch plants would be constructed and operated approximately every 25
 4 miles along the ROW, mainly at construction staging areas. The maximum number of concrete batch
 5 plants by subroute and the total anticipated emissions from construction and operation of batch plants are
 6 provided in table 4.2-6 (the use of local alternatives to substitute for line segments in route group 1 would
 7 not be expected to increase the quantity of concrete batch plants).

8 **Table 4.2-6.** Route Group 1 Estimated Concrete Batch Plant Construction and Operation Emissions (tpy)

	Maximum Quantity	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂
Subroute 1.1, Proponent Preferred	6	0.03	0.12	0.36	<0.01	3.36	0.60	76
Subroute 1.2, Proponent Alternative	9	0.05	0.18	0.54	<0.01	5.04	0.90	114

1 Quantifying proposed Project expected emissions for comparison to acceptable regulatory emission
 2 thresholds is further complicated by the number of possible Project configurations and the overall
 3 geographic dispersion of the proposed Project. Proposed Project construction and operation emissions are
 4 presented herein in such a manner as to facilitate comparison between the various alternatives even
 5 though such analysis makes comparison between the proposed Project and acceptable regulatory criteria
 6 more difficult. For example, route group 1 potentially crosses through four counties (Doña Ana, Grant,
 7 Hidalgo, and Luna); it is therefore unreasonable to assume that pollutant emissions from a backhoe
 8 operating in Afton, located in Doña Ana County, New Mexico, would impact pollutant concentrations in
 9 Hidalgo, located in Hidalgo County, New Mexico, approximately 100 miles away, yet both locations are
 10 within the same route group for comparison between proposed alternatives.

11 In order to demonstrate proposed Project criteria pollutant emissions against the conformity de minimis
 12 thresholds, estimated emissions for the route group have been aggregated by subalternative along with all
 13 additional emission sources (substations and batch plants). Table 4.2-7 presents the summed total of
 14 anticipated annualized emissions from all the transmission line construction activities from the various
 15 proposed alternatives in the Afton Substation to Hidalgo Substation route group.

16 **Table 4.2-7. Route Group 1 Estimated Annualized Emissions by Alternative (tpy)**

	Total Miles	VOCs	CO	NO_x	SO₂	PM₁₀	PM_{2.5}	CO₂	HAPs
Subroute 1.1, Proponent Preferred	146.9	1.12	5.56	13.89	0.03	6.77	2.19	2,759	0.0017
Substations	–	0.48	3.08	5.47	0.01	1.68	0.67	1,079	0.0011
Batch Plants	–	0.03	0.12	0.36	<0.01	3.36	0.60	114	
Total Emissions	–	1.63	8.76	19.72	0.04	11.81	3.46	3,914	0.0028
General Conformity Threshold Levels	–	100	100	100	100	100	10	25,000	25
Exceeds Threshold?	–	No	No	No	No	No	No	No	No
Subroute 1.2, Proponent Alternative	141.2	1.09	5.34	13.37	0.03	6.31	2.08	2,652	0.0016
Substations	–	0.48	3.08	5.47	0.01	1.68	0.67	1,079	0.0011
Batch Plants	–	0.05	0.18	0.54	<0.01	5.04	0.90	114	–
Total Emissions	–	1.61	8.60	19.38	0.04	13.03	3.65	3,845	0.0027
Impact Threshold	–	100	100	100	100	100	10	25,000	25
Exceeds Threshold?	–	No	No	No	No	No	No	No	No
Route Group 1 Local Alternatives									
DN1	42.5	0.36	1.79	4.46	0.01	2.65	0.81	887	0.0006
A	17.5	0.13	0.66	1.65	<0.01	0.64	0.23	329	0.0002
B	12.2	0.09	0.46	1.16	<0.01	0.33	0.14	230	0.0001
C	9.0	0.07	0.34	0.85	<0.01	0.26	0.10	169	0.0001
D	22.8	0.18	0.86	2.16	<0.01	0.93	0.31	428	0.0003

As can be seen from table 4.2-7, expected emissions for criteria pollutants from proposed Project construction regardless of the subroute or local substitutive alternative chosen would be well below de minimis conformity thresholds, even when aggregated over vast geographical distances and multiple regional airsheds. HAPs would also be well below the 25 tpy aggregated HAP threshold level. Additionally, proposed Project GHG emissions would be expected to be well below the 25,000 metric ton threshold. Cumulative impacts from GHG emissions are discussed further in section 4.20.

ROUTE GROUP 1 IMPACTS TO AMBIENT AIR QUALITY

As discussed in “Significant Impacts,” if the screening level modeling predicted exceedances of the SIL, the proposed Project impact would be added to a representative background concentration and the sum would be compared to the applicable air quality standard. Background concentrations were obtained from recent and nearby ambient air monitoring sites. These background concentrations represent ambient concentrations of air quality pollutants contributed by other air pollutant emission sources within the airshed. Table 4.2-8 presents a comparison of the expected maximum short-term AERSCREEN concentrations from proposed Project construction, representative background concentrations of NO₂, PM₁₀, and PM_{2.5}, and the applicable ambient air quality standards for route group 1.

Table 4.2-8. Route Group 1 Transmission Line and Substation Construction: Comparison of Estimated Maximum Air Pollutant Concentrations Plus Background with Applicable Ambient Air Standards

Pollutant	Averaging Period	Maximum 1-hour AERSCREEN Concentration* (µg/m ³)	Background Concentration (µg/m ³)	Project Impact and Background (µg/m ³)	NAAQS (µg/m ³)	NMAAQS (µg/m ³)	Below all AAQS?
NO ₂	1-hour	59.91	81.1 [†]	141.01	188.7	188.7	Yes
PM ₁₀	24-hour	80.32	62 [‡]	142.32	150	–	Yes
PM _{2.5}	24-hour	10.98	13 [§]	23.98	35	–	Yes

Note: µg/m³ = micrograms per cubic meter; AAQS = Ambient Air Quality Standards.

* Maximum AERSCREEN concentrations obtained from comparable and larger transmission line/substation construction projects (BLM 2013a, 2013n).

[†] Background concentrations of NO₂ from Santa Teresa air quality monitoring station in Doña Ana County, New Mexico.

[‡] Background concentrations of PM₁₀ from Sunland Park air quality monitoring station in Doña Ana County, New Mexico.

[§] Background concentrations for PM_{2.5} from Douglas Red Cross air quality monitoring station in Cochise County, Arizona.

As seen in table 4.2-8, the sum of the proposed Project impact and the background concentration would be below all applicable AAQS. The proposed Project would therefore not trigger any significant impact indicator for route group 1 and no significant impacts to air quality would result from the construction or operation and maintenance of the transmission lines and substations.

SUBROUTE 1.1 – PROPONENT PREFERRED

Construction

As can be seen from table 4.2-7, even assuming no geographic dispersion of air emissions, annual emissions from transmission line construction activities would be expected to be well below the de minimis thresholds for criteria pollutants and HAPs regardless of the combination of alternatives selected.

Operation and Maintenance

With the exception of SF₆ emissions from substation circuit breakers, potential Project operational air emissions were not analyzed as operational emissions would be substantively lower than those expected

1 from construction emissions, which are already demonstrated herein as being well below the significant
2 impact thresholds.

3 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

4 **Construction**

5 As can be seen from table 4.2-7, even assuming no geographic dispersion of air emissions, annual
6 emissions from transmission line construction activities would be expected to be well below the de
7 minimis thresholds for criteria pollutants and HAPs regardless of the combination of alternatives selected.

8 **Operation and Maintenance**

9 As with subroute 1.1, anticipated Project operational air emissions (with the exception of SF₆ emissions
10 from substation circuit breakers) were not analyzed, since operational emissions would be substantively
11 lower than those expected from construction emissions, which are already demonstrated herein as being
12 well below the significant impact thresholds.

13 **LOCAL ALTERNATIVES**

14 There are five local alternatives available for route group 1. These local alternatives include DN1, A, B,
15 C, and D.

16 **Construction**

17 The local alternatives are meant to be substitutive of portions of the main subroute chosen, and therefore
18 any air emission contributions from local alternatives would not substantively contribute to proposed
19 Project emissions since any additions to emissions from an alternative would substitute for emissions
20 from the portion of the route it is replacing. While estimated emissions may be slightly higher or lower
21 than the portion of the route substituted for, depending upon whether or not the substation extended or
22 shortened overall line length, emissions would remain well below de minimis conformity levels as a
23 result of the substitution of a local alternative, as demonstrated in table 4.2-7 above.

24 **Operation and Maintenance**

25 As with the subroutes, proposed Project operational air emissions from the local substitutive alternatives
26 were not analyzed (with the exception of SF₆ emissions from substation circuit breakers) as operational
27 emissions would be substantively lower than those expected from construction emissions, which are
28 already demonstrated herein as being well below the significant impact thresholds.

29 **ROUTE GROUP 1 IMPACT SUMMARY**

30 None of the subroutes or substitutive alternatives in route group 1 would result in emissions that would be
31 expected to exceed either conformity thresholds or ambient air quality standards for either construction or
32 operation and maintenance activities. Therefore, impacts to air quality resources from route group 1
33 would be minor (i.e., impacts would occur but air quality would retain its existing character) and short-
34 term (i.e., less than 5 years in duration) for construction activities, and minor and long-term (i.e., greater
35 than 5 years in duration) for operational activities.

1 **Route Group 2 – Hidalgo Substation to Apache Substation**

2 Table 4.2-9 presents the total estimated fugitive dust, criteria, HAP, and GHG potential air emissions
 3 from the construction of the transmission lines from the Hidalgo Substation to the Afton Substation
 4 (route group 2). For route group 2, fugitive dust from transmission line, staging area, and access road
 5 construction earth-moving and grading activities; off-road construction vehicle and commuter, vendor,
 6 and haul truck traffic exhaust emissions; and fugitive dust from vehicle travel on both paved and unpaved
 7 roads are all estimated on an annualized basis in table 4.2-9. Estimated emissions from various proposed
 8 construction scenarios and local alternative routes are presented for comparative purposes.

9 **Table 4.2-9.** Route Group 2 Estimated Transmission Line Construction Annualized Emissions by Activity
 10 (tpy)

	Subroute 2.1, Proponent Preferred	Subroute 2.2, Proponent Alternative	Route Group 2 Local Alternatives							
			LD1	LD2	LD3a	LD3b	LD4	LD4- Option 4	LD4- Option 5	WC1
Total Miles	95.6	95.8	35.4	9.6	27.9	1.9	51.7	6.5	12.3	14.8
Fugitive Dust from Earth-moving and Grading Activities										
PM ₁₀	0.64	0.65	0.23	0.07	0.19	0.01	0.35	0.04	0.08	0.10
PM _{2.5}	0.12	0.14	0.06	0.01	0.04	<0.01	0.07	0.01	0.02	0.02
Construction Equipment Exhaust Emissions										
VOCs	0.71	0.72	0.27	0.07	0.20	0.01	0.43	0.05	0.10	0.11
CO	3.31	3.32	1.23	0.33	0.96	0.07	1.99	0.25	0.47	0.51
NO _x	8.97	9.00	3.33	0.90	2.62	0.18	5.39	0.68	1.28	1.39
SO ₂	0.01	0.02	0.01	<0.01	<0.01	<0.01	0.01	<0.01	<0.01	<0.01
PM ₁₀	0.63	0.64	0.23	0.07	0.19	0.01	0.39	0.05	0.09	0.10
PM _{2.5}	0.63	0.64	0.23	0.07	0.19	0.01	0.39	0.05	0.09	0.10
CO ₂	1,767	1,770	654	177	515	35	1,061	133	252	274
Fugitive Dust from Access Road Construction										
PM ₁₀	2.30	2.86	1.09	0.40	0.56	0.01	2.29	0.29	0.44	0.57
PM _{2.5}	0.48	0.60	0.23	0.08	0.12	<0.01	0.48	0.06	0.09	0.12

11

1 **Table 4.2-9.** Route Group 2 Estimated Transmission Line Construction Annualized Emissions by Activity
2 (tpy), Continued

	Subroute 2.1, Proponent Preferred	Subroute 2.2, Proponent Alternative	Route Group 2 Local Alternatives							
			LD1	LD2	LD3a	LD3b	LD4	LD4- Option 4	LD4- Option 5	WC1
Fugitive Dust from Travel on Paved and Unpaved Roads										
PM ₁₀	0.35	0.35	0.15	0.04	0.10	0.01	0.21	0.03	0.05	0.01
PM _{2.5}	0.08	0.08	0.03	0.01	0.02	<0.01	0.05	0.01	0.01	<0.01
Traffic Exhaust Emissions										
VOCs	0.02	0.03	0.01	<0.01	0.01	<0.01	0.01	<0.01	<0.01	<0.01
CO	0.30	0.31	0.12	0.03	0.09	0.01	0.19	0.02	0.05	0.05
NO _x	0.07	0.06	0.02	0.01	0.02	<0.01	0.04	0.01	0.01	0.01
SO ₂	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM ₁₀	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM _{2.5}	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
CO ₂	29	29	11	3	9	1	18	2	4	5
HAPs	0.0011	0.0011	0.0009	0.0001	0.0003	<0.0001	0.0007	0.0001	0.0002	0.0002

3 Temporary portable concrete batch plants would be constructed and operated approximately every 25
4 miles along the ROW, mainly at construction staging areas. The maximum number of concrete batch
5 plants by subroute and/or alternative and the total anticipated emissions from construction and operation
6 of batch plants are provided in table 4.2-10 (local alternatives LD1, LD2, LD3a, LD4, LD4-Option 4, and
7 LD4-Option5 would not be expected to result in additional concrete batch plants for route group 2 line
8 segments).

9 **Table 4.2-10.** Route Group 2 Estimated Concrete Batch Plant Construction and Operation Emissions
10 (tpy)

	Maximum Quantity	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂
Subroute 2.1, Proponent Preferred	4	0.02	0.08	0.24	<0.01	2.24	0.40	51
Subroute 2.2, Proponent Alternative	5	0.03	0.10	0.30	<0.01	2.80	0.50	64
Local Alternative WC1	1	0.01	0.02	0.06	<0.01	0.56	0.10	13

11 As can be seen from the various tables above, emissions from any substitutions from the expected
12 proposed Project would result in comparable emissions of criteria pollutants, HAPs, and GHGs. In order
13 to demonstrate proposed Project criteria pollutant emissions against the conformity de minimis
14 thresholds, estimated emissions for the route group have been aggregated by subalternative along with all

1 additional emission sources (substations and batch plants). Table 4.2-11 presents the summed total of
 2 anticipated annualized emissions from all the transmission line construction activities from the various
 3 proposed alternatives in the Hidalgo Substation to Apache Substation route group.

4 **Table 4.2-11.** Route Group 2 Estimated Annualized Emissions by Alternative (tpy)

	Total Miles	VOC	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Subroute 2.1, Proponent Preferred	95.6	0.73	3.62	9.04	0.01	3.92	1.31	1,796	0.0011
Substations	–	0.40	2.47	4.55	0.01	1.46	0.57	961	0.0007
Batch Plants	–	0.03	0.10	0.30	<0.01	2.80	0.50	64	–
Total Emissions	–	1.15	6.19	13.89	0.02	8.18	2.38	2,820	0.0018
Significant Impact Threshold	–	100	100	100	100	100	10	25,000	25
Exceeds Threshold?	–	No	No	No	No	No	No	No	No
Subroute 2.2, Proponent Alternative	95.8	0.75	3.63	9.06	0.02	4.51	1.46	1,800	0.0011
Substations	–	0.40	2.47	4.55	0.01	1.46	0.57	961	0.0007
Batch Plants	–	0.03	0.12	0.36	<0.01	3.36	0.60	76	-
Total Emissions	–	1.18	6.22	13.97	0.03	9.33	2.63	2,837	0.0018
Impact Threshold	–	100	100	100	100	100	10	25,000	25
Exceeds Threshold?	–	No	No	No	No	No	No	No	No
Route Group 2 Local Alternatives									
LD1	35.4	0.28	1.35	3.35	0.01	1.71	0.55	665	0.0009
LD2	9.6	0.07	0.36	0.91	<0.01	0.58	0.17	180	0.0001
LD3a	27.9	0.21	1.05	2.64	<0.01	1.03	0.37	524	0.0003
LD3b	1.9	0.01	0.08	0.18	<0.01	0.04	0.01	36	<0.0001
LD4	51.7	0.44	2.18	5.43	0.01	3.24	0.99	1,079	0.0007
LD4-Option 4	6.5	0.06	0.27	0.68	<0.01	0.41	0.12	136	0.0001
LD4-Option 5	12.3	0.11	0.52	1.29	<0.01	0.67	0.21	257	0.0002
WC1	14.8	0.11	0.56	1.40	<0.01	0.78	0.24	278	0.0002

5 As can be seen from table 4.2-11, expected emissions for criteria pollutants from proposed Project
 6 construction regardless of the subroute or local substitutive alternative chosen would be well below de
 7 minimis conformity thresholds, even when aggregated over vast geographical distances and multiple
 8 regional airsheds. HAPs would also be well below the 25 tpy aggregated HAP threshold level.
 9 Additionally, proposed Project GHG emissions would be expected to be well below the 25,000 metric
 10 ton threshold. Cumulative impacts from GHG emissions are discussed further in section 4.20.

11 **ROUTE GROUP 2 IMPACTS TO AMBIENT AIR QUALITY**

12 Table 4.2-12 presents a comparison of the expected maximum short-term AERSCREEN concentrations
 13 from proposed Project construction, representative background concentrations of NO₂, PM₁₀, and PM_{2.5},
 14 and the applicable ambient air quality standards for route group 2.

1 **Table 4.2-12.** Route Group 2 Estimated Transmission Line and Substation Construction: Comparison of
2 Maximum Air Pollutant Concentrations Plus Background to Applicable Ambient Air Standards

Pollutant	Averaging Period	Maximum 1-hour AERSCREEN Concentration ($\mu\text{g}/\text{m}^3$)*	Background Concentration ($\mu\text{g}/\text{m}^3$)	Project Impact and Background ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	AAQS ($\mu\text{g}/\text{m}^3$)	NMAAQS ($\mu\text{g}/\text{m}^3$)	Below all AAQS?
NO ₂	1-hour	59.91	81.1 [†]	141.01	188.7	188.7	188.7	Yes
PM ₁₀	24-hour	80.32	62 [‡]	142.32	150	150	-	Yes
PM _{2.5}	24-hour	10.98	13 [§]	23.98	35	65 [¶]	-	Yes

3 Note: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

4 * Maximum AERSCREEN concentrations obtained from comparable and larger transmission line/substation construction projects (BLM 2013a, BLM2013n).

5 [†] Background concentrations of NO₂ from Santa Teresa air quality monitoring station in Doña Ana County, NM.

6 [‡] Background concentrations of PM₁₀ from Sunland Park air quality monitoring station in Doña Ana County, NM.

7 [§] Background concentrations for PM_{2.5} from Douglas Red Cross air quality monitoring station in Cochise County, AZ.

8 [¶] Arizona's AAQS is listed as 65 $\mu\text{g}/\text{m}^3$ for the PM_{2.5} 24-hour standard; however, the more stringent NAAQS value is used for comparison.

9 As seen in table 4.2-12, the sum of the proposed Project impact and the background concentration would
10 be below all applicable AAQS. The proposed Project would therefore not trigger any significant impact
11 indicator for route group 2, and no significant impacts to air quality would result from the construction or
12 operation and maintenance of the transmission lines and substations.

13 **SUBROUTE 2.1 – PROPONENT PREFERRED**

14 **Construction**

15 As can be seen from table 4.2-11, even assuming no geographic dispersion of air emissions, annual
16 emissions from transmission line construction activities would be expected to be well below the de
17 minimis thresholds for criteria pollutants and HAPs regardless of the combination of alternatives selected.

18 **Operation and Maintenance**

19 With the exception of SF₆ emissions from substation circuit breakers, potential Project operational air
20 emissions were not analyzed, since operational emissions would be substantively lower than those
21 expected from construction emissions, which are already demonstrated herein as being well below the
22 significant impact thresholds.

23 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

24 **Construction**

25 As can be seen from table 4.2-11, even assuming no geographic dispersion of air emissions, annual
26 emissions from transmission line construction activities would be expected to be well below the de
27 minimis thresholds for criteria pollutants and HAPs regardless of the combination of alternatives selected.

28 **Operation and Maintenance**

29 With the exception of SF₆ emissions from substation circuit breakers, anticipated Project operational air
30 emissions were not analyzed as operational emissions would be substantively lower than those expected
31 from construction emissions, which are already demonstrated herein as being well below the significant
32 impact thresholds.

1 **LOCAL ALTERNATIVES**

2 There are seven local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
3 4, and WC1.

4 **Construction**

5 The local alternatives are meant to be substitutive of portions of the main subroute chosen, and therefore
6 any air emission contributions from local alternatives would not substantively contribute to proposed
7 Project emissions since any additions to emissions from an alternative would substitute for emissions
8 from the portion of the route it is replacing. While estimated emissions may be slightly higher or lower
9 than the portion of the route substituted for, depending upon whether or not the substation extended or
10 shortened overall line length, emissions would not substantively increase as a result of the substitution of
11 a local alternative, as demonstrated in table 4.2-11 above.

12 **Operation and Maintenance**

13 As with the subroutes, proposed Project operational air emissions from the local substitutive alternatives
14 were not analyzed (with the exception of SF₆ emissions from substation circuit breakers) as operational
15 emissions would be substantively lower than those expected from construction emissions, which are
16 already demonstrated herein as being well below the significant impact thresholds.

17 **ROUTE GROUP 2 IMPACT SUMMARY**

18 None of the subroutes or substitutive alternatives in route group 2 would result in emissions that would be
19 expected to exceed either conformity thresholds or ambient air quality standards for either construction or
20 operation activities. Therefore, impacts to air quality resources from route group 2 would be minor
21 (i.e., impacts would occur but air quality would retain its existing character) and short-term (i.e., less than
22 5 years in duration) for construction activities, and minor and long-term (i.e., greater than 5 years in
23 duration) for operational activities.

24 ***Route Group 3 – Apache Substation to Pantano Substation***

25 Table 4.2-13 presents the total estimated fugitive dust, criteria, HAP, and GHG potential air emissions
26 from the construction of the transmission lines from the Apache Substation to Pantano Substation
27 (route group 3). For route group 3, fugitive dust from transmission line, staging area, and access road
28 construction earth-moving and grading activities; off-road construction vehicle and commuter, vendor,
29 and haul truck traffic exhaust emissions; and fugitive dust from vehicle travel on both paved and unpaved
30 roads are all estimated on an annualized basis in table 4.2-13. Estimated emissions from various proposed
31 construction scenarios and local alternative routes are presented for comparative purposes.

32 Temporary portable concrete batch plants would be constructed and operated approximately every 25
33 miles along the ROW, mainly at construction staging areas. The maximum number of concrete batch
34 plants by subroute and the total anticipated emissions from construction and operation of batch plants are
35 provided in table 4.2-14 (the use of the local alternative to substitute for a portion of the line segment in
36 route group 3 would not be expected to increase the quantity of concrete batch plants).

1
2

Table 4.2-13. Route Group 3 Estimated Transmission Line Construction Annualized Emissions by Activity (tpy)

	Subroute 3.1, Proponent Preferred	Route Group 3 Local Alternative H
Total Miles	70.4	19.3
Fugitive Dust from Earth-moving and Grading Activities		
PM ₁₀	1.22	0.33
PM _{2.5}	0.26	0.07
Construction Equipment Exhaust Emissions		
VOCs	0.62	0.17
CO	2.63	0.73
NO _x	7.18	1.97
SO ₂	0.02	<0.01
PM ₁₀	0.51	0.14
PM _{2.5}	0.51	0.14
CO ₂	1,519	416
Fugitive Dust from Access Road Construction		
PM ₁₀	1.43	0.59
PM _{2.5}	0.30	0.12
Fugitive Dust from Travel on Paved and Unpaved Roads		
PM ₁₀	0.30	0.08
PM _{2.5}	0.07	0.02
Traffic Exhaust Emissions		
VOCs	0.01	<0.01
CO	0.20	0.05
NO _x	0.06	0.02
SO ₂	<0.01	<0.01
PM ₁₀	<0.01	<0.01
PM _{2.5}	<0.01	<0.01
CO ₂	26	7
HAPs	0.0009	0.0003

1 **Table 4.2-14.** Route Group 3 Estimated Concrete Batch Plant Construction and Operation Emissions
 2 (tpy)

	Maximum Quantity	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂
Subroute 3.1, Proponent Preferred	4	0.02	0.08	0.24	<0.01	2.24	0.40	51

3 As can be seen from the various tables above, emissions from any substitutions from the expected
 4 subroute 3.1 would result in comparable emissions of criteria pollutants, HAPs, and GHGs. In order to
 5 demonstrate proposed Project criteria pollutant emissions against the conformity de minimis thresholds,
 6 estimated emissions for the route group have been aggregated by subalternative along with all additional
 7 emission sources (substations and batch plants). Table 4.2-15 presents the summed total of anticipated
 8 annualized emissions from all the transmission line construction activities from the various proposed
 9 alternatives in the Apache Substation to Pantano Substation route group.

10 **Table 4.2-15.** Route Group 3 Estimated Annualized Emissions by Alternative (tpy)

	Total Miles	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Subroute 3.1, Proponent Preferred	70.4	0.64	2.83	7.24	0.02	3.47	1.14	1,545	0.0009
Substations	–	0.31	1.90	3.62	0.01	1.06	0.44	718	0.0005
Batch Plants	–	0.02	0.08	0.24	<0.01	2.24	0.40	51	–
Total Emissions	–	0.97	4.81	11.10	0.02	6.77	1.98	2,313	0.0014
Significant Impact Threshold	–	100	100	100	100	100	10	25,000	25
Exceeds Threshold?	–	No	No	No	No	No	No	No	No
Route Group 3 Local Alternatives									
H	19.3	0.18	0.78	1.98	<0.01	1.15	0.36	423	0.0003

11 As can be seen from table 4.2-15, expected emissions for criteria pollutants from proposed Project
 12 construction regardless of the subroute or local substitutive alternative chosen would be well below de
 13 minimis conformity thresholds, even when aggregated over vast geographical distances and multiple
 14 regional airsheds. HAPs would also be well below the 25 tpy aggregated HAP threshold level.
 15 Additionally, proposed Project GHG emissions would be expected to be well below the 25,000 metric ton
 16 threshold. Cumulative impacts from GHG emissions are discussed further in section 4.20.

17 **ROUTE GROUP 3 IMPACTS TO AMBIENT AIR QUALITY**

18 Table 4.2-16 presents a comparison of the expected maximum short-term AERSCREEN concentrations
 19 from proposed Project construction, representative background concentrations of NO₂, PM₁₀, and PM_{2.5},
 20 and the applicable ambient air quality standards for route group 3.

1 **Table 4.2-16.** Route Group 3 Transmission Line and Substation Construction: Comparison of Estimated
2 Maximum Air Pollutant Concentrations Plus Background to Applicable Ambient Air Standards

Pollutant	Averaging Period	Maximum 1-hour AERSCREEN Concentration ($\mu\text{g}/\text{m}^3$)*	Background Concentration ($\mu\text{g}/\text{m}^3$)	Project Impact and Background ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	AAQS ($\mu\text{g}/\text{m}^3$)	Below all AAQS?
NO ₂	1-hour	59.91	30 [†]	89.91	188.7	188.7	Yes
PM ₁₀	24-hour	80.32	58 [†]	138.32	150	150	Yes
PM _{2.5}	24-hour	10.98	13 [†]	23.98	35	65 [§]	Yes

3 Note: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.
4 * Maximum AERSCREEN concentrations obtained from comparable and larger transmission line/substation construction projects (BLM 2013a,
5 BLM2013n).
6 † Background concentrations of NO₂ and PM₁₀ from ADEQ's Technical Support Document for Concrete Batch Plants, Table 11 (2010). Nonattainment
7 value used for PM₁₀.
8 ‡ Background concentrations for PM_{2.5} from Douglas Red Cross air quality monitoring station in Cochise County, Arizona.
9 § Arizona's AAQS is listed as 65 $\mu\text{g}/\text{m}^3$ for the PM_{2.5} 24-hour standard; however, the more stringent NAAQS value is used for comparison.

10 As seen in table 4.2-16, the sum of the proposed Project impact and the background concentration would
11 be below all applicable AAQS. The proposed Project would therefore not trigger any significant impact
12 indicator for route group 3, and no significant impacts to air quality would result from the construction or
13 operation and maintenance of the transmission lines and substations.

14 **SUBROUTE 3.1 – PROPONENT PREFERRED**

15 **Construction**

16 As can be seen from table 4.2-15, even assuming no geographic dispersion of air emissions, annual
17 emissions from transmission line construction activities would be expected to be well below the de
18 minimis thresholds for criteria pollutants and HAPs regardless of the combination of alternatives selected.

19 **Operation and Maintenance**

20 With the exception of SF₆ emissions from substation circuit breakers, potential Project operational air
21 emissions were not analyzed, since operational emissions would be substantively lower than those
22 expected from construction emissions, which are already demonstrated herein as being well below the
23 significant impact thresholds.

24 **LOCAL ALTERNATIVES**

25 There is one local alternative for route group 3: local alternative H.

26 **Construction**

27 The local alternatives are meant to be substitutive of portions of the main subroute chosen, and therefore
28 any air emission contributions from local alternatives would not substantively contribute to proposed
29 Project emissions since any additions to emissions from an alternative would substitute for emissions
30 from the portion of the route it is replacing. While estimated emissions may be slightly higher or lower
31 than the portion of the route substituted for, depending upon whether or not the substation extended or
32 shortened overall line length, emissions would not substantively increase as a result of the substitution of
33 a local alternative, as demonstrated in the table 4.2-15 above.

1 **Operation and Maintenance**

2 As with the subroutes, proposed Project operational air emissions from the local substitutive alternatives
 3 were not analyzed (with the exception of SF₆ emissions from substation circuit breakers) as operational
 4 emissions would be substantively lower than those expected from construction emissions, which are
 5 already demonstrated herein as being well below the significant impact thresholds.

6 **ROUTE GROUP 3 IMPACT SUMMARY**

7 Neither the subroute nor the substitutive alternative in route group 3 would result in emissions that would
 8 be expected to exceed either conformity thresholds or ambient air quality standards for either construction
 9 or operation activities. Therefore, impacts to air quality resources from route group 3 would be minor
 10 (i.e., impacts would occur but air quality would retain its existing character) and short-term (i.e., less than
 11 5 years in duration) for construction activities, and minor and long-term (i.e., greater than 5 years in
 12 duration) for operational activities.

13 **Route Group 4 – Pantano Substation to Saguaro Substation**

14 Table 4.2-17 presents the total estimated fugitive dust, criteria, HAP, and GHG potential air emissions
 15 from the construction of the transmission lines from the Pantano Substation to the Saguaro Substation
 16 (route group 4). For route group 4, fugitive dust from transmission line, staging area, and access road
 17 construction earth-moving and grading activities; off-road construction vehicle and commuter, vendor,
 18 and haul truck traffic exhaust emissions; and fugitive dust from vehicle travel on both paved and unpaved
 19 roads are all estimated on an annualized basis in table 4.2-17. Estimated emissions from various proposed
 20 construction scenarios and local alternative routes are presented for comparative purposes.

21 **Table 4.2-17.** Route Group 4 Estimated Transmission Line Construction Annualized Emissions by Activity
 22 (tpy)

	Subroute 4.1, Proponent Preferred	Route Group 4 Local Alternatives									
		MA1	TH1a	TH1b	TH1c	TH1- Option	TH3- Option A	TH3- Option B	TH3- Option C	TH3a	TH3b
Total Miles	48.4	1.1	1.4	1.6	0.3	1.0	0.8	0.8	1.8	2.7	4.5
Fugitive Dust from Earth- moving and Grading Activities											
PM ₁₀	0.86	0.02	0.02	0.03	<0.01	0.02	0.01	0.01	0.03	0.05	0.08
PM _{2.5}	0.16	<0.01	0.01	0.01	<0.01	<0.01	<0.01	<0.01	0.01	0.01	0.02

23

1 **Table 4.2-17.** Route Group 4 Estimated Transmission Line Construction Annualized Emissions by Activity
2 (tpy), Continued

	Subroute 4.1, Proponent Preferred	Route Group 4 Local Alternatives									
		MA1	TH1a	TH1b	TH1c	TH1- Option	TH3- Option A	TH3- Option B	TH3- Option C	TH3a	TH3b
Construction Equipment Exhaust Emissions											
VOCs	0.43	0.01	0.01	0.01	<0.01	0.01	0.01	0.01	0.02	0.02	0.04
CO	1.80	0.04	0.05	0.06	0.01	0.05	0.03	0.03	0.07	0.10	0.17
NO _x	4.90	0.11	0.14	0.16	0.03	0.09	0.08	0.08	0.18	0.28	0.46
SO ₂	0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM ₁₀	0.36	0.01	0.01	0.01	<0.01	0.01	0.01	0.01	0.01	0.02	0.03
PM _{2.5}	0.36	0.01	0.01	0.01	<0.01	0.01	0.01	0.01	0.01	0.02	0.03
CO ₂	1,041	24	30	34	6	22	18	18	39	59	97
Fugitive Dust from Access Road Construction											
PM ₁₀	0.77	0.01	0.01	0.01	<0.01	<0.01	0.02	0.01	0.05	0.06	0.07
PM _{2.5}	0.16	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.01	0.01	0.01
Fugitive Dust from Travel on Paved and Unpaved Roads											
PM ₁₀	0.21	<0.01	0.01	0.01	<0.01	<0.01	<0.01	<0.01	0.01	0.01	0.02
PM _{2.5}	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Traffic Exhaust Emissions											
VOCs	0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
CO	0.14	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.01	0.01	0.01
NO _x	0.04	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SO ₂	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM ₁₀	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PM _{2.5}	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
CO ₂	18	<1	1	1	<1	<1	<1	<1	1	1	2
HAPs	0.0007	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001	0.0001

3 Temporary portable concrete batch plants would be constructed and operated approximately every 25
4 miles along the ROW, mainly at construction staging areas. The maximum number of concrete batch
5 plants by subroute and the total anticipated emissions from construction and operation of batch plants are

1 provided in table 4.2-18 (the use of local alternatives to substitute for line segments in route group 4
 2 would not be expected to increase the quantity of concrete batch plants).

3 **Table 4.2-18.** Route Group 4 Estimated Concrete Batch Plant Construction and Operation Emissions
 4 (tpy)

	Maximum Quantity	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂
Subroute 4.1, Proponent Preferred	3	0.02	0.06	0.18	<0.01	1.68	0.30	38

5 As can be seen from the various tables above, emissions from any substitutions from subroute 4.1 would
 6 result in comparable emissions of criteria pollutants, HAPs, and GHGs. In order to demonstrate proposed
 7 Project criteria pollutant emissions against the conformity de minimis thresholds, estimated emissions for
 8 the route group have been aggregated by subalternative along with all additional emission sources
 9 (substations and batch plants). Table 4.2-19 presents the summed total of anticipated annualized
 10 emissions from all the transmission line construction activities from the various proposed alternatives in
 11 the Pantano Substation to Saguaro Substation route group.

12 **Table 4.2-19.** Route Group 4 Estimated Annualized Emissions by Alternative (tpy)

	Total Miles	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Subroute 4.1, Proponent Preferred	48.4	0.44	1.93	4.94	0.01	2.20	0.73	1,058	0.0007
Substations	–	0.84	4.85	10.01	0.02	1.68	0.94	1,928	0.0005
Batch Plants	–	0.02	0.06	0.18	<0.01	1.68	0.30	38	–
Total Emissions	–	1.29	6.84	15.13	0.02	5.56	1.97	3,024	0.0011
Significant Impact Threshold	–	100	100	100	100	70	10	25,000	25
Exceeds Threshold?	–	No	No	No	No	No	No	No	No
Route Group 4 Local Alternatives									
MA1	1.1	0.01	0.04	0.11	<0.01	0.04	0.01	24	<0.0001
TH1a	1.4	0.01	0.05	0.14	<0.01	0.04	0.02	31	<0.0001
TH1b	1.6	0.01	0.06	0.16	<0.01	0.06	0.02	34	<0.0001
TH1c	0.3	<0.01	0.01	0.03	<0.01	0.01	<0.01	6	<0.0001
TH1-Option	1.0	0.01	0.05	0.09	<0.01	0.04	0.01	22	<0.0001
TH3-Option A	0.8	0.01	0.03	0.08	<0.01	0.04	0.01	18	<0.0001
TH3-Option B	0.8	0.01	0.03	0.08	<0.01	0.04	0.01	18	<0.0001
TH3-Option C	1.8	0.02	0.08	0.18	<0.01	0.10	0.03	39	<0.0001
TH3a	2.7	0.02	0.11	0.28	<0.01	0.14	0.04	60	<0.0001
TH3b	4.5	0.04	0.18	0.46	<0.01	0.20	0.07	99	0.0001

13 As can be seen from table 4.2-19, expected emissions for criteria pollutants from proposed Project
 14 construction regardless of the subroute or local substitutive alternative chosen would be well below de
 15 minimis conformity thresholds, even when aggregated over vast geographical distances and multiple
 16 regional airsheds. HAPs would also be well below the 25 tpy aggregated HAP threshold level.

1 Additionally, proposed Project GHG emissions would be expected to be well below the 25,000 metric ton
2 threshold. Cumulative impacts from GHG emissions are discussed further in section 4.20.

3 **ROUTE GROUP 4 IMPACTS TO AMBIENT AIR QUALITY**

4 Table 4.2-20 presents a comparison of the expected maximum short-term AERSCREEN concentrations
5 from proposed Project construction, representative background concentrations of NO₂, PM₁₀, and PM_{2.5},
6 and the applicable ambient air quality standards for route group 4.

7 **Table 4.2-20.** Route Group 4 Transmission Line and Substation Construction: Comparison of Estimated
8 Maximum Air Pollutant Concentrations Plus Background to Applicable Ambient Air Standards

Pollutant	Averaging Period	Maximum 1-hour AERSCREEN Concentration (µg/m ³)*	Background Concentration (µg/m ³)	Project Impact and Background (µg/m ³)	NAAQS (µg/m ³)	AAAQS (µg/m ³)	Below all AAQS?
NO ₂	1-hour	59.91	30 [†]	89.91	188.7	188.7	Yes
PM ₁₀	24-hour	80.32	58 [†]	138.32	150	150	Yes
PM _{2.5}	24-hour	10.98	13 [‡]	23.98	35	65 [§]	Yes

9 * Maximum AERSCREEN concentrations obtained from comparable and larger transmission line/substation construction projects (BLM 2013a, 2013n).

10 † Background concentrations of NO₂ and PM₁₀ from ADEQ's Technical Support Document for Concrete Batch Plants, table 11. Nonattainment value
11 used for PM₁₀.

12 ‡ Background concentrations for PM_{2.5} from Douglas Red Cross air quality monitoring station in Cochise County, Arizona.

13 § Arizona's AAQS is listed as 65 µg/m³ for the PM_{2.5} 24-hour standard; however, the more stringent NAAQS value is used for comparison.

14 As seen in table 4.2-20, the sum of the proposed Project impact and the background concentration would
15 be below all applicable AAQS. The proposed Project would not trigger any significant impact indicator
16 for route group 4, and no significant impacts to air quality would result from the construction or operation
17 and maintenance of the transmission lines and substations.

18 **SUBROUTE 4.1 – PROPONENT PREFERRED**

19 **Construction**

20 As can be seen from table 4.2-19, even assuming no geographic dispersion of air emissions, annual
21 emissions from transmission line construction activities would be expected to be well below the de
22 minimis thresholds for criteria pollutants and HAPs regardless of the combination of alternatives selected.

23 **Operation and Maintenance**

24 With the exception of SF₆ emissions from substation circuit breakers, potential Project operational air
25 emissions were not analyzed, since operational emissions would be substantively lower than those
26 expected from construction emissions, which are already demonstrated herein as being well below the
27 significant impact thresholds.

28 **LOCAL ALTERNATIVES**

29 There are 10 local alternatives are available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option,
30 TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

1 **Construction**

2 The local alternatives are meant to be substitutive of portions of the main subroute chosen, and therefore
3 any air emission contributions from local alternatives would not substantively contribute to proposed
4 Project emissions since any additions to emissions from an alternative would substitute for emissions
5 from the portion of the route it is replacing. While estimated emissions may be slightly higher or lower
6 than the portion of the route substituted for, depending upon whether or not the substation extended or
7 shortened overall line length, emissions would not substantively increase as a result of the substitution of
8 a local alternative, as demonstrated in table 4.2-19 above.

9 **Operation and Maintenance**

10 As with the subroutes, proposed Project operational air emissions from the local substitutive alternatives
11 were not analyzed (with the exception of SF₆ emissions from substation circuit breakers) as operational
12 emissions would be substantively lower than those expected from construction emissions, which are
13 already demonstrated herein as being well below the significant impact thresholds.

14 **ROUTE GROUP 4 IMPACT SUMMARY**

15 Neither the subroute nor the substitutive alternatives in route group 4 would result in emissions that
16 would be expected to exceed either conformity thresholds or ambient air quality standards for either
17 construction or operation activities. Therefore, impacts to air quality resources from route group 4 would
18 be minor (i.e., impacts would occur but air quality would retain its existing character) and short-term
19 (i.e., less than 5 years in duration) for construction activities, and minor and long-term (i.e., greater than 5
20 years in duration) for operational activities.

21 ***Agency Preferred Alternative***

22 Emissions of air pollutants from construction activities from the Agency Preferred Alternative, even
23 aggregated over vast geographic distances and multiple airsheds, would be substantively below the de
24 minimis thresholds for criteria pollutants, GHGs, and HAPs. Emissions of air pollutants would not vary
25 substantively between the Agency Preferred Alternative and the other alternatives. Construction
26 emissions would be transient, short-term, and spread over large distances and multiple airsheds. Operation
27 and maintenance emissions would be long-term and similar, but substantively less than, construction
28 emissions.

29 The Agency Preferred Alternative would cross the Rillito PM₁₀ nonattainment area and the Tucson CO
30 maintenance area, both located in Pima County, Arizona. However, none of the alternatives to the Agency
31 Preferred Alternative would avoid these non-attainment/maintenance areas. As can be seen from table
32 4.2-21, the total aggregated PM₁₀ and CO emissions from construction of the Agency Preferred
33 Alternative would be well the de minimis conformity thresholds of the Rillito PM₁₀ nonattainment area
34 and the Tucson CO maintenance area, even with the inclusion of proposed Project emissions from well
35 outside of these areas.

36 Therefore, overall impacts to air quality resources from the Agency Preferred Alternative would be minor
37 and short-term for construction activities, and minor and long-term for operation and maintenance
38 activities.

39 Air quality impacts from the Agency Preferred Alternative are quantified by pollutant in Table 4.2-12
40 below.

1 **Table 4.2-21.** Agency Preferred Alternative Estimated Annualized Emissions (tpy)

Route Group	Segments	Total Miles	VOCs	CO	NO _x	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	HAPs
Route group 1	P1, P2, P3, and P4a	146.9	1.12	5.56	13.89	0.03	6.77	2.19	2,759	0.0017
Route group 2	LD3a, LD4, LD4-Option5, P7	97.1	0.94	4.60	11.47	0.02	5.78	1.87	2,278	0.0014
Route group 3	U1a, U1b, U2, U3a	70.3	0.64	2.83	7.24	0.02	3.47	1.14	1,545	0.0009
Route group 4	TH1a, U4, TH1-Option, U3b, U3c, U3d, U3g, U3h, U3i, MA1, U3k, U3l, U3m	49.3	0.44	1.98	5.03	0.01	2.19	0.74	1,082	0.0007
Substations	–	–	1.59	9.60	18.64	0.03	4.27	1.99	3,641	0.0020
Batch Plants	–	–	0.10	0.38	1.14	<0.01	10.64	1.90	241	<0.0001
Total Emissions	–	363.6	4.81	24.95	57.41	0.11	33.13	9.83	11,546	0.0067
Lowest Significant Impact Threshold	–	–	100	100	100	100	70	10	25,000	25
Exceeds Threshold?	–	–	No	No	No	No	No	No	No	No

2 ***Additional Mitigation Measures***

3 As shown in the calculations presented herein, the proposed Project would not cause or contribute to a
 4 significant deterioration in air quality within the airsheds of the proposed Project. The proposed Project
 5 would incorporate BMPs from the POD and the mitigation measures from any permitting and/or
 6 regulatory requirements (e.g., for concrete batch plants). Therefore, no additional mitigation measures
 7 would be necessary and none are proposed.

8 ***Residual Impacts***

9 As the proposed Project would not require any additional mitigation measures, any residual impacts to air
 10 quality from the proposed Project would be minor and short-term.

11 ***Unavoidable Adverse Impacts***

12 The proposed Project would result in some increase to ambient pollutant concentrations. Since adverse
 13 impacts to air quality from proposed Project emissions would dissipate with time, there would be no long-
 14 term air quality impacts from proposed Project criteria and HAP emissions. GHG emissions, however,
 15 tend to be cumulative in nature. No Federal or State ambient air quality standards exist for GHGs.
 16 Furthermore, it is impossible to determine accurately the specific impacts on the environment that would
 17 be caused by a new source of GHGs. However, GHG emissions would result in an unavoidable adverse
 18 impact from the proposed Project.

19 The February 18, 2010, “Draft NEPA Guidance on Consideration of the Effects of Climate Change and
 20 Greenhouse Gases” from the CEQ proposed a threshold of 25,000 tpy CO₂e as a threshold for which

1 further qualitative and quantitative evaluation may be warranted. CEQ notes that this threshold should be
2 considered as “a useful indicator – rather than an absolute standard of insignificant effects” (CEQ 2010).
3 CEQ draft GHG guidance states that NEPA environmental assessment and EIS documents for proposed
4 Federal actions resulting in direct GHG emissions of 25,000 metric tons per year should include a GHG
5 emissions analysis of alternatives (CEQ 2012).

6 The total combined GHG construction emissions are anticipated to be well below the 25,000 metric ton
7 threshold, regardless of the sub-routes or local alternatives chosen. As an example, the total GHG
8 construction emissions from the use of all the Proponent Preferred sub-routes would result in GHG
9 emissions of approximately 12,000 tons (11,000 metric tons) of CO₂e. The substitution of other sub-
10 routes or alternatives would not increase emissions above the CEQ threshold. Additionally, these
11 projections are over the entire duration of proposed Project activities over several years and the entire
12 geographic distance. Therefore, emissions from the proposed Project would be much less than the CEQ
13 indicator and would be a tiny fraction of the existing annual Federal and State emissions.

14 The total GHG operations emissions per year combined for the proposed Project due to SF₆ emission
15 leaks would be approximately 7,124 metric tons of CO₂e per year, which is below the CEQ indicator of
16 25,000 metric tons. The total GHG operations emissions per year for any of the various substitutive
17 alternatives would be comparable to those for the proposed segments.

18 Therefore, it is difficult to state with any certainty what impacts on climate change may result from GHG
19 emissions, or to what extent the proposed Project would contribute to those climate change impacts. As a
20 result, any attempt to analyze and predict the local or regional impacts of the proposed Project on GHG
21 emissions cannot be done in any way that produces reliable results. On May 14, 2008, the Director of the
22 FWS noted, “The best scientific data available today do not allow us to draw a causal connection between
23 GHG emissions from a given facility and effects posed to listed species or their habitats, nor are there
24 sufficient data to establish that such impacts are reasonably certain to occur” (FWS 2008:1–2).

25 ***Short-term Uses versus Long-term Productivity***

26 The proposed Project would cause some short-term, minor deterioration in existing air quality during the
27 construction of the transmission lines, substations, and ancillary facilities. Long-term impacts would be
28 negligible because operation and maintenance of the proposed Project would not emit pollutants into
29 the atmosphere in quantities that would exceed air pollution standards. Therefore, no effects on the
30 maintenance and enhancement of long-term productivity related to air quality would occur because of the
31 implementation of the proposed Project.

32 ***Irreversible and Irrecoverable Commitments of Resources***

33 As the proposed Project would eventually be decommissioned, air quality would then be the same as the
34 no action alternative and therefore the Project would not result in an irretrievable commitment to air
35 resources. There may be an irreversible commitment of local ambient air quality if the transmission line
36 enables the transmission of electricity generated from fossil fuels. Additionally, GHG emissions from the
37 construction and operation and maintenance of the proposed Project (including SF₆ leaks from circuit
38 breakers) would result in minor (relative to local, national, and/or global GHG emissions) but irreversible
39 and irretrievable increase in GHGs.

4.3 NOISE AND VIBRATION

4.3.1 Introduction

Noise and vibration impacts are evaluated for all areas where sensitive receptors would be within the analysis area for the proposed Project. Impacts during construction would result from the use of equipment and vehicles but would be limited to the immediate vicinity of the proposed overhead line, along the proposed Project route, and along all transport access routes. Construction noise and vibration would be temporary and sporadic in nature. During operation, corona noise caused by operation of the new transmission line would elevate the current ambient noise levels within the immediate vicinity of the edge of the ROW.

This section describes the potential impacts of noise and vibration associated with the construction and operation of the transmission line, substations, and ancillary facilities. Impacts to noise are discussed in terms of noise levels expected to be produced by the proposed Project and compared to applicable laws and regulations. Potential impacts from vibration are only considered for construction, specifically for pile-driving activities. The impacts described in this section are based on the analysis provided in “Southline Transmission Project Resource Report 8: Noise” (CH2M Hill 2013b). The contents of that report are used herein without specific reference.

Decommissioning activities could also potentially result in noise. Impacts resulting from decommissioning activities would be similar in scope to impacts from construction. While impacts are anticipated to be similar in nature, the potential timeframe for decommissioning activities (at least 50 years out) renders the consideration of impacts to noise levels from decommissioning activities highly speculative. Therefore, impacts to noise from decommissioning activities are not addressed.

4.3.2 Methodology and Assumptions

This section describes the noise analysis area, the assumption and methodology used to calculate noise impacts, a description of the impact approach, and identification of what would be considered a significant noise impact from the construction and operation of the transmission lines and substations.

Analysis Area

The analysis area for the evaluation of noise impacts is 1 mile on either side of the centerline for both the New Build Section and Upgrade Section, and any substation or access roads outside that corridor. The analysis area for the evaluation of proposed Project noise impacts is depicted in figure 3.3-1 in chapter 3.

Analysis Assumptions

CONSTRUCTION

The noise levels expected to be generated by construction equipment have been calculated and published in various reference documents. The FHWA has published construction noise data for construction projects, which is used to determine construction noise impacts. Projected noise levels from proposed Project construction activities, including the expected noise attenuation due to distance from construction activities, are discussed further in appendix C. The values presented for estimated construction noise levels at the nearest new source review (NSR) are the expected maximum noise levels that the nearest

1 NSR will experience during construction. Due to the short-term, temporary, and intermittent nature of
2 construction activities, these values are conservative.

3 Ground-borne vibration impacts are only expected to occur during pile-driving activities. At this time,
4 it is not known whether pile-driving would be required. These activities would occur over a limited time
5 period and be confined to daytime hours when noise-sensitive resources are nearby to minimize potential
6 for disturbance. If pile-driving is required, there are two primary pile-driving methods: impact and
7 vibratory. Impact pile drivers typically use a weight (sometimes referred to as a piston or hammer) to
8 impact the top of pile to force it into the ground. Vibratory pile drivers are clamped to the pile and use
9 motors to generate vibrations in the range of 2 to 25 hertz. The vibrations reduce the frictional grip of the
10 soil and permit the soil at the tip of the pile to be displaced, which, coupled with the weight of the pile
11 itself or additional dead weights, allows the pile to advance into the ground. The primary sources of
12 noise associated with vibratory driving are the engine/motor and radiated noise from the vibrating pile.
13 The noise from a vibratory driver is more of a continuous or steady noise. The radiated noise from the pile
14 can be significant and has been reported to be louder than impact drivers when driving sheet or AZ-pile.
15 The noise from pile-driving is incorporated into proposed Project construction noise estimates.

16 **OPERATIONS AND MAINTENANCE**

17 For substation noise, standard acoustical engineering methods were used to determine a range in
18 anticipated sound levels based on the megavolt ampere rating of the substation. Predicted levels at
19 distances of interest were calculated based on geometric spreading attenuation using International
20 Organization for Standardization (ISO) 9613-2, “Acoustics—Sound Attenuation during Propagation
21 Outdoors” (ISO 1996). Additional attenuation factors, such as intervening terrain, structures, barriers,
22 and air absorption were not considered.

23 For corona noise, the Electric Power Research Institute (EPRI) ENVIRO computer model, containing the
24 EPRI corona model algorithm, was used to calculate noise levels from the transmission lines (in addition
25 to the electric and magnetic fields). A total of 10 scenarios representing combinations of the proposed
26 Project and alternatives with existing adjacent transmission lines were selected for corona modeling.
27 Corona noise results from changes in electric charges that are minimal in fair weather conditions and are
28 increased during wet and humid conditions. Corona noise can increase when a transmission line is in
29 proximity to other transmission lines and with the age and condition of equipment. Along the New Build
30 Section of the proposed Project and alternatives, existing transmission lines cross or are within certain
31 distances of the proposed Project that may have an effect on corona noise, and are included in the model.

32 ***Impact Indicators***

33 Noise sensitive receptors, including any residential areas, schools and day care facilities, hospitals, long-
34 term care facilities, places of worship, libraries, parks, and recreational areas specifically known for their
35 solitude and tranquility (such as wilderness areas) are identified for each route. The length from the ROW
36 to the NSR was used to determine estimated impacts from construction or operation and maintenance
37 (substation and corona discharge) noise levels at the NSR. Vibratory impacts are not analyzed directly;
38 instead, if a noise impact exists for a location, then a vibratory impact may be presumed to exist if pile-
39 driving construction activities were to occur at that location.

40 As discussed in chapter 3, there are no Federal regulations that limit overall environmental noise levels.
41 A number of agencies have issued guidance documents addressing exterior noise and regulations for
42 specific sources. The most stringent noise regulations come from the EPA. The EPA’s Noise Control Act
43 of 1972 published guidelines that address the issue of community noise and contains goals for noise
44 levels affecting residential land use of L_{dn} of less than 55 dBA for exterior levels and an L_{dn} of less than

1 45 dBA for interior levels. For purposes of this analysis, the exterior noise level guidelines of the Noise
2 Control Act of 1972 for NSRs will be used (55 dBA).

3 ***Significant Impacts***

4 For the purposes of this analysis, a significant impact on noise could result if any of the following were to
5 occur from construction or operation of the proposed Project:

- 6 • Exceedance of local or Federal noise regulations or guidelines. If there are no local guidelines,
7 then Federal guidelines (the Noise Control Act of 1972) will be used;
- 8 • Increased noise levels could impose restrictions on land currently planned for residential
9 development; or
- 10 • Increased noise levels directly or indirectly could affect any places of traditional use that are
11 NRHP listed or eligible, or identified as important to tribes.

12 A significant impact would constitute a “major” impact according to the impact description provided in table
13 4.1-1. The other impact descriptions provided in table 4.1-1 are also used herein for impacts less than major.
14 Increases to noise levels that impose restrictions on land use or that affect NRHP listed or eligible sites
15 are analyzed qualitatively herein. Noise is a potential issue to sites that are in current use by tribal
16 members. The nearest NSRs to the proposed Project were identified; therefore, if operation and
17 maintenance noise impacts affect these NSRs, then land use restrictions from increased noise levels or
18 adverse impacts to NRHP sites could be presumed at these locations. Construction impacts would be of
19 limited duration and therefore would not represent significant impacts to land use restrictions or NRHP
20 sites, even if noise levels would be above impact thresholds.

21 **4.3.3 Impacts Analysis Results**

22 ***No Action Alternative***

23 Under the no action alternative, the BLM would not issue a ROW permit and Western would not partner
24 with Southline or uprate its existing lines as part of the proposed Project. Noise and vibration impacts
25 from construction and operation and maintenance of the proposed Project transmission line and associated
26 activities and facilities would not occur. Under the no action alternative, noise and vibration conditions
27 would likely continue at current levels and trends, although it is uncertain whether other changes may
28 occur that affect conditions.

29 Even under the no action alternative, Western still plans to upgrade the existing lines between the Apache
30 and Saguaro substations within the next 10 years, per Western’s 10-year capital improvement plan
31 (Western 2012a).

32 ***Impacts Common to All Action Alternatives***

33 **CONSTRUCTION**

34 Construction activities for both the New Build and Upgrade Sections of the proposed Project and
35 alternatives would result in similar noise generation and impacts. Construction activities would be of
36 short duration in any single area and generally would be limited to daytime hours. The majority of the
37 New Build Section would pass through rural and open areas as well as around a number of small cities,
38 including Deming and Lordsburg. As a result, a minimal number of receptors would be located along the
39 New Build Section. The Upgrade Section would cross areas of rural and open lands and several small

1 communities, including Benson, as well as high-density areas of Tucson and surrounding communities.
2 Residents and commercial establishments would experience short-term noise increases in these areas
3 during construction.

4 Vibratory impacts from pile-driving construction activities may be a concern for NSRs that are located
5 near the ROW. Vibratory impacts are not analyzed directly; instead, if a noise impact exists for a location,
6 then a vibratory impact may be presumed to exist if pile-driving construction activities were to occur at
7 that location. Vibration from construction activities would be of even more limited duration than the
8 construction activities themselves, since the use of pile-driving construction activities would represent a
9 fraction of total construction activity.

10 **OPERATION AND MAINTENANCE**

11 Corona noise would occur throughout the length of the proposed Project. The level of noise associated
12 with the corona effect strongly depends on weather conditions as well as the condition of the transmission
13 line. The proposed Project location is generally considered to have fair weather during most of the year;
14 however, foul weather, or rain conditions, occurs periodically and seasonally. As noted in the Final
15 WWEC PEIS (DOE and BLM 2008:3-143):

16 In arid regions of the 11 western states, corona-generated audible noise would occur infrequently,
17 as most of the areas adjacent to the proposed corridors on federal lands are undeveloped and
18 sparsely populated. Whether occurring on federal or nonfederal land, corona noise would be
19 scarcely discernible within ¼ mile or less from the center of the nearest transmission tower.

20 Corona noise for both the New Build and Upgrade Sections of the proposed Project and alternatives
21 would be highest in areas where the new lines would be constructed in close proximity to existing
22 transmission lines. Overall, because of the relatively dry nature of the area crossed by the proposed
23 Project, the overall level of operational noise would be minimal and would therefore represent a minor,
24 but long-term impact to ambient soundscapes. Operational noise would decrease rapidly with distance
25 from the transmission line. According to the EPRI ENVIRO model, the maximum corona noise for all
26 modeled scenarios for both the New Build and Upgrade Sections on the edge of the right-of-way would
27 be 52.4 dBA (in foul weather for two double-circuit transmission lines separated by a distance of 200
28 feet). This value is lower than the exterior noise level guidelines of the Noise Control Act of 1972 and the
29 proposed Project is not expected to cause a significant impact with respect to corona noise.

30 Corona noise increases with aging, damaged equipment. For the Upgrade Section, where the transmission
31 line would be replacing the existing line with newer equipment, have an increased height above ground,
32 and/or different arrangement of the equipment (e.g., vertical configuration of the double-circuit), corona
33 noise from the proposed Project at the nearest NSR would be expected to decrease from currently existing
34 line conditions. This change in noise due to the corona effect would most likely be minimal and would
35 still be affected by other circumstances (i.e., adverse weather).

36 Maintenance activities associated with substations and transmission lines would be similar in noise level
37 to construction-related activities, but would be anticipated to occur less frequently, include fewer
38 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
39 Maintenance activities are primarily inspection-related (for example, annual inspection of the
40 transmission line from vehicles) and repair of damaged equipment. Actual maintenance activities would
41 occur over a short period of time at any single location and typically would be of shorter duration than
42 during initial construction activities.

1 **Route Group 1 – Afton Substation to Hidalgo Substation**

2 A summary of the noise resource inventory data for route group 1 is presented in table 4.3-1. Some
3 segments have multiple land use descriptions that describe the segment’s land use in greater detail.
4 The expected range of baseline noise levels, estimated number of residential NSRs, the estimated closest
5 distance to the NSR, and the estimated construction noise level at the nearest NSR are evaluated for each
6 segment and land use type. Where there are no NSRs identified, the construction noise levels were not
7 evaluated for that particular segment or land use.

8 **Table 4.3-1. Route Group 1 Noise Resource Inventory Data**

	Total Miles	Description/ Land Use	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
Subroute 1.1, Proponent Preferred						
P1	5.1	Desert open space	0	–	8–45	–
P2	102	Desert open space	2	1300	8–45	63
		Follows highway (2,500 feet)	5	100	34–54	79
		Crosses highway (< 250 feet)	2	600	44–64	69
		Agricultural areas	0	–	30–52	–
		Near Deming, NM	40	100	40–67	79
P3	31.1	Desert open space	0	–	8–45	–
		Crosses highway (< 250 feet)	7	1100	44–64	63
P4a	8.7	Desert open space	0	–	8–45	–
Subroute 1.2, Proponent Alternative						
S1	13.4	Desert open space	1	2100	8–45	58
S2	11.1	Desert open space	0	–	8–45	–
		Near highway (500 feet)	0	–	41–61	–
S3	12.9	Follows highway (500 feet)	0	–	41–61	–
		Crosses highway (< 250 feet)	0	–	44–64	–
S4	10.6	Desert open space	0	–	8–45	–
		Near highway (1,000 feet)	0	–	38–58	–
S5	29.7	Follows highway (500 feet)	0	–	41–61	–
		Near Columbus, NM	35	2900	33–66	58
		Agricultural areas	2	1300	30–52	63
		Desert open space	0	–	8–45	–

9

1 **Table 4.3-1.** Route Group 1 Noise Resource Inventory Data (Continued)

	Total Miles	Description/ Land Use	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
S6	7.4	Agricultural areas	1	500	30–52	69
		Near highway (1,000 feet)	0	–	38–58	–
		Desert open space	0	–	8–45	–
S7	41.5	Follows highway (250 feet)	2	300	44–64	74
		Crosses highway (< 250 feet)	0	–	44–64	–
		Near Hachita, NM	10	500	33–66	69
		Desert open space	1	<50	8–45	83
S8	14.6	Agricultural areas	3	2200	30–52	58
		Crosses highway (< 250 feet)	0	–	44–64	–
		Desert open space	0	–	8–45	–
Route Group 1 Local Alternatives						
DN1	42.5	Crosses highway (< 250 feet)	0	–	44–64	–
		Desert open space	1	100	8–45	79
		Agricultural areas	1	4900	30–52	52
A	17.5	Follows highway (500 feet)	0	–	41–61	–
		Desert open space	0	–	8–45	–
B	12.2	Follows highway (500 feet)	0	–	41–61	–
C	9	Follows highway (250 feet)	2	300	44–64	74
		Crosses highway (< 250 feet)	0	–	44–64	–
D	22.8	Agricultural areas	3	3700	30–52	52
		Crosses highway (< 250 feet)	1	100	44–64	79
		Desert open space	0	–	8–45	–
		Near Lordsburg, NM	12	3100	33–66	58
		Follows highway (2,500 feet)	1	4900	34–54	52

2 Current and predicted noise from substations associated with route group 1 is presented in table 4.3-2.
 3

1 **Table 4.3-2.** Route Group 1 Current and Predicted Noise from Substations

Substation	Distance to Closest NSR (in feet)	Approximate Substation Noise Based on Existing Conditions at NSR	Predicted Approximate Substation Noise Based on Future Conditions at NSR	Change in Noise at NSR
Afton	35,942	< 40 dBA	< 40 dBA	0 dBA
Hidalgo	15,120	< 40 dBA	< 40 dBA	0 dBA
Proposed Midpoint	N/A	N/A	N/A	N/A
Alternative Midpoint	N/A	N/A	N/A	N/A

2 Note that neither the Proposed nor Alternative Midpoint substations are currently anticipated to have a
3 transformer, the primary source of noise at the substations.

4 The New Build Section of the proposed Project and alternatives between the Afton Substation to Hidalgo
5 Substation would pass by five non-residential noise-sensitive receptors and scattered residential areas,
6 primarily near the community of Deming. However, this route group is predominantly open space and has
7 very few noise-sensitive receptors. Non-residential NSRs in this route group are listed in appendix C.

8 **SUBROUTE 1.1 – PROPONENT PREFERRED**

9 **Construction**

10 There is an estimated total of 56 NSRs along subroute 1.1. The majority of estimated NSRs (40) are
11 located in and around the city of Deming, New Mexico. NSRs identified in table 4.3-1 would be expected
12 to experience noise levels of approximately 63 to 79 dBA during construction activities. NSRs
13 specifically identified other than residences on this route include Holy Cross Cemetery near segment P2,
14 which could experience construction noise levels of 52 dBA. The residential NSRs in subroute 1.1 could
15 experience exceedances of the guidelines contained within the Noise Control Act of 1972, the most
16 stringent regulatory criteria identified in chapter 3. Therefore, using the significance criteria outlined
17 in the beginning of this chapter in table 4.1-1, impacts to noise from subroute 1.1 could be major
18 (i.e., impacts would occur, and could represent a high degree of change over existing baseline conditions);
19 however, construction noise would be short-term, temporary, and intermittent in nature. Therefore,
20 construction noise would represent more of a nuisance and could be mitigated to be below thresholds
21 and/or baseline conditions.

22 **Operation and Maintenance**

23 Substation noise for the Afton and Hidalgo substations would be expected to remain the same, with no
24 change in noise levels at the distance to the closest NSR. Neither the Proposed nor Alternative Midpoint
25 substations are currently anticipated to have a transformer, the primary source of noise at the substations.
26 The nearest NSRs all experience noise levels less than the guidelines in the Noise Control Act of 1972.
27 Maintenance activities associated with substations and transmission lines would be similar in noise level
28 to construction-related activities, but would be anticipated to occur less frequently, include fewer
29 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
30 Therefore, impacts to noise from this route group would be minor and long-term for operation and
31 maintenance activities.

1 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

2 **Construction**

3 Fifty-five NSRs were identified along this subroute. The majority of estimated NSRs are located in the
4 communities of Columbus and Hachita. The noise levels at those identified NSRs could range from 58 to
5 83 dBA, with one location that could experience an estimated construction noise level as high as 83 dBA.
6 Three NSRs (other than residences) were identified along segment S7. These NSRs include two
7 cemeteries (Victorio and Hachita Cemeteries) and a church (Hachita Baptist Church) that could
8 experience construction noise levels ranging from 69 dBA (at Hachita Cemetery and Hachita Baptist
9 Church) to 83 dBA (at Victorio Cemetery). These NSRs could experience exceedances of the guidelines
10 contained within the Noise Control Act of 1972, the most stringent regulatory criteria identified in chapter
11 3. Therefore, using the significance criteria outlined in the beginning of this chapter in table 4.1-1,
12 impacts to noise from subroute 1.2 could be major (i.e., impacts would occur, and could represent a high
13 degree of change over existing baseline conditions); however, construction noise would be short-term,
14 temporary, and intermittent in nature. Therefore, construction noise would represent more of a nuisance
15 and could be mitigated to be below thresholds and/or baseline conditions.

16 **Operation and Maintenance**

17 Substation noise from this alternative would be expected to be the same as that from subroute 1.1.
18 Maintenance activities associated with substations and transmission lines would be similar in noise level
19 to construction-related activities, but would be anticipated to occur less frequently, include fewer
20 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
21 Therefore, impacts to noise from this route group would be minor and long-term for operation and
22 maintenance activities.

23 **LOCAL ALTERNATIVES**

24 There are five local alternatives available for route group 1. These local alternatives include DN1, A, B, C
25 and D.

26 **Construction**

27 There are few NSRs, including residences, near any of the local alternatives. Alternative D includes the
28 most NSRs (12) as it passes by Lordsburg, New Mexico. All other alternatives have been identified as
29 having two or less NSRs. Noise levels at all these NSRs could be expected to range from 52 dBA to 79
30 dBA. These NSRs could experience exceedances of the guidelines contained within the Noise Control
31 Act of 1972, the most stringent regulatory criteria identified in chapter 3. Therefore, using the
32 significance criteria outlined in the beginning of this chapter in table 4.1-1, impacts to noise from local
33 alternatives could be major (i.e., impacts would occur, and could represent a high degree of change over
34 existing baseline conditions); however, construction noise would be short-term, temporary, and
35 intermittent in nature. Therefore, construction noise would represent more of a nuisance and could be
36 mitigated to be below thresholds and/or baseline conditions.

37 **Operation and Maintenance**

38 Maintenance activities associated with substations and transmission lines would be similar in noise level
39 to construction-related activities, but would be anticipated to occur less frequently, include fewer
40 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.

1 Therefore, impacts to noise from local alternatives for this route group would be minor and long-term for
2 operation and maintenance activities.

3 **Route Group 2 – Hidalgo Substation to Apache Substation**

4 A summary of the noise resource inventory data for route group 2 is presented in table 4.3-3. Some
5 segments have multiple land use descriptions that describe the segment’s land use in greater detail.
6 The expected range of baseline noise levels, estimated number of residential NSRs, the estimated closest
7 distance to the NSR, and the estimated construction noise level at the nearest NSR are evaluated for each
8 segment and land use type. Where there are no NSRs identified, the construction noise levels were not
9 evaluated for that particular segment or land use.

10 **Table 4.3-3.** Route Group 2 Noise Resource Inventory Data

	Total Miles	Description	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
Subroute 2.1, Proponent Preferred						
P4b	14	Crosses highway (< 250 feet)	0	–	44–64	–
		Desert open space	2	3600	8–45	52
P4c	1.9	Desert open space	0	–	8–45	–
P5a	9.6	Desert open space	0	–	8–45	–
P5b	21.1	Desert open space	0	–	8–45	–
		Near highway (1,000 feet)	0	–	38–58	–
P6a	0.9	Near highway (1,000 feet)	0	–	38–58	–
P6b	22.5	Near highway (500 feet)	0	–	41–61	–
		Agricultural areas	1	<50	30–52	83
		Desert open space	0	–	8–45	–
P6c	2.8	Near highway (5,000 feet)	0	–	31–51	–
		Desert open space	0	–	8–45	–
P7	22.3	Near highway (5,000 feet)	0	–	31–51	–
		Desert open space	1	1900	8–45	58
		Agricultural areas	1	800	30–52	63
P8	0.5	Agricultural areas	0	–	30–52	–

11

1 **Table 4.3-3.** Route Group 2 Noise Resource Inventory Data (Continued)

	Total Miles	Description	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
Subroute 2.2, Proponent Alternative						
E	31.8	Near highway (5,000 feet)	0	–	31–51	–
		Desert open space	0	–	8–45	–
		Agricultural areas	1	<50	30–52	83
		Near San Simon, AZ	>100	2400	33–66	58
		Follows highway (2,500 feet)	0	–	34–54	–
F	25.3	Near highway (2,500 feet)	0	–	34–54	–
		Follows highway (5,000 feet)	0	–	31–51	–
		Agricultural areas	1	<50	30–52	83
		Near Bowie, AZ	>100	2400	33–66	58
		Desert open space	1	600	8–45	69
		Follows highway (500 feet)	0	–	41–61	–
Ga	25.7	Near highway (500 feet)	0	–	41–61	–
		Desert open space	1	1900	8–45	58
		Agricultural areas	8	<50	30–52	83
		Follows highway (250 feet)	0	–	44–64	–
		Crosses highway (< 250 feet)	0	–	44–64	–
Gb	1	Follows highway (2,500 feet)	0	–	34–54	–
Gc	7.4	Follows highway (2,500 feet)	0	–	34–54	–
		Crosses highway (< 250 feet)	0	–	44–64	–
		Near Cochise, AZ	25	300	33–66	74
		Agricultural areas	2	<50	33–66	83
I	2.3	Crosses highway (< 250 feet)	0	–	44–64	–
		Near highway (5,000 feet)	0	–	31–51	–
		Desert open space	0	–	8–45	–

2

1 **Table 4.3-3.** Route Group 2 Noise Resource Inventory Data (Continued)

	Total Miles	Description	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
J	2.3	Follows highway (5,000 feet)	2	1000	31–51	63
		Follows highway (2,500 feet)	0	–	34–54	–
		Crosses highway (< 250 feet)	0	–	44–64	–
Route Group 2 Local Alternatives						
LD1	35.4	Desert open space	0	–	8–45	–
		Follows highway (250 feet)	0	–	44–64	–
		Crosses highway (< 250 feet)	5	<50	44–64	83
		Follows highway (1,000 feet)	80	800	38–58	63
		Follows highway (500 feet)	0	–	41–61	–
LD2	9.6	Desert open space	0	–	8–45	–
LD3a	27.9	Crosses highway (< 250 feet)	0	–	44–64	–
		Desert open space	1	50	8–45	83
LD3b	1.9	Desert open space	0	–	8–45	–
LD4	51.7	Desert open space	0	–	8–45	–
		Crosses highway (< 250 feet)	0	–	44–64	–
		Agricultural areas	8	<50	30–52	83
LD4–Option4	6.5	Desert open space	0	–	8–45	–
		Crosses highway (< 250 feet)	0	–	44–64	–
		Follows highway (2,500 feet)	0	–	34–54	–
		Follows highway (1,000 feet)	0	–	38–58	–
LD4–Option 5	12.3	Follows highway (2,500 feet)	0	–	34–54	–
		Desert open space	0	–	8–45	–
		Crosses highway (< 250 feet)	0	–	44–64	–
WC1	14.8	Near Willcox, AZ	>100	<50	40–67	83
		Follows highway (5,000 feet)	2	1000	31–51	63
		Follows highway (1,000 feet)	0	–	38–58	–
		Follows highway (250 feet)	0	–	44–64	–

1 Current and predicted noise from substations associated with route group 2 is presented in table 4.3-4.

2 **Table 4.3-4.** Route Group 2 Current and Predicted Noise from Substations

Substation	Distance to Closest NSR (in feet)	Approximate Substation Noise Based on Existing Conditions at NSR	Predicted Approximate Substation Noise Based on Future Conditions at NSR	Change in Noise at NSR
Apache	2,736	40 dBA	37–47 dBA	0–7 dBA
Hidalgo	15,120	< 40 dBA	< 40 dBA	0

3 The closest residence to a substation in the New Build Section is located approximately 2,736 feet from
 4 the fence line of the Apache Substation. This residence is also located approximately 4,500 feet from an
 5 existing coal-fired power plant and approximately 1,800 feet from railroad tracks used to deliver coal to
 6 the power plant. For purposes of this analysis, it is assumed that the existing sound level at the residence
 7 closest to the proposed Apache Substation is 40 dBA. At this residence the noise level associated with the
 8 proposed Project and alternatives’ two 650 megavolt ampere (MVA) transformers would be anticipated to
 9 be between 37 and 47 dBA. A range is provided, because the precise sound rating of the transformers
 10 would be determined during detailed design, as would their location and the location of any noise barriers.

11 There are six non-residential NSRs identified for this route group (five schools and one cemetery).
 12 Non-residential NSRs in this route group are listed in appendix C.

13 **SUBROUTE 2.1 – PROPONENT PREFERRED**

14 **Construction**

15 There are five identified potential NSRs for this subroute. Most are located greater than 1,000 feet from
 16 the edge of the ROW, but one residence is within 50 feet of the ROW. That residence could experience
 17 temporary construction noise levels as high as 83 dBA. The other residential NSRs could experience
 18 temporary construction noise levels ranging from 52 to 63 dBA. Some NSRs could therefore experience
 19 noise levels in excess of the guidelines published in the Noise Control Act of 1972, the most stringent
 20 regulatory criteria identified in chapter 3. Therefore, using the significance criteria outlined in the
 21 beginning of this chapter in table 4.1-1, impacts to noise from subroute 2.1 could be major (i.e., impacts
 22 would occur, and could represent a high degree of change over existing baseline conditions); however,
 23 construction noise would be short-term, temporary, and intermittent in nature. Therefore, construction
 24 noise would represent more of a nuisance and could be mitigated to be below thresholds and/or baseline
 25 conditions.

26 **Operation and Maintenance**

27 Substation noise for the Hidalgo Substation would be expected to remain the same, with no change in
 28 noise levels at the distance to the closest NSR. The NSR nearest the Apache Substation could experience
 29 an increase in noise levels by 0 to 7 dBA. The nearest NSRs would all experience noise levels less than
 30 the guidelines in the Noise Control Act of 1972. Maintenance activities associated with substations and
 31 transmission lines would be similar in noise level to construction-related activities, but would be
 32 anticipated to occur less frequently, include fewer individual noise point sources such as pieces of
 33 equipment and vehicles, and would be of shorter duration. Therefore, impacts to noise from this route
 34 group would be minor and long-term for operation and maintenance activities.

1 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

2 **Construction**

3 There are in excess of 100 identified potential NSRs in this subroute. All identified closest NSRs to the
4 ROW could potentially have estimated construction noise levels over the recommended guidelines in the
5 Noise Control Act of 1972. Non-residential NSRs associated with this Subroute would experience noise
6 levels between 58 and 83 dBA, with four of the six non-residential NSRs below the guidelines of the
7 Noise Control Act of 1972, the most stringent regulatory criteria identified in chapter 3. Therefore, using
8 the significance criteria outlined in the beginning of this chapter in table 4.1-1, impacts to noise from
9 subroute 2.2 could be major (i.e., impacts would occur, and could represent a high degree of change
10 over existing baseline conditions); however, construction noise would be short-term, temporary, and
11 intermittent in nature. Therefore, construction noise would represent more of a nuisance and could be
12 mitigated to be below thresholds and/or baseline conditions.

13 **Operation and Maintenance**

14 Substation noise from this alternative would be expected to be the same as that from subroute 2.1.
15 Maintenance activities associated with substations and transmission lines would be similar in noise level
16 to construction-related activities, but would be anticipated to occur less frequently, include fewer
17 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
18 Therefore, impacts to noise from this route group would be minor and long-term for operation and
19 maintenance activities.

20 **LOCAL ALTERNATIVES**

21 There are eight local alternatives available for route group 2. These local alternatives include LD1, LD2,
22 LD3a, LD3b, LD4, LD4-Option 4, LD4-Option 5, and WC1.

23 **Construction**

24 Local alternative WC1 contains the most potential NSRs (over 1,000), as it passes through the city of
25 Willcox, Arizona. The nearest NSRs would experience construction noise levels as high as 83 dBA.
26 The second most number of estimated NSRs (85) is found in local alternative LD1, where sound levels
27 would range from 64 to 83 dBA at the nearest NSR. Some local alternatives are desert open space with no
28 identified potential NSRs (for local alternatives LD2, LD3b, LD4-Option 4, and LD4-Option 5).
29 The other local alternatives (LD3a and LD4) have eight or less NSRs, and those nearest potential NSRs
30 could experience construction noise levels between 74 and 83 dBA. Therefore, using the significance
31 criteria outlined in the beginning of this chapter in table 4.1-1, impacts to noise from local alternatives
32 could be major (i.e., impacts would occur, and could represent a high degree of change over existing
33 baseline conditions); however, construction noise would be short-term, temporary, and intermittent in
34 nature. Therefore, construction noise would represent more of a nuisance and could be mitigated to be
35 below thresholds and/or baseline conditions.

36 **Operation and Maintenance**

37 Maintenance activities associated with substations and transmission lines would be similar in noise level
38 to construction-related activities, but would be anticipated to occur less frequently, include fewer
39 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
40 Therefore, impacts to noise from local alternatives for this route group would be minor and long-term for
41 operation and maintenance activities.

1 **Route Group 3 – Apache Substation to Pantano Substation**

2 A summary of the noise resource inventory data for route group 3 is presented in table 4.3-5. Some
 3 segments have multiple land use descriptions that describe the segment’s land use in greater detail.
 4 The expected range of baseline noise levels, estimated number of residential NSRs, the estimated closest
 5 distance to the NSR, and the estimated construction noise level at the nearest NSR are evaluated for each
 6 segment and land use type. Where there are no NSRs identified, the construction noise levels were not
 7 evaluated for that particular segment or land use.

8 **Table 4.3-5. Route Group 3 Noise Resource Inventory Data**

	Total Miles	Description	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
Subroute 3.1, Proponent Preferred						
U1a	16.1	Agricultural areas	8	<50	30–52	83
		Desert open space	0	–	8–45	–
		Near highway (250 feet)	0	–	44–64	–
U1b	2.9	Crosses highway (< 250 feet)	0	–	44–64	–
		Near highway (5,000 feet)	0	–	31–51	–
U2	15.8	Follows highway (5,000 feet)	0	–	31–51	–
		City of Benson, AZ	>100	<50	33–66	83
		Follows highway (2,500 feet)	5	<50	34–54	83
		Mescal, AZ	>100	<50	33–66	83
		Crosses highway	50	200	44–64	74
U3a	35.6	Follows highway (5,000 feet)	75	<50	31–51	83
		Desert open space	0	–	8–45	–
		Vail, AZ	>100	<50	33–66	83
		City of Tucson (near airport)	>100	<50	48–92	83
Route Group 3 Local Alternative						
H	19.3	Desert open space	0	–	8–45	–
		Agricultural areas	20	400	30–52	69
		Follows highway (250 feet)	0	–	44–64	–
		Crosses highway (< 250 feet)	0	–	44–64	–

1 Current and predicted noise from substations associated with route group 3 is presented in table 4.3-6.
2 The Apache Substation NSR is discussed in route group 2.

3 **Table 4.3-6.** Route Group 3 Current and Predicted Noise from Substations

Substation	Distance to Closest NSR (feet)	Approximate Substation Noise Based on Existing Conditions at NSR	Predicted Approximate Substation Noise Based on Future Conditions at NSR	Change in Noise at NSR
Apache	2,736	40 dBA	37–47 dBA	0–7 dBA
Pantano	13,247	< 40 dBA	< 40 dBA	0
Adams Tap	11,977	< 40 dBA	< 40 dBA	0

4 There are 40 non-residential NSRs identified for this route group, which includes churches, schools,
5 museums, libraries, and parks. Non-residential NSRs in this route group are listed in appendix C.

6 **SUBROUTE 3.1 – PROPONENT PREFERRED**

7 **Construction**

8 Subroute 3.1 reaches the southern fringe of the city of Tucson, and has many potential NSRs (greater than
9 100). Segment U1a has eight potential NSRs, around agricultural areas, that could experience
10 construction noise as high as 83 dBA. Segment U1b is completely vacant of NSRs. Segment U2 passes by
11 the communities of Benson and Mescal, Arizona, and has many potential NSRs (greater than 100) within
12 the Analysis Area. For the communities of Benson and Mescal and other land-use areas for segment U2,
13 estimated construction noise levels would range between 74 and 83 dBA. As segment U3a reaches the
14 City of Tucson, the number of potential NSRs increase. The NSRs located closest to the ROW would
15 experience construction noise levels as high as 83 dBA. Most of the NSRs for this segment are also near
16 the Tucson International Airport, and the baseline values for that area can range from 48-92 dBA.
17 Approximately 40 non-residential NSRs are located within the area of analysis of this subroute. The
18 nearest non-residential NSR is located approximately 600 feet from the proposed Project ROW (both the
19 Skyline Baptist Church located in Benson, Arizona and the Desert Vista Library in Tucson, Arizona).
20 These non-residential NSRs could be expected to experience construction noise levels as high as 69 dBA.
21 Other non-residential NSRs could be expected to experience noise levels as high as 69 dBA. Therefore,
22 using the significance criteria outlined in the beginning of this chapter in table 4.1-1, impacts to noise
23 from subroute 3.1 could be major (i.e., impacts would occur, and could represent a high degree of change
24 over existing baseline conditions); however, construction noise would be short-term, temporary, and
25 intermittent in nature. Therefore, construction noise would represent more of a nuisance and could be
26 mitigated to be below thresholds and/or baseline conditions.

27 **Operation and Maintenance**

28 Substation noise for the Pantano and Adams Tap substations would be expected to remain the same, with
29 no change in noise levels at the distance to the closest NSR. The NSR nearest the Apache Substation
30 would experience an increase in noise levels by 0 to 7 dBA. The nearest NSRs would experience noise
31 levels less than the guidelines in the Noise Control Act of 1972. Maintenance activities associated with
32 substations and transmission lines would be similar in noise level to construction-related activities, but
33 would be anticipated to occur less frequently, include fewer individual noise point sources such as pieces
34 of equipment and vehicles, and would be of shorter duration. Therefore, impacts to noise from this route
35 group would be minor and long-term for operation and maintenance activities.

1 **LOCAL ALTERNATIVES**

2 There is one local alternative for route group 3: local alternative H.

3 **Construction**

4 Local alternative H has 20 identified potential NSRs. The nearest NSRs would experience construction
 5 noise levels as high as 69 dBA. Therefore, using the significance criteria outlined in the beginning of this
 6 chapter in table 4.1-1, impacts to noise from local alternatives could be major (i.e., impacts would occur,
 7 and could represent a high degree of change over existing baseline conditions); however, construction
 8 noise would be short-term, temporary, and intermittent in nature. Therefore, construction noise would
 9 represent more of a nuisance and could be mitigated to be below thresholds and/or baseline conditions.

10 **Operation and Maintenance**

11 Maintenance activities associated with substations and transmission lines would be similar in noise level
 12 to construction-related activities, but would be anticipated to occur less frequently, include fewer
 13 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
 14 Therefore, impacts to noise from the local alternative for this route group would be minor and long-term
 15 for operation and maintenance activities.

16 **Route Group 4 – Pantano Substation to Saguaro Substation**

17 A summary of the noise resource inventory data for route group 4 is presented in table 4.3-7. Some
 18 segments have multiple land use descriptions that describe the segment’s land use in greater detail.
 19 The expected range of baseline noise levels, estimated number of residential NSRs, the estimated closest
 20 distance to the NSR, and the estimated construction noise level at the nearest NSR are evaluated for each
 21 segment and land use type. Where there are no NSRs identified, the construction noise levels were not
 22 evaluated for that particular segment or land use.

23 **Table 4.3-7. Route Group 4 Noise Resource Inventory Data**

	Total Miles	Description	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
Subroute 4.1, Proponent Preferred						
U3b	0.5	City of Tucson (near airport)	>100	<50	48–92	83
U3c	1	City of Tucson (6 miles from airport)	>100	<50	44–69	83
U3d	3.4	City of Tucson (6 miles from airport)	>100	<50	44–69	83
U3e	0.9	City of Tucson (6 miles from airport)	>100	<50	44–69	83
U3f	0.7	City of Tucson (6 miles from airport)	>100	200	44–69	74
U3g	0.9	City of Tucson (6 miles from airport)	>100	<50	44–69	83
U3h	1.1	City of Tucson (6 miles from airport)	>100	<50	44–69	83
U3i	18.2	City of Tucson (6 miles from airport)	>100	<50	44–69	83
		City of Tucson (outskirts)	>100	<50	40–67	83
		Agricultural areas	0	–	30–52	–

1 **Table 4.3-7.** Route Group 4 Noise Resource Inventory Data (Continued)

	Total Miles	Description	Estimated Number of NSRs	Estimated Closest Distance to NSR (feet)	Range of Baseline Noise Levels (dBA)	Estimated Construction Noise Levels at Nearest NSR (dBA)
U3j	0.9	Agricultural areas	0	–	30–52	–
U3k	16.7	Agricultural areas	10	<50	30–52	83
		Near Silverbell West	>100	100	30-52	79
		Near highway (250 feet)	0	–	44–64	–
U3l	1.6	Crosses highway (< 250 feet)	0	–	44–64	–
		Near highway (2,500 feet)	0	–	34–54	–
U3m	0.6	Crosses highway (< 250 feet)	0	–	44–64	–
U4	1.9	Desert open space	0	–	8–45	–
Route Group 4 Local Alternatives						
MA1	1.1	Agricultural areas	0	–	30–52	–
TH1a	1.4	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH1b	1.6	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH1c	0.3	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH1–Option	0.4	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH3–Option A	0.8	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH3–Option B	0.8	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH3–Option C	1.8	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH3a	2.7	City of Tucson (6 miles from airport)	>100	<50	44–69	83
TH3b	4.5	City of Tucson (6 miles from airport)	>100	<50	44–69	83

2 Current and predicted noise from substations associated with route group 4 is presented in table 4.3-8.

3 **Table 4.3-8.** Route Group 4 Current and Predicted Noise from Substations

Substation	Distance to Closest NSR (in feet)	Approximate Substation Noise Based on Existing Conditions at NSR	Predicted Approximate Substation Noise Based on Future Conditions at NSR	Change in Noise at NSR
Nogales	5,711	< 40 dBA	< 40 dBA	0
Vail	5,534	< 40 dBA	< 40 dBA	0
Rattlesnake	10,687	< 40 dBA	< 40 dBA	0
Tucson-DMP	934	41 dBA	43–49 dBA	2–8 dBA
Marana	512	<40 dBA	43–53 dBA	3–13 dBA
Saguaro/Tortolita	11,484	< 40 dBA	< 40 dBA	0
DeMoss Petrie	1,476	41 dBA	43–49 dBA	2–8 dBA

4 Note that the Del Bac and DeMoss Petrie substations are not currently anticipated to have a transformer,
5 the primary source of noise at the substations. Based on a standard existing 100-MVA transformer at the

1 Tucson Substation, the existing sound level at the closest NSR is estimated to be 41 dBA. These
2 residences are also located approximately 1,900 feet from the I-10 freeway, which represents another
3 existing source of noise. The addition of the proposed Project and alternatives' 287-MVA transformer is
4 anticipated to result in a sound pressure level of between 43 and 49 dBA. A range is provided, because
5 the precise number, size, and sound rating of the transformers would be determined during detailed
6 design, as would their location and the location of any noise barriers. The nearby DeMoss Petrie
7 Substation is located farther away (approximately 1,500 feet) from the residences and is also shielded by
8 a long intervening brick building. The proposed Project and alternatives' modifications of the DeMoss
9 Petrie Substation are therefore not anticipated to have an additive effect on the sound level at the NSRs.

10 No existing transformers are planned for the proposed Marana Substation; therefore, the existing levels
11 would be expected to be consistent with rural residential areas and may at times be less than 40 dBA.
12 The proposed Project and alternatives' 287-MVA transformer at Marana Substation is anticipated to be
13 between 43 and 53 dBA at the closest NSR. A range is provided, because the precise sound rating of the
14 transformers would be determined during detailed design, as would their location and the location of any
15 noise barriers.

16 Pinal County has an ordinance that addresses excessive noise, and specifically lists land use categories
17 and times where certain limiting sound levels are allowed (see table 8-9 in chapter 3 of the ordinance).
18 The EPA's Noise Control Act of 1972 is more stringent than these values and is used instead of the local
19 regulations.

20 There are seventy-five non-residential NSRs identified for this route group (which includes parks,
21 schools, churches, hospitals, libraries, and cemeteries). Non-residential NSRs in this route group are listed
22 in appendix C.

23 **SUBROUTE 4.1 – PROPONENT PREFERRED**

24 **Construction**

25 The Upgrade Section would not pass any NSRs until it reaches the city of Tucson (Segment U3) and its
26 surrounding communities. The proposed Project and alternatives would traverse a partially urban area
27 with scattered areas of residential development along the 2-mile study corridor. However, no hospitals,
28 cemeteries, schools, or churches are within the 2-mile study corridor of the Upgrade Section. Likewise,
29 no wilderness areas or other public recreation spaces that require low noise limits are in this section
30 either.

31 There are 1,350 identified potential NSRs for this subroute. Most NSRs may experience construction
32 noise levels of between 74 and 83 dBA. There is one NSR on segment U3f that could experience
33 construction noise levels of 69 dBA. Some segments (U3j, U3l, U3m, and U4) have no identified
34 potential NSRs. Approximately 60 non-residential NSRs are located within the area of analysis of this
35 subroute. Multiple non-residential NSRs are located on the proposed Project ROW (Joaquin Murrieta
36 Northwest Park, Christopher Columbus Park, and Rattlesnake Ridge Elementary, all located in Tucson,
37 Arizona). These non-residential NSRs could be expected to experience construction noise levels as high
38 as 83 dBA. Other non-residential NSRs could be expected to experience noise levels as high as 83 dBA.
39 Therefore, using the significance criteria outlined in the beginning of this chapter in table 4.1-1, impacts
40 to noise from subroute 4.1 could be major (i.e., impacts would occur, and could represent a high degree of
41 change over existing baseline conditions); however, construction noise would be short-term, temporary,
42 and intermittent in nature. Therefore, construction noise would represent more of a nuisance and could be
43 mitigated to be below thresholds and/or baseline conditions.

1 **Operation and Maintenance**

2 Substation noise for the Nogales, Vail, Rattlesnake, and Saguaro/Tortolita substations would be expected
3 to remain the same, with no change in noise levels at the distance to the closest NSR. The nearest NSR to
4 the Tucson-DMP, Marana, and DeMoss Petrie substations would all experience higher noise levels
5 (between 2 and 13 dBA). The nearest NSRs would experience noise levels less than the guidelines in the
6 Noise Control Act of 1972. Maintenance activities associated with substations and transmission lines
7 would be similar in noise level to construction-related activities, but would be anticipated to occur less
8 frequently, include fewer individual noise point sources such as pieces of equipment and vehicles, and
9 would be of shorter duration. Therefore, impacts to noise from this route group would be minor and long-
10 term for operation and maintenance activities.

11 **LOCAL ALTERNATIVES**

12 There are 10 local alternatives are available for route group 4. The local alternative includes MA1, TH1a,
13 TH1b, TH1c, TH1-Option, TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

14 **Construction**

15 There are greater than 100 identified potential NSRs. Local alternative MA1 has no identified potential
16 NSRs. For all other segment alternatives, the nearest NSRs could experience construction noise levels as
17 high as 83 dBA. The closest non-residential NSRs were identified along alternative TH1a (Tolson
18 Elementary School), TH1b (Greasewood Park), and TH3-Option C (Santa Cruz River Park). Each of
19 these non-residential NSRs was identified on the ROW; therefore, proposed Project construction noise
20 levels could be expected as high as 83 dBA. Other non-residential NSRs identified for the other
21 alternatives could experience noise levels ranging from 58 to 83 dBA. Using the significance criteria
22 outlined in the beginning of this chapter in table 4.1-1, impacts to noise from local alternatives could be
23 major (i.e., impacts would occur, and could represent a high degree of change over existing baseline
24 conditions); however, construction noise would be short-term, temporary, and intermittent in nature.
25 Therefore, construction noise would represent more of a nuisance and could be mitigated to be below
26 thresholds and/or baseline conditions.

27 **Operation and Maintenance**

28 Maintenance activities associated with substations and transmission lines would be similar in noise level
29 to construction-related activities, but would be anticipated to occur less frequently, include fewer
30 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
31 Therefore, impacts to noise from local alternatives for this route group would be minor and long-term for
32 operation and maintenance activities.

33 ***Agency Preferred Alternative***

34 The Agency Preferred Alternative for route group 1 of the New Build Section would cross primarily
35 desert open space and, therefore, there would be few NSRs affected by noise from this alternative.
36 The Agency Preferred Alternative would pass in and around the city of Deming, New Mexico, where
37 several clusters of both residential and non-residential NSRs are located. The nearest identified sensitive
38 receptors to the route group 1 preferred alternative would be located near the interstate (I-10) and in and
39 around the city of Deming at a distance of approximately 100 feet from the proposed Project ROW.
40 The estimated unmitigated noise levels could be as high as 79 dBA during Project construction; however,
41 construction activities would be temporary and intermittent in nature, while operation and maintenance
42 activities would be long-term but would involve less noise point sources and also be intermittent in

1 nature. Additionally, standard construction mitigation measures, built-in design features, and incorporated
2 BMPs would further reduce noise levels below the predicted maximum. While some of the alternatives to
3 the Agency Preferred Alternative would avoid the city of Deming, these alternatives would pick up
4 additional NSRs (such as in and around Columbus, New Mexico) and, therefore, the amount and
5 proximity of NSRs for these alternatives is not substantively different from those of the Agency Preferred
6 Alternative.

7 The Agency Preferred Alternatives segments LD3a, LD4, LD4-Option 5, and P7 for route group 2 of the
8 New Build Section would cross primarily desert open space and agricultural areas with few NSRs.
9 The choice of these alternatives avoids the towns and cities of the Proponent Alternative and another local
10 alternative (WC1). While there were few identified NSRs near the Agency Preferred Alternative for route
11 group 2, the nearest NSRs would be located close to the Project ROW (potentially within 50 feet of
12 construction activities) and could experience noise levels as high as 83 dBA. As discussed, construction
13 would be temporary and intermittent in nature, and proposed Project construction noise would be further
14 ameliorated by the use of standard construction mitigation measures, built-in design features, and
15 incorporated BMPs. Project operation and maintenance activities would be long-term, but involve less
16 noise point sources and also be intermittent in nature.

17 Segments U1a, U1b, U2, and U3a in route group 3 of the Agency Preferred Alternative have a large
18 number of potential NSRs near the proposed Project in and near the towns and cities of Benson, Mescal,
19 Vail, and Tucson in Arizona. Outside of these developed areas, the Agency Preferred Alternative would
20 cross primarily desert open spaces and agricultural lands, with few NSRs. The nearest NSRs identified
21 would be within approximately 100 feet of the proposed Project ROW and therefore could experience
22 construction noise as high as 83 dBA. As discussed, Project construction, operation, and maintenance
23 noise would be short-term and/or intermittent in nature and would be further mitigated through
24 construction mitigation measures, built-in design features, and incorporated BMPs. The only alternative
25 proposed for route group 3 and the Agency Preferred Alternative, local alternative H, would avoid the city
26 of Benson and therefore the NSRs associated with that city.

27 As all of the route group 4 alternatives pass through a large urban area (the city of Tucson and outskirts),
28 no substantive differences exist between the Agency Preferred Alternative and the other alternatives in
29 regards to noise impacts to sensitive receptors. The nearest identified receptors would be within 50 feet
30 and would experience noise levels as high as 83 dBA under the Agency Preferred Alternative or any other
31 alternative in this route group. Project construction, operation, and maintenance noise would be short-
32 term and/or intermittent in nature and would be further mitigated through construction mitigation
33 measures, built-in design features, and incorporated BMPs.

34 Therefore, overall impacts to noise from the Agency Preferred Alternative for construction activities
35 could be major; however, construction noise would be short-term, temporary, and intermittent in nature.
36 Maintenance activities associated with substations and transmission lines would be similar in noise level
37 to construction-related activities, but would be anticipated to occur less frequently, include fewer
38 individual noise point sources such as pieces of equipment and vehicles, and would be of shorter duration.
39 Therefore, impacts to noise from the Agency Preferred Alternative would be minor and long-term for
40 operation and maintenance activities.

41 ***Additional Mitigation Measures***

42 In addition to the proponent-committed environmental protection measures and BMPs from the POD, the
43 following measures could be implemented to further reduce or eliminate the effects of the proposed
44 Project. The DOE and BLM prepared a PEIS in November 2008 titled “Designation of Energy Corridors

1 on Federal Land in the 11 Western States” (DOE and BLM 2008). Within this PEIS, the BLM also offers
2 recommended mitigation measures as ways to reduce potential noise impacts:

- 3 • For construction-related noise impacts:
 - 4 ◦ “Schedule construction activities and route construction traffic to minimize disruption to
5 nearby residents and existing operations surrounding the Project.”
 - 6 ◦ “Noisy construction activities (including blasting) should be limited to the least noise-
7 sensitive times of day (daytime only between 7 a.m. and 10 p.m.) and to weekdays.
8 In sensitive wildlife areas, they should be limited to between 1.5 hours after sunrise and
9 1.5 hours before sunset.”
 - 10 ◦ “Erect temporary wooden noise barriers around areas where construction equipment would
11 disturb sensitive receptors.”
 - 12 ◦ “To the extent possible, locate noisy equipment away from sensitive receptors.”
 - 13 ◦ “Whenever feasible, schedule noise [-generating] activities to occur at the same time, since
14 additional sources of noise generally do not add noise. That is, less-frequent noise activities
15 would be less annoying than frequent less-noisy activities.”
 - 16 ◦ “If blasting or other noisy activities are required during the construction period, notify nearby
17 residents in advance.”
- 18 • For operations-related noise impacts:
 - 19 ◦ “If possible, minimize trips for surveillance and monitoring of pipelines and/or transmission
20 lines by the energy transport system operating companies.”

21 ***Residual Impacts***

22 The proposed Project would result in temporary increases to ambient noise levels from the construction of
23 the transmission lines, substations, and ancillary facilities. Some of these temporary increases would
24 exceed local or Federal noise regulations or guidelines. The built-in design features, incorporated BMPs,
25 and mitigation measures would reduce, but not altogether eliminate, proposed Project impacts to noise.
26 Limited increases to ambient noise would result from proposed Project operation over the lifetime of the
27 Project. The proposed Project would not be expected to increase noise levels to levels that could impose
28 restrictions on land currently planned for residential development or affect any places of traditional use
29 that are NRHP listed or eligible, or identified as important to tribes.

30 ***Unavoidable Adverse Impacts***

31 The proposed Project could result in unavoidable increases in ambient noise levels over the life of the
32 Project. Construction noise represents the largest increase in noise, but that noise is temporary. Operation
33 and maintenance noise would persist through the life of the proposed Project, but is expected to be
34 negligible. Additionally, operation and maintenance noise from the proposed Project can be expected to
35 decrease for the Upgrade Section because there is expected to be less maintenance activity with the
36 installation of a new transmission line; however, this change can be expected to be negligible. Substation
37 noise at the nearest NSR would stay the same or increase slightly. In general, the DOE and BLM state in a
38 PEIS titled “Designation of Energy Corridors on Federal Land in the 11 Western States” (DOE and BLM
39 2008) that the sound level at the edge of the ROW (200 feet from the transmission line) would be about
40 44 dBA and would fall to 35 dBA at 0.25 mile from the edge. As modeled for the proposed Project,
41 corona noise can be expected to be as high as 52.4 dBA in foul weather and where the transmission lines
42 are located near each other. Corona noise on the Upgrade Section of the proposed Project would be

1 expected to decrease due to new equipment, the increased height from the ground, and configuration of
2 the circuit.

3 ***Short-term Uses versus Long-term Productivity***

4 The proposed Project would cause some short-term ambient noise level increase during the construction
5 of the transmission lines, substations, and ancillary facilities. This increase in ambient noise would be
6 reduced through the use of built-in design features, incorporated BMPs, and mitigation measures. Long-
7 term impacts would be negligible because operation of the proposed Project would not create noise that
8 would exceed any standard. Therefore, no effects on the maintenance and enhancement of long-term
9 productivity related to noise would occur because of the implementation of the proposed Project.

10 ***Irreversible and Irrecoverable Commitments of Resources***

11 While there would be a limited amount of loss of lower ambient noise levels during proposed Project
12 operation, there would not be any irreversible or irretrievable commitment of resources from the
13 implementation of the proposed Project, as ambient soundscapes would be restored after proposed Project
14 decommissioning.

15 **4.4 GEOLOGY AND MINERAL RESOURCES**

16 **4.4.1 Introduction**

17 This section describes the impacts to geological and mineral resources that could potentially occur during
18 construction, operation, and maintenance of the proposed Project, and also addresses the impacts of
19 geology on the proposed Project facilities. Impacts to geological and mineral resources are discussed in
20 terms of whether the proposed Project and alternatives would result in significant effects on geological
21 and mineral resources by analyzing the context and intensity of the change that would be introduced by
22 the Project, in accordance with CEQ regulations at 1508.27. This section also addresses the methodology
23 for determining the impacts of geology on the proposed Project facilities. In order to facilitate the
24 comparison of alternatives, potential environmental changes are described in terms of temporal scale,
25 spatial extent, and significance. The impacts described in this section are based on data available in
26 “Southline Transmission Project Resource Report 4: Geology and Minerals” (CH2M Hill 2013c).
27 The contents of that report are used herein without specific reference.

28 **4.4.2 Methodology and Assumptions**

29 This section describes the area that was analyzed for determining the effects of the proposed Project on
30 geological and mineral resources, how effects would be measured, the assumptions used when evaluating
31 the effects, and what criteria must be met for an impact to be considered significant.

32 ***Analysis Area***

33 The analysis area for the purpose of evaluating effects and impacts is the corridor of the ROW, plus the
34 footprints of substations and construction laydown areas located outside the ROW. The ROW for the New
35 Build Section would be 200 feet wide, and the ROW for the Upgrade Section would be 150 feet wide.
36 This analysis area is sufficient for identifying resources that could be directly impacted by ground
37 disturbance during construction and that would be precluded from mining access during operation and
38 maintenance.

1 **Analysis Assumptions**

2 The following factors were assumed when evaluating the effects of the proposed Project on geological
3 and mineral resources:

- 4 • A geotechnical engineering study would be completed prior to final design and construction of
5 the Project to identify site-specific geological conditions and potential geological hazards.
6 The data collected from the study would be used to guide sound engineering practices, and
7 foundation design would be consistent with geological conditions for each tower site.
- 8 • Existing fault lines, land subsidence areas, earth fissures, mining claims, oil/gas reserves, areas of
9 mineral resources of economic value, and other pertinent geological and mineral-related features
10 have been accurately mapped.
- 11 • Operation and maintenance of the Project, as it relates to geological and mineral resources, would
12 primarily be the presence of transmission towers and transmission lines and how they could
13 preclude access to underground resources in the immediate vicinity.
- 14 • Transmission lines typically have little impact to mining operations. Span lengths are such that
15 access to minerals can be accomplished between spans. Should open pit mining be planned,
16 structures can be left on 'islands,' or the mining interests can have the transmission line locally
17 re-routed (personal communication, Mark Wieringa, 2013).

18 **Impact Indicators**

19 The following indicators were considered when analyzing the effects on geology and mineral resources:

- 20 • Types of geological hazards and the potential of the Project to aggravate existing hazards;
- 21 • Types of geological hazards and their potential for affecting the Project;
- 22 • The potential for the Project to negatively affect important geological resources, including
23 important State-identified rock outcroppings and potential geothermal areas; and
- 24 • The potential for the Project to negatively affect access to important mineral and petroleum
25 resources.

26 While many of the potential impacts are difficult to quantify, "units of change" for the items above are
27 based on the number of claims, leases, oil/gas wells, geological features, and locatable, leasable, and/or
28 saleable mineral areas within the analysis area; or the acreage of overlap between the Project ROW and
29 certain resources. Measured impacts are followed by a binary determination regarding whether or not they
30 are likely to be lost or occluded, and quantification of impacts when possible.

31 **Significant Impacts**

32 For the purposes of this analysis, a significant impact on geology and mineral resources could result if any
33 of the following were to occur from construction or operation and maintenance of the proposed Project:

- 34 • Areas of geological importance are lost or made inaccessible for future use;
- 35 • Important State-identified rock outcroppings are adversely affected;
- 36 • Known mineral resources of economic value are lost or made inaccessible;
- 37 • Project activity (construction, operation, or maintenance) would locate ROW over a mining claim
38 located on or before July 23, 1955, or otherwise affect a valid existing mineral right;
- 39 • Project activity (construction, operation, or maintenance) would locate ROW over oil or gas well
40 fields, reserves, or otherwise affect valid existing petroleum rights;

- 1 • Project would occur in an area of known geological hazard;
- 2 • Structures would fail or create hazards due to slope instability, the effects of earthquakes, or land
- 3 subsidence; and
- 4 • Project would create geological hazards, particularly increases in the probability or magnitude of
- 5 mass wasting events.

6 **4.4.3 Impacts Analysis Results**

7 ***No Action Alternative***

8 Under the no action alternative, the New Build Section would not be constructed. In the New Build

9 Section, undisturbed areas and existing geology and mineral resources would remain undisturbed unless

10 they are mined in unrelated actions. Underground resources would not be precluded from access within

11 the proposed Project ROW. Geological activity such as fault creep, earthquakes, landslides, and land

12 subsidence and earth fissures would continue to occur.

13 Even under the no action alternative, Western still plans to upgrade the existing lines between Apache and

14 Saguaro substations within the next 10 years, in accordance with Western's 10-year capital improvement

15 plan (Western 2012a). The Upgrade Section would remain in its current state as a disturbed ROW with

16 transmission towers and transmission lines, until such time as Western upgrades the line.

17 ***Impacts Common to All Action Alternatives***

18 Many of the potential impacts discussed in chapter 3 would universally apply to all action alternatives.

19 Resources not present are discussed first, then potential impacts common to all alternatives are discussed

20 below as they each relate to construction, operation, and maintenance of the Project.

21 **GEOLOGICAL FAULTS**

22 As discussed in chapter 3, no active faults have been mapped in any alternatives in the analysis area.

23 **VOLCANOES**

24 As discussed in chapter 3, no potentially active volcanoes have been identified or are being monitored in

25 the proposed Project vicinity.

26 **AREAS OF UNIQUE GEOLOGICAL INTEREST**

27 As discussed in chapter 3, no areas of unique geological interest, caves, rock outcroppings, or mineral

28 collection areas of recreational or scientific importance have been identified within the analysis area.

29 **OIL AND GAS WELLS AND COAL RESOURCES**

30 As discussed in chapter 3, no wells in the analysis area are currently producing oil or gas, and there are no

31 coal leases or known coal resources within the analysis area.

32 **PRE-1955 MINING CLAIMS**

33 As discussed in chapter 3, no known pre-1955 mining claims are present within the analysis area.

1 **CONSTRUCTION**

2 All action alternatives would involve drilling, blasting, excavation, etc., during construction. The potential
3 impacts from construction include:

- 4 • areas of geological importance lost or made inaccessible for future use (direct);
- 5 • adversely affected important State-identified rock outcroppings (direct);
- 6 • known mineral resources of economic value or pre-1955 mining claims lost or made inaccessible
7 (direct);
- 8 • affecting a valid existing mineral right by preclusion of access (direct);
- 9 • affecting oil or gas well fields, reserves, or otherwise affecting valid existing petroleum rights by
10 preclusion of access (direct); and
- 11 • creation or exacerbation of geological hazards, particularly increases in the probability or
12 magnitude of mass wasting events or hazards due to slope instability (indirect).

13 **Land Subsidence**

14 Most cases of land subsidence in the Southwest are caused by excessive groundwater pumping. This type
15 of subsidence occurs very slowly over decades (AZGS 1993). Therefore, land subsidence would not have
16 direct or indirect effects on the operation and maintenance of the Project.

17 **Earth Fissures**

18 Existing earth fissures are discrete locations that are easily identified and that would be avoided during
19 final Project design for tower placement. Although the exact location of a future fissure cannot be
20 predicted, areas where fissures are likely to form have been identified. These areas would be avoided
21 where feasible, and appropriately engineered foundations would be installed to mitigate this potential
22 hazard. For the purposes of actual construction activities, fissures are generally easy to fill, span, or drive
23 around and would not pose challenges. Therefore, direct or indirect impacts from earth fissures would not
24 be anticipated.

25 **Earthquakes**

26 As described in chapter 3, the seismic hazard is relatively low (“moderate to low” to “low”) for the region
27 that encompasses all action alternatives. Because proposed Project activities would have no means of
28 influencing seismicity, the frequency and magnitude of earthquakes would not be directly or indirectly
29 impacted from construction of any action alternative.

30 **Landslides**

31 Areas with slopes greater than 25 percent were identified in chapter 3 as having the potential for
32 landslides or mass wasting events. The proposed Project would be designed to avoid steep slopes where
33 possible, and a preconstruction geotechnical study would identify areas that need engineered solutions to
34 mitigate for the potential for mass wasting events. Therefore, the potential for landslides would not likely
35 be changed by construction and direct or indirect effects to the potential for landslides would not be
36 anticipated.

1 **Karst and Cave Areas**

2 The mapped karst and cave areas are places that “may have the potential” to contain underground
3 fissures, tubes, and caves. If present, individual caves and voids would be identified during
4 preconstruction geotechnical studies, and would be avoided if it is determined that there is a danger to
5 humans, the environment, or proposed Project infrastructure. Because they would be avoided, no direct or
6 indirect impacts would be anticipated from karst and cave areas during construction of any action
7 alternative.

8 **Mining Districts**

9 Direct impacts to mining districts during construction would be immediate preclusion of access to
10 underground resources within the ROW as the proposed Project is constructed. However, this impact
11 would only have consequences in areas within active mining districts where active mines are located. It
12 should be noted that mining districts are not mines; they are large areas within which mining occurs and
13 within which specific mines are located. Because the final route would be sited such that impacts to active
14 mining operations are avoided, construction would cause no direct impacts to operating mines and mining
15 districts. Because construction would be limited to the ROW, construction-related indirect impacts would
16 not be anticipated. Continued preclusion of access to these resources by virtue of the existence of the
17 proposed Project is described below in the “Operation and Maintenance” section.

18 However, transmission lines typically have little impact to mining operations. Span lengths are such that
19 access to minerals can be accomplished between spans. Should open pit mining be planned, structures can
20 be left on ‘islands,’ or the mining interests can have the transmission line locally re-routed. Transmission
21 line structures are routinely moved to accommodate surface mining (personal communication, Mark
22 Wieringa, 2013).

23 **Geothermal Resources**

24 No geothermal leases have ever been established on or near the analysis area, and there has never been
25 any commercial production anywhere in or near the analysis area. The moderate temperatures and limited
26 geographic area likely preclude the potential for generating electricity, leaving only direct-use
27 applications, like heating greenhouses. The potential for geothermal development in this area is “low to
28 very low.” No commercially viable geothermal resources are located on the Arizona portion of the
29 analysis area. For these reasons, no direct or indirect impacts to geothermal resources would be
30 anticipated from construction of any action alternative.

31 **OPERATION AND MAINTENANCE**

32 Operation and maintenance of the proposed Project, as it relates to impacts to geological and mineral
33 resources, would primarily consist of the presence of transmission towers, transmission lines, and
34 maintenance roads and how they preclude access to underground resources in the immediate vicinity.
35 Potential impacts from operation include:

- 36 • continued preclusion of access to mineral and petroleum resources (direct); and
- 37 • damage to the proposed Project from preexisting or exacerbated geological hazards such as mass
38 wasting events, hazards due to slope instability, or the effects of earthquakes or land subsidence
39 (direct).

1 **Land Subsidence**

2 Most cases of land subsidence in the Southwest are caused by excessive groundwater pumping. This type
3 of subsidence occurs very slowly over decades and affects broad areas; as such, structures sink uniformly
4 with the ground and are not damaged. Because the severity of subsidence increases from the edges to the
5 center like a bowl, certain infrastructure like canals and sewers, which rely on slope, can be damaged or
6 rendered inoperable (AZGS 1993). Transmission lines, however, are not slope-dependent and would not
7 be affected in such a way. Therefore, no direct or indirect effects on the proposed Project would be
8 anticipated from land subsidence.

9 **Earth Fissures**

10 Whereas isolated poles and towers have very narrow bases of support and may lean or fall in the case of a
11 new fissure forming, poles that hold utility lines such as electric transmission lines may be prevented
12 from falling or leaning by the support of adjacent poles and taut lines (AZGS 1993). Although the exact
13 location of a future fissure cannot be predicted, areas where fissures are likely to form have been
14 identified. These areas would be avoided where feasible, and appropriately engineered foundations would
15 be designed to mitigate for this potential hazard.

16 **Earthquakes**

17 As described in chapter 3, the seismic hazard is relatively low (“moderate to low” to “low”) for the region
18 that encompasses all action alternatives. No direct or indirect impacts would be anticipated from
19 earthquakes during operation and maintenance of any action alternative.

20 **Landslides**

21 Neither operation nor maintenance of the proposed Project would involve blasting, road-cutting, ground
22 disturbance, or other activities that could exacerbate the potential for landslides and mass wasting.
23 Therefore, operation and maintenance of the proposed Project would not be expected to have any direct or
24 indirect effects on the potential for landslides.

25 **Karst and Cave Areas**

26 As discussed above, caves and voids would be identified during preconstruction geotechnical studies and
27 would be avoided if it is determined that there is a danger to humans, the environment, or proposed
28 Project infrastructure. Because they would be avoided, no direct or indirect impacts from karst and cave
29 areas would be anticipated from operation and maintenance of any action alternative.

30 **Mining Districts**

31 During operation and maintenance of the proposed Project, underground resources would be physically
32 precluded from access in the vicinity of the towers. Blasting would be restricted in the vicinity of the
33 towers and anywhere within the ROW. The final route would be located such that impacts to active
34 mining operations are avoided. Therefore, operation and maintenance of the proposed Project would not
35 directly impact active mines or mining districts, but could have potential long-term indirect impacts by
36 precluding access to underground resources within the ROW for future mining.

37 However, transmission lines typically have little impact to mining operations. Span lengths are such that
38 access to minerals can be accomplished between spans. Should open pit mining be planned, structures can
39 be left on ‘islands,’ or the mining interests can have the transmission line locally re-routed. Transmission

1 line structures are routinely moved to accommodate surface mining (personal communication, Mark
 2 Wieringa, 2013).

3 **Geothermal Resources**

4 No geothermal leases have ever been established on or near the analysis area, and there has never been
 5 any commercial production anywhere in or near the analysis area. The moderate temperatures and limited
 6 geographic area likely preclude the potential for generating electricity, leaving only direct-use
 7 applications, like heating greenhouses. The potential for geothermal development in this area is “low to
 8 very low.” No commercially viable geothermal resources are located on the Arizona portion of the
 9 analysis area. For these reasons, no direct or indirect impacts to geothermal resources would be
 10 anticipated during operation and maintenance of any action alternative.

11 **SUMMARY OF IMPACTS COMMON TO ALL ACTION ALTERNATIVES**

12 Because the only potential impacts identified above are indirect impacts to mining districts during
 13 operation and maintenance, this topic will be discussed further below. Because the boundaries of mining
 14 districts are somewhat arbitrary and are not exact, the acreages and calculations described below are not
 15 intended to be interpreted as precise data. The other topics described above are not further discussed in
 16 this chapter. It should be kept in mind that as discussed above, transmission lines typically have little
 17 impact to mining operations.

18 ***Route Group 1 – Afton Substation to Hidalgo Substation***

19 Several mining districts would be crossed by the various alternatives of route group 1, and table 4.4-1
 20 below details the acres of overlap between the mining districts and the ROWs of the various alternatives.
 21 For each alternative, the types of impacts would be as described in the “Impacts Common to All Action
 22 Alternatives” section above, with only the amounts of impact (acres of overlap) varying between the
 23 alternatives.

24 Of the mining districts crossed by the alternatives in this route group, only the Aden district is known to
 25 be active (McLemore 1998; McLemore et al. 1996; McLemore et al. 2005). Table 4.4-1 describes the
 26 acres of each mining district crossed by segment within each alternative, and table 4.4-2 describes the
 27 acres of overlap by mining district within each alternative.

28 **Table 4.4-1.** Route Group 1 Geology Resource Inventory Data by Segment

Segment	Total Miles	Mining Districts Crossed (acres)	Districts Crossed	Production Years (active or inactive)	Size of Mining District (acres)	Percentage of Mining District Affected
Subroute 1.1, Proponent Preferred						
P1	5.1	125	Aden	1950s to present (active)	514,300	0.02%
P2	102.0	590	Aden	1950s to present (active)	514,300	0.10%
P3	31.1	–	–	–	–	–
P4a	8.7	–	–	–	–	–

29

1 **Table 4.4-1.** Route Group 1 Geology Resource Inventory Data by Segment (Continued)

Segment	Total Miles	Mining Districts Crossed (acres)	Districts Crossed	Production Years (active or inactive)	Size of Mining District (acres)	Percentage of Mining District Affected
Subroute 1.2, Proponent Alternative						
S1	13.4	325	Aden	1950s to present (active)	514,300	0.06%
S2	11.1	204; 63	Aden; Potrillo Mountains	1950s to present (active); Unknown (inactive)	514,300; 16,822	0.040%; 0.40%
S3	12.9	121	Aden	1950s to present (active)	514,300	0.02%
S4	10.6	75	Camel Mountain–Eagle Nest	None (inactive)	13,967	0.50%
S5	29.7	–	–	–	–	–
S6	7.4	120	Carrizalillo Hills	Late 1800s, 1930–1956 (inactive)	41,438	0.30%
S7	41.5	4	Carrizalillo Hills	Late 1800s, 1930–1956 (inactive)	41,438	0.01%
S8	14.6	–	–	–	–	–
Route Group 1 Local Alternatives						
DN1	42.5	142	Fluorite Ridge	1909–1954 (inactive)	26,755	0.50%
A	17.5	265	Aden	1950s to present (active)	514,300	0.05%
B	12.2	54	Camel Mountain–Eagle Nest	None (inactive)	13,967	0.40%
C	9.0	108	Carrizalillo Hills	Late 1800s, 1930–1956 (inactive)	41,438	0.30%
D	22.8	58	Lordsburg Mesa	1885–1978, 1990–1999 (inactive)	34,579	0.20%
Representative Staging Areas						
1	NA	20	Aden	1950s to present (active)	514,300	0.004%
S1	NA	20	Aden	1950s to present (active)	514,300	0.004%
S2	NA	20	Aden	1950s to present (active)	514,300	0.004%
S5	NA	20	Carrizalillo Hills	Late 1800s, 1930–1956 (inactive)	41,438	0.05%

2 Note: NA = not applicable (size of each staging area is approximately 20 acres, entirely within mining district)

1 **Table 4.4-2.** Route Group 1 Geology Resource Inventory Data by Mining District

Mining Districts Crossed	Production Years (active or inactive)	Acres of Overlap with ROW	Size of Mining District (acres)	Percentage of Mining District Affected
Subroute 1.1, Proponent Preferred				
Aden	1950s to present (active)	715	514,300	0.14%
Subroute 1.2, Proponent Alternative				
Aden	1950s to present (active)	650	514,300	0.12%
Potrillo Mountains	Unknown (inactive)	63	16,822	0.37%
Camel Mountain–Eagle Nest	None (inactive)	75	13,967	0.54%
Carrizalillo Hills	Late 1800s, 1930–1956 (inactive)	124	41,438	0.30%
Route Group 1 Local Alternatives				
Fluorite Ridge (DN1)	1909–1954 (inactive)	142	26,755	0.53%
Aden (A)	1950s to present (active)	265	514,300	0.05%
Camel Mountain–Eagle Nest (B)	None (inactive)	54	13,967	0.39%
Carrizalillo Hills (C)	Late 1800s, 1930–1956 (inactive)	108	41,438	0.26%
Lordsburg Mesa (D)	1885–1978, 1990–1999 (inactive)	58	16,333	0.36%

2 Sources: McLemore (1998); McLemore et al. (1996); McLemore et al. (2005).

3 **SUBROUTE 1.1 – PROPONENT PREFERRED**

4 This alternative would only cross through one mining district, the Aden district. This is an active mining
 5 district. A total of 715 acres of the district would be precluded from access for future mining—a long-
 6 term indirect impact. Although this represents 20 percent of the total ROW for this alternative, it
 7 represents only 0.14 percent of the Aden district. No active mines would be crossed.

8 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

9 This alternative would cross through 912 acres of mining districts, 650 acres of which are within the
 10 active Aden district. The remainder would be within inactive districts. A total of 912 acres would be
 11 precluded from access for future mining—a long-term indirect impact. Although this represents 27
 12 percent of the total ROW for this alternative, it represents only 0.16 percent of the 586,527 combined
 13 acres of the districts (0.12 percent of the Aden district, 0.37 percent of the Potrillo mountain district, 0.54
 14 percent of the Camel Mountain–Eagle Nest district, and 0.30 percent of the Carrizalillo Hills district).
 15 No active mines would be crossed.

16 **LOCAL ALTERNATIVES**

17 There are five local alternatives available for route group 1. These local alternatives include DN1, A, B,
 18 C, and D. Impacts to mining districts crossed by these alternatives would be long-term indirect impacts
 19 from preclusion from access for future mining.

20 Local alternative DN1 would impact 0.53 percent of the Fluorite Ridge mining district. Local alternative
 21 A would impact 0.05 percent of the Aden mining district; B would impact 0.39 percent of the Camel

1 Mountain–Eagle Nest mining district, C would impact 0.26 percent of the Carrizalillo Hills mining
2 district, and D would impact 0.36 percent of the Lordsburg Mesa mining district. The Aden district is the
3 only active mining district among those impacted by the local alternatives. No active mines would be
4 crossed.

5 **REPRESENTATIVE STAGING AREAS**

6 Representative staging areas 1, S1, and S2 would each overlap 20 acres (0.004 percent) of the active Aden
7 mining district. Staging area S5 would overlap 20 acres (0.05 percent) of the Carrizalillo Hills district.
8 No active mines would be located within the proposed footprint of any staging areas.

9 ***Route Group 2 – Hidalgo Substation to Apache Substation***

10 Several mining districts are crossed by the various alternatives of route group 2. Table 4.4-3 details the
11 acres of overlap between the mining districts and the ROWs of the various alternatives. For each
12 alternative, the types of impacts would be as described in the “Impacts Common to All Action
13 Alternatives” section above, with only the amount of impact (acres of overlap) varying between the
14 alternatives.

15 Of the districts crossed by the alternatives in this route group, only the Bowie mining district is known to
16 be active (McLemore 1998; McLemore et al. 1996; McLemore et al. 2005). Table 4.4-3 describes the
17 acres of each mining district that would be crossed by segment within each alternative and the acres of
18 overlap by mining district within each alternative.

19 **Table 4.4-3.** Route Group 2 Geology Resource Inventory Data by Segment

Segment	Total Miles	Mining Districts Crossed (acres)	Districts Crossed	Production Years (active or inactive)	Size of Mining District (acres)	Percentage of Mining District Affected
Subroute 2.1, Proponent Preferred						
P4b	14.0	35	Lordsburg Mesa	None (inactive)	34,579	0.10%
P4c	1.9	–	–	–	–	–
P5a	9.6	–	–	–	–	–
P5b	21.1	77	Kimball	1875–1953 (inactive)	11,078	0.70%
P6a	0.9	–	–	–	–	–
P6b	22.5	–	–	–	–	–
P6c	2.8	–	–	–	–	–
P7	22.3	–	–	–	–	–
P8	0.5	–	–	–	–	–
Subroute 2.2, Proponent Alternative						
E	31.8	74	Kimball	1875–1953 (inactive)	11,078	0.67%
F	25.3	–	–	–	–	–
Ga	25.7	–	–	–	–	–
Gb	1.0	–	–	–	–	–
Gc	7.4	–	–	–	–	–
I	2.3	–	–	–	–	–
J	2.3	–	–	–	–	–

20

1 **Table 4.4-3.** Route Group 2 Geology Resource Inventory Data by Segment (Continued)

Segment	Total Miles	Mining Districts Crossed (acres)	Districts Crossed	Production Years (active or inactive)	Size of Mining District (acres)	Percentage of Mining District Affected
Route Group 2 Local Alternatives						
LD1	35.4	13	Kimball	1875–1953 (inactive)	11,078	0.12%
LD2	9.6	–	–	–	–	–
LD3a	27.9	124	Lordsburg Mesa	None (inactive)	34,579	0.36%
LD3b	1.9	–	–	–	–	–
LD4	51.7	121	Bowie	1960s to present	4,000 (estimated)	3.03%
LD4-Option 4	6.5	–	–	–	–	–
LD4-Option 5	12.3	–	–	–	–	–
WC1	14.8	–	–	–	–	–
Representative Staging Areas						
LD3	NA	18	Lordsburg Mesa	None (inactive)	34,579	0.05%
7	–	–	–	–	–	–
9	–	–	–	–	–	–
E	–	–	–	–	–	–
Ga	–	–	–	–	–	–
Gb	–	–	–	–	–	–
LD1b	–	–	–	–	–	–
Southline Apache Substation Expansion	–	–	–	–	–	–
SWTC Apache Substation Expansion	–	–	–	–	–	–
WC1	–	–	–	–	–	–

2 Note: NA = not applicable.

3 **SUBROUTE 2.1 – PROPONENT PREFERRED**

4 This alternative would cross through 112 acres of mining districts, none of which are within active
 5 districts. A total of 112 acres would be precluded from access for future mining—a long-term indirect
 6 impact. Although this would represent 4.8 percent of the total ROW for this alternative, it would represent
 7 only 0.25 percent of the 45,657 combined acres of the districts crossed (0.10 percent of the Lordsburg
 8 Mesa district and 0.70 percent of the Kimball district). No active mines would be crossed.

9 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

10 This alternative crosses through 74 acres of the Kimball mining district, an inactive district. A total of
 11 74 acres would be precluded from access for future mining—a long-term indirect impact. Although this
 12 would represent 3.2 percent of the total ROW for this alternative, it would represent only 0.67 percent of
 13 the 11,078 total acres of the district. No active mines would be crossed.

1 **LOCAL ALTERNATIVES**

2 There are eight local alternatives available for route group 2, three of which (LD1, LD3a, and LD4)
3 would cross through mining districts. Local alternative LD1 would cross through 13 acres (0.12 percent)
4 of the inactive Kimball district, and local alternative LD3a would cross through 124 acres (0.36 percent)
5 of the Lordsburg Mesa district. Local alternative LD4 would cross through approximately 121 acres
6 (3.03%) of the Bowie Mining District. No active mines would be crossed.

7 **REPRESENTATIVE STAGING AREAS**

8 Representative staging area LD3 would cross through 18 acres (0.05 percent) of the inactive Lordsburg
9 Mesa district. No other proposed staging areas would cross mining districts, and no active mines would
10 be crossed. It is unknown if any of the proposed staging areas overlap with the Bowie Mining District.

11 ***Route Group 3 – Apache Substation to Pantano Substation***

12 Because the Upgrade Section would run primarily through broad alluvial basins, there are very few
13 mineral resources in the vicinity of route group 3. No metal or nonmetallic mineral resources were
14 specifically identified within the Upgrade Section. No known mines, active or inactive, would be crossed
15 by the Upgrade Section. Therefore, the proposed Project would not have direct or indirect effects on
16 mining in this route group.

17 ***Route Group 4 – Pantano Substation to Saguaro Substation***

18 Because the Upgrade Section runs primarily through broad alluvial basins, there are very few mineral
19 resources in the vicinity of route group 4. No metal or nonmetallic mineral resources were specifically
20 identified within the Upgrade Section. No known mines, active or inactive, would be crossed by the
21 Upgrade Section. Therefore, the proposed Project would not have direct or indirect effects on mining in
22 this route group.

23 **AGENCY PREFERRED ALTERNATIVE**

24 Because the Agency Preferred Alternative maximizes use of existing and proposed linear ROW by
25 paralleling existing and proposed infrastructure and transmission lines, the impacts and acreage of mining
26 districts crossed would be similar for all action alternatives, including the Agency Preferred Alternative.
27 No known mines, active or inactive, would be crossed by the Agency Preferred Alternative. Impacts
28 would be similar as described under Impacts Common to All Action Alternatives. However, transmission
29 lines typically have little impact to mining operations. Span lengths are such that access to minerals can
30 be accomplished between spans. Should open pit mining be planned, structures can be left on ‘islands,’
31 or the mining interests can have the transmission line locally re-routed. Transmission line structures are
32 routinely moved to accommodate surface mining (personal communication, Mark Wieringa, 2013).

33 The Agency Preferred Alternative would cross approximately 960 acres (combined) of the active Aden
34 Mining District (715 acres), the inactive Lordsburg Mesa Mining District (124 acres), and the active
35 Bowie mining district (121 acres). This represents approximately 0.17 percent of the mining districts
36 crossed.

37 ***Additional Mitigation Measures***

38 In addition to the proponent-committed environmental protection measures and BMPs previously
39 described elsewhere, the following measures would be implemented to further reduce or eliminate the

1 effects of the proposed Project. Southline would prepare a geotechnical engineering study prior to the
2 final Project design to identify site-specific geological conditions and potential geological hazards.
3 The data collected from the study would be used to guide sound design and engineering and mitigate
4 potential geological hazards. By means of this DEIS, Southline would attempt to identify any areas within
5 the ROW where mineral rights, mining claims, and petroleum resources are located. Southline would
6 attempt to design the proposed Project such that access to underground resources in those areas is not
7 precluded by the ROW.

8 ***Residual Impacts***

9 It is anticipated that the mitigation described above would eliminate or reduce impacts to geology and
10 mineral resources. However, as previously discussed, transmission lines typically have little impact to
11 mining operations. Access to minerals can be accomplished between spans, or structures can be left on
12 'islands,' or the mining interests can have the transmission line locally re-routed. In this case,
13 transmission lines would not produce obvious changes in the baseline condition of the resource; there
14 would be no residual impacts. The area of this impact would vary with each alternative, subalternative,
15 and combination of segments. If the area under the ROW was never intended to be mined even if the
16 proposed Project did not exist, then there would be no residual impacts.

17 ***Unavoidable Adverse Impacts***

18 Because transmission lines typically have little impact to mining operations, access to minerals can be
19 accomplished between spans, and structures can be left on 'islands' or the mining interests can have the
20 transmission line locally re-routed, there would be no unavoidable adverse impacts to geological and
21 mineral resources.

22 ***Short-term Uses versus Long-term Productivity***

23 Transmission lines may need to be locally re-routed to accommodate surface mining. However, this is
24 only considered an adverse impact (1) in areas defined as mining districts, (2) only in specific locations
25 within mining districts that are active or would have become active. Because only one of the several
26 mining districts crossed by the proposed Project is active, because the proposed Project covers only a
27 fraction of a percent of that mining district, and because that fraction of a percent is not currently being
28 mined, the short-term loss of productivity would be minor if and when mining begins in those areas.
29 There would be no long-term loss of productivity.

30 ***Irreversible and Irretrievable Commitments of Resources***

31 Because underground resources would not be affected by the proposed Project and because the proposed
32 Project could be decommissioned and removed, no proposed Project impacts to mineral or geological
33 resources would be considered to be irreversible.

34 Because transmission lines typically have little impact to mining operations, no proposed Project impacts
35 to mineral or geological resources would be considered to be irretrievable.

4.5 SOIL RESOURCES

4.5.1 Introduction

This section describes the impacts to soil resources in association with the construction, operation, and maintenance of the transmission line, substations, and ancillary facilities. Impacts to soil resources are discussed in terms of acreage impacted and percent of disturbance. The impacts described in this section are based on the resource data presented in Section 3.5, “Soil Resources,” in chapter 3.

4.5.2 Methodology and Assumptions

Soils data used in this analysis were obtained from soil survey data from the NRCS Soil Survey Geographic (SSURGO) database, which contains more than 158 different soil data variables or attributes. This database provides geo-referenced data on the distribution of soil mapping units and corresponding data on soil properties and related attributes. A GIS data layer was developed, with soil mapping units and associated attributes overlain on the proposed analysis area. It should be noted that NRCS attribute data coverage did not encompass the entire analysis area for the Project and alternatives, and the analyses presented here are based on existing data within the NRCS databases. No alternate sources of soils data outside the NRCS databases were identified.

The selection of the most appropriate soil attributes to consider in the soil resources analysis was coordinated with BLM staff (CH2M Hill 2013d). Soil data variables from this list for which data were available were downloaded for the mapping units within the proposed Project footprint so that they could be summarized on an area (total acreage) basis. Of particular concern for soil resources were the potential hazards related to soil erosion by water and wind, potential losses to soil productivity, and loss of important farmlands.

The data were sorted by Project segment and the total acreages were calculated corresponding to different classes. Where attributes were given as numerical values or indices, ranges of data were classified as “severe,” “moderate,” or “slight,” as described below.

Use of these data assumes mapped soil conditions are representative of actual conditions in the field. As with any mapped data, there is a certain amount of uncertainty related to the accuracy and scale of mapping; therefore, the actual soil conditions could vary substantially from those described at any particular location. The data used represent the best available information for evaluating soil resources. The inherent limitations of soil survey data are resolved with site-specific soil investigations within the actual Project footprint that are part of the permitting and construction design process.

Soil Erosion

In order to determine impacts to soil resources from wind erosion the following variable was analyzed:

- Wind Erodibility Group (WEG).

The WEG index groups soils that have similar properties affecting their resistance to wind erosion. The total acreage for WEG included highly susceptible (1 and 2) and the moderately susceptible (3, 4, and 4L) classes.

1 **Soil Productivity**

2 Another key variable assessed when determining whether the proposed Project would have impacts to the
3 soil resources is looking at the potential loss of soil productivity. In order to do this, the following
4 variables were analyzed:

- 5 • T factor -“Sustainable” soil loss factor in tons
- 6 • Rangeland Productivity - Normal Year (RngProdNY); and
- 7 • Rangeland Productivity - Favorable Year (RngProdFY).

8 The T factor attribute is an estimate of the annual amount of soil loss from water and wind (expressed in
9 tons) that can be sustained without long-term loss of soil productivity. The total acreage for T factor
10 included very severe (0 and 1 tons of soil loss), severe (2 and 3 tons of soil loss), and moderate (4 tons of
11 soil loss) classes.

12 The rangeland productivity attributes estimate the amount of natural vegetation that would be produced
13 annually per acre (expressed in pounds, dry weight). The total acreage for RngProdNY was divided into
14 classes according to the following ranges: very highly productive (>2,000 pounds (lb)/acre), highly
15 productive (>1,000 to 2,000 lb/acre), and moderately productive (500 to 1,000 lb/acre) classes. The total
16 acreage for RngProdFY was divided into the following classes: very highly productive (>4,000 lb/acre),
17 highly productive (>2,000 to 4,000 lb/acre), and moderately productive (1,000 to 2,000 lb/acre). The
18 moderate to very high productivity classes were used, as these rangelands are of most importance to
19 domesticated and native wildlife.

20 **Corrosion of Steel and Concrete**

21 Another key variable assessed when determining the longevity of the proposed Project would be looking
22 at the potential of the soil to corrode steel and concrete. In order to do this, the following variables were
23 analyzed

- 24 • Corrosion of Steel and Concrete

25 The Corrosion of steel and concrete can be a concern during the construction and maintenance phase of
26 the Project. Only soils with a high probability of causing corrosion were used in this analysis.

27 **Biological Soil Crusts**

28 The current conditions and spatial extent of the biological soils crusts are not known, since no formal
29 inventory or monitoring system is currently in place. However, all soils within the Project footprint have
30 the ability to support soil biotic crust, and therefore biotic crusts could occur within the Project footprint.
31 The impacts that may occur as a result of this Project will be assessed qualitatively because of the lack of
32 quantitative data available. In order to quantify the impacts to these crusts they will need to be inventoried
33 as part of the biological surveys conducted for the FEIS before construction begins.

34 **Farmlands**

35 The impacts to farmlands found within the analysis area are discussed in detail in the section on land use
36 (section 4.11) and therefore will not be included in this section for analysis.

1 **Other Soil Data**

2 Other soil attribute data that were considered but not used in the resource evaluation (due to inherent
3 difficulties with evaluation or inadequate spatial coverage) included attributes that could be used to assess
4 potential difficulties for restoration of affected areas, such as Erosion Hazard off-road, off-trail; Topsoil
5 Source; Potential for Seedling Mortality; and Depth to a Selected Soil Restrictive Layer. Attributes used
6 to assess flooding or ponding frequency included Flooding Frequency Class and Ponding Frequency
7 Class. Attributes used to assess potentially occurring important ecological habitats included Ecological
8 Site ID and Ecological Site Name. These attributes are summarized for the proposed Project and
9 alternatives and can be found in “Resource Report 12: Soil Resources” (CH2M Hill 2013d).

10 **Analysis Area**

11 The analysis area for the purpose of evaluating impacts to soil resources is the corridor of the ROW, plus
12 the footprints of substations and construction laydown areas located outside the ROW. The ROW for the
13 New Build Section is 200 feet wide, and the ROW for the Upgrade Section is 150 feet wide. This analysis
14 area is sufficient to identify soil resources that could be directly impacted by ground disturbance during
15 construction and during operation and maintenance of the line. The New Build and Upgrade Sections and
16 route groups within those will be addressed separately for impact analysis. The New Build Section
17 includes route group 1: Afton Substation to Hidalgo Substation, and route group 2: Hidalgo Substation to
18 Apache Substation. The Upgrade Section includes route group 3: Apache Substation to Pantano
19 Substation, and route group 4: Pantano Substation to Saguaro Substation.

20 **Analysis Assumptions**

21 The Southline proponent proposed measures (PPMs) under section 8.3.12 of the POD (Southline 2012)
22 provides plans to minimize, mitigate, and/or restore soils resources. These BMPs would reduce the
23 impacts as follows:

24 PPM SOIL-1: Topsoil Segregation. As appropriate and feasible, Southline would implement topsoil
25 segregation and conservation practices at substation sites and as directed by the BLM and Western.
26 See PPM VEG-2: Reclamation, Restoration, and Revegetation Plan.

27 Additionally, as described in chapter 2, a SWPPP, Soil Management Plan, as well as the Erosion, Dust
28 Control and Air Quality Plan would define procedures for managing soils, erosion, and sediment control
29 to minimize impacts to soils, air quality, and water quality.

30 In construction areas (i.e., temporary use areas, structure sites, etc.) where grading is required, surface
31 restoration would be implemented as required by the landowner or BLM authorized officer. The method
32 of restoration would normally consist of returning disturbed areas back to their normal contour, reseeding
33 (where required), installing cross drains for erosion control, placing water bars in the road, and filling
34 ditches.

35 **Impact Indicators**

36 The following impact indicators were considered when analyzing potential impacts to the soil resources:
37 loss of topsoil due to construction, operation, and maintenance activities (i.e., removal or mixing of
38 topsoil);

- 39 • soil compaction from vehicular traffic;
- 40 • soil erosion due to water and wind; and

- 1 • changes in soil productivity that could result from topsoil disturbance after construction and
2 reclamation:
- 3 ◦ disturbance of sensitive soils (soils which may be difficult to reclaim); and
- 4 ◦ disturbance of biotic soil crusts due to surface disturbance due to Project activities.

5 ***Significant Impacts***

6 For the purposes of this analysis, a significant impact on soil resources would result if any of the
7 following were to occur from construction, operation, or maintenance of the proposed Project:

- 8 • Any disturbance to the land surface which exposes the soil surface that was once covered with
9 vegetation and results in accelerated erosion resulting in rill and gulley formation will be a
10 significant impact.
- 11 • Any activity such as compaction or mixing of soils which would result in long-term loss of
12 productivity or significantly alters current use or vegetative growth during restoration would be
13 considered a significant impact.
- 14 • Loss of soils that uniquely support threatened or endangered plant species, or contamination of
15 soils that support an existing sensitive ecosystem.

16 **4.5.3 Impacts Analysis Results**

17 ***No Action Alternative***

18 Under the no action alternative, there would no direct or indirect impacts to soil resources in the New
19 Build Section, because the transmission line would not be built or upgraded. For the Upgrade Section,
20 even under the no action alternative, Western still plans to upgrade the existing lines between the Apache
21 and Saguaro substations within the next 10 years, in accordance with Western's 10-year capital
22 improvement plan (Western 2012a).

23 ***Impacts Common to All Action Alternatives***

24 **CONSTRUCTION**

25 Direct impacts to soil resources as a result of construction activities include the loss of soil productivity
26 due to the removal of soils during construction of access roads, and at structure and substation sites.
27 Limited clearing of vegetation and topsoil, as well as grading, would be required and these activities
28 could result in newly exposed, disturbed soils that could be subject to accelerated erosion by wind and
29 water. Any soil removal associated with development of structure foundations and at substation sites
30 would be permanent. One of the primary impacts of concerns for construction is disturbance to soil
31 biological crusts. It is expected that all soils within the Project footprint have the ability to support soil
32 biotic crust; therefore, it is expected that disturbance caused by excavation and compaction during
33 construction may directly affect biological soil crusts. Clearing of the substation site and access roads
34 could also adversely affect any soil biological crusts in the immediate vicinity. During construction the
35 use of roads already found within the analysis area is expected to improve the soil resources within the
36 Project footprint. Old roads which are not maintained are more susceptible to erosion by wind and water;
37 therefore, any improvements to these roads would be a benefit to the soil resources.

38 Another important concern for construction impacts would be loss of soil productivity resulting in areas
39 where soils are covered by support structures or other facilities where otherwise not available for
40 production.

1 Indirect impacts associated with soil removal may include invasive plant colonization, soil erosion, and
 2 reduction of soil water retention. Construction may also cause disturbance to fragile biological crusts,
 3 which could increase wind and water erosion and delay reestablishment of plant communities post
 4 construction. Other indirect effects are associated with the sediment redistribution of the soil resource as a
 5 result of wind and water erosion, which could cause damages to WUS, prime farmlands, and air quality.

6 **OPERATION AND MAINTENANCE**

7 Impacts to soil resources as a result of operation and maintenance activities are expected to be minimal.
 8 Access roads will be maintained during operation and Project maintenance, which will result in less
 9 erosion occurring from wind and water than would be if these roads remained in their current state.
 10 Minimal soil resource management would be needed during transmission line operation and most
 11 inspection activities would be carried out aerially. On-the-ground inspection would cause minimal
 12 damage to existing soil resources if vehicle use is confined to existing roadways. No indirect effects are
 13 expected during the operation and maintenance activities.

14 ***Route Group 1 – Afton Substation to Hidalgo Substation***

15 **SUBROUTE 1.1 – PROPONENT PREFERRED**

16 **Construction**

17 Subroute 1.1 representative ROW comprises 3,567.5 acres. Within this proposed route the total temporary
 18 disturbance would result in 23.1 percent of the ROW being disturbed, and total permanent disturbance
 19 would result in 6.1 percent being disturbed. The acreages of the direct impact to the soil resources can be
 20 found in table 4.5-1 below.

21 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

22 **Construction**

23 Subroute 1.2 representative ROW comprises 3,424.1 acres. Within this proposed route the total temporary
 24 disturbance would result in 23.1 percent of the ROW being disturbed, and total permanent disturbance
 25 would result in 5.8 percent being disturbed. The acreages of direct impacts to the soil resources can be
 26 found in table 4.5-1.

27 **Table 4.5-1.** Route Group 1 Soil Resources Inventory Data

Segment	Total Acreage	Wind Erosion		Productivity		Corrosion of Uncoated Steel (acres)	Corrosion of Concrete (acres)
		T factor (acres)	WEG (acres)	RngProdNY (acres)	RngProdFY (acres)		
Subroute 1.1, Proponent Preferred							
P1	125.1	83	125	0	79	125	0
P2	2,472.0	884	1,946	701	2,311	2469	0
P3	753.3	551	736	270	734	734	0
P4a	217.1	6	72	66	217	217	0

28

1 **Table 4.5-1. Route Group 1 Soil Resources Inventory Data (Continued)**

Segment	Total Acreage	Wind Erosion		Productivity		Corrosion of Uncoated Steel (acres)	Corrosion of Concrete (acres)
		T factor (acres)	WEG (acres)	RngProdNY (acres)	RngProdFY (acres)		
Subroute 1.2, Proponent Alternative							
S1	325.3	325	325	0	20	325	0
S2	267.7	241	230	23	253	253	0
S3	314.0	306	314	0	314	314	0
S4	255.2	120	210	85	178	211	0
S5	720.1	441	489	92	652	713	0
S6	182.1	43	7	45	153	153	0
S7	1,007.0	505	542	298	839	1,007	0
S8	352.8	0	191	139	353	352	0
Route Group 1 Local Alternatives							
DN1	1,030.5	279	648	191	975	1012	0
A	422.9	283	283	0	393	422	0
B	291.5	20	269	49	191	191	0
C	215.7	34	0	48	206	215	0
D	551.1	109	197	80	551	551	0

2 Source: NRCS SSURGO Database intersected with representative ROW. Total acreages include moderate to very severe (or very susceptible) for
 3 erosion hazards; moderate to very high productivity; and all important farmlands.
 4 Tfactor = 'Sustainable' soil loss factor in tons. Acreage total includes moderate (4 tons); severe (2 and 3 tons); and very severe (0 and 1 tons).
 5 WEG = Wind Erodibility Group. Acreage total includes moderately susceptible (WEGs 3, 4, and 4L) and (highly susceptible (WEGs 1 and 2).
 6 RngProdNY = Rangeland Productivity - Normal Year. Acreage total includes moderate (500–1,000 lb/acre [dry weight]); high (1,000–2,000 lb/acre);
 7 and very high (>2,000 lb/acre).
 8 RngProdFY = Rangeland Productivity - Favorable Year. Acreage total includes moderate (1,000–2,000 lb/acre [dry weight]); high (2,000–4,000
 9 lb/acre); and very high (>4,000 lb/acre).

10 **LOCAL ALTERNATIVES**

11 There are five local alternatives available for route group 1: DN1, A, B, C, and D.

12 **Construction**

13 Local alternative A is a short loop at the southeast end of the Project that would provide an alternative
 14 connection between segments S1 and S3. The route comprises 422.9 acres. Total temporary disturbance
 15 from construction would result in 23.2 percent of the ROW being disturbed, and total permanent
 16 disturbance would result in 4.2 percent being disturbed. The acreages of direct impacts to the soil
 17 resources can be found in table 4.5-1.

18 Local alternative B is a loop on the south edge of the Project that would provide an alternative connection
 19 between segments S3 and S5, going along the north side of segment S4. Total temporary disturbance
 20 from construction would result in 23.4 percent of the ROW being disturbed, and total permanent
 21 disturbance would result in 2.5 percent being disturbed. The acreages of direct impacts to the soil
 22 resources can be found in table 4.5-1.

1 Local alternative C is another short loop on the south edge of the Project that would provide an alternative
2 connection between segments S5 and S7. Total temporary disturbance from construction would result in
3 23.3 percent of the ROW being disturbed, and total permanent disturbance would result in 2.8 percent
4 being disturbed. The acreages of direct impacts to the soil resources can be found in table 4.5-1.

5 Local alternative D provides an alternative connection from the Alternative Southern Route at segment S7
6 to the New Build Section at segment P5. Total temporary disturbance from construction would result in
7 23.2 percent of the ROW being disturbed, and total permanent disturbance would result in 5.1 percent
8 being disturbed. The acreages of direct impacts to the soil resources can be found in table 4.5-1.

9 Local alternative DN1 provides an alternate route just north and parallel to segment P2. Total temporary
10 disturbance from construction would result in 23.1 percent of the ROW being disturbed, and total
11 permanent disturbance would result in 9.0 percent being disturbed. The acreages of direct impacts to the
12 soil resources can be found in table 4.5-1.

13 **Route Group 2 – Hidalgo Substation to Apache Substation**

14 **SUBROUTE 2.1 – PROPONENT PREFERRED**

15 **Construction**

16 Subroute 2.1 representative ROW comprises 2,309.8 acres. Within this proposed route the total temporary
17 disturbance would result in 23.2 percent of the ROW being disturbed, and total permanent disturbance
18 would result in 6.2 percent being disturbed. The acreages of direct impacts to the soil resources can be
19 found below in table 4.5-2.

20 **Table 4.5-2.** Route Group 2 Soil Resource Inventory Data

Segment	Total Acreage	Wind Erosion		Productivity		Corrosion of Uncoated Steel (acres)	Corrosion of Concrete (acres)
		T factor (acres)	WEG (acres)	RngProdNY (acres)	RngProd FY (acres)		
Subroute 2.1, Proponent Preferred							
P4b	335.8	114	297	111	336	335	0
P4c	44.9	17	25	11	45	44	0
P5a	233.5	41	107	162	234	231	0
P5b	510.9	285	212	252	332	473	145
P6a	21.3	0	21	0	21	21	0
P6b	545.1	293	290	339	380	413	0
P6c	68.3	68	45	68	68	60	0
P7	540.8	244	309	469	469	486	244
P8	9.0	0	8	9	9	9	0

21

1 **Table 4.5-2.** Route Group 2 Soil Resource Inventory Data (Continued)

Segment	Total Acreage	Wind Erosion		Productivity		Corrosion of Uncoated Steel (acres)	Corrosion of Concrete (acres)
		T factor (acres)	WEG (acres)	RngProdNY (acres)	RngProd FY (acres)		
Subroute 2.2, Proponent Alternative							
E	766.6	263	349	481	660	754	127
F	611.1	401	378	490	526	457	68
Ga	622.4	328	268	531	531	465	0
Gb	25.9	0	0	26	26	25	0
Gc	179.6	12	103	180	180	179	0
I	55.4	51	5	37	37	22	0
J	55.6	55	21	43	43	34	0
Route Group 2 Local Alternatives							
LD1	857.5	306	333	431	718	853	139
LD2	233.2	82	150	63	233	233	0
LD3a	677.5	78	467	275	677	677	0
LD3b	46.6	0	2	11	47	46	0
LD4	1,253	719	583	1,116	1,253	1,253	165
LD4-Option 4	156.1	155	31	141	141	48	0
LD4-Option 5	296.8	284	44	250	250	153	0
WC1	359.1	278	220	355	355	358	240

2 Source: NRCS SSURGO Database intersected with the representative ROW.
 3 Total acreages include moderate to very severe (or very susceptible) for erosion hazards; moderate to very high productivity; and all important
 4 farmlands.
 5 T factor = 'Sustainable' soil loss factor in tons. Acreage total includes moderate (4 tons); severe (2 and 3 tons); and very severe (0 and 1 tons).
 6 WEG = Wind Erodibility Group. Acreage total includes moderately susceptible (WEGs 3, 4, and 4L) and (highly susceptible (WEGs 1 and 2).
 7 RngProdNY = Rangeland Productivity - Normal Year. Acreage total includes moderate (500–1,000 lb/acre [dry weight]); high (1,000–2,000 lb/acre);
 8 and very high (>2,000 lb/acre).
 9 RngProdFY = Rangeland Productivity - Favorable Year. Acreage total includes moderate (1,000–2,000 lb/acre [dry weight]); high (2,000–4,000
 10 lb/acre); and very high (>4,000 lb/acre).

11 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

12 **Construction**

13 Subroute 2.2 representative ROW comprises 2,316.6 acres. Within this proposed route the total temporary
 14 disturbance would result in 23.2 percent of the ROW being disturbed, and total permanent disturbance
 15 would result in 6.3 percent being disturbed. The acreages of direct impacts to the soil resources can be
 16 found in table 4.5-2.

1 **LOCAL ALTERNATIVES**

2 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
3 4, LD4-Option 5, and WC1.

4 **Construction**

5 The alternative LD1 total representative ROW comprises 857.5 acres. Total temporary disturbance from
6 construction would result in 23.1 percent of the ROW being disturbed, and total permanent disturbance
7 would result in nearly 6.4 percent being disturbed. The acreages of direct impacts to the soil resources can
8 be found in table 4.5-2. The alternative LD2 total representative ROW comprises 233.2 acres. Total
9 temporary disturbance from construction would result in 23.1 percent of the ROW being disturbed, and
10 total permanent disturbance would result in nearly 8.6 percent being disturbed. The acreages of direct
11 impacts to the soil resources can be found in table 4.5-2. The alternative LD3a total representative ROW
12 comprises 677.5 acres. Total temporary disturbance from construction would result in 23.1 percent of the
13 ROW being disturbed, and total permanent disturbance would result in 4.3 percent being disturbed.
14 The acreages of direct impacts to the soil resources can be found below in 4.5-2.

15 The alternative LD3b total representative ROW comprises 46.6 acres. Total temporary disturbance from
16 construction would result in nearly 23.1 percent of the ROW being disturbed, and total permanent
17 disturbance would result in nearly 1.3 percent being disturbed. The acreages of direct impacts to the soil
18 resources can be found in 4.5-2.

19 The alternative LD4 total representative ROW comprises 1,253.1 acres. Total temporary disturbance from
20 construction would result in 23.1 percent of the ROW being disturbed, and total permanent disturbance
21 would result in 9.1 percent being disturbed. The acreages of direct impacts to the soil resources can be
22 found in table 4.5-2. The alternative LD4-Option 4 total representative ROW comprises 156.1 acres. Total
23 temporary disturbance from construction would result in nearly 23.2 percent of the ROW being disturbed,
24 and total permanent disturbance would result in nearly 9.1 percent being disturbed. The acreages of
25 direct impacts to the soil resources can be found in table 4.5-2. The alternative LD4-Option 5 total
26 representative ROW comprises 296.8 acres. Total temporary disturbance from construction would result
27 in 23.2 percent of the ROW being disturbed, and total permanent disturbance would result in nearly 7.5
28 percent being disturbed. The acreages of direct impacts to the soil resources can be found in table 4.5-2.

29 The alternative WC1 total representative ROW comprises 359.1 acres. Total temporary disturbance from
30 construction would result in 23.1 percent of the ROW being disturbed, and total permanent disturbance
31 would result in nearly 7.9 percent being disturbed. The acreages of direct impacts to the soil resources can
32 be found in table 4.5-2.

33 ***Route Group 3 – Apache Substation to Pantano Substation***

34 **SUBROUTE 3.1 – PROPONENT PREFERRED**

35 **Construction**

36 Subroute 3.1 representative ROW comprises 1,278.6 acres. Within this proposed route the total temporary
37 disturbance would result in 28.1 percent of the ROW being disturbed, and total permanent disturbance
38 would result in nearly 5.4 percent being disturbed. The acreages of direct impacts to the soil resources can
39 be found in table 4.5-3.

1 **LOCAL ALTERNATIVES**

2 There is one local alternative for route group 3–local alternative H.

3 **Construction**

4 Local alternative H provides an alternative loop around the north side of Benson, Arizona, to connect
 5 segment U1 with segment U3. This route comprises 350.2 acres. Within this proposed route the total
 6 temporary disturbance would result in 28.1 percent of the ROW being disturbed, and total permanent
 7 disturbance would result in 8.1 percent being disturbed. The acreages of direct impacts to the soil
 8 resources can be found in table 4.5-3.

9 **Table 4.5-3.** Route Group 3 Soil Resource Inventory Data

Segment	Total Acreage	Wind Erosion		Productivity		Corrosion of Uncoated Steel (acres)	Corrosion of Concrete (acres)
		T factor (acres)	WEG (acres)	RngProdNY (acres)	RngProdFY (acres)		
Subroute 3.1, Proponent Preferred							
U1a	291.91	129	148	279	283	152	0
U1b	253.0	35	53	53	53	18	0
U2	287.0	101	267	247	255	189	63
U3a	646.7	516	77	430	475	632	0
Route Group 3 Local Alternative							
H	350.2	237	282	201	224	159	199

10 Source: NRCS SSURGO Database intersected with the representative ROW.
 11 Total acreages include moderate to very severe (or very susceptible) for erosion hazards; moderate to very high productivity; and all important
 12 farmlands.
 13 T factor = ‘Sustainable’ soil loss factor in tons. Acreage total includes moderate (4 tons); severe (2 and 3 tons); and very severe (0 and 1 tons).
 14 WEG = Wind Erodibility Group. Acreage total includes moderately susceptible (WEGs 3, 4, and 4L) and (highly susceptible (WEGs 1 and 2).
 15 RngProdNY = Rangeland Productivity - Normal Year. Acreage total includes moderate (500–1,000 lb/acre [dry weight]); high (1,000–2,000 lb/acre);
 16 and very high (>2,000 lb/acre).
 17 RngProdFY = Rangeland Productivity - Favorable Year. Acreage total includes moderate (1–2,000 lb/acre [dry weight]); high (2,000–4,000 lb/acre);
 18 and very high (>4,000 lb/acre).

19 **Route Group 4 – Pantano Substation to Saguaro Substation**

20 **SUBROUTE 4.1 – PROPONENT PREFERRED**

21 **Construction**

22 Subroute 4.1 representative ROW comprises 874.8 acres. Within this proposed route the total temporary
 23 disturbance would result in 28.1 percent of the ROW being disturbed, and total permanent disturbance
 24 would result in 4.2 percent being disturbed. The acreages of direct impacts to the soil resources can be
 25 found below in table 4.5-4.

1 **Table 4.5-4.** Route Group 4 Soil Resource Inventory Data

Segment	Total Acreage	Wind Erosion		Productivity		Corrosion of Uncoated Steel (acres)	Corrosion of Concrete (acres)
		T factor (acres)	WEG (acres)	RngProdNY (acres)	RngProdFY (acres)		
Subroute 4.1, Proponent Preferred							
U3b	8.2	3	2	0	2	8	0
U3c	17.5	0	10	16	16	17	0
U3d	62.4	57	6	12	58	62	0
U3e	16.1	5	4	12	13	12	0
U3f	12.4	12	0	11	15	12	0
U3g	16.2	8	5	11	15	16	0
U3h	19.8	0	14	15	290	20	0
U3i	331.1	118	91	269	16	331	0
U3j	15.9	0	7	16	221	16	0
U3k	303.6	66	208	191	27	304	0
U3l	28.1	28	27	0	9	27	0
U3m	8.9	9	9	0	29	9	0
U4	34.7	14	7	0	28	35	0
Route Group 4 Local Alternatives							
MA1	19.0	0	9	19	19	19	0
TH1a	25.7	11	0	15	28	25	0
TH1b	28.4	27	0	2	5	28	0
TH1c	4.8	0	0	5	8	5	0
TH1-Option	1.0	7.7	0	0	25	8	0
TH3-Option A	15.1	1	7	8	15	15	0
TH3-Option B	14.5	0	3	14	24	14	0
TH3-Option C	29.3	0	9	24	20	29	0
TH3a	49.7	23	8	18	32	50	0
TH3b	81.4	0	69	32	16	81	0

2 Source: NRCS SSURGO Database intersected with the representative ROW.

3 Total acreages include moderate to very severe (or very susceptible) for erosion hazards; moderate to very high productivity; and all important farmlands.

4 T factor = 'Sustainable' soil loss factor in tons. Acreage total includes moderate (4 tons); severe (2 and 3 tons); and very severe (0 and 1 tons).

5 WEG = Wind Erodibility Group. Acreage total includes moderately susceptible (WEGs 3, 4, and 4L) and (highly susceptible (WEGs 1 and 2).

6 RngProdNY = Rangeland Productivity - Normal Year. Acreage total includes moderate (500–1,000 lb/acre [dry weight]); high (1,000–2,000 lb/acre); and very high (>2,000 lb/acre).

7 RngProdFY = Rangeland Productivity - Favorable Year. Acreage total includes moderate (1,000–2,000 lb/acre [dry weight]); high (2,000–4,000 lb/acre); and very high (>4,000 lb/acre).

1 **LOCAL ALTERNATIVES**

2 There are 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a,
3 TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

4 **Construction**

5 The alternative TH1a total representative ROW comprises 25.7 acres. Total temporary disturbance from
6 construction would result in 28.1 percent of the ROW being disturbed, and total permanent disturbance
7 would result in 1.2 percent being disturbed. The acreages of direct impacts to the soil resources can be
8 found in table 4.5-4. The alternative TH1b total representative ROW comprises 28.4 acres. Total
9 temporary disturbance from construction would result in 28.1 percent of the ROW being disturbed, and
10 total permanent disturbance would result in 2.1 percent being disturbed. The acreages of direct impacts to
11 the soil resources can be found in table 4.5-4. The alternative TH1c total representative ROW comprises
12 4.8 acres. Total temporary disturbance from construction would result in 35.2 percent of the ROW being
13 disturbed, and total permanent disturbance would result in 3.1 percent being disturbed. The acreages of
14 direct impacts to the soil resources can be found in table 4.5-4.

15 The alternative TH1-Option total representative ROW comprises 7.7 acres. Total temporary disturbance
16 from construction would result in nearly 42.8 percent of the ROW being disturbed, and total permanent
17 disturbance would result in nearly 0.1 percent being disturbed. The acreages of direct impacts to the soil
18 resources can be found in table 4.5-4.

19 The alternative TH3-Option A total representative ROW comprises 15.1 acres. Total temporary
20 disturbance from construction would result in 28.1 percent of the ROW being disturbed, and total
21 permanent disturbance would result in 5.8 percent being disturbed. The acreages of direct impacts to the
22 soil resources can be found in table 4.5-4. The alternative TH3-Option B total representative ROW
23 comprises 14.5 acres. Total temporary disturbance from construction would result in 28.8 percent of the
24 ROW being disturbed, and total permanent disturbance would result in 4.4 percent being disturbed.
25 The acreages of direct impacts to the soil resources can be found in table 4.5-4. The alternative TH3-
26 Option C total representative ROW comprises 29.3 acres. Total temporary disturbance from construction
27 would result in 31.4 percent of the ROW being disturbed, and total permanent disturbance would result in
28 8.8 percent being disturbed. The acreages of direct impacts to the soil resources can be found in table
29 4.5-4. The alternative TH3a total representative ROW comprises 49.7 acres. Total temporary disturbance
30 from construction would result in nearly 28.1 percent of the ROW being disturbed, and total permanent
31 disturbance would result in nearly 5.4 percent being disturbed. The acreages of direct impacts to the soil
32 resources can be found in table 4.5-4.

33 The alternative TH3b total representative ROW comprises 81.4 acres. Total temporary disturbance from
34 construction would result in nearly 28.2 percent of the ROW being disturbed, and total permanent
35 disturbance would result in nearly 4.0percent being disturbed. The acreages of direct impacts to the soil
36 resources can be found in table 4.5-4. The alternative MA1 total representative ROW comprises 19.0
37 acres. Total temporary disturbance from construction would result in nearly 29.4 percent of the ROW
38 being disturbed, and total permanent disturbance would result in nearly 1.6 percent being disturbed.
39 The acreages of direct impacts to the soil resources can be found in table 4.5-4.

40 ***Agency Preferred Alternative***

41 Impacts to soils would generally be as described under “Impacts Common to All Action Alternatives,”
42 as described above.

1 In terms of highly erodible soils, local alternatives LD3a and LD4 and LD4-Option 5 around Lordsburg
2 Playa would cross 338 acres of highly erodible soils, compared to the Proponent Preferred route
3 (segments P4b, P4c, P5b, P6a, P6b, and P6c) which would cross 60 acres of highly erodible soils south of
4 the Lordsburg Playa. Around the Willcox Playa, the Agency Preferred Alternative (segment P7) would
5 cross approximately 41-acres of highly erodible soils and 270-acres of moderately erodible soils.
6 In comparison, segments Gb and Gc of the Proponent Alternative would not intersect any highly erodible
7 soils.

8 ***Additional Mitigation Measures***

9 The SWPPP, Soil Management Plan, as well as the Erosion, Dust Control and Air Quality Plan would
10 define procedures for managing soils, erosion, and sediment control to minimize impacts to soils, air
11 quality, and water quality. Mitigation identified in these plans would likely include structural controls
12 (SWPPP), as well dust mitigation measures such as application of water or soil additives, control of
13 vehicle access, vehicle speed restrictions, or even work stoppage during extreme wind.

14 ***Residual Impacts***

15 Mitigation efforts would likely alleviate most all environmental impacts to the soil resources as a result of
16 the Project. Maintenance activities aimed at mitigating soil erosion will be ongoing and therefore; impacts
17 will be negligible following the Project construction.

18 ***Unavoidable Adverse Impacts***

19 Minor environmental impacts would occur that are necessary for the Project, and no mitigation measures
20 were deemed necessary or feasible. Such impacts include permanent or long-term impact effects, such as
21 the construction of substation enhancements, permanent access roads, and other permanent constructed
22 features that would permanently impact the soil resources. The installation of new transmission facilities
23 would result in the unavoidable loss of soil productivity where structures and other facilities are located.

24 ***Short-term Uses versus Long-term Productivity***

25 The productivity or function of soil resources would be affected by both short-term or temporary impacts,
26 and long-term or permanent impacts. Temporary impacts to soil resources would be present until
27 restoration is conducted. Following restoration, temporary impact effects would be alleviated to the soil
28 resources. Relative to temporary impacts, permanent loss of soil resources would be minimal in spatial
29 scale.

30 ***Irreversible and Irretrievable Commitments of Resources***

31 Environmental impacts that have irreversible negative effects on soil resources are situations where
32 vegetation and topsoils are impacted and not restored. In most cases, restoration efforts would be made,
33 and irreversible impacts to the soil resources and associated vegetation would be minor, including
34 unavoidable adverse impacts and residual impacts discussed above. In limited areas, soil resources would
35 be significantly impacted, but such areas would be minimal and would focus on low-sensitivity soils.

4.6 PALEONTOLOGICAL RESOURCES

4.6.1 Introduction

Concerns regarding paleontological resources consist of the loss of scientifically important fossils or loss of access to scientifically important fossils from the analysis area; however, encountering previously unknown fossil localities during construction may contribute to scientific knowledge. Scientifically important fossils are generally defined as vertebrate fossils, but may also include invertebrate fossils (BLM 2008f; Society of Vertebrate Paleontology 1995). Assessing a project's likelihood of encountering important fossils is conducted by using the BLM's PFYC system of predicting the sensitivity of a geological unit. Impacts are primarily assessed based on disturbance to geological units with a PFYC of 3 (moderate or unknown potential), 4 (high potential), and 5 (very high potential). The impacts described in this section are based on the analysis found in "Southline Transmission Project Resource Report 9: Paleontology" (CH2M Hill 2013e). The contents of that report are used herein without specific reference.

4.6.2 Methodology and Assumptions

The analysis was conducted by calculating the acreage of each PFYC class within the representative ROW by alternative. A paleontological sensitivity value was then assigned to segments or portions of segments based on their potential to produce important fossils. Although all attempts are made to quantify paleontological sensitivity in terms of acreage, sensitivity is a qualitative value.

Analysis Area

The analysis area for the New Build Section is 1 mile on either side of the centerline of all alternatives. The analysis area for the Upgrade Section is a 500-foot corridor (200 feet on either side of centerline of the existing 100-foot corridor).

Southline has developed a representative ROW to be used in this analysis for both the New Build and Upgrade Sections. The following analysis will discuss resources found along the representative ROW.

Analysis Assumptions

The analysis was conducted under the following assumptions:

- the literature review and BLM PFYC is sufficient to characterize the fossil-bearing potential within the analysis area;
- because ground disturbance would result in the loss of or damage to paleontological resources if present, all direct impacts are permanent and long term; and
- all access routes, substations, and temporary construction easements are within the analysis area.

Impact Indicators

Loss of or restriction of access to scientifically important fossils would be the primary negative direct impact of the Project on paleontological resources. The primary positive direct impact of the Project would be the discovery of important fossils that would otherwise be unavailable for study as an inadvertent result of ground disturbing activities. The relative impacts were assessed by assigning paleontological sensitivity values based on PFYC class and then comparing the acreage of land (both

1 within the representative ROW and, as a subset, within the anticipated area of disturbance) falling within
2 each paleontological sensitivity value among the various Project segments and alternatives.

3 The paleontological sensitivity values are as follows:

- 4 • Very Low to Low Sensitivity—Geological units with a PFYC of 1 or 2. These areas are unlikely
5 to produce fossils or unlikely to produce important fossils.
- 6 • Moderate Sensitivity—Geological units with a PFYC of 3 (Moderate or Unknown). These areas
7 may produce important fossils, or it is unknown whether they may produce important fossils.
- 8 • High Sensitivity—Geological units with a PFYC of 4. These areas have a high likelihood of
9 producing important fossils.

10 ***Significant Impacts***

11 For the purposes of this analysis, a significant impact on paleontological resources could result if any of
12 the following were to occur from construction or operation of the proposed Project:

- 13 • Ground disturbance in areas with moderate paleontological sensitivity (PFYC 3) if they contain
14 important fossils.
- 15 • Ground disturbance in areas with high paleontological sensitivity (PFYC 4) if they contain
16 important fossils.
- 17 • Access restrictions to areas with moderate and high paleontological sensitivity.

18 **4.6.3 Impacts Analysis Results**

19 ***No Action Alternative***

20 Under the no action alternative, the New Build Section would not be constructed from the Afton to
21 Apache substations. Even under the no action alternative, Western still plans to upgrade the existing lines
22 between the Apache and Saguaro substations within the next 10 years, in accordance with Western’s
23 10-year capital improvement plan (Western 2012a).

24 The existing transmission line route from Apache to Saguaro substation is almost entirely of Low
25 Sensitivity (PFYC 1-2) for paleontological resources; only 28 acres of the route is classified as Moderate
26 Sensitivity (PFYC 3). Ten of those 28 acres are expected to be disturbed. If fossils are present and if the
27 areas cannot be avoided or mitigated in accordance with applicable regulations, minor direct and indirect
28 are expected for No Action alternative.

29 ***Impacts Common to All Action Alternatives***

30 **CONSTRUCTION**

31 Direct impacts to paleontological resources during construction have the potential to occur during ground
32 disturbance in areas with moderate or unknown sensitivity to high sensitivity. The severity of the
33 disturbance to areas with moderate to high sensitivity would vary by alternative. Ground disturbance
34 would occur with road construction or improvement, substation expansion and construction, and tower
35 construction. Loss of access to paleontological resources during construction activities only would be the
36 primary potential indirect impact; however access restrictions would vary by alternative and are
37 anticipated to be negligible.

Prior to construction Southline would implement the Paleontological Resource Management Plan (Proponent Proposed Measure (PPM) PAL-1) as described in Section 8.3.8 of the Plan of Development in order to mitigate any adverse effects to important paleontological resources. If areas are identified as containing paleontological resources, a paleontological resources treatment plan would be prepared and implemented. If fossils are found inadvertently during construction Southline would implement the plan outlined in PPM PAL-2: Recovery, Testing, and Documentation.

Assessment and mitigation of adverse effects to paleontological resources would be conducted according to BLM manual H-8270-1: “General Procedural Guidance for Paleontological Resource Management” (BLM 2008f). Mitigation measures would be developed and designed to minimize adverse effects. According to the manual, mitigation may involve but is not limited to no action, avoidance, or collection of fossils or samples of fossil with curation. Other mitigation could include education of construction and maintenance workers, covering fossils bearing formations with sediment, and monitoring during construction.

OPERATION AND MAINTENANCE

No direct or indirect impacts to paleontological resources are expected during routine operation and maintenance. If during maintenance activities ground disturbance is to occur in areas beyond that disturbed during construction or if access restrictions are imposed, they would be mitigated in accordance with all applicable regulations.

Route Group 1 – Afton Substation to Hidalgo Substation

Impacts to paleontological resources would primarily occur during construction activities. Impacts during operation and maintenance activities are not anticipated or are anticipated to be minor. Because all ground disturbance can result in the loss of scientifically valuable fossils if present, temporary and permanent ground disturbance are both considered permanent.

Table 4.6-1 presents the acreage/mileage of potential disturbance by PFYC class within the representative ROW of route group 1, Afton Substation to Hidalgo Substation. Table 4.6-2 presents the paleontological sensitivity within the representative ROW of route group 1, Afton Substation to Hidalgo Substation.

Table 4.6-1. Route Group 1 Paleontological Resource Inventory Data within the Representative ROW

	Total Miles	Acreage of PFYC 1	Acreage of PFYC 2	Acreage of PFYC 3	Acreage of PFYC 4	Total Acreage
Subroute 1.1, Proponent Preferred						
P1	5.1	0	0	0	125.1	125.1
P2	102.0	1,522.0	49.1	0	900.9	2,472.0
P3	31.1	353.6	0	0	400.0	753.6
P4a	8.7	30.1	0	0	187.0	217.1

1 **Table 4.6-1.** Route Group 1 Paleontological Resource Inventory Data within the Representative ROW
2 (Continued)

	Total Miles	Acreage of PFYC 1	Acreage of PFYC 2	Acreage of PFYC 3	Acreage of PFYC 4	Total Acreage
Subroute 1.2, Proponent Alternative						
S1	13.4	0	0	0	325.3	325.3
S2	11.1	36.3	0	0	231.3	267.6
S3	12.9	228.6	0	0	85.4	314.0
S4	10.6	88.4	0	0	166.8	255.2
S5	29.7	676.5	0	0	43.6	720.1
S6	7.4	165.3	16.8	0	0	182.1
S7	41.5	986.2	20.8	0	0	1,007.0
S8	14.6	316.3	0	0	36.5	352.8
Route Group 1 Local Alternatives						
DN1	42.5	808.4	77.1	0	145.0	1,030.5
A	17.5	77.9	0	0	345.0	422.9
B	12.2	171.6	0	0	120.0	291.6
C	9.0	187.6	28.1	0	0	215.7
D	22.8	542.0	9.1	0	0	551.1

3 **Table 4.6-2.** Route Group 1 Paleontological Sensitivity by Acreage within the Representative ROW

	Total Miles	Percent Permanent and Temporary Disturbance*	Low Sensitivity Acreage (acreage total disturbance)	Moderate Sensitivity Acreage (acreage total disturbance)	High Sensitivity Acreage (acreage total disturbance)
Subroute 1.1, Proponent Preferred					
P1	5.1	31.3%	0 (0)	0 (0)	125.1 (39.1)
P2	102.0	28.4%	1,571.1 (446.2)	0 (0)	900.9 (255.9)
P3	31.1	31.5%	353.6 (111.5)	0 (0)	399.7 (126.1)
P4a	8.7	27.5%	30.1 (8.3)	0 (0)	187.0 (51.4)
Total	146.9	NA	1,954.8 (566.0)	0 (0)	1,612.7 (472.5)
Subroute 1.2, Proponent Alternative					
S1	13.4	29.8%	0 (0)	0 (0)	325.3 (96.9)
S2	11.1	31.6%	36.3 (11.5)	0 (0)	231.3 (73.0)
S3	12.9	25.6%	228.6 (57.8)	0 (0)	85.4 (21.9)
S4	10.6	31.7%	88.4 (28.0)	0 (0)	166.8 (52.9)
S5	29.7	27.1%	676.5 (183.3)	0 (0)	43.6 (11.8)
S6	7.4	30.1%	182.1 (54.8)	0 (0)	0 (0)
S7	41.5	28.3%	1,007.0 (285.0)	0 (0)	0 (0)
S8	14.6	31.6%	316.3 (99.9)	0 (0)	36.5 (11.5)
Total	141.2	NA	2,535.2 (720.3)	0 (0)	888.9 (268.0)

1 **Table 4.6-2.** Route Group 1 Paleontological Sensitivity by Acreage within the Representative ROW
 2 (Continued)

	Total Miles	Percent Permanent and Temporary Disturbance*	Low Sensitivity Acreage (acreage total disturbance)	Moderate Sensitivity Acreage (acreage total disturbance)	High Sensitivity Acreage (acreage total disturbance)
Route Group 1					
Local Alternatives[†]					
DN1	42.5	32.1%	885.5 (284.2)	0 (0)	145.0 (46.5)
A	17.5	27.4%	77.9 (21.3)	0 (0)	345.0 (94.5)
B	12.2	25.9%	171.6 (44.4)	0 (0)	112.0 (29.0)
C	9.0	26.2%	215.7 (56.5)	0 (0)	0 (0)
D	22.8	38.3%	551.1 (211.1)	0 (0)	0 (0)

3 Note: NA = not applicable.

4 * Anticipated disturbance by segment; distribution of anticipated disturbance within each segment not currently known as project is still in
 5 engineering/design phase.

6 [†] Local alternatives are each considered separately and are not totaled.

7 **SUBROUTE 1.1 – PROPONENT PREFERRED**

8 Subroute 1.1 consists of segments P1, P2, P3, and P4a. Segment P1 connects the Afton Substation to an
 9 existing line to the southwest. Segments P2 and P4a form the primary route, which runs from the Afton
 10 Substation west and northwest past Deming to the Hidalgo Substation. Segment P3 is an interconnection
 11 route running north-south between I-10 and NM 9.

12 Major direct (loss of scientifically important fossils) and indirect (loss of access to scientifically important
 13 fossils) may occur with subroute 1.1 if fossils are present. Within the representative ROW for subroute
 14 1.1, 1,613 acres is classified as high sensitivity (PFYC 4) for paleontological resources; it is anticipated
 15 that 473 acres would be disturbed by construction. The remaining 1,955 acres is classified as low
 16 sensitivity (PFYC 1 or 2); it is anticipated that 566 acres would be disturbed.

17 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

18 Subroute 1.2 consists of segments S1 through S8. It begins at the Afton Substation and runs south and
 19 southwest to NM 9. It then continues west along Columbus Road and eventually runs south of the town
 20 of Columbus. It then runs west along NM 9 to the intersection of NM 9 and NM 146, and then runs
 21 northwest just east of the Luna and Grant County line. Segment S8 then runs north to segment P4a of
 22 subroute 1.1.

23 Subroute 1.2 is less sensitive for paleontological resources than subroute 1.1; however, major direct and
 24 indirect impacts may still occur if fossils are present. Within the representative ROW for subroute 1.2,
 25 889 acres is categorized as high sensitivity (PFYC 4). Disturbance is estimated to affect 268 of the 889
 26 acres. Low sensitivity (PFYC 1 or 2) acreage totals 2,535; 720 of the 2,535 acres is anticipated to be
 27 disturbed.

28 **LOCAL ALTERNATIVES**

29 There are five local alternatives available for route group 1: DN1, A, B, C, and D. DN1 would run north
 30 of subroute 1.1 and share ROW with the proposed SunZia project. Alternative A would follow existing
 31 unpaved roads south and southeast of subroute 1.2. Alternatives B and C both run parallel to NM 9 for 12
 32 miles. Alternative D runs from segment S7 to just south of Lordsburg, where it continues west and
 33 northwest to 1 mile north of I-10.

1 Moderate direct and indirect impacts would occur for local alternatives DN1, A, and B if fossils are
 2 present. For local alternative DN1, 145 acres is categorized as high sensitivity (PFYC 4); 47 of those
 3 acres is expected to be disturbed. The remaining 886 acres, with 284 acres to be disturbed, is all
 4 categorized as low sensitivity (PFYC 1 or 2). Local alternative A has 345 acres with high sensitivity
 5 (PFYC 4); however, only 95 acres is expected to be disturbed. Seventy-eight acres of local alternative A
 6 is classified as low sensitivity (PFYC 1 or 2). A total of 112 acres of local alternative B is categorized as
 7 high sensitivity (PFYC 4); 29 acres of the 112 acres is expected to be disturbed. The remaining 172 acres
 8 of B is categorized as low sensitivity (PFYC 1 or 2).

9 All of local alternatives C (216 acres) and D (551 acres) is classified as low sensitivity (PFYC 1 or 2).
 10 No direct or indirect impacts would occur.

11 **NEW SUBSTATIONS OR SUBSTATION EXPANSION**

12 One new substation and expansion of two existing substations is planned for route group 1 (table 4.6-3).
 13 The new substation (Midpoint) would be located along subroute 1.1 (Proposed Midpoint) or subroute 1.2
 14 (Alternative Midpoint). The existing stations are the Afton Substation and the Hidalgo Substation.

15 **Table 4.6-3.** Expected Acreage of Ground Disturbance by Substation in Route Group 1

Substation	Low Sensitivity Acreage – PFYC 1 and 2	Moderate or Unknown Sensitivity Acreage – PFYC 3	High Sensitivity Acreage – PFYC 4
Proposed Midpoint (new)	8.8	0.0	68.0
Alternative Midpoint (new)	0.0	0.0	326.6
Afton Substation	0.0	0.0	19.9
Hidalgo Substation	0.0	0.0	38.7

16 Proposed Midpoint would have a moderate direct and indirect impact on paleontological resources; 68
 17 acres classified as high sensitivity are expected to be disturbed.

18 Alternative Midpoint would have a major direct and indirect impact on paleontological resources; 327
 19 acres classified as high sensitivity are expected to be disturbed.

20 The expansion of the Afton and Hidalgo substations is expected to disturb 20 and 39 acres, respectively.
 21 If fossils are present, moderate direct and indirect impacts to paleontological resources are expected for
 22 both substations.

23 **ROUTE GROUP 1 IMPACT SUMMARY**

24 For route group 1, major direct and indirect impacts to paleontological resources may occur if fossils are
 25 present because of the presence of High Sensitivity Acreage within the ROW of subroutes 1.1 and 1.2.
 26 Subroute 1.2 is slightly less sensitive overall than subroute 1.1. For local alternatives DN-1, A and B,
 27 moderate impacts may occur if fossils are present and no impacts are anticipated for local alternatives C
 28 and D. Primarily moderate impacts are expected for the substation construction and/or expansions.
 29 Although route group 1 has predicted major and moderate impacts, if fossils are present adverse impacts
 30 will be mitigated according to the appropriate regulations and the Project’s paleontological resources
 31 treatment plan.

1 **Route Group 2 – Hidalgo Substation to Apache Substation**

2 Table 4.6-4 presents acreage/mileage of potential disturbance by PFYC class within the representative
 3 ROW of route group 2, Hidalgo Substation to Apache Substation. Table 4.6-5 presents the
 4 paleontological sensitivity within the representative ROW of route group 2, Hidalgo Substation to Apache
 5 Substation.

6 **Table 4.6-4.** Route Group 2 Paleontological Resource Inventory Data within the Representative ROW

	Total Miles	Acreage of PFYC 1	Acreage of PFYC 2	Acreage of PFYC 3	Acreage of PFYC 4	Total Acreage
Subroute 2.1, Proponent Preferred						
P4b	14.0	334.3	1.4	0	0	335.7
P4c	1.9	37.4	7.5	0	0	44.9
P5a	9.6	233.5	0	0	0	233.5
P5b	21.1	422.7	66.7	0	21.6	511.0
P6a	0.9	21.3	0	0	0	21.3
P6b	22.5	545.1	0	0	0	545.1
P6c	2.8	68.3	0	0	0	68.3
P7	22.3	514.8	26.0	0	0	540.8
P8	0.5	9.0	0	0	0	9.0
Subroute 2.2, Proponent Alternative						
E	31.8	672.7	77.7	0	16.2	766.6
F	25.3	611.0	0	0	0	611.0
Ga	25.7	622.4	0	0	0	622.4
Gb	1.0	25.9	0	0	0	25.9
Gc	7.4	166.8	12.8	0	0	179.6
I	2.3	55.4	0	0	0	55.4
J	2.3	55.6	0	0	0	55.6
Route Group 2 Local Alternatives						
LD1	35.4	772.7	84.8	0	0	857.5
LD2	9.6	233.2	0	0	0	233.2
LD3a	27.9	637.1	0	0	40.4	677.5
LD3b	1.9	46.6	0	0	0	46.6
LD4	51.7	1,253.1	0	0	0	1,467.7
LD4-Option 4	6.5	156.1	0	0	0	156.1
LD4-Option 5	12.3	296.8	0	0	0	296.8
WC1	14.8	359.1	0	0	0	359.1

7

1 **Table 4.6-5.** Route Group 2 Paleontological Sensitivity by Acreage within the Representative ROW

	Total Miles	Percent Permanent and Temporary Disturbance	Low Sensitivity Acreage (acreage total disturbance)	Moderate Sensitivity Acreage (acreage total disturbance)	High Sensitivity Acreage (acreage total disturbance)
Subroute 2.1, Proponent Preferred					
P4b	14.0	31.7%	335.7 (106.3)	0 (0)	0 (0)
P4c	1.9	31.7%	44.9 (14.2)	0 (0)	0 (0)
P5a	9.6	28.0%	233.5 (65.4)	0 (0)	0 (0)
P5b	21.1	27.3%	489.4 (133.6)	0 (0)	21.6 (5.8)
P6a	0.9	26.5%	21.3 (5.6)	0 (0)	0 (0)
P6b	22.5	27.8%	545.1 (151.5)	0 (0)	0 (0)
P6c	2.8	27.8%	68.3 (19.0)	0 (0)	0 (0)
P7	22.3	27.5%	540.8 (148.7)	0 (0)	0 (0)
P8	0.5	31.5%	9.0 (2.8)	0 (0)	0 (0)
Total	95.5	NA	2,288.0 (647.1)	0 (0)	21.6 (5.8)
Subroute 2.2, Proponent Alternative					
E	31.8	31.2%	750.4 (234.1)	0 (0)	16.2 (5.1)
F	25.3	28.6%	611.0 (174.7)	0 (0)	0 (0)
Ga	25.7	28.7%	622.4 (178.6)	0 (0)	0 (0)
Gb	1.0	28.2%	25.9 (7.3)	0 (0)	0 (0)
Gc	7.4	27.2%	179.6 (48.9)	0 (0)	0 (0)
I	2.3	32.1%	55.4 (17.8)	0 (0)	0 (0)
J	2.3	28.7%	55.6 (16.0)	0 (0)	0 (0)
Total	95.8	NA	2,300.3 (677.4)	0 (0)	16.2 (5.1)
Route Group 2 Local Alternatives					
LD1	35.4	29.5%	857.5 (253.0)	0 (0)	0 (0)
LD2	9.6	31.8%	233.2 (74.1)	0 (0)	0 (0)
LD3a	27.9	27.4%	637.1 (174.6)	0 (0)	40.4 (11.1)
LD3b	1.9	24.4%	46.6 (11.3)	0 (0)	0 (0)
LD4	51.7	32.2%	1,253.1 (403.5)	0 (0)	0 (0)
LD4-Option 4	6.5	32.3%	156.1 (50.4)	0 (0)	0 (0)
LD5-Option 5	12.3	30.6%	296.8 (90.8)	0 (0)	0 (0)
WC1	14.8	31.0%	359.1 (111.3)	0 (0)	0 (0)

2 Note: NA = not applicable.

3 SUBROUTE 2.1 – PROPONENT PREFERRED

4 Within route group 2, subroute 2.1 consists of segments P4b, P4c, P5a, P5b, P6a, P6b, P6c, P7, and P8.
 5 Beginning northeast of Lordsburg, subroute 2.1 travels west and south around Lordsburg. It then travels
 6 west across the New Mexico–Arizona State line and into Arizona, where it extends south and southwest
 7 around the eastern edge of Willcox Playa.

1 Within the representative ROW for subroute 2.1, 22 acres is categorized as high sensitivity (PFYC 4);
2 6 of the 22 acres is expected to be disturbed during construction. The remaining 2,288 acres is categorized
3 as low sensitivity (PFYC 1 or 2); 647 of the 2,288 acres is expected to be disturbed. Minor direct and
4 indirect impacts may occur in the area of high sensitivity for paleontological resources if fossils are
5 present.

6 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

7 Subroute 2.2 consists of E, F, Ga, Gb, Gc, I, and J. It begins south of the Lordsburg Playa and heads west
8 across the New Mexico–Arizona State line and north of San Simon. The subroute then travels west-
9 northwest to north of the Dos Cabezas Mountains and then northwest, west, and south around Willcox
10 Playa.

11 Within the representative ROW for subroute 2.2, only 16 acres, with 5 acres disturbed, is categorized as
12 high sensitivity (PFYC 4). A total of 2,300 acres is categorized as low sensitivity (PFYC 1 or 2), with 677
13 acres expected to be disturbed. Minor direct and indirect impacts would occur in the area of high
14 sensitivity for paleontological resources if fossils are present.

15 **LOCAL ALTERNATIVES**

16 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
17 4, LD4-Option 5, and WC1. LD1 starts east of Lordsburg, crosses the Peloncillo Mountains, and ends
18 northwest of San Simon. LD2 starts northwest of Lordsburg and crosses the Lordsburg Playa between the
19 north and south playa. LD3a and LD3b travel around the north sites of the Lordsburg Playa. LD4 crosses
20 the Peloncillo Mountains and the San Simon Valley and ends northwest of Willcox. LD4-Option 4 begins
21 in the foothills of the Peloncillo Mountains, travels south across I-10, and ends at the Dos Cabezas
22 Mountains. LD5-Option 5 runs southwest between LD4 and P6c. WC1 runs roughly parallel to I-10
23 through Sulphur Springs Valley.

24 For local alternative LD3a, 40 acres is categorized as high sensitivity (PFYC 4); 11 of the 40 acres is
25 expected to be disturbed during construction. Minor direct and indirect impacts would occur in the area of
26 high sensitivity for paleontological resources if fossils are present.

27 All of local alternatives LD1, LD2, LD3b, LD4, LD4-Option 4, LD4-Option 5, and WC1 are categorized
28 as low sensitivity (PFYC 1 or 2). No direct or indirect impacts would occur.

29 **NEW SUBSTATIONS OR SUBSTATION EXPANSION**

30 Expansion of one existing substation, the Apache Substation, is proposed for route group 2. The
31 expansion would occur over 68.9 acres of low sensitivity (PFYC 1 or 2) for paleontological resources.
32 No direct or indirect impacts would occur.

33 **ROUTE GROUP 2 IMPACT SUMMARY**

34 For route group 1, minor direct and indirect impacts may occur if fossils are present for both subroute 2.1
35 and 2.2. For local alternative LD3a minor impacts may occur if fossils are present and no impacts are
36 anticipated for local alternatives LD1, LD2, LD3b, LD4, LD4-Option 4, LD4-Option 5, and WC1 or the
37 expansion of the Apache substation. If fossils are present, adverse impacts will be mitigated according to
38 the appropriate regulations and the Project's paleontological resources treatment plan.

1 **Route Group 3 – Apache Substation to Pantano Substation**

2 Table 4.6-6 presents acreage/mileage of potential disturbance by PFYC class within the representative
3 ROW of route group 3, Apache Substation to Pantano Substation. Table 4.6-7 presents the
4 paleontological sensitivity within the representative ROW of route group 3, Apache Substation to Pantano
5 Substation.

6 **Table 4.6-6.** Route Group 3 Paleontological Resource Inventory Data within the Representative ROW

	Total Miles	Acreage of PFYC 1	Acreage of PFYC 2	Acreage of PFYC 3	Acreage of PFYC 4	Total Acreage
Subroute 3.1, Proponent Preferred						
U1a	16.1	291.9	0	0	0	291.9
U1b	2.9	53.0	0	0	0	53.0
U2	15.8	259.3	0	27.7	0	287.0
U3a	35.6	646.7	0	0	0	646.7
Route Group 3 Local Alternative						
H	19.3	350.2	0	0	0	350.2

7 **Table 4.6-7.** Route Group 3 Paleontological Sensitivity by Acreage within the Representative ROW

	Total Miles	Percent Permanent and Temporary Disturbance	Low Sensitivity Acreage (acreage total disturbance)	Moderate Sensitivity Acreage (acreage total disturbance)	High Sensitivity Acreage (acreage total disturbance)
Subroute 3.1, Proponent Preferred					
U1a	16.1	32.7%	291.9 (95.5)	0 (0)	0 (0)
U1b	2.9	32.5%	53.0 (17.2)	0 (0)	0 (0)
U2	15.8	35.2%	259.3 (91.3)	27.7 (9.8)	0 (0)
U3a	35.6	33.1%	646.7 (214.1)	0 (0)	0 (0)
Total	70.4	NA	1,250.9 (418.1)	27.7 (9.8)	0 (0)
Route Group 3 Local Alternative					
H	19.3	36.2%	350.2 (126.8)	0 (0)	0 (0)

8 **SUBROUTE 3.1 – PROPONENT PREFERRED**

9 Subroute 3.1 consists of upgrade of the existing Western 115-kV line running from the Apache Substation
10 west of Willcox Playa, east of the north end of the Dragoon Mountains, and through the San Pedro
11 Valley.

12 Within the representative ROW for subroute 3.1, 28 acres is categorized as moderate sensitivity
13 (PFYC 3); 10 of the 28 acres is expected to be disturbed during construction. The remaining 1,251 acres

1 is categorized as low sensitivity (PFYC 1 or 2). Disturbance within the representative ROW would result
 2 in a minor direct and indirect impact to paleontological resources if fossils are present.

3 **LOCAL ALTERNATIVES**

4 There is one local alternative for route group 3: local alternative H, which runs around the north side of
 5 Benson. Within the representative ROW, all of local alternative H is categorized as low sensitivity (PFYC
 6 1 or 2). No direct or indirect effects on paleontological resources are expected for local alternative H.

7 **NEW SUBSTATIONS OR SUBSTATION EXPANSION**

8 Expansion of two existing substations, the Pantano and Adams Tap substations, is proposed for route
 9 group 3. The Pantano Substation expansion would occur over 25.4 acres of low sensitivity (PFYC 1 or 2)
 10 for paleontological resources; the Adams Tap Substation expansion would occur over 5.6 acres of low
 11 sensitivity. No direct or indirect impacts would occur for either expansion.

12 **ROUTE GROUP 3 IMPACT SUMMARY**

13 For route group 3, minor direct and indirect impacts may occur if fossils are present in subroute 3.1.
 14 No impacts are anticipated for local alternative H or the substation expansions. If fossils are present in
 15 subroute 3.1, adverse impacts will be mitigated according to the appropriate regulations and the Project's
 16 paleontological resources treatment plan.

17 ***Route Group 4 – Pantano Substation to Saguaro Substation***

18 Table 4.6-8 presents acreage/mileage of potential disturbance by PFYC class within the representative
 19 ROW of route group 4, Pantano Substation to Saguaro Substation. Table 4.6-9 presents the
 20 paleontological sensitivity within the representative ROW of route group 4, Pantano Substation to
 21 Saguaro Substation.

22 **Table 4.6-8.** Route Group 4 Paleontological Resource Inventory Data within the Representative ROW

	Total Miles	Acreage of PFYC 1	Acreage of PFYC 2	Acreage of PFYC 3	Acreage of PFYC 4	Total Acreage
Subroute 4.1, Proponent Preferred						
U3b	0.5	8.2	0	0	0	8.2
U3c	1.0	17.5	0	0	0	17.5
U3d	3.4	62.4	0	0	0	62.4
U3e	0.9	16.1	0	0	0	16.1
U3f	0.7	12.4	0	0	0	12.4
U3g	0.9	16.2	0	0	0	16.2
U3h	1.1	19.8	0	0	0	19.8
U3i	18.2	331.1	0	0	0	331.1
U3j	0.9	15.9	0	0	0	15.9
U3k	16.7	303.6	0	0	0	303.6
U3l	1.6	28.1	0	0	0	28.1
U3m	0.6	8.9	0	0	0	8.9
U4	1.9	34.7	0	0	0	34.7

1 **Table 4.6-8.** Route Group 4 Paleontological Resource Inventory Data within the Representative ROW
2 (Continued)

	Total Miles	Acreage of PFYC 1	Acreage of PFYC 2	Acreage of PFYC 3	Acreage of PFYC 4	Total Acreage
Route Group 4 Local Alternatives						
MA1	1.1	19.0	0	0	0	19.0
TH1a	1.4	25.7	0	0	0	25.7
TH1b	1.6	28.4	0	0	0	28.4
TH1c	0.3	4.8	0	0	0	4.8
TH1-Option	1.0	7.7	0	0	0	7.7
TH3-Option A	0.8	15.1	0	0	0	15.1
TH3-Option B	0.8	14.5	0	0	0	14.5
TH3-Option C	1.8	29.3	0	0	0	29.3
TH3a	2.7	49.7	0	0	0	49.7
TH3b	4.5	81.4	0	0	0	81.4

3 **Table 4.6-9.** Route Group 4 Paleontological Sensitivity within the Representative ROW

	Total Miles	Percent Permanent and Temporary Disturbance	Low Sensitivity Acreage (acreage total disturbance)	Moderate Sensitivity Acreage (acreage total disturbance)	High Sensitivity Acreage (acreage total disturbance)
Subroute 4.1, Proponent Preferred					
U3b	0.5	32.2%	8.2 (2.6)	0 (0)	0 (0)
U3c	1.0	29.0%	17.5 (5.1)	0 (0)	0 (0)
U3d	3.4	32.1%	62.4 (20.0)	0 (0)	0 (0)
U3e	0.9	32.2%	16.1 (5.2)	0 (0)	0 (0)
U3f	0.7	32.2%	12.4 (4.0)	0 (0)	0 (0)
U3g	0.9	30.3%	16.2 (4.9)	0 (0)	0 (0)
U3h	1.1	28.9%	19.8 (5.7)	0 (0)	0 (0)
U3i	18.2	32.0%	331.1 (106.0)	0 (0)	0 (0)
U3j	0.9	32.7%	15.9 (5.2)	0 (0)	0 (0)
U3k	16.7	33.2%	303.6 (100.8)	0 (0)	0 (0)
U3l	1.6	31.9%	28.1 (8.7)	0 (0)	0 (0)
U3m	0.6	35.3%	8.9 (3.1)	0 (0)	0 (0)
U4	1.9	33.0%	34.7 (11.5)	0 (0)	0 (0)
Total	48.4	NA	874.9 (282.8)	0 (0)	0 (0)

4

1 **Table 4.6-9.** Route Group 4 Paleontological Sensitivity within the Representative ROW (Continued)

	Total Miles	Percent Permanent and Temporary Disturbance	Low Sensitivity Acreage (acreage total disturbance)	Moderate Sensitivity Acreage (acreage total disturbance)	High Sensitivity Acreage (acreage total disturbance)
Route Group 4 Local Alternatives					
MA1	1.1	31.0%	19.0 (5.9)	0 (0)	0 (0)
TH1a	1.4	29.3%	25.7 (7.5)	0 (0)	0 (0)
TH1b	1.6	30.2%	28.4 (8.6)	0 (0)	0 (0)
TH1c	0.3	35.3%	4.8 (1.7)	0 (0)	0 (0)
TH1-Option	1.0	30.1%	7.7 (2.3)	0 (0)	0 (0)
TH3-Option A	0.8	28.1%	15.1 (4.2)	0 (0)	0 (0)
TH3-Option B	0.8	33.2%	14.5 (4.8)	0 (0)	0 (0)
TH3-Option C	1.8	40.2%	29.3 (11.8)	0 (0)	0 (0)
TH3a	2.7	33.5%	49.7 (16.6)	0 (0)	0 (0)
TH3b	4.5	32.3%	81.4 (26.3)	0 (0)	0 (0)

2 Note: NA = not applicable

3 **SUBROUTE 4.1 – PROPONENT PREFERRED**

4 Subroute 4.1 begins at the Pantano Substation and travels northwest and north through Green Valley to
 5 Tucson. It runs around the Tucson International Airport to the Del Bac Substation and then heads north
 6 and northwest across Tumamoc Hill, connecting to the Tucson Substation. The line then continues north
 7 and northwest, traveling northeast of the Tucson Mountains to Marana and ending at the Saguaro
 8 Substation.

9 Within the representative ROW, all of subroute 4.1 is categorized as low sensitivity (PFYC 1 or 2).
 10 No direct or indirect effects are expected for subroute 4.1.

11 **LOCAL ALTERNATIVES**

12 There are ten local alternatives available for route group 4: TH1a, TH1b, TH1c, TH1-Option, TH3a,
 13 TH3b, TH3-Option A, TH3-Option B, TH3-Option C, and MA1. The nine TH alternatives are all options
 14 for replacing the existing line that currently runs across Tumamoc Hill. MA1 runs southwest of the
 15 Marana Airport in an “L” shape to avoid the airport itself.

16 Within the representative ROW, all ten local alternatives are categorized as low sensitivity (PFYC 1 or 2).
 17 No direct or indirect effects are expected for TH1a, TH1b, TH1c, TH3a, TH3b, TH3-Option A, TH3-
 18 Option B, TH3-Option C, and MA1.

19 **NEW SUBSTATIONS OR SUBSTATION EXPANSION**

20 The expansion of nine existing substations is planned for route group 4. The existing stations are Del Bac
 21 Substation, DeMoss Petrie Substation, Marana Substation, Nogales Substation, Rattlesnake Substation,
 22 Tortolita Substation, Tucson Substation, Vail Substation, and Saguaro Substation. Table 4.6-10 presents
 23 the ground disturbance acreage by substation.

1 **Table 4.6-10.** Expected Acreage of Ground Disturbance by Substation in Route Group 4

Substation	Low Sensitivity Acreage – PFYC 1 and 2	Moderate or Unknown Sensitivity Acreage – PFYC 3	High Sensitivity Acreage – PFYC 4
Apache Substation	69.8	0.0	0.0
Adams Tap Substation	5.6	0.0	0.0
Del Bac Substation	14.2	0.0	0.0
DeMoss Petrie Substation	4.2	0.0	0.0
Marana Substation	14.5	0.0	0.0
Nogales Substation	10.2	0.0	0.0
Pantano Substation	25.4	0.0	0.0
Rattlesnake Substation	16.7	0.0	0.0
Tortolita Substation	16.1	0.0	0.0
Tucson Substation	10.6	0.0	0.0
Vail Substation	27.7	0.0	0.0
Saguaro Substation	22.7	0.0	0.0

2 The substation expansions (Del Bac Substation, DeMoss Petrie Substation, Marana Substation, Nogales
3 Substation, Rattlesnake Substation, Tortolita Substation, Tucson Substation, Vail Substation, and Saguaro
4 Substation) are all located on areas of low sensitivity (PFYC 1 or 2) for paleontological resources.
5 No direct or indirect impacts are expected.

6 **ROUTE GROUP 4 IMPACT SUMMARY**

7 For route group 4, no impacts to paleontological resources are expected for subroute 4.1, the local
8 alternatives, or the substation expansions.

9 ***Agency Preferred Alternative***

10 In the New Build Section, the Agency Preferred Alternative consists of segments P1, P2, P3, and P4a
11 within route group 1 and of segment P7 and a portion of local alternatives L3a and LD4, and all of LD4-
12 Option 5 within route group 2. The Agency Preferred Alternative within route group 1 has the greatest
13 acreage of potential disturbance within the representative ROW (473 ac) across geological formations
14 with high sensitivity. The high sensitivity formations are the Upper Santa Fe Group and the Gila Group.
15 These formations have produced dinosaur, mammal, avian, and reptilian fossils, although no fossils
16 localities have been recorded in the analysis area or representative ROW of the Agency Preferred
17 Alternative. The majority of route group 2 for the Agency Preferred Alternative would not cross
18 geological formations with high sensitivity. Construction is expected to disturb 11 acres of high
19 sensitivity Gila Group geological formations within the representative ROW of LD3a.

20 In the Upgrade Section, the Agency Preferred Alternative consists of segments U1a, U1b, U2, and U3a
21 within route group 3 and consists of segments U3b, U3c, U3f, U3g, U3h, U3i, U3g, U3l, U3m, and U4
22 and local alternatives TH1a, TH1 Option, and MA1 within route group 4. Ten acres of geological
23 formations with moderate sensitivity is expected to be disturbed by construction within the representative
24 ROW of segment U2 of route group 3. The moderate sensitivity geological formations are unnamed
25 Quaternary deposits in the San Pedro River valley which have produced mammal fossils. No impacts to
26 paleontological resources are expected for the remainder of route group 3 and all of route group 4 because
27 they do not cross any geological formations with moderate or high sensitivity.

1 For the Agency Preferred Alternative, no impacts to paleontological resources are anticipated.

2 This analysis has identified the following potential impacts to paleontological resources:

- 3 • In route group 1, the Agency Preferred Alternative representative ROW crosses the Upper Santa
4 Fe and the Gila Group formations which have a high sensitivity. Although, no fossils localities
5 have been recorded in the analysis area or representative ROW, these formations may produce
6 important fossils. All segments in route group 1 cross high sensitivity formations.
- 7 • In route group 2, the Agency Preferred Alternative representative ROW of local alternative LD3a
8 crosses an area of high sensitivity (Gila Group) which may produce fossils.
- 9 • In route group 4, segment U2 crosses an area of unnamed Quaternary deposits in the San Pedro
10 River valley with moderate sensitivity.

11 If fossils are present in the areas of high or moderate sensitivity within the Agency Preferred Alternative,
12 any adverse impacts from construction would be mitigated according to all applicable laws and
13 regulations and Southline's POD. These mitigation measures would also apply to inadvertent discoveries
14 during operation and maintenance. If fossils are present, provided that all mitigation measures are
15 followed, adverse impacts would be reduced to minor for the areas of concern outlined above.

16 ***Additional Mitigation Measures***

17 Potential mitigation measures for adverse impacts to paleontological resources include paleontological
18 surveys of PFYC 3 and 4 geological units within the selected route, avoidance by spanning resource
19 areas, training and education for construction and maintenance personnel, monitoring of ground
20 disturbance activities in sensitive areas, covering of fossil-bearing sediment to protect resources, recovery
21 of fossils, and curation of fossils in an appropriate repository. As discussed in the POD for the Project,
22 approved mitigation measures would be detailed in a paleontological resources treatment plan that would
23 be followed before and during construction, as well as during maintenance activities.

24 ***Residual Impacts***

25 If the mitigation measures detailed in the paleontological resources treatment plan are followed, there
26 would be no residual impacts.

27 ***Unavoidable Adverse Impacts***

28 If areas with moderate or high paleontological sensitivity cannot be avoided by Project design,
29 disturbance to these areas may result in unavoidable adverse impacts due to loss of scientifically
30 important fossils.

31 ***Short-term Uses versus Long-term Productivity***

32 Construction of the Project would result in ground disturbance resources during construction. Ground
33 disturbance that results in the loss of scientifically important fossils is considered a long-term impact.
34 Impacts to scientifically important fossils are of concern primarily in the New Mexico portions of the
35 Project; the majority of the representative ROW in Arizona has low sensitivity for paleontological
36 resources.

37 During construction, the removal of fossils from areas of moderate or high sensitivity would alter the
38 long-term productivity of those fossil sources because fossils are a finite and nonrenewable resource.
39 However, the discovery and removal of previously unknown fossils can contribute to long-term

1 productivity as well by: (1) allowing those fossils to be studied by the scientific community; and
2 (2) potentially revealing new fossil beds for later research.

3 Loss of access to resources during construction would be reversed once construction was complete.
4 However, any permanent facilities construction on areas with moderate or high sensitivity would restrict
5 access until the line is decommissioned in 50 years.

6 ***Irreversible and Irrecoverable Commitments of Resources***

7 Although fossils are a finite and nonrenewable resource, provided that all mitigation measures are
8 followed there are no irreversible or irretrievable commitments of resources.

9 **4.7 WATER RESOURCES**

10 **4.7.1 Groundwater, Surface Water, and Wetlands –** 11 **Introduction**

12 This section describes the impacts to groundwater, surface water, floodplains, and wetlands associated
13 with the construction and operation and maintenance of the transmission line, substations, and ancillary
14 facilities. Impacts to water resources are discussed primarily in terms of the number or acreage of waters
15 impacted, and the potential for contamination to occur. The impacts described in this section are based on
16 data compiled in “Southline Transmission Project Resource Report 17: Water Resources” (CH2M Hill
17 2013f). The contents of that report are used herein without specific reference.

18 **4.7.2 Methodology and Assumptions**

19 ***Analysis Area***

20 **NEW BUILD SECTION**

21 The environmental consequences for water resources for the New Build Section are based on a 200-foot-
22 wide representative ROW, located along the centerline of the 2-mile-wide analysis area. The actual
23 construction ROW would likely be configured to avoid certain environmental impacts, or for other
24 logistical reasons. Therefore, specific water bodies impacted by the representative ROW could or could
25 not be impacted by the final construction ROW. However, use of the representative ROW allows
26 disclosure of the approximate magnitude of impacts associated with each route group and route segment.

27 Environmental consequences for water resources could extend beyond the representative ROW in order to
28 incorporate the potential for indirect impacts to water resources aside from direct disturbance. For surface
29 water this also includes any downstream drainages, limited to the downstream confluence of the next
30 major watercourse. For groundwater this includes any aquifers that would be affected by changes in
31 groundwater quantity or quality, but limited just to the area of the aquifer where any impacts would affect
32 known or existing users, or where changes in groundwater quality might migrate.

33 **UPGRADE SECTION**

34 The environmental consequences for water resources for the Upgrade Section are based on a 150-foot
35 representative ROW, located along the centerline of the 500-foot-wide analysis area. Similar to the New
36 Build Section, the analysis area also includes downstream drainages and aquifers as described above.

1 **Analysis Assumptions**

2 **SURFACE WATER**

3 There are three primary assumptions for analyzing impacts to surface waters. First, analysis of impacts
4 assumes that all appropriate construction stormwater permits would be in place, that a SWPPP had been
5 prepared and implemented, and that BMPs would be in place and would be followed. Second, it is
6 assumed that spill prevention and spill response would be in place as part of the SWPPP, and that minor
7 accidental spills or discharges could and would be properly addressed. Third, it is assumed that there
8 would be less risk of impact from stormwater runoff to ephemeral washes than perennial or flowing
9 waters. Therefore, the analysis focuses on those areas where perennial surface water has been
10 documented, or where special status waters are present or nearby; the potential for discharge to these
11 waters would be considered an impact. Since the SWPPP, BMPs, and spill prevention plans would be in
12 place, the potential for discharge to ephemeral washes is not considered an impact.

13 **FLOODPLAINS**

14 It is assumed that any mapped floodplain (identified in chapter 3) crossed by the representative ROW
15 would be impacted temporarily. It is assumed that permanent structures would potentially be present only
16 for those floodplains whose span exceeds 900 feet (which is the approximate distance between poles for
17 both the New Build and Upgrade Sections) or for which known constraints exist that require placement
18 within the floodplain. Not all permanent structures placed within floodplains would be considered an
19 impact. In some cases, mapped floodplains represent areas of sheetflow or represent shallow playa lakes.
20 Placement of permanent structures within these areas would not be considered an impact. Placement of
21 permanent structures within well-defined flow channels would be considered an impact.

22 **WETLANDS AND WATERS OF THE U.S.**

23 Ephemeral drainages/ washes are regulated under Section 404 of the Clean Water Act. Should a proposed
24 action require the discharge of dredged or fill material into an ephemeral, intermittent, or perennial
25 drainage, a Department of the Army discharge permit may be required. It is assumed that any linear water
26 feature (identified in chapter 3) crossed by the representative ROW would be a potential WUS that could
27 be impacted. It is also assumed that any wetland (identified in chapter 3) crossed by the representative
28 ROW could be impacted. However, in both cases both the final placement of the ROW and the permitting
29 process that is required under Section 404 of the CWA would have the goal of avoiding both wetlands
30 and WUS. Therefore, while these features may be present within the ROW, there would only be an
31 impact to wetlands and WUS if disturbance is unavoidable. A WUS or wetland would be considered
32 unavoidable if it is large enough or configured such that it cannot be spanned. As noted, the approximate
33 distance between poles is 900 feet.

34 **GROUNDWATER**

35 With respect to groundwater quantity and impacts to local well users, there is insufficient detail to know
36 precisely from where construction water would be obtained, except that it would be obtained from
37 existing sources. The amount of water needed for construction (dewatering, concrete mixing) is relatively
38 minor compared to the large municipal and agricultural uses throughout the analysis area, and it would be
39 widely distributed along the construction route and not concentrated in one area. For these reasons,
40 impacts to groundwater quantity due to withdrawal of construction water are considered minimal and are
41 not explicitly analyzed. Damage to any water infrastructure (wells, canals) from the proposed Project is
42 not expected to occur. If occurring, infrastructure would be replaced or repaired. Therefore, these impacts
43 are not explicitly analyzed.

1 With respect to groundwater quality, it is assumed that with BMPs in place to prevent and respond to
2 spills or other contamination, there is little risk to contamination of groundwater resources except in areas
3 of known shallow groundwater (defined for this analysis as groundwater less than 20 feet bgs). Therefore,
4 the analysis focuses on those areas where shallow groundwater has been documented.

5 ***Impact Indicators***

6 **SURFACE WATER**

- 7 • Qualitative assessment of the potential for accidental or intentional release of contaminants to
8 surface waters.
- 9 • Number of springs that occur within the ROW.
- 10 • Acreage of any specially designated waters, including impaired waters, Outstanding National
11 Resource Waters (in New Mexico), and Outstanding Arizona Waters, that occurs within the
12 ROW.
- 13 • Qualitative assessment of the effects on any specially designated waters, including impaired
14 waters, Outstanding National Resource Waters (in New Mexico), and Outstanding Arizona
15 Waters, including discharge of stormwater.
- 16 • Length of perennial or flowing waters that occur within the ROW.
- 17 • Qualitative assessment of the effects on any perennial or flowing waters, including discharge of
18 stormwater.
- 19 • Number and type of water bodies that occur within the ROW with special management
20 designation and restrictions.

21 **FLOODPLAINS**

- 22 • Acreage of disturbance within floodplains.
- 23 • Presence of any permanent physical structures within floodplains, excluding areas of sheetflow or
24 shallow playa lakes.

25 **WETLANDS AND WATERS OF THE U.S.**

- 26 • Number and length of WUS for which disturbance would be unavoidable.
- 27 • Number, acreage, and type of wetlands or special aquatic sites for which disturbance would be
28 unavoidable.

29 **GROUNDWATER**

- 30 • Qualitative assessment of the potential for accidental or intentional release of contaminants to
31 shallow groundwater.

32 ***Significant Impacts***

33 For the purposes of this analysis, a significant impact on water resources could result if any of the
34 following were to occur from construction or operation and maintenance of the proposed Project:

- 35 • A spring were located within the representative ROW, was unavoidable during final design,
36 and was directly disturbed.
- 37 • An intentional or accidental release of contaminants, including sediment, were to enter a
38 perennial or intermittent surface water.

- 1 • An intentional or accidental release of contaminants, including sediment, were to enter an
- 2 Outstanding Arizona Water or Outstanding National Resource Water.
- 3 • An intentional or accidental release of contaminants were to impact an area of shallow
- 4 groundwater.
- 5 • A WUS, wetland, or special aquatic site were unavoidable and disturbed by the representative
- 6 ROW.
- 7 • Any permanent structures were located within floodplains with well-defined flow channels.

8 **4.7.3 Impacts Analysis Results**

9 ***No Action Alternative***

10 Under the no action alternative, no additional ground disturbance would occur in the New Build Section.
11 Surface waters and wetlands in the analysis area would be subject to impacts from ongoing land
12 management and climatic trends like drought or climate change. Groundwater use would continue in a
13 similar manner to that observed at present. With regard to the Upgrade Section, even under the no action
14 alternative, Western still plans to upgrade the existing lines between the Apache and Saguaro substations
15 within the next 10 years, in accordance with Western's 10-year capital improvement plan (Western
16 2012a).

17 ***Impacts Common to All Action Alternatives***

18 The potential for accidental or intentional release of contaminants to surface waters and shallow
19 groundwater is common to all action alternatives.

20 **CONSTRUCTION**

21 Materials would be used during construction, including petroleum products (oil, gasoline, diesel) and
22 other hazardous materials, that are potential contaminants that could impact surface water or shallow
23 groundwater. The proposed Project includes control measures and BMPs that are intended to minimize
24 this risk (see table 2-7 in chapter 2). These are standard industry practices and are typically effective at
25 minimizing the risk for accidental release of contaminants to surface water or shallow groundwater when
26 implemented properly. The proposed Project does not include the intentional release of any potential
27 contaminants.

28 The most common contaminant from construction activity is the movement of sediment by stormwater
29 into nearby surface waters, due to ground disturbance. The proposed Project includes control measures
30 and BMPs that are intended to stabilize disturbed ground, control erosion from disturbed areas, and
31 prevent sediment from entering surface waters. The SWPPP(s) required to be prepared for the
32 construction activities would identify the specific structural control measures and BMPs to be
33 implemented. If implemented properly, as required under Section 402 of the CWA, these activities
34 minimize the risk for erosion and movement of sediment in stormwater.

35 BMPs and control measures are designed to be adapted to site-specific conditions. Some characteristics
36 encountered for individual route segments represent special conditions that could need to be specially
37 assessed. These are identified in the next section for each route group. Proposed structure locations should
38 incorporate avoidance and BMPs to avoid WUS and wetlands. Construction of access roads would likely
39 not impact wetlands if avoidance measures are incorporated. Specific wetlands or special aquatic sites
40 that could be impacted are identified under each route group.

1 **OPERATION AND MAINTENANCE**

2 Similar BMPs and control measures would be implemented during operation and maintenance, and
3 overall minimize the risk for accidental release of potential contaminants and erosion and movement of
4 sediment in stormwater due to ground disturbance.

5 If avoidance measures and BMPs are incorporated, then most WUS and wetlands would not be affected
6 by the operation and maintenance of the transmission line.

7 ***Route Group 1 – Afton Substation to Hidalgo Substation***

8 **SUBROUTE 1.1 – PROPONENT PREFERRED**

9 **Construction**

10 There are no springs impacted for any segments within this subroute.

11 One segment contains several WUS (P2); all of these WUS can be spanned or otherwise avoided, and do
12 not constitute significant impacts. No wetlands or special aquatic sites are impacted under this subroute
13 (table 4.7-1).

14 The Mimbres River is crossed by one segment within this subroute (P2). The Mimbres River has
15 intermittent flow and could have surface flow present during construction, which represents an increased
16 risk of potential contamination of surface waters. Construction activities in this area could require special
17 management practices or controls to minimize this risk.

18 **Operation and Maintenance**

19 The potential for delivery of sediment into the Mimbres River would be elevated after construction, but
20 with implementation of stabilization and revegetation measures, this potential would decrease over time.

21 Permanent structures are likely to be located within the floodplains for two segments (P2, P3). These
22 floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
23 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
24 represent a significant impact.

25 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

26 **Construction**

27 There are no springs impacted for any segments within this subroute.

28 One segment contains several WUS (S8); all of these WUS can be spanned or otherwise avoided, and do
29 not constitute significant impacts. No wetlands or special aquatic sites are impacted under this subroute.

30 **Operation and Maintenance**

31 Permanent structures are likely to be located within the floodplains for four segments (S5, S6, S7, S8).
32 These floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
33 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
34 represent a significant impact.

1 **LOCAL ALTERNATIVES**

2 There are five local alternatives available for route group 1: DN1, A, B, C, and D.

3 **Table 4.7-1.** Route Group 1 Groundwater, Surface Water, and Wetlands Resource Inventory Data

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status†
Subroute 1.1, Proponent Preferred							
P1	5.1	0	0	0	0	0	
P2	102.0	0	215	275.9 (16)	5 (1,125)	0	Mimbres River‡
P3	31.1	0	0	235.7 (2)	0	0	
P4a	8.7	0	0	0	0	0	
Subroute 1.2, Proponent Alternative							
S1	13.4	0	0	0	0	0	
S2	11.1	0	0	0	0	0	
S3	12.9	0	0	0	0	0	
S4	10.6	0	0	0	0	0	
S5	29.7	0	0	201.3 (4)	0	0	
S6	7.4	0	0	9.9 (1)	0	0	
S7	41.5	0	0	69.1 (4)	0	0	
S8	14.6	0	0	22.1 (2)	2 (439)	0	
Route Group 1 Local Alternatives							
DN1	42.5	0	200	95.6 (8)	3 (872)	0	Mimbres River‡
A	17.5	0	0	0	0	1 (0.3)	
B	12.2	0	0	0	0	0	
C	9.0	0	0	27.1 (2)	0	0	
D	22.8	0	0	8.8 (1)	2 (804)	0	

4

1 **Table 4.7-1.** Route Group 1 Groundwater, Surface Water, and Wetlands Resource Inventory Data
2 (Continued)

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
Substations and Staging Areas							
Proposed Midpoint	NA	0	0	54.5 (1)	0	0	
Rep. Staging Area S4	NA	0	0	6.1	0	0	
Rep. Staging Area S6	NA	0	0	6.9	0	0	
Rep. Staging Area S7	NA	0	0	4.1	0	0	

3 Note: NA = not applicable.

4 * Number in parentheses indicates number of floodplain areas that are in excess of 900 feet wide, which is the average space between pole structures.

5 † Includes areas of shallow groundwater, perennial or intermittent surface water, presence of impaired water, Outstanding National Resource Water, Outstanding Arizona Water, or presence of special management area.

6 ‡ The Mimbres River is an intermittent surface water. Surface flow may be present during construction.

7 **Bold-faced items identify a significant impact.**

9 Construction

10 There are no springs impacted for any segments within these local alternatives.

11 Two segments contain WUS (DN1, D) and one segment (A) contains a wetland; all of these WUS can be
12 spanned or otherwise avoided, and do not constitute significant impacts. The 0.3-acre wetland is a
13 freshwater pond within Kilbourne Hole in Doña Ana County, New Mexico. Proposed structure locations
14 should incorporate avoidance and BMPs to avoid the wetland; therefore the presence of this wetland is
15 not considered a significant impact. This wetland is likely an upland swale where storm runoff within
16 Kilbourne Hole drains and provides temporary drinking water for cattle and possibly local fauna.
17 Construction of access roads would likely not impact the pond if avoidance measures are incorporated.

18 The Mimbres River is crossed by one segment within the local alternatives (DN1). The Mimbres River
19 has intermittent flow and could have surface flow present during construction, which represents an
20 increased risk of potential contamination of surface waters. Construction activities in this area could
21 require special management practices or controls to minimize this risk.

22 Operation and Maintenance

23 The potential for delivery of sediment into the Mimbres River would be elevated after construction, but
24 with implementation of stabilization and revegetation measures, this potential would decrease over time.

25 Permanent structures are likely to be located within the floodplains for two segments (C, D). These
26 floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
27 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
28 represent a significant impact.

1 **SUBSTATIONS AND STAGING AREAS**

2 **Construction**

3 There are no springs impacted for any substations or representative staging areas within this route group,
4 and no WUS, wetlands, or special aquatic sites are impacted.

5 Three staging areas would temporarily impact floodplains, but would be unlikely to have permanent
6 structures.

7 **Operation and Maintenance**

8 Permanent structures are likely to be located within the floodplain for the Proposed Midpoint Substation.
9 Placement of this structure would likely elevate flooding risk; permitting processes would ensure that
10 flooding risk remains within allowable levels. This is considered a significant impact; impacts would be
11 minor and long-term.

12 ***Route Group 2 – Hidalgo Substation to Apache Substation***

13 **SUBROUTE 2.1 – PROPONENT PREFERRED**

14 **Construction**

15 There are no springs impacted for any segments within this subroute.

16 Two segments contain WUS (P5b, P6b) and one additional segment contains two wetland areas (P7);
17 all of these WUS can be spanned or otherwise avoided, and do not constitute significant impacts (table
18 4.7-2). The two wetland areas impacted by segment P7 consist of the Willcox Playa and one additional
19 smaller wetland in Cochise County, Arizona (111.8 acres). The Willcox Playa is classified as a dry
20 ephemeral lake. It is located within the San Pedro Watershed and is known as a terminal or “interior
21 draining” basin, containing approximately 30,000 acres. Willcox Playa is also known to be a remnant of
22 the Pleistocene pluvial Lake Cochise. While the smaller wetland potentially could be spanned, Willcox
23 Playa would be unavoidable and would be impacted by construction disturbance; this is considered a
24 significant impact. Direct impacts associated with the wetlands include the construction of the
25 transmission line structures and temporary access roads. These impacts would be minor and long-term.
26 Proposed structure locations should incorporate avoidance and BMPs to avoid the smaller wetland.
27 Construction of access roads would likely not impact the smaller wetland if avoidance measures are
28 incorporated.

29 The Lordsburg Playa RNA is crossed by segment P5a, which has management restrictions on
30 authorization of new ROWs.

31 **Operation and Maintenance**

32 Permanent structures are likely to be located within the floodplains for three segments (P5b, P6b, P7).
33 These floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
34 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
35 represent a significant impact.

1 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

2 **Construction**

3 There are no springs impacted for any segments within this subroute.

4 Three segments contain WUS (E, F, I); all of these WUS can be spanned or otherwise avoided, and do not
5 constitute significant impacts, including the largest, which is the San Simon River. No wetlands or special
6 aquatic sites are impacted under this subroute.

7 The Lordsburg Playa RNA is crossed by segment E, and the Willcox Playa NNL is crossed by segment
8 Gc, both of which have management restrictions on authorization of new ROWs.

9 **Operation and Maintenance**

10 Permanent structures are likely to be located within the floodplains for five segments (E, F, Ga, Gb, Gc).
11 These floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
12 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
13 represent a significant impact.

14 **Table 4.7-2.** Route Group 2 Groundwater, Surface Water, and Wetlands Resource Inventory Data

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
Subroute 2.1, Proponent Preferred							
P4b	14.0	0	0	0	0	0	
P4c	1.9	0	0	0	0	0	
P5a	9.6	0	0	0	0	0	Lordsburg Playa [†]
P5b	21.1	0	0	9.2 (2)	1 (212)	0	
P6a	0.9	0	0	1.9	0	0	
P6b	22.5	0	0	55.2 (4)	2 (506)	0	
P6c	2.8	0	0	0	0	0	
P7	22.3	0	0	116 (2)	0	2 (111.8)	
P8	0.5	0	0	0	0	0	
Subroute 2.2, Proponent Alternative							
E	31.8	0	0	6.6 (1)	1 (228)	0	Lordsburg Playa [†]
F	25.3	0	0	50.3 (4)	1 (341)	0	
Ga	25.7	0	0	192.7 (5)	0	0	
Gb	1.0	0	0	3.6 (1)	0	0	
Gc	7.4	0	0	9.8 (2)	0	0	Willcox Playa [§]
I	2.3	0	0	2.0	1 (231)	0	
J	2.3	0	0	0	0	0	

1 **Table 4.7-2.** Route Group 2 Groundwater, Surface Water, and Wetlands Resource Inventory Data
 2 (Continued)

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
Route Group 2							
Local Alternatives							
LD1	35.4	0	0	89.7 (1)	3 (4,788)	0	
LD2	9.6	0	0	0	0	0	
LD3a	27.9	0	0	0	0	0	
LD3b	1.9	0	0	0	0	0	
LD4	51.7	0	0	117.4 (7)	4 (1,728)	0	
LD4-Option 4	6.5	0	0	0	0	0	
LD4-Option 5	12.3	0	0	11.6	1 (200)	0	
WC1	14.8	0	0	142.2 (3)	0	0	
Substations and Staging Areas							
Rep. Staging Area Ga	NA	0	0	15.9	0	0	

- 3 Note: NA = not applicable.
 4 * Number in parentheses indicates number of floodplain areas that are in excess of 900 feet wide, which is the average space between pole structures.
 5 † Includes areas of shallow groundwater, perennial or intermittent surface water, presence of impaired water, Outstanding National Resource Water,
 6 Outstanding Arizona Water, or presence of special management area.
 7 ‡ Management direction for the Lordsburg Playa RNA excludes authorization of new ROWs.
 8 § Management direction for the Willcox Playa NNL excludes authorization of new ROWs.
 9 **Bold-faced items identify a significant impact.**

10 **LOCAL ALTERNATIVES**

11 There are seven local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
 12 4, and WC1.

13 **Construction**

14 There are no springs impacted for any segments within the local alternatives.

15 Three segments contain WUS (LD1, LD4, LD4-Option 5); with the exception of LD1, all of these WUS
 16 can be spanned or otherwise avoided, and do not constitute significant impacts. Segment LD1 roughly
 17 parallels Stein’s Creek for almost 1 mile, and it is not clear that this WUS could be avoided; therefore this
 18 represents a significant impact. This impact would be minor to moderate and long-term. No wetlands or
 19 special aquatic sites are impacted under this subroute.

20 **Operation and Maintenance**

21 Permanent structures are likely to be located within the floodplains for two segments (LD1, WC-1). These
 22 floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
 23 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
 24 represent a significant impact.

1 **SUBSTATIONS AND STAGING AREAS**

2 **Construction**

3 There are no springs impacted for any substations or representative staging areas within this route group,
4 and no WUS are impacted.

5 One staging area would temporarily impact floodplains, but would be unlikely to have permanent
6 structures.

7 **Operation and Maintenance**

8 There are no permanent impacts to floodplains from substations or staging areas.

9 ***Route Group 3 – Apache Substation to Pantano Substation***

10 **SUBROUTE 3.1 – PROPONENT PREFERRED**

11 **Construction**

12 There are no springs impacted for any segments within this subroute.

13 Three segments contain WUS (U1a, U2, U3a), and two wetland areas are also present within the ROW
14 (U2); all of these WUS can be spanned or otherwise avoided, and do not constitute significant impacts,
15 including the San Pedro River (table 4.7-3). The wetlands consist of a 2.4-acre freshwater pond within the
16 Ash Creek–San Pedro River complex and a 0.7-acre riverine segment in Graham County, Arizona.
17 Proposed structure locations should incorporate avoidance and BMPs to avoid the wetlands; therefore the
18 presence of these wetlands is not considered a significant impact. Construction of access roads would
19 likely not impact the pond if avoidance measures are incorporated.

20 **Table 4.7-3.** Route Group 3 Groundwater, Surface Water, and Wetlands Resource Inventory Data

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
Subroute 3.1, Proponent Preferred							
U1a	16.1	0	0	0	2 (518)	0	
U1b	2.9	0	0	0	0	0	
U2	15.8	0	157	29.4 (2)	4 (642)	2 (3.05)	San Pedro River [‡]
U3a	35.6	0	0	6.6	1 (150)	0	Cienega Creek [§]

21

1 **Table 4.7-3.** Route Group 3 Groundwater, Surface Water, and Wetlands Resource Inventory Data
 2 (Continued)

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
Route Group							
3 Local							
Alternative							
H	19.3	0	409	47.7 (5)	2 (563)	1 (2.7)	San Pedro River [‡]

3 * Number in parentheses indicates number of floodplain areas that are in excess of 900 feet wide, which is the average space between pole structures.
 4 † Includes areas of shallow groundwater, perennial or intermittent surface water, presence of impaired water, Outstanding National Resource Water,
 5 Outstanding Arizona Water, or presence of special management area.
 6 ‡ The San Pedro River is a perennial surface water. Surface flow is likely to be present during construction. The San Pedro River also has an impaired
 7 water designation in the analysis area. The area around the San Pedro River also exhibits shallow groundwater (less than 20 feet bgs).
 8 § Cienega Creek is an intermittent surface water. Surface flow may be present during construction. Cienega Creek is also a designated Outstanding
 9 Arizona Water.

10 The San Pedro River is crossed by one segment within the subroute (U2). The San Pedro River has
 11 perennial flow and is likely to surface flow present during construction, which represents an increased risk
 12 of potential contamination of surface waters. In addition, the area near the San Pedro River exhibits very
 13 shallow groundwater, which represents an increased risk of potential contamination of groundwater.
 14 Construction activities in this area could require special management practices or controls to minimize this
 15 risk.

16 Cienega Creek is crossed by one segment within the subroute (U3a). Cienega Creek has intermittent flow
 17 and may have surface flow present during construction, which represents an increased risk of potential
 18 contamination of surface waters. In addition, Cienega Creek has been designated an Outstanding Arizona
 19 Water. There are additional restrictions associated with obtaining an AZPDES stormwater permit because
 20 of the presence of the Outstanding Arizona Water, which has strict anti-degradation standards.
 21 Construction activities are very likely to require special management practices or controls to minimize this
 22 risk, and likely would also have to be reviewed and approved by the ADEQ prior to issuance of the permit.

23 **Operation and Maintenance**

24 The potential for delivery of sediment into the San Pedro River and Cienega Creek would be elevated
 25 after construction, but with implementation of stabilization and revegetation measures, this potential
 26 would decrease over time.

27 Permanent structures are likely to be located within the floodplains for one segment (U2). These
 28 floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
 29 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
 30 represent a significant impact.

31 **LOCAL ALTERNATIVES**

32 There is one local alternative for route group 3: local alternative H.

33 **Construction**

34 There are no springs impacted by local alternative H.

1 Two WUS and one wetland area are contained in local alternative H; all of these WUS can be spanned or
2 otherwise avoided, and do not constitute significant impacts, including the San Pedro River. The wetland
3 area is a 2.7-acre riverine segment associated with the Ash Creek–San Pedro River complex. Proposed
4 structure locations should incorporate avoidance and BMPs to avoid the WUS; therefore the presence of
5 these wetlands is not considered a significant impact. Construction of access roads would likely not
6 impact the WUS if avoidance measures are incorporated.

7 The San Pedro River is crossed by local alternative H. The San Pedro River has perennial flow and is
8 likely to surface flow present during construction, which represents an increased risk of potential
9 contamination of surface waters. In addition, the area near the San Pedro River exhibits very shallow
10 groundwater, which represents an increased risk of potential contamination of groundwater. Construction
11 activities in this area could require special management practices or controls to minimize this risk.

12 **Operation and Maintenance**

13 The potential for delivery of sediment into the San Pedro River would be elevated after construction, but
14 with implementation of stabilization and revegetation measures, this potential would decrease over time.

15 Permanent structures are likely to be located within the floodplains for local alternative H. These
16 floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
17 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
18 represent a significant impact.

19 ***Route Group 4 – Pantano Substation to Saguaro Substation***

20 **SUBROUTE 4.1 – PROPONENT PREFERRED**

21 **Construction**

22 There are no springs impacted for any segments within this subroute.

23 Five segments contain WUS (U3c, U3d, U3h, U3i, U3k) and four additional segments contain wetland
24 areas (U3b, U3c, U3g, U3h); all of these WUS can be spanned or otherwise avoided, and do not constitute
25 significant impacts, including multiple crossings of the Santa Cruz River (table 4.7-4). All four riverine
26 segments are part of the Julian Wash–Santa Cruz River complex in Pima County, Arizona. The total
27 acreage for all four segments is 2.19 acres. Proposed structure locations should incorporate avoidance and
28 BMPs to avoid the riverine segments; therefore the presence of these wetlands is not considered a
29 significant impact. Construction of access roads would likely not impact the riverine segments if
30 avoidance measures are incorporated.

31 **Table 4.7-4.** Route Group 4 Groundwater, Surface Water, and Wetlands Resource Inventory Data

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
Subroute 4.1, Proponent Preferred							
U3b	0.5	0	0	0.6	0	1 (0.6)	
U3c	1.0	0	0	3.6 (1)	2 (361)	1 (0.5)	
U3d	3.4	0	0	2.2	1 (48)	0	

1 **Table 4.7-4.** Route Group 4 Groundwater, Surface Water, and Wetlands Resource Inventory Data
 2 (Continued)

	Total Miles	Number of Springs	Length of Perennial or Intermittent Waters (feet)	Acres of Floodplains and Number of Areas with Permanent Structures within Floodplain*	Number and Length of WUS (feet)	Number and Acres of Wetlands	Special Status [†]
U3e	0.9	0	0	6.1	0	0	
U3f	0.7	0	0	0.5 (1)	0	0	
U3g	0.9	0	0	8.0 (1)	0	0	
U3h	1.1	0	0	7.1 (2)	1 (181)	1 (0.6)	
U3i	18.2	0	0	94.5 (6)	1 (244)	1 (0.5)	
U3j	0.9	0	0	15.9 (1)	0	0	
U3k	16.7	0	0	136.8 (2)	1 (178)	0	
U3l	1.6	0	0	0	0	0	
U3m	0.6	0	0	0	0	0	
U4	1.9	0	0	0	0	0	
Route Group 4 Local Alternatives							
MA1	1.1	0	0	19.0 (1)	0	0	
TH1a	1.4	0	0	3.1	0	0	
TH1b	1.6	0	0	0	0	0	
TH1c	0.3	0	0	0.1	0	0	
TH1-Option	1.0	0	0	1.5 (1)	0	0	
TH3-Option A	0.8	0	0	2.9	1 (219)	1 (2.1)	
TH3-Option B	0.8	0	0	13.9 (1)	1 (867)	0	
TH3-Option C	1.8	0	0	10.8 (1)	2 (1,733)	1 (4.9)	
TH3a	2.7	0	0	3.5	1 (246)	1 (0.2)	
TH3b	4.5	0	0	46.6 (4)	1 (6,329)	2 (26.4)	
Substations and Staging Areas							
Marana Substation Expansion	NA	0	0	0.2 (1)	0	0	
Rep. Staging Area 13	NA	0	0	20.3	0	0	

3 Note: NA = not applicable.
 4 * Number in parentheses indicates number of floodplain areas that are in excess of 900 feet wide, which is the average space between pole structures.
 5 † Includes areas of shallow groundwater, perennial or intermittent surface water, presence of impaired water, Outstanding National Resource Water,
 6 Outstanding Arizona Water, or presence of special management area.

7 Operation and Maintenance

8 Permanent structures are likely to be located within the floodplains for seven segments (U3c, U3f–U3k).
 9 These floodplain areas largely consist of areas of sheetflow or overbank areas that would likely have very
 10 shallow water. Placement of permanent structures within these areas does not elevate flooding risk or
 11 represent a significant impact.

1 **LOCAL ALTERNATIVES**

2 There are 10 local alternatives for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a, TH3b,
3 TH3-Option A, TH3-Option B, and TH3-Option C.

4 **Construction**

5 There are no springs impacted for any segments within these local alternatives.

6 Five segments contain WUS (TH3-Option A, TH3-Option B, TH3-Option C, TH3a, TH3b) and four
7 additional segments contain wetland areas (TH3-Option A, TH3-Option C, TH3a, TH3b); with the
8 exception of segment TH3b, all of these WUS can be spanned or otherwise avoided, and do not constitute
9 significant impacts. Segment TH3b roughly parallels the Santa Cruz River for approximately 4.5 miles.
10 The constraints on pole placement within this ROW are such that impacts to the Santa Cruz River would
11 be unavoidable; this is considered a significant impact. These impacts would be minor to moderate and
12 long-term. Several local alternatives contain riverine segments and one wetland associated with the Julian
13 Wash–Santa Cruz River complex in Pima County, Arizona. The total acreage for all four riverine
14 segments is 33.6 acres. Also, within local alternative TH3b is a 0.4-acre wetland. With the exception of
15 segment TH3b, proposed structure locations should incorporate avoidance and BMPs to avoid the WUS
16 and the wetland; therefore the presence of these wetlands is not considered a significant impact. Segment
17 TH3b parallels the riverine wetland segments along the Santa Cruz River and impacts within this area
18 would be unavoidable; this is considered a significant impact. These impacts would be minor to moderate
19 and long-term. Construction of access roads would likely not impact the WUS or the wetland if avoidance
20 measures are incorporated.

21 **Operation and Maintenance**

22 Permanent structures are likely to be located within the floodplains for four segments (MA1, TH3-Option
23 B, TH3-Option C, TH3b). With the exception of segment TH3b, these floodplain areas largely consist of
24 areas of sheetflow or overbank areas that would likely have very shallow water, or are urbanized
25 watersheds. Placement of permanent structures within these areas does not elevate flooding risk or
26 represent a significant impact. Segment TH3b would include the placement of multiple structures within
27 the floodplain and defined channel of the Santa Cruz River; permitting processes would ensure that
28 flooding risk remains within allowable levels. This is considered a significant impact. These impacts
29 would be minor and long-term.

30 **SUBSTATIONS AND STAGING AREAS**

31 **Construction**

32 There are no springs impacted for any substations or representative staging areas within this route group,
33 and no WUS are impacted.

34 One staging area would temporarily impact floodplains, but would be unlikely to have permanent
35 structures.

36 **Operation and Maintenance**

37 Permanent structures are likely to be located within the floodplain for the Marana substation. Placement
38 of this structure would likely elevate flooding risk; permitting processes would ensure that flooding risk
39 remains within allowable levels. This is considered a significant impact.

1 **Agency Preferred Alternative**

2 As described in “Impacts Common to All Action Alternatives,” the Agency Preferred Alternative would
3 involve implementation of BMPs and control measures. If implemented properly, these activities
4 minimize the risk for erosion and movement of sediment in stormwater, as well as the potential for spills
5 or release of hazardous substances that could impact groundwater. Further, proposed structure locations
6 should incorporate avoidance and BMPs to avoid WUS and wetlands. The only significant impacts
7 identified involve areas where impacts to WUS or wetlands are unavoidable, and where permanent
8 structures would be placed within certain floodplains.

9 Within the New Build Section of the Agency Preferred Alternative, the proposed Midpoint North
10 substation would be required under the Agency Preferred Alternative; this substation would have
11 significant impacts from permanent structures unavoidably located within a floodplain, which is not the
12 case for the Proponent Alternative (subroutes 1.2 and 2.2). By using segment LD4, the Agency Preferred
13 Alternative avoids significant impacts to WUS along Stein’s Creek which would be unavoidable under
14 segment LD1, which parallels Stein’s Creek for approximately 1 mile. However, by using segment P7,
15 the Agency Preferred Alternative has unavoidable significant impacts to WUS associated with Willcox
16 Playa. Although this segment follows an existing transmission line around the east side of the playa,
17 expansion of the utility corridor would unavoidably impact WUS.

18 Within the Upgrade Section of the Agency Preferred Alternative, the proposed Marana Substation
19 expansion would be required under the Agency Preferred Alternative; this substation expansion would
20 have significant impacts from permanent structures unavoidably located within a floodplain; however, no
21 alternative route exists that would avoid these impacts. By using the Agency Preferred Alternative
22 segments west of Sentinel Peak (TH1a and TH1-Option), the Agency Preferred Alternative avoids
23 significant impacts to WUS and floodplains along the Santa Cruz River. These impacts would be
24 unavoidable under all TH3 segments, which parallels the Santa Cruz River for approximately 7 miles.

25 **Additional Mitigation Measures**

26 As indicated in the impact analysis, proponent-committed BMPs and controls are largely effective, if
27 properly implemented, at reducing the risk of accidental discharge of pollutants, including sediment, into
28 WUS. No additional mitigation measures are considered.

29 Permitting requirements, such as under Section 404 of the CWA, are sufficient to reduce impacts to the
30 extent possible within wetlands and special aquatic sites. Additional mitigation could be applied during
31 this permitting process to offset, compensate, or reduce impacts to wetlands or special aquatic sites.

32 **Residual Impacts**

33 Under CWA Section 404 permitting, required mitigation would be expected to offset or compensate for
34 impacts to wetlands or special aquatic sites. Residual impacts would be expected to be minimal.

35 **Unavoidable Adverse Impacts**

36 Unavoidable adverse impacts could occur from the placement of permanent substation structures within
37 floodplains. Permitting processes would ensure that flooding risk remains within allowable levels, but this
38 would still represent an unavoidable adverse impact. There are numerous floodplain areas where full
39 spanning of floodplains is not possible, based on initial design parameters. However, most of these
40 represent single pole structures in areas of sheetflow or very shallow flood flow, and permanent impacts
41 to floodplain function would not be expected.

1 ***Short-term Uses versus Long-term Productivity***

2 Long-term productivity of water resources would be affected by any long-term change in water quality
3 attributable to the proposed Project. As indicated in the impact analysis, proponent-committed BMPs and
4 controls are largely effective at reducing risks that would cause these changes; therefore no impacts are
5 likely to affect long-term productivity.

6 ***Irreversible and Irretrievable Commitments of Resources***

7 As indicated in the impact analysis, proponent-committed BMPs and controls are largely effective, if
8 properly implemented, at reducing the risk of accidental discharge of pollutants, including sediment, into
9 WUS. There are unlikely to be any irreversible commitment of groundwater or surface water resources.

10 Disturbance of WUS, wetlands, or special aquatic sites would generally be mitigated through the CWA
11 Section 404 permitting process. However, there could be an interim time period when aquatic resources
12 have exhibited some temporary impact, before stabilization, restoration, or replacement would occur. This
13 time period would represent an irretrievable commitment of water resources.

14 Placement of permanent structures within the floodplain would represent an impact to floodplain
15 resources. However, floodplain permitting requirements ensure that the floodplains continue to function
16 for flood conveyance without undue harm to existing structures or landowners. Therefore, there are
17 neither irretrievable nor irreversible impacts to floodplain resources.

18 **4.8 BIOLOGICAL RESOURCES**

19 **4.8.1. Vegetation**

20 This section describes impacts to vegetation associated with the construction, operation, and maintenance
21 of the transmission line, substations, and ancillary facilities. Impacts to vegetation are discussed in terms
22 of impacts on vegetation communities, special status species, and noxious weeds. The impacts described
23 in this section are based on the vegetation analysis available in “Southline Resource Report 15:
24 Vegetation” (CH2M Hill 2013g), and presented in chapter 3. Direct (same time and place that the action
25 is performed) and indirect (later in time or farther from the initial action) effects, and short-term or
26 temporary (5 years or less) and long-term (greater than 5 years) or permanent (life of the Project, 50
27 years) impacts are evaluated relative to vegetation resources. Cumulative effects also will be evaluated;
28 impacts added to the impacts of past, present, and foreseeable future actions, regardless of the cause or
29 source of other impacts. The vegetation resources are partitioned into: (1) vegetation communities, (2)
30 special status species, and (3) noxious weeds and other exotic invasive plant species. Impacts could affect
31 each of those vegetation resources in different ways.

32 ***Methodology and Assumptions***

33 **ANALYSIS AREA**

34 The analysis area for the purpose of evaluating effects and impacts to vegetation resources is the corridor
35 of the ROW, plus the footprints of substations and construction laydown areas located outside of the
36 ROW. The ROW for the New Build Section is 200 feet wide, and the ROW for the Upgrade Section is
37 150 feet wide. This analysis area is sufficient to identify vegetation resources that could be directly
38 impacted by ground disturbance during construction. The New Build and Upgrade Sections and route

1 groups within those will be addressed separately for impact analysis. The New Build Section includes
2 route group 1: Afton Substation to Hidalgo Substation, and route group 2: Hidalgo Substation to Apache
3 Substation. The Upgrade Section includes route group 3: Apache Substation to Pantano Substation, and
4 route group 4: Pantano Substation to Saguaro Substation.

5 **ANALYSIS ASSUMPTIONS**

6 For this analysis, it is assumed that the Southline PPMs under section 8.3.12 of the POD would be
7 implemented to minimize, mitigate, and/or restore vegetation disturbance.

8 **IMPACT INDICATORS**

9 **Vegetation Communities**

10 The following indicators were considered when analyzing potential impacts to vegetation:

- 11 • Long-term loss of natural (native species dominated) vegetation communities or associations.
- 12 • Direct loss of wetland and/or riparian areas caused by degradation of water quality, diversion of
13 water sources, or erosion or sedimentation from altered drainage patterns.

14 **Special Status Species**

15 The potential for occurrence of special status species within the broader analysis area was categorized
16 using the following criteria:

- 17 • None – Project is well outside the known geographic and elevational range, or lacks suitable
18 habitat necessary for the species, or both. Plants with highly restricted ranges are considered to
19 have no potential to occur if the analysis area is outside its known range, even if the required
20 habitat characteristics are present onsite.
- 21 • Unlikely – Project could contain suitable habitat for this species but is outside its known
22 geographic and/or elevational range.
- 23 • Possible – Project is within the geographic and elevational range and has suitable habitat for the
24 species.
- 25 • Present – The species was observed during limited field investigations in 2012 for this Project by
26 CH2M Hill (CH2M Hill 2013g). A listing of special status plant species that have the potential to
27 occur within the analysis area are presented in table D-1 in appendix D.

28 The following indicators were considered when analyzing potential impacts to special status plant
29 species:

- 30 • Direct loss to any population of special status plants that would jeopardize the continued
31 existence of that population
- 32 • Loss to any population of plants or an activity that would result in a species being listed or
33 proposed for listing as endangered or threatened

34 **Noxious Weeds**

35 The following indicators were considered when analyzing potential impacts to native vegetation
36 resources:

- 1 • Introduction or increased spread of noxious weeds and other invasive exotic weed species into the
2 Project footprint and Project perimeter area
- 3 • Using the indicator listed above, each category for each phase of the Project (construction,
4 operations and maintenance, and decommissioning) would be analyzed as to how vegetation
5 could be an impact from this Project (e.g., acreage and linear feet of land colonized by non-native
6 species (change through time))

7 **SIGNIFICANT IMPACTS**

8 For the purposes of this analysis, a significant impact on vegetation could result if any of the following
9 were to occur from construction or operation and maintenance of the proposed Project:

- 10 • Long-term loss of riparian vegetation or sensitive plants; loss to any population of special status
11 plant species that would jeopardize the continued existence of that population
- 12 • Introduction or increased spread of noxious weeds per EO 13112 – Invasive Weed Species
- 13 • Loss to any population of plants that would result in a species being listed or proposed for listing
14 as endangered or threatened
- 15 • An activity that would result in a plant species being listed or proposed for listing as endangered
16 or threatened
- 17 • An activity that would result in an indirect loss of wetland and riparian vegetation, caused by
18 degradation of water quality, diversion of water sources, or erosion and sedimentation from
19 altered drainage patterns

20 ***Impacts Analysis Results***

21 **NO ACTION ALTERNATIVE**

22 Under the no action alternative, the proposed Project would not be developed. No construction would take
23 place in the New Build Section, therefore, there would be no impacts to vegetation resources. Although
24 the existing transmission line would remain in place in the Upgrade Section, ongoing maintenance
25 activities would occur which could result in impacts to vegetation resources. Even under the no action
26 alternative, Western still plans to upgrade the existing lines between the Apache and Saguaro substations
27 within the next 10 year, per Western's 1-year capital improvement plan (Western 2012a).

28 **IMPACTS COMMON TO ALL ACTION ALTERNATIVES**

29 **Construction**

30 ***New Build Section***

31 The New Build Section would include construction, operation, and maintenance of the transmission line
32 as well as upgrades to and new construction of substations. All these activities would have the potential to
33 impact vegetation resources. Table 4.8-1 summarizes the plant associations within the representative
34 ROW. Tables 4.8-2 through 4.8-6 list the occurrence of each vegetation type and special status species in
35 each New Build Section. Eleven special status species have potential to be present within the proposed
36 New Build Section of these, three are listed as endangered by the State of New Mexico, three are listed as
37 sensitive by the BLM, and eight are listed as salvage restricted by the ANPL (three species are listed with
38 multiple statuses).

1 **Table 4.8-1.** Relative Percentage of Cover within the Representative ROW of SWReGAP Plant
 2 Associations

Plant Association	Total Acres	Area (%)
Apacherian-Chihuahuan Piedmont Semidesert Grassland and Steppe	8,249.0	37.08
Apacherian-Chihuahuan Mesquite Upland Scrub	4,632.5	20.82
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	3,534.6	15.89
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	2,291.3	10.30
Sonoran Paloverde-Mixed Cacti Desert Scrub	720.5	3.24
Chihuahuan Mixed Salt Desert Scrub	671.6	3.02
Agriculture	550.3	2.47
Developed, Medium to High Intensity	464.7	2.09
North American Warm Desert Active and Stabilized Dune	309.1	1.39
Sonora-Mojave Creosotebush-White Bursage Desert Scrub	230.1	1.03
North American Warm Desert Riparian Mesquite Bosque	91.0	0.41
Developed, Open Space to Low Intensity	78.2	0.35
Chihuahuan Sandy Plains Semidesert Grassland	64.1	0.29
Chihuahuan Succulent Desert Scrub	61.0	0.27
North American Arid West Emergent Marsh	59.6	0.27
North American Warm Desert Wash	40.0	0.18
North American Warm Desert Volcanic Rockland	36.5	0.16
Madrean Juniper Savanna	30.8	0.14
Sonoran Mid-Elevation Desert Scrub	21.7	0.10
North American Warm Desert Bedrock Cliff and Outcrop	19.8	0.09
North American Warm Desert Riparian Woodland and Shrubland	19.5	0.09
Barren Lands, Non-specific	13.9	0.06
North American Warm Desert Pavement	12.5	0.06
Mogollon Chaparral	11.4	0.05
Open Water	1.2	0.01
North American Warm Desert Playa	7.5	0.03
Madrean Pinyon-Juniper Woodland	6.4	0.03
Chihuahuan Gypsophilous Grassland and Steppe	4.9	0.02
Madrean Encinal	4.6	0.02
Inter-Mountain Basins Semidesert Shrub Steppe	1.8	0.01
Total	22,240.10	100

3 **Vegetation Communities**

4 All action alternatives would involve the removal of vegetation during construction activities resulting in
 5 the direct loss of plant communities. The primary direct and indirect impacts to vegetation during
 6 construction and operation and maintenance of the proposed Project would be associated with:

- 1 • removal and/or crushing of natural, native-species dominated vegetation communities or
- 2 associations from construction of transmission lines, substations, temporary work areas, and
- 3 access roads;
- 4 • decreased plant productivity from fugitive dust; and
- 5 • plant community fragmentation.

6 Vegetation removal could have a variety of effects on vegetation communities ranging from changes in
7 community structure and composition to alteration of soil moisture or nutrient regimes. The degree of
8 impact depends on the type and amount of vegetation affected, and the rate at which vegetation would
9 regenerate after construction. Ultimately, these direct and indirect effects could reduce or change the
10 functional qualities of vegetation including habitat and forage. Fugitive dust from construction and
11 maintenance traffic has the potential to affect photosynthetic rates and decrease plant productivity.

12 Indirectly, removal of protective vegetation would also expose soil to potential wind and water erosion.
13 This could result in further loss of soil and vegetation, as well as increased sediment input to water
14 resources. There would also be indirect effects resulting from the fragmentation of connected vegetation
15 types. Edge areas have different microclimatic conditions and structure, which could lead to different
16 species composition than interior area. The introduction and colonization of disturbed areas by invasive
17 exotic plant species also would lead to changes in vegetation communities, including the possible shift to
18 more wildfire-prone vegetation that favors invasive exotic species over native species.

19 Much of the Upgrade Section occurs in urban areas where native vegetation has already undergone
20 disturbance and exotic plantings increase the presence of non-native species. Impacts to native plant
21 associations throughout these previously disturbed areas would therefore be minimal relative to open
22 country sections of the proposed route.

23 The proposed Project could have direct and indirect impacts on vegetation resources located within areas
24 disturbed by construction activity. These potential impacts would be mitigated through implementation of
25 PPM VEG-1, VEG-2, VEG-3, VEG-4, VEG-5, or VEG-6 (see Section 8-8 of the POD).

26 PPM VEG-1 states that vegetation disturbance would be minimized to the extent practicable.
27 The following mitigation measures would be employed:

- 28 • In construction areas where recontouring is not required, vegetation would be left in place
- 29 wherever possible, to avoid excessive root damage and allow for resprouting.
- 30 • In designated areas, structures would be placed or rerouted so as to avoid sensitive features or to
- 31 allow conductors to clearly span the features, within limits of standard tower design.
- 32 • Blading for access roads would be minimized. Use of unimproved access via two-tracks or
- 33 maximizing overland travel to reduce the need for bladed access roads would be maximized in
- 34 order to minimize vegetation impacts and minimize erosion.
- 35 • All ground-clearing/disturbance activities that could affect special status species or habitat would
- 36 be monitored. Where warranted, a qualified biologist would be retained to conduct pre-
- 37 construction surveys to minimize or prevent impacts to sensitive species or habitat.

38 PPM VEG-2 states that Southline would develop a reclamation and re-vegetation plan that would guide
39 restoration and re-vegetation activities for all disturbed lands associated with construction of the proposed
40 Project and its eventual termination and decommissioning. The plan would address all Federal and private
41 land disturbances. It would be developed in consultation with appropriate agencies and landowners, and
42 would be provided to these entities for review and concurrence. The plan would provide details on
43 topsoil segregation and conservation, vegetation treatment and removal, salvage of succulent species,

1 re-vegetation methods, including use of native seed mixes, application rates, transplants, and criteria to
2 monitor and evaluate re-vegetation success.

3 PPM VEG-4 states that clearing of riparian vegetation would be avoided where possible, and restoration
4 of such impacted communities would be conducted. Natural regeneration of native plants would be
5 supported by cutting vegetation with hand tools, moving, trimming, or using other removal methods that
6 allow root systems to remain intact.

7 Compensatory mitigation could also be necessary where avoidance and restoration have been insufficient
8 in mitigating impacts to vegetation communities.

9 **Special Status Species**

10 PPM VEG-3 calls for a Special Status Plant Restoration and Compensation Plan. Special status plants,
11 including Pima pineapple cactus, would be restored by relocating plants and/or reseeded, replacing
12 topsoil with existing topsoil that was removed, and regarding in compliance with local ordinances (State
13 of Arizona, Pima County) and/or measures in the biological opinion, if an ESA Section 7 consultation is
14 required. Measures to restore special status plants would be implemented through the reclamation,
15 restoration, and re-vegetation plan.

16 A Compensatory Mitigation Plan would be developed to address any residual impacts following
17 application of the restoration/relocation plan. The plan would be developed in accordance with BLM
18 regulations and approval.

19 Preconstruction presence/absence surveys would be required in areas where Special Status Species are
20 expected to occur. In consultation with the BLM and Western, Southline would hire qualified biologists
21 to conduct preconstruction surveys in ground-disturbance areas within suitable habitat for appropriate
22 special status species and their habitats.

23 **Noxious Weeds**

24 PPM VEG-5 states that an invasive plant species management plan would be developed in consultation
25 with the BLM.

26 PPM VEG-6 states that equipment would be washed prior to entering work areas to minimize the spread
27 of invasive weed species.

28 **Special Status Species**

29 The primary direct and indirect impacts to special status species during construction and operation and
30 maintenance of the proposed Project would be associated with:

- 31 • removal and/or crushing of special status plants from construction of transmission line,
32 substations, temporary work areas, and access roads; and
- 33 • direct and indirect impacts on special status species from increased access by OHVs over newly
34 constructed transmission line access roads.

35 Vegetation removal could have a variety of effects on special status species ranging from alteration of soil
36 moisture or nutrient regimes to population loss to the extent that continued existence of the population is
37 threatened. Any changes to the habitats of special status species may negatively affect individuals of those
38 species, including altering soils, microenvironments, and introducing invasive weeds and increasing
39 wildfire potential.

1 Pre-construction surveys for the species with the potential to occur in the ROW could allow direct
2 impacts to be avoided. Furthermore, application of measures PPM VEG 1-6 described above would be
3 used to mitigate these impacts, particularly PPM VEG-1: Minimize Vegetation Impacts; and PPM VEG-
4 3: Special Status Plants Restoration and Compensation. Measures to restore special status species would
5 also be implemented through the reclamation, restoration, and revegetation plan (PPM VEG-2). Measures
6 that reduce ground disturbance and aid reclamation would also reduce any detrimental effects on sensitive
7 biological soil crusts. Specific mitigation measures for the protection of soil crusts are proposed in
8 section 4.5.

9 Application of BMPs to reduce the transfer of invasive species on construction vehicles (as directed under
10 PPM VEG-5: Invasive Plant Management Plan and PPM VEG-6: Equipment Washing) should also
11 mitigate most direct and indirect impacts to special status species associated with the spread of noxious
12 weeds during construction. Adherence to measures included in these plans would result in only short-
13 term, minor impact to vegetation communities.

14 **Noxious Weeds**

15 The primary direct and indirect impacts to noxious weeds during construction and operation and
16 maintenance of the proposed Project would be associated with:

- 17 • introduction or increased spread of noxious weeds and other invasive exotic weed species; and
- 18 • direct and indirect impacts on native vegetation and special status species.

19 The Project would directly affect noxious weeds through soil and native vegetation disturbance. Since
20 noxious weeds are typically effective competitors with native plants, disturbance of vegetative cover that
21 facilitates their introduction, spread and proliferation, could alter plant community composition, reduce
22 native plant species cover, and produce monocultures that could alter natural fire regimes. Noxious weeds
23 are often fire-adapted and so perpetuate increased fire risk once established or following a fire. If present
24 in the ROW, species like Russian thistle, kochia, and Lehmann lovegrass are heavily favored by
25 disturbance and could disperse seed across long distances. As infestations develop, they could displace
26 the herbaceous resident vegetation, reducing species biodiversity and transforming soil properties and
27 hydrology.

28 Some noxious weeds may exist in the region (for example, buffelgrass is a noxious species known to
29 occur outside the ROW in many route group segments) but may not be currently present in the proposed
30 Project footprint. An influx of vehicles and machinery from outside the representative ROW could
31 facilitate noxious weed introduction into the Project footprint. Because the rate of seed production and
32 seed dispersal (i.e., the likelihood of introduction) differs for each particular noxious and invasive species,
33 it is difficult to define the exact area that would be affected; thus, this impact is quantified as the ROW
34 perimeter.

35 Development of an Invasive Plant Management Plan and PPM-VEG 6: Equipment Washing would be
36 applied in order to address impacts resulting from the introduction and spread of noxious weeds.

37 **Upgrade Section**

38 The Upgrade Section would include construction, operation, and maintenance of the transmission line as
39 well as upgrades to existing substations. These activities have the potential to impact vegetation
40 resources. In total, 22 special status species have potential to occur within the Upgrade Section (tables
41 4.8-7 through 4.8-11). Of these species, two are listed as endangered by the FWS, five are listed as
42 sensitive by the BLM, two are listed as sensitive by Coronado National Forest, three are listed as highly
43 safeguarded by the ANPL, 15 are listed as salvage restricted by the ANPL, and four are listed as SDCP

1 species (seven species have multiple statuses). The Upgrade Section would consist of rebuilding an
2 existing transmission line, mostly within an existing ROW utilizing existing access roads, thus greatly
3 minimizing the amount of currently undisturbed vegetation potentially impacted. Much of the Upgrade
4 Section would occur within an urban setting with exotic plantings and irrigation and minimal native
5 vegetation component. Construction of the Upgrade Section would therefore have minor direct and
6 indirect impacts on native vegetation resources within areas disturbed by this activity, and minor short-
7 term impacts to exotic and cultivated plantings in back yard settings. Since most of the ROW for this
8 section of the line has been previously analyzed for impacts for the existing transmission line; additional
9 impacts would be limited to new ROW within this section. These impacts would be reduced through use
10 of PPMs VEG-1, VEG-2, VEG-3, VEG-4, VEG-5, or VEG-6.

11 **Vegetation Communities**

12 The Project would directly affect vegetation communities through the temporary trampling of herbaceous
13 vegetation, the partial removal of aboveground plant cover, and the complete removal of vegetation due
14 to rebuilding of the transmission line and associated aboveground structures, access roads, temporary
15 work spaces, and other Project facilities within the existing ROW. Direct impacts to vegetation
16 communities in the Upgrade Section would be the same as described above for the New Build Section but
17 at a reduced level since the construction activities are occurring within an existing disturbance area.
18 Indirect impacts to vegetation communities would be the same as described above for the New Build
19 Section but at a reduced level since the construction activities are occurring within an existing disturbance
20 area where communities have already undergone fragmentation.

21 Application of measures PPM VEG 1-6 discussed above would be used to mitigate these impacts,
22 particularly PPM VEG-1: Minimize Vegetation Impacts; PPM VEG-2: Reclamation, Restoration and Re-
23 vegetation Plan, and PPM VEG-4: Vegetation Clearing. Adherence to these measures would result in
24 short-term, minor impacts to vegetation communities.

25 **Special Status Species**

26 The Project would directly affect special status species through the temporary trampling of species, the
27 partial removal of aboveground plant cover, and the complete removal of vegetation including special
28 status species due to rebuilding of the existing transmission line and associated aboveground structures,
29 access roads, temporary work spaces, and other Project facilities within the existing ROW. Direct impacts
30 to special status species in the Upgrade Section would be the same as described above for the New Build
31 Section but at a reduced level since the construction activities are occurring within an existing disturbance
32 area. Indirect impacts to special status species would be the same as described above for the New Build
33 Section but at a reduced level since the construction activities are occurring within an existing disturbance
34 area where communities have already undergone fragmentation. Application of measures PPM VEG 1-6
35 discussed above would be used to mitigate these impacts, particularly PPM VEG-1: Minimize Vegetation
36 Impacts, and PPM VEG-3: Special Status Plants Restoration and Compensation. Measures to restore
37 special status species would also be implemented through the reclamation, restoration and re-vegetation
38 plan (PPM VEG-2).

39 Application of BMPs to reduce the transfer of invasive species on construction vehicles (as directed under
40 PPM VEG-5: Invasive Plant Management Plan and PPM VEG-6: Equipment Washing) should also
41 mitigate most direct and indirect impacts to special status species associated with the spread of noxious
42 weeds during construction.

43 Adherence to these measures would result in only short-term, minor impacts to special status species.

1 **Noxious Weeds**

2 The Project would directly affect noxious weeds through soil and native vegetation disturbance associated
3 with the transmission line rebuild and associated upgrades to facilities. Direct impacts to noxious weeds
4 in the Upgrade Section would be the same as described above for the New Build Section but at a reduced
5 level since the construction activities are occurring within existing disturbance areas.

6 Development of an Invasive Plant Management Plan and PPM-VEG 6: Equipment Washing would be
7 applied in order to address impacts resulting from the introduction and spread of noxious weeds.
8 Adherence to measures included in these plans would result in only short-term, minor impact to noxious
9 weeds.

10 **Operation and Maintenance**

11 ***New Build Section***

12 Following Project construction, operation and maintenance of the new line and facilities would
13 commence. Operation and maintenance activities would consist of ground and aerial inspections,
14 vegetation management, electrical equipment repair, structure and conductor repair, off-road driving by
15 maintenance workers, and regeneration station operation and maintenance. These activities are expected
16 to result in minimal impact to vegetation resources. Due to the nature of much of the vegetation within the
17 analysis area and representative ROW, minimal vegetation management activities would be required to
18 maintain the operating transmission line, for example periodic vegetation trimming under the mid point/
19 low point of the conductor line. Aerial inspection would not have any impacts on vegetation resources.
20 Ground inspection on existing roads would not be likely to have any additional impacts, direct or indirect,
21 on vegetation resources if vehicle use were confined to within existing roadways. Repairs to the
22 transmission structures and conductors could have minor direct and indirect impacts on vegetation
23 resources within areas disturbed by this activity. Impacts would be reduced by implementing PPMs VEG-
24 1, VEG-2, VEG-3, VEG-4, VEG-5, or VEG-6, and restricting off-road driving.

25 **Vegetation Communities**

26 Routine operation and maintenance activities could introduce additional long-term chances for invasive
27 weed and wildfire threats to vegetation communities.

28 Application of measures PPM VEG 1-6 as discussed above would be used to mitigate these impacts,
29 particularly PPM VEG-1: Minimize Vegetation Impacts, PPM VEG-2: Reclamation, Restoration and Re-
30 vegetation Plan, and PPM VEG-4: Vegetation Clearing. Adherence to these measures would result in
31 only short-term, minor impacts to vegetation communities.

32 **Special Status Species**

33 Routine operation and maintenance activities could introduce additional long-term chances for invasive
34 weed and wildfire threats to special status plant species.

35 Application of measures PPM VEG 1-6 as previously discussed would be used to mitigate these impacts
36 particularly PPM VEG-1: Minimize Vegetation Impacts and PPM VEG-3: Special Status Plants
37 Restoration and Compensation. Measures to restore special status species would also be implemented
38 through the reclamation, restoration and re-vegetation plan (PPM VEG-2).

39 Application of BMPs to reduce the transfer of invasive species on construction vehicles (as directed under
40 PPM VEG-5: Invasive Plant Management Plan and PPM VEG-6: Equipment Washing) should also

1 mitigate most direct and indirect impacts to special status species associated with the spread of noxious
2 weeds during construction.

3 Adherence to these measures would result in only short-term, minor impacts to special status species.

4 **Noxious Weeds**

5 Routine operation and maintenance activities could introduce or reintroduce additional invasive weed
6 species in the long-term.

7 Application of PPM VEG-5: Development of an Invasive Plant Management Plan and PPM VEG-6:
8 Equipment Washing would be applied in order to address this impact. Adherence to measures included in
9 these plans would result in only short-term, minor impact to noxious weeds.

10 **Upgrade Section**

11 Following Project construction, operation and maintenance of the upgraded line and facilities would
12 commence. Operation and maintenance activities and their associated impacts to vegetation for the
13 Upgrade Section would be similar to the ongoing operations and maintenance for the existing Western
14 Saguaro–Tucson and Tucson–Apache 115-kV transmission lines. Operation and maintenance activities
15 would consist of ground and aerial inspections, vegetation management, electrical equipment repair,
16 transmission structure and conductor repair, and regeneration station operation and maintenance. Direct
17 and indirect impacts resulting from operation and maintenance activities are expected to be the same as
18 described above for the New Build Section. Impacts would be reduced by implementing PPMs VEG-1,
19 VEG-2, VEG-3, VEG-4, VEG-5, or VEG-6, and restricting off-road driving.

20 **Vegetation Communities**

21 Routine operation and maintenance activities could introduce additional long-term chances for invasive
22 weed and wildfire threats to vegetation communities.

23 Application of measures PPM VEG 1-6 described above would be used to mitigate these impacts,
24 particularly PPM VEG-1: Minimize Vegetation Impacts, PPM VEG-2: Reclamation, Restoration and Re-
25 vegetation Plan, and PPM VEG-4: Vegetation Clearing. Adherence to these measures would result in
26 only short-term, minor impacts to vegetation communities.

27 **Special Status Species**

28 Routine operation and maintenance activities could introduce additional long-term chances for invasive
29 weed and wildfire threats to special status plant species.

30 Application of previously described measures PPM VEG 1-6 would be used to mitigate these impacts
31 particularly PPM VEG-1: Minimize Vegetation Impacts and PPM VEG-3: Special Status Plants
32 Restoration and Compensation. Measures to restore special status species would also be implemented
33 through the reclamation, restoration, and revegetation plan (PPM VEG-2).

34 Application of BMPs to reduce the transfer of invasive species on construction vehicles (as directed under
35 PPM VEG-5: Invasive Plant Management Plan and PPM VEG-6: Equipment Washing) should also
36 mitigate most direct and indirect impacts to special status species associated with the spread of noxious
37 weeds during construction.

38 Adherence to these measures would result in only short-term, minor impacts to special status species.

1 **Noxious Weeds**

2 Routine operation and maintenance activities could introduce or reintroduce additional invasive weed
3 species in the long term.

4 Application of PPM VEG-5: Development of an Invasive Plant Management Plan and PPM VEG-6:
5 Equipment Washing would be applied in order to address this impact. Adherence to measures included in
6 these plans would result in only short-term, minor impact to noxious weeds.

7 ***Route Group 1 – Afton Substation to Hidalgo Substation***

8 **SUBROUTE 1.1 – PROPONENT PREFERRED**

9 **Construction**

10 Subroute 1.1 representative ROW acreage totals 3,567.5 acres. Total temporary disturbance, which
11 includes acres for structure sites, tensioning and pulling sites, and spur roads (associated with
12 construction activities), would result in nearly 23.1 percent of the representative ROW being disturbed.
13 Total permanent disturbance, which includes acres for access and structure foundations (associated with
14 operation and maintenance of the facilities), would result in nearly 6.1 percent being disturbed, or
15 approximately 822.6 acres and 216.6 acres, respectively.

16 ***Vegetation Communities***

17 Segment P1 (proposed interconnection segment P1) extends approximately 5.5 miles southwest from the
18 Afton Substation in Doña Ana County. Existing impacts to the cover type include transmission lines, gas
19 and oil pipelines, railroads, grazing, and road networks.

20 Subroute 1.1 is characterized by the following dominant plant associations: Apacherian-Chihuahuan
21 Mesquite Upland Scrub (76.8 acres); Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and
22 Steppe (1,426.1 acres); Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub (640 acres); and
23 Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub (944 acres) (see table 4.8-2).

24 Construction impacts to vegetation communities and implementation and effects of mitigation measures
25 would be the same as described for “Impacts Common to All Action Alternatives.” Since the subroute
26 already has a significant amount of existing disturbance, any additional disturbance could be reduced by
27 adherence to mitigation measures that would result in only short-term, minor impacts to vegetation
28 communities.

29 ***Special Status Species***

30 No ESA-listed plant species are considered to have the potential to occur along segments P1, P2, P3, or
31 P4; however, four sensitive plant species—Sneed’s pincushion cactus, dune pricklypear, Gregg night-
32 blooming cereus, and Parish’s alkali grass—have potential to occur in segments P2, P3, and P4.

33 Construction impacts to special status species and implementation and effects of mitigation measures
34 would be the same as described for Impacts Common to All Action Alternatives. Adherence to mitigation
35 measures would result in short-term, minor impacts to special status species.

1 **Table 4.8-2.** Route Group 1 Vegetation Resource Inventory Data Showing Acres of each Vegetation Type in each Alternative Segment

Segment	Total Miles	Vegetation Communities																											
		Agriculture	Apacherian-Chihuahuan Mesquite Upland Scrub	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	Chihuahuan Gypsophilous Grassland and Steppe	Chihuahuan Mixed Salt Desert Scrub	Chihuahuan Sandy Plains Semi-Desert Grassland	Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	Chihuahuan Succulent Desert Scrub	Developed, Medium - High Intensity	Developed, Open Space Low Intensity	Inter-Mountain Basins Semi-Desert Shrub Steppe	Madrean Encinal	Madrean Juniper Savanna	Madrean Pinyon-Juniper Woodland	Mogollon Chaparral	North American Arid West Emergent Marsh	North American Warm Desert Active and Stabilized Dune	North American Warm Desert Bedrock Cliff and Outcrop	North American Warm Desert Lower Montane Riparian Woodland and Shrubland	North American Warm Desert Pavement	North American Warm Desert Playa	North American Warm Desert Riparian Mesquite Bosque	North American Warm Desert Riparian Woodland and Shrubland	North American Warm Desert Volcanic Rockland	North American Warm Desert Wash	Open Water	Rocky Mountain Lower Montane-Foothill Shrubland
Subroute 1.1, Proponent Preferred																													
P1	5.1	0	11.1	0	10.5	0	0	0	103.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
P2	102.0	0	194.2	1,120.6	423.3	0	40.2	45	618	0	2.5	1.6	0	0	2.7	0.3	0	0	2.4	3.1	0	4.8	1.2	0	0	12.0	0	0	0
P3	31.1	5.6	31.1	243.3	175	5.3	29.7	0.2	220.3	29.1	1.4	0	0	0	0	0	0	9.8	0	0	0	1.4	0	1.1	0	0	0	0	
P4a	8.7	0	15.4	162.2	31.6	0	0	0	2.7	0	2.7	0	0	0	0	0.6	0	0	0	0	0	2.1	0	0	0	0	0	0	
Subroute 1.2, Proponent Alternative																													
S1	13.4	0	104.3	0.4	46.9	0	43.9	0	121.1	0	0	0	2.9	0	0	0	0	0	5.8	0	0	0	0	0	0	0	0	0	0
S2	11.1	0	62.1	4.3	94.2	0	0.1	0	90.5	0	0	0	0	0	0	0	0	0	16.0	0.5	0	0	0	0	0	0	0	0	0
S3	12.9	0	105.0	6.4	91.7	0	1.6	0	79.6	0	0	0	0	0	0	0	0	0	29.4	0	0	0	0	0	0.3	0	0	0	0
S4	10.6	0	14.7	10.9	62.1	0	2.1	0	102.8	0	0	0	0	0	0	0	0	0	62.6	0	0	0	0	0	0	0	0	0	0
S5	29.7	42.4	47.5	342.6	144.3	0	45.8	0	80.7	10.6	0	0	0	4.0	0	0	0	0	0	0.2	0	0	1.9	0	0	0	0	0	
S6	7.4	12.7	1.6	61.9	42.0	0	0	0.7	42.3	0	0	0	0	0	20.8	0	0	0	0	0	0	0	0	0	0	0	0	0	0
S7	41.5	0	6.2	543.7	415.7	0	0.7	0.4	36.3	0	0	0	0	0	1.1	0	0	0	0	0	0	2.9	0	0	0	0	0	0	0
S8	14.6	0	4.5	284.9	7.4	0	0.7	3.6	17.3	0	2.0	0	0	0	0	0.2	1.3	0	0	0	0	0	0	0	0	22.3	8.5	0	
Route Group 1 Local Alternatives																													
DN1	42.5	0	12.1	764.2	147.2	0	3.1	0.6	58.1	0	0	0	0	2.2	0	0	0	0	0	0	0	0	0	0.0	0	43.0	0	0	0
A	17.5	0	94.6	6.5	92.8	0	0	0	197.7	0	0	0	0	0	0	0	0	0	26.5	3.3	0	0	1.5	0	0	0	0	0	0
B	12.2	0	13.0	12.3	99.1	0	2.4	0	104.4	1.4	0	0	0	0	0	0	0	0	58.7	0	0	0	0	0	0	0	0	0	0
C	9.0	5.8	0.8	114.6	78.3	0	0	0.1	16.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
D	22.8	20.9	3.5	380.1	135.1	0	4.0	0	3.3	0	1.9	0	0	0	0	0	0	0	0	0	0	1.8	0	0	0	0	0.5	0	0

Note: Data comes from SWReGAP GIS desktop analysis and not actual ground surveys.

2
3

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1 **Table 4.8-3.** Route Group 1 Vegetation Resource Inventory Data

Segment	Total Miles	Special Status Species					Noxious Weeds / Invasive Exotic Weeds	
		Dune Pricklypear	Sneed's Pincushion Cactus	Gregg Night-blooming Cereus	Parish's Alkali Grass	Chihuahua Scurfpea	Noxious Weeds	Invasive Exotic Weeds
Subroute 1.1, Proponent Preferred								
P1	5.1	X	X					X
Subroute 1.2, Proponent Alternative								
S1	13.4	X	X	X				X
S2	11.1	X	X	X				X
S3	12.9	X	X	X				X
S4	10.6	X	X	X				X
S5	29.7	X	X	X				X
S6	7.4	X	X	X				X
S7	41.5	X	X	X			X	X
S8	14.6	X	X	X	X			X
Route Group 1 Local Alternatives								
DN1	42.5	X	X	X				X
A	17.5	X	X	X				X
B	12.2	X	X	X				X
C	9.0	X	X	X				X
D	22.8	X	X	X	X			X

2 **Noxious Weeds**

3 African rue and starthistle are the primary noxious weeds of concern across the Afton to Hidalgo route
 4 group. Based on brief, one-time site visits (and without protocol-level surveys), none of these species
 5 were observed in sections P1, P2, P3, or P4. Some exotic invasive species, not classified noxious, were
 6 found in P1, P2, P3, and P4a, including Russian thistle, filaree, and mustards. The invasive exotics
 7 Lehmann lovegrass and kochia also occur in the region, and readily colonize disturbed soils.
 8 Construction impacts to noxious species and implementation and effects of mitigation measures would be
 9 the same as described in "Impacts Common to All Action Alternatives." Adherence to mitigation
 10 measures would result in short-term, minor impacts to noxious weeds.
 11

1 **Operation and Maintenance**

2 Total permanent disturbance within subroute 1.1 would result in nearly 6.1 percent of the representative
3 ROW being disturbed, or approximately 216.6 acres.

4 ***Vegetation Communities***

5 Operation and maintenance impacts to vegetation communities and implementation and effects of
6 mitigation measures would be the same as described for “Impacts Common to All Action Alternatives.”
7 Since the subroute already has a significant amount of existing disturbance, any additional disturbance
8 could be reduced by adherence to mitigation measures that would result in only short-term, minor impacts
9 to vegetation communities.

10 ***Special Status Species***

11 Operation impacts to special status species and implementation and effects of mitigation measures would
12 be the same as described for “Impacts Common to All Action Alternatives.” Adherence to mitigation
13 measures would result in short-term, minor impacts to special status species.

14 ***Noxious Weeds***

15 Operation impacts to noxious species and implementation and effects of mitigation measures would be
16 the same as described for “Impacts Common to All Action Alternatives.”

17 Adherence to mitigation measures would result in short-term, minor impacts to noxious weeds.

18 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

19 **Construction**

20 Subroute 1.2 (segments S1 through S8) comprises the primary alternative route, following a path close to
21 the international border from Afton to Hachita and then heading north to Lordsburg. The total length is
22 141 miles and 3,424.1 acres. The majority of the segments are currently impacted by grazing, and a
23 variety of gravel and dirt roads. Total temporary disturbance from construction would result in nearly
24 23.1 percent of the representative ROW being disturbed and total permanent disturbance would result in
25 nearly 5.8 percent being disturbed, or approximately 790.1 acres and 198.6 acres, respectively.

26 ***Vegetation Communities***

27 Segments S1, S2, SE, and S4 are characterized by the following dominant vegetation communities:
28 Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub (570 acres), Chihuahuan Creosotebush, Mixed
29 Desert and Thorn Scrub (904.3 acres), Apacherian-Chihuahuan Mesquite Upland Scrub (645.9 acres),
30 and North American Warm Desert Active and Stabilized Dune (113.8 acres) plant associations (see table
31 4.8-2). In addition to smaller amounts of the associations found in segments S1–S4, segments S5–S8 are
32 also characterized by large percentages of Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and
33 Steppe (1,233.1 acres). The majority of the segments are currently impacted by grazing and a variety of
34 gravel and dirt roads.

35 Construction impacts to vegetation communities and implementation and effects of mitigation measures
36 would be the same as described for “Impacts Common to All Action Alternatives.”

37 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

1 **Special Status Species**

2 No ESA-listed plant species are considered to have the potential to occur along the Afton to Hidalgo route
3 group, within 2 miles of the Project footprint. Among the other sensitive listed plant species, the Sneed's
4 pincushion cactus, dune pricklypear, and Gregg night-blooming cereus all have potential to occur
5 throughout the Afton to Hidalgo route group. Additionally, among non-ESA listed plant species, Parish's
6 alkali grass has potential to occur within segment S8, and the Chihuahua scurfpea in segment S7
7 (see table 4.8-2).

8 Construction impacts to special status species and implementation and effects of mitigation measures
9 would be the same as described for "Impacts Common to All Action Alternatives."

10 Adherence to mitigation measures would result in short-term, minor impacts to special status species.

11 **Noxious Weeds**

12 African rue and starthistle are the primary noxious weeds of concern across the Afton to Hidalgo route
13 group. Tamarisk was observed in sections S1–S8. Some exotic invasive species, not classified noxious,
14 were found in segments S1–S8, including Russian thistle, filaree, and mustards (see table 4.8-2).
15 The invasive exotics Lehmann lovegrass and kochia also occur in the region, and readily colonize
16 disturbed soils.

17 Construction impacts to noxious species and implementation and effects of mitigation measures would be
18 the same as described for "Impacts Common to All Action Alternatives."

19 Tamarisk is known to occur in segment S5. Tamarisk can disrupt the structure and stability of native plant
20 communities by outcompeting and replacing native plant species, salinizing soils, monopolizing limited
21 sources of moisture, and increasing the frequency, intensity, and effect of fires and floods.

22 Adherence to mitigation measures would result in short-term, minor impacts to noxious weeds.

23 **Operation and Maintenance**

24 Subroute 1.2 comprises 3,424.1 acres. Total permanent disturbance within subroute 1.2 would result in
25 nearly 5.8 percent of the representative ROW being disturbed, or approximately 198.6 acres.

26 **Vegetation Communities**

27 Operation and maintenance impacts to vegetation communities and implementation and effects of
28 mitigation measures would be the same as described for "Impacts Common to All Action Alternatives."

29 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

30 **Special Status Species**

31 Operation and maintenance impacts to special status species and implementation and effects of mitigation
32 measures would be the same as described for "Impacts Common to All Action Alternatives."

33 Adherence to mitigation measures would result in short-term, minor impacts to special status species.
34

1 **Noxious Weeds**

2 Operation and maintenance impacts to noxious species and implementation and effects of mitigation
3 measures would be the same as described for “Impacts Common to All Action Alternatives.”

4 Adherence to mitigation measures would result in short-term, minor impacts to noxious weeds.

5 **LOCAL ALTERNATIVES**

6 There are five local alternatives available for route group 1: A, B, C, D, and DN1. Table 4.8-4 lists the
7 acres of disturbance proposed under the route group 1 local alternatives.

8 **Table 4.8-4.** Temporary and Permanent Disturbance Acreages for Route Group 1 Local Alternatives

Local Alternative	Total Acres within Representative ROW	Temporary Disturbance (percent of ROW)	Temporary Disturbance (acres)	Permanent Disturbance (percent of ROW)	Permanent Disturbance (acres)
A	422.9	23.2	98.0	4.2	17.8
B	291.5	23.4	68.3	2.5	7.2
C	215.7	23.3	50.3	2.8	6.1
D	551.1	23.2	127.6	5.1	28.1
DN1	1,030.5	23.1	238.0	8.4	92.9

9 Source: Data comes from SWReGAP GIS desktop analysis and not actual ground surveys.

10 **Construction**

11 Table 4.8-4 lists the acres of temporary and permanent disturbance proposed under the route group 1 local
12 alternatives.

13 **Vegetation Communities**

14 Local alternative A is a short loop at the southeast end of the Project that would provide an alternative
15 connection between segments S1 and S3. The route is characterized by the Chihuahuan Stabilized
16 Coppice Dune and Sand Flat Scrub (197.7 acres), Chihuahuan Creosotebush, Mixed Desert and Thorn
17 Scrub (92.8 acres), and Apacherian-Chihuahuan Mesquite Upland Scrub (94.6 acres) plant associations
18 (see table 4.8-2).

19 Local alternative B is a loop on the south edge of the Project that would provide an alternative connection
20 between segments S3 and S5, going along the north side of segment S4. The route is characterized by the
21 Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub (99.1 acres) and North American Warm Desert
22 Active and Stabilized Dune (58.7 acres) plant associations (see table 4.8-2). Local alternative C is another
23 short loop on the south edge of the Project that would provide an alternative connection between
24 segments S5 and S7. The route is characterized by the Chihuahuan Creosotebush, Mixed Desert and
25 Thorn Scrub (78.3 acres) and Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub (16.1 acres)
26 plant associations (see table 4.8-2). Local alternative D provides an alternative connection from the
27 subroute at segment S7 to the New Build Section at segment P5.

28 The route is characterized by the Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe
29 (380.1 acres) and the Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub (135.1 acres) plant
30 associations (see table 4.8-2). Local alternative DN1 provides an alternate route just north and parallel to

1 segment P2. The route is characterized by Apacherian-Chihuahuan Piedmont Semi-desert Grassland and
2 Steppe (764.2 acres), Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub (58.1 acres), and
3 Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub (147.2 acres) plant associations (see table
4 4.8-2).

5 Construction impacts to vegetation communities and implementation and effects of mitigation measures
6 would be the same as described for “Impacts Common to All Action Alternatives.”

7 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

8 ***Special Status Species***

9 No ESA-listed plant species are considered to have the potential to occur along route group 1, within 2
10 miles of the Project footprint. Among the other sensitive listed plant species, the Sneed’s pincushion
11 cactus, dune pricklypear, and Gregg night-blooming cereus all have potential to occur throughout the
12 Afton to Hidalgo route group. Additionally, among non-ESA listed plant species, Parish’s alkali grass has
13 potential to occur within local alternative C (see table 4.8-2). Local alternative DN1 has not been
14 surveyed but due to its close proximity to segment P2, special status species would likely be similar to
15 segment P2. Construction impacts to special status species and implementation and effects of mitigation
16 measures would be the same as described for “Impacts Common to All Action Alternatives.”

17 Adherence to mitigation measures would result in short-term, minor impacts to special status species.

18 ***Noxious Weeds***

19 African rue and starthistle are the primary noxious weeds of concern across the route group 1. None were
20 observed within the route group 1 local alternatives. Some exotic invasive species, not classified noxious,
21 were found in the local alternatives including Russian thistle, filaree, and mustards (see table 4.8-2).
22 The invasive exotic Lehmann lovegrass also occurs in the region, and it readily colonizes disturbed soils.
23 Local alternative DN1 has not been surveyed but due to its close proximity to segment P2, special
24 status species would likely be similar to segment P2. Construction impacts to noxious species and
25 implementation and effects of mitigation measures would be the same as described for “Impacts Common
26 to All Action Alternatives.”

27 Adherence to mitigation measures would result in short-term, minor impacts to noxious weeds.

28 **Operation and Maintenance**

29 Table 4.8-4 lists the potential permanent disturbance acres for the route group 1 local alternatives that
30 would result from operation and maintenance of the facilities.

31 ***Vegetation Communities***

32 Operation and maintenance impacts to vegetation communities and implementation and effects of
33 mitigation measures would be the same as described for “Impacts Common to All Action Alternatives.”

34 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

35 ***Special Status Species***

36 Operation and maintenance impacts to special status species and implementation and effects of mitigation
37 measures would be the same as described for “Impacts Common to All Action Alternatives.”

1 Adherence to mitigation measures would result in short-term, minor impacts to special status species.

2 ***Noxious Weeds***

3 Operation and maintenance impacts to noxious species and implementation and effects of mitigation
4 measures would be the same as described for “Impacts Common to All Action Alternatives.”

5 Adherence to mitigation measures would result in short-term, minor impacts to noxious weeds.

6 ***Route Group 2 – Hidalgo Substation to Apache Substation***

7 **SUBROUTE 2.1 – PROPONENT PREFERRED**

8 **Construction**

9 Subroute 2.1 comprises 2,309.8 total acres. Total temporary disturbance from construction would result in
10 nearly 23.2 percent of the representative ROW being disturbed and total permanent disturbance would
11 result in nearly 5.1 percent being disturbed, or approximately 534.9 acres and 118.5 acres, respectively.

12 ***Vegetation Communities***

13 Subroute 2.1 comprises route segments P4 (4b and 4c), P5 (P5a and P5b), P6 (P6a, P6b, and P6c), P7 and
14 P8, local alternatives E, F, G (Ga, Gb, and Gc), I, J, and local alternatives LD3a, LD3b, LD2, LD1, LD4,
15 LD4-Option 4, LD4-Option 5, and WC1.

16 Segment P4 is a segment of the proposed route from Lordsburg to the Apache Substation and is divided
17 into three subsegments (P4a is in route group 1). Route segment P4 extends south from the west end of
18 segment P2 to a point approximately 6 miles west-southwest of Lordsburg in Hidalgo County. The
19 subroute comprises 2,309.8 acres and is characterized by the following dominant plant associations:
20 Apacherian-Chihuahuan Piedmont Semi-desert Grassland and Steppe plant association (1,059.9 acres),
21 Apacherian-Chihuahuan Mesquite Upland Scrub (681.9 acres), Chihuahuan Creosotebush, Mixed Desert
22 and Thorn Scrub (233.2 acres), and Chihuahuan Mixed Salt Desert Scrub (114.5 acres). Segment P8
23 crosses the Willcox Playa (see table 4.8-5).

24 Construction impacts to vegetation communities and implementation and effects of mitigation measures
25 would be the same as described for “Impacts Common to All Action Alternatives.”

26 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

27 ***Special Status Species***

28 No ESA-listed plant species have potential to occur along route group 2 within 2 miles of the Project
29 footprint. Of the other sensitive plant species considered in this analysis, the Sneed’s pincushion cactus,
30 Gregg night-blooming cereus, Parish’s alkali grass, button cactus, devilthorn hedgehog cactus, Gregg
31 night-blooming cereus, playa spider plant, San Carlos wild-buckwheat, slender needle corycactus, varied
32 fishhook cactus, and Wilcox pincushion cactus have some potential to occur in segments P4–P8 (see table
33 4.8-5).

34 Construction impacts to special status species and implementation and effects of mitigation measures
35 would be the same as described for “Impacts Common to All Action Alternatives.” Adherence to
36 mitigation measures would result in short-term, minor impacts to vegetation communities.
37

1 **Table 4.8-5.** Route Group 2 Vegetation Resource Inventory Data Showing Acres of each Vegetation Type in each Alternative Segment

Segment	Total Miles	Vegetation Communities																											
		Agriculture	Apacherian-Chihuahuan Mesquite Upland Scrub	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	Chihuahuan Mixed Salt Desert Scrub	Chihuahuan Sandy Plains Semi-Desert Grassland	Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	Chihuahuan Succulent Desert Scrub	Developed, Medium - High Intensity	Developed, Open Space - Low Intensity	Madrean Encinal	Madrean Juniper Savanna	Madrean Pine -Oak forest and woodland	Madrean Juniper Savanna	Madrean Pinyon-Juniper Woodland	Mogollon Chaparral	North American Arid West Emergent Marsh	North American Warm Desert Active and Stabilized Dune	North American Warm Desert Bedrock Cliff and Outcrop	North American Warm Desert Lower Montane Riparian Woodland and Shrubland	North American Warm Desert Pavement	North American Warm Desert Riparian Mesquite Bosque	North American Warm Desert Volcanic Rockland	North American Warm Desert Wash	Open Water	Sonoran mid-elevation desert scrub	Sonoran Paloverde-Mixed cactus Desert Scrub	
Subroute 2.1, Proponent Preferred																													
P4b	14.0	0	1.3	234.8	33.8	12.6	5.2	42.4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5.7	0	0	0
P4c	1.9	0	0	21.7	10.6	9.6	0	2.9	0	0	0	0	0	0	0	0	0	0	0.0	0	0	0	0	0	0	0	0	0	0
P5a	9.6	0	0.1	215.6	3.0	12.3	0	2.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
P5b	21.1	0	187.9	132.8	90.3	78.9	0	2.9	0	0	0	0.4	0	0	0	0	0	0	7.1	0.6	0	0	0	0	0	0	0	0	0
P6a	0.9	0.2	12.1	4.1	0	1.9	0	0	0	1.2	0	0	0	0	0	0	0.6	0	0	0	0	0	1.2	0	0	0	0	0	0
P6b	22.5	49.8	311.0	59.4	103.6	12.2	0	1.0	0	0	0	0	0	0	2.0	0.5	5.0	0	0	0	0	0	0.5	0	0	0	0	0	0
P6c	2.8	0	45.9	20.5	1.2	0	0.7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
P7	22.3	0	123.0	368.0	31.0	9.2	0	8.3	0	0	0	0	0	0	0	0.0	0	0	0	0	0	1.2	0	0	0	0	0	0	0
P8	0.5	0	1.9	3.0	4.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Subroute 2.2, Proponent Alternative																													
E	31.8	62.7	136.7	317.6	133.1	91.0	0	12.2	0	0	0	1.4	0	0	0	0	0	0	0.2	0	0	10.9	0	0.8	0	0	0	0	0
F	25.3	1.9	327.8	123.4	124.4	6.1	0	0.5	0	1.0	0	1.8	0	0	0	0.6	11.0	0	0	0	0	11.9	0	0.6	0	0	0	0	0
Ga	25.7	6.2	257.6	314.7	34.1	0.3	0	0	0	1.7	0	0	0	0	0.9	0.0	0	0	0	0	0	0	0	6.9	0	0	0	0	0
Gb	1.0	0	8.5	17.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Gc	7.4	0	132.0	46.1	0	1.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
I	2.3	0	12.0	31.1	10.5	0	0	0	0	1.2	0	0	0	0	0.3	0.4	0	0	0	0	0	0	0	0	0	0	0	0	0
J	2.3	0	12.4	34.6	7.0	0	0	0	0	1.6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2

1 **Table 4.8-5.** Route Group 2 Vegetation Resource Inventory Data Showing Acres of each Vegetation Type in each Alternative Segment (Continued)

Segment	Total Miles	Vegetation Communities																										
		Agriculture	Apacherian-Chihuahuan Mesquite Upland Scrub	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	Chihuahuan Mixed Salt Desert Scrub	Chihuahuan Sandy Plains Semi-Desert Grassland	Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	Chihuahuan Succulent Desert Scrub	Developed, Medium - High Intensity	Developed, Open Space - Low Intensity	Madrean Encinal	Madrean Juniper Savanna	Madrean Pine -Oak forest and woodland	Madrean Juniper Savanna	Madrean Pinyon-Juniper Woodland	Mogollon Chaparral	North American Arid West Emergent Marsh	North American Warm Desert Active and Stabilized Dune	North American Warm Desert Bedrock Cliff and Outcrop	North American Warm Desert Lower Montane Riparian Woodland and Shrubland	North American Warm Desert Pavement	North American Warm Desert Riparian Mesquite Bosque	North American Warm Desert Volcanic Rockland	North American Warm Desert Wash	Open Water	Sonoran mid-elevation desert scrub	Sonoran Paloverde-Mixed cactus Desert Scrub
Route Group 2 Local Alternatives																												
LD1	35.4	69.3	171.9	261.0	210.8	45.7	1.0	42.3	0	27.9	0	0	0.1	0	0	0	0	13.5	0	0	0	0.4	12.4	0	1.1	0	0	0
LD2	9.6	0	3.8	172.5	35.9	21.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LD3a	27.9	0	17.0	401.7	137.2	3.7	11.5	79.4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27.0	0	0	0
LD3b	1.9	0	0	27.1	18.4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1.0	0	0	0
LD4	51.7	1.3	399.1	297.2	419.4	263.6	0	28.3	0	0	11.0	6.2	0	0	22.1	8.1	0	0	0	0	0	0	2.2	1.2	6.9	0	0.2	0.9
LD4-Option 4	6.5	0	17.0	99.4	31.4	5.1	0	0	0	2.1	0	1.0	0	0	0.1	0	0	0	0	0	0	0	0	0	0	0	0	0
LD4-Option 5	12.3	0	48.3	152.8	68.9	14.0	0	4.0	0	1.6	0	0.6	0	0	0	6.7	0	0	0	0	0	0	0	0	0	0	0	0
WC1	14.8	0	85.3	251.8	0.3	11.5	0	0.5	0	7.6	1.3	0	0	0	0	0	0	0	0	0	0	0	0	0	0.9	0	0	0

2 Note: Data comes from SWReGAP GIS desktop analysis and not actual ground surveys.

1 **Noxious Weeds**

2 Primary noxious weeds of concern in the region of the proposed Project in New Mexico are African rue
3 and starthistles. Tamarisk is known to occur in segment P5 and in the San Simon Creek vicinity (NISS
4 2013) (see table 4.8-5). The primary noxious weed of concern in the vicinity of the Project in Arizona is
5 buffelgrass. This species is not currently known to occur within the analysis area. Hoary cress has been
6 documented in the Lordsburg vicinity (NISS 2013). Other exotic, invasive species, including Russian
7 thistle, filaree, mustards, kochia, and Lehmann lovegrass occur throughout the Hidalgo to Apache region,
8 but these species are not classified as noxious weeds.

9 Construction impacts to noxious species and implementation and effects of mitigation measures would be
10 the same as described for “Impacts Common to All Action Alternatives.” Tamarisk can disrupt the
11 structure and stability of native plant communities by outcompeting and replacing native plant species,
12 salinizing soils, monopolizing limited sources of moisture, and increasing the frequency, intensity, and
13 effect of fires and floods.

14 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

15 **Operation and Maintenance**

16 Subroute 2.1 comprises 2,309.8 total acres. Total permanent disturbance would result in nearly 5.1
17 percent being disturbed, or approximately 118.5 acres.

18 **Vegetation Communities**

19 Operation and maintenance impacts to vegetation communities and implementation and effects of
20 mitigation measures would be the same as described for “Impacts Common to All Action Alternatives.”
21 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

22 **Special Status Species**

23 Operation and maintenance impacts to special status species and implementation and effects of mitigation
24 measures would be the same as described for “Impacts Common to All Action Alternatives.” Adherence
25 to mitigation measures would result in short-term, minor impacts to vegetation communities.

26 **Noxious Weeds**

27 Operation and maintenance impacts to noxious species and implementation and effects of mitigation
28 measures would be the same as described for “Impacts Common to All Action Alternatives.” Adherence
29 to mitigation measures would result in short-term, minor impacts to vegetation communities.

30 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

31 **Construction**

32 Subroute 2.2 totals 2,316.6 acres. Total temporary disturbance from construction would result in nearly
33 23.2 percent of the representative ROW being disturbed and total permanent disturbance would result in
34 nearly 6.3 percent being disturbed, or approximately 537.3 acres and 145.2 acres, respectively.

35 **Vegetation Communities**

36 Subroute 2.2 segments E, F, Ga, Gb, Gc, I, and J all provide alternative route connections. Segment E
37 runs just south and parallel to segments P5a and P5b. Segment F runs just north and parallel to segment

1 P6b. Segments Ga, Gb, and Gc run west and parallel to segment P7, west of Willcox. Segment I and J are
2 very short alternatives at the intersection of segments P6b and P7. The subroute totals 2,316.6 acres and
3 all seven segments are characterized by the Apacherian-Chihuahuan Piedmont Semi-Desert Grassland
4 and Steppe (885 acres), the Apacherian-Chihuahuan Mesquite Upland Scrub (887 acres), and the
5 Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub (309.1 acres) plant associations (see 4.8-4).
6 These segments are currently impacted by a mixture of grazing, agriculture, railroads, transmission lines,
7 a pipeline, and a variety of roads.

8 Construction impacts to vegetation communities and implementation and effects of mitigation measures
9 would be the same as described for “Impacts Common to All Action Alternatives.” Since the subroute
10 already has a significant amount of existing disturbance, any additional disturbance could be reduced by
11 adherence to mitigation measures that would result in only short-term, minor impacts to vegetation
12 communities.

13 ***Special Status Species***

14 No ESA-listed plant species have potential to occur along the Hidalgo to Apache route group within 2
15 miles of the Project footprint. Of the other sensitive plant species considered in this analysis, the Sneed’s
16 pincushion cactus, Gregg night-blooming cereus, Parish’s alkali grass, button cactus, devilthorn hedgehog
17 cactus, Gregg night-blooming cereus, playa spider plant, San Carlos wild-buckwheat, slender needle
18 corycactus, varied fishhook cactus, needle-spined pineapple cactus, and Wilcox pincushion cactus have
19 some potential to occur in segments E, F, Ga, Gb, Gc, I, and J (see table 4.8-5).

20 Construction impacts to special status species and implementation and effects of mitigation measures
21 would be the same as described for “Impacts Common to All Action Alternatives.” Adherence to
22 mitigation measures would result in short-term, minor impacts to vegetation communities.

23 ***Noxious Weeds***

24 Primary noxious weeds of concern in the region of the proposed Project in New Mexico are African rue
25 and starthistles. The primary noxious weed of concern in the vicinity of the Project footprint in Arizona is
26 buffelgrass. This species is not known to occur along the study corridor. Hoary cress has been
27 documented in the Lordsburg vicinity (NISS 2013). Other exotic, invasive species, including Russian
28 thistle, filaree, and mustards, kochia, and Lehmann lovegrass occur throughout route group 2, but these
29 species are not classified as noxious weeds (see table 4.8-5).

30 Construction impacts to noxious species and implementation and effects of mitigation measures would be
31 the same as described for “Impacts Common to All Action Alternatives.” Adherence to mitigation
32 measures would result in short-term, minor impacts to vegetation communities.

33 **Operation and Maintenance**

34 Subroute 2.2 totals 2,316.6 acres. Total permanent disturbance would result in nearly 6.3 percent of the
35 representative ROW being disturbed, or approximately 145.2 acres.

36 ***Vegetation Communities***

37 Operation and maintenance impacts to vegetation communities and implementation and effects of
38 mitigation measures would be the same as described for “Impacts Common to All Action Alternatives.”
39 Since the subroute already has a significant amount of existing disturbance, any additional disturbance
40 could be reduced by adherence to mitigation measures that would result in only short-term, minor impacts
41 to vegetation communities.

1 **Special Status Species**

2 Operation and maintenance impacts to special status species and implementation and effects of mitigation
 3 measures would be the same as described for “Impacts Common to All Action Alternatives.” Adherence
 4 to mitigation measures would result in short-term, minor impacts to vegetation communities.

5 **Noxious Weeds**

6 Operation and maintenance impacts to noxious species and implementation and effects of mitigation
 7 measures would be the same as described for “Impacts Common to All Action Alternatives.” Adherence
 8 to mitigation measures would result in short-term, minor impacts to vegetation communities.

9 **LOCAL ALTERNATIVES**

10 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
 11 4, LD4-Option 5, and WC1. Table 4.8-7 lists the acres of disturbance proposed under the route group 2
 12 local alternatives.

13 **Table 4.8-7.** Temporary and Permanent Disturbance Acreages, Route Group 2 Local Alternatives

Alternative	Total Acres within Representative ROW	Temporary Disturbance (percent of ROW)	Temporary Disturbance (acres)	Permanent Disturbance (percent of ROW)	Permanent Disturbance (acres)
LD1	857.5	23.1	198.1	6.4	55.2
LD2	233.2	23.1	54.0	8.6	20.2
LD3	677.5	23.1	156.5	4.3	29.3
LD3b	46.6	23.1	10.8	1.3	0.6
LD4	1,253.1	23.1	289.3	9.1	113.9
LD4-Option 4	156.1	23.2	36.2	9.1	14.3
LD4-Option 5	296.8	23.2	68.7	7.5	22.2
WC1	359.1	23.1	83.0	7.9	28.3

14 Source: Data come from SWReGAP GIS desktop analysis and not actual ground surveys.

15 **Construction**

16 Table 4.8-7 lists the acres of temporary and permanent disturbance proposed under the route group 2 local
 17 alternatives.

18 **Vegetation Communities**

19 The local alternative segments are all characterized by the Apacherian-Chihuahuan Piedmont Semi-
 20 Desert Grassland and Steppe, Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub and Apacherian-
 21 Chihuahuan Mesquite Upland Scrub plant associations. Existing impacts are associated with grazing,
 22 agriculture, a pipeline, and a variety of roads including an Interstate highway across local alternative LD1.

23 Local alternative LD1 is characterized by the following dominant plant associations: Agriculture (69.3
 24 acres), Apacherian-Chihuahuan Mesquite Upland Scrub (171.9 acres), Apacherian-Chihuahuan Piedmont
 25 Semi-Desert Grassland and Steppe (261.0 acres), Chihuahuan Creosotebush, Mixed Desert and Thorn
 26 Scrub (210.8 acres), and Chihuahuan Mixed Salt Desert Scrub (45.7 acres) (see table 4.8-5).

1 Local alternative LD2 is characterized by the following dominant plant associations: Apacherian-
2 Chihuahuan Piedmont Semi-Desert Grassland and Steppe (172.5 acres), Chihuahuan Creosotebush,
3 Mixed Desert and Thorn Scrub (35.9 acres), and Chihuahuan Mixed Salt Desert Scrub (21.7 acres)
4 (see table 4.8-5).

5 Local alternative L D3a is characterized by the following dominant plant associations: Apacherian-
6 Chihuahuan Mesquite Upland Scrub (17.0 acres), Apacherian-Chihuahuan Piedmont Semi-Desert
7 Grassland and Steppe (401.7 acres), Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub (137.2
8 acres), and Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub (79.4 acres) (see table 4.8-5).

9 The alternative LD3b is characterized by the following dominant plant associations: Apacherian-
10 Chihuahuan Piedmont Semi-Desert Grassland and Steppe (27.1 acres), Chihuahuan Creosotebush, Mixed
11 Desert and Thorn Scrub (18.4 acres) (see table 4.8-5). The alternative LD4 is characterized by the
12 following dominant plant associations: Apacherian-Chihuahuan Mesquite Upland Scrub (399.1 acres),
13 Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe (297.2 acres), Chihuahuan
14 Creosotebush, Mixed Desert and Thorn Scrub (419.4 acres), Chihuahuan Mixed Salt Desert Scrub
15 (263.6 acres, Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub (28.3 acres), and Madrean
16 Pinyon-Juniper Woodland (22.1 acres) (see table 4.8-5).

17 The alternative LD4-Option 4 is characterized by the following dominant plant associations: Apacherian-
18 Chihuahuan Mesquite Upland Scrub (17.0 acres), Apacherian-Chihuahuan Piedmont Semi-Desert
19 Grassland and Steppe (99.4 acres) and Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub
20 (31.4 acres) (see table 4.8-5). The alternative LD4-Option 5 is characterized by the following dominant
21 plant associations: Apacherian-Chihuahuan Mesquite Upland Scrub (48.3 acres), Apacherian-Chihuahuan
22 Piedmont Semi-Desert Grassland and Steppe (152.8 acres) and Chihuahuan Creosotebush, Mixed Desert
23 and Thorn Scrub (68.9 acres) (see table 4.8.5). The alternative WC1 is characterized by the following
24 dominant plant associations: Apacherian-Chihuahuan Mesquite Upland Scrub (85.3 acres), Apacherian-
25 Chihuahuan Piedmont Semi-Desert Grassland and Steppe (251.8 acres) (see table 4.8-5). Construction
26 impacts to vegetation communities and implementation and effects of mitigation measures would be the
27 same as described for “Impacts Common to All Action Alternatives.” Since the subroute already has a
28 significant amount of existing disturbance, any additional disturbance could be reduced by adherence to
29 mitigation measures that would result in only short-term, minor impacts to vegetation communities.

30 ***Special Status Species***

31 No ESA-listed plant species have potential to occur along route group 2. Of the other sensitive plant
32 species considered in this analysis, the Sneed’s pincushion cactus, Gregg night-blooming cereus, Parish’s
33 alkali grass, button cactus, devilthorn hedgehog cactus, Gregg night-blooming cereus, playa spider plant,
34 San Carlos wild-buckwheat, slender needle corycactus, varied fishhook cactus, needle-spined pineapple
35 cactus, and Wilcox pincushion cactus have some potential to occur in segments LD1, LD2, LD3a, LD3b,
36 LD4, LD4-Option 4, LD4-Option 5, an WC1 (see table 4.8-5). Construction impacts to special status
37 species and implementation and effects of mitigation measures would be the same as described for
38 “Impacts Common to All Action Alternatives.” Adherence to mitigation measures would result in short-
39 term, minor impacts to vegetation communities.

40 ***Noxious Weeds***

41 Primary noxious weeds of concern in the region of the proposed Project in New Mexico are African rue
42 and starthistles. Tamarisk could be present on segment LD1. The primary noxious weed of concern in the
43 vicinity of the Project in Arizona is buffelgrass. This species is not known to occur along the Project
44 footprint. Hoary cress has been documented in the Lordsburg vicinity (NISS 2013), and it could be
45 present on local alternative LD3a. Other exotic, invasive species, including Russian thistle, filaree,

1 mustards, kochia, and Lehmann lovegrass occur throughout the route group 2, but these species are not
2 classified as noxious weeds (see table 4.8-5).

3 Construction impacts to noxious species and implementation and effects of mitigation measures would be
4 the same as described for “Impacts Common to All Action Alternatives.” Adherence to mitigation
5 measures would result in short-term, minor impacts to vegetation communities.

6 **Operation and Maintenance**

7 Table 4.8-7 lists the potential permanent disturbance acres for the route group 2 local alternatives that
8 would result from operation and maintenance of the facilities.

9 ***Vegetation Communities***

10 Operation and maintenance impacts to vegetation communities and implementation and effects of
11 mitigation measures would be the same as described for “Impacts Common to All Action Alternatives.”
12 Since the subroute already has a significant amount of existing disturbance, any additional disturbance
13 could be reduced by adherence to mitigation measures that would result in only short-term, minor impacts
14 to vegetation communities. Special Status Species

15 Operation and maintenance impacts to special status species and implementation and effects of mitigation
16 measures would be the same as described for “Impacts Common to All Action Alternatives.” Adherence
17 to mitigation measures would result in short-term, minor impacts to vegetation communities.

18 ***Noxious Weeds***

19 Operation and maintenance impacts to noxious species and implementation and effects of mitigation
20 measures would be the same as described for “Impacts Common to All Action Alternatives.” Adherence
21 to mitigation measures would result in short-term, minor impacts to vegetation communities.

22 ***Route Group 3 – Apache Substation to Pantano Substation***

23 **SUBROUTE 3.1 – PROPONENT PREFERRED**

24 **Construction**

25 Subroute 3.1 totals 1,278.6 acres and is 70.3 miles in length. Total temporary disturbance from
26 construction would result in nearly 28.1 percent of the ROW being disturbed and total permanent
27 disturbance would result in nearly 5.4 percent being disturbed, or approximately 358.7 acres and 68.7
28 acres, respectively.

29 ***Vegetation Communities***

30 Subroute 3.1 comprises route segments U1a, U1b, U2, and U3a. The subroute totals 1,278.6 acres and the
31 segments are characterized by the Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe
32 (255.8 acres), the Apacherian-Chihuahuan Mesquite Upland Scrub (407.9 acres), and the Chihuahuan
33 Creosotebush, Mixed Desert and Thorn Scrub (132.3) plant associations (see table 4.8-8). Existing
34 impacts are associated with urban development, highways, ranches, grazing, agriculture, transmission
35 lines, and a railroad.

36 Construction impacts to vegetation communities relating to the Upgrade Section, and implementation and
37 effects of mitigation measures would be the same as described for “Impacts Common to All Action

1 Alternatives.” Since the subroute already has a significant amount of existing disturbance, any additional
2 disturbance could be reduced by adherence to mitigation measures that would result in only short-term,
3 minor impacts to vegetation communities.

4 ***Special Status Species***

5 No ESA-listed plant species are considered to have the potential to occur along segments U1 and U3.
6 The Huachuca water umbel, listed as endangered under the ESA, has some potential to be present on
7 segment U2, if suitable habitat is available on this portion of the San Pedro River and where the Project
8 footprint crosses the upper portions of Cienega Creek. This species is known to be present on other parts
9 of the San Pedro River and along Cienega Creek. Of the other sensitive plant species considered in this
10 analysis, the broadleaf ground cherry, button cactus, devilthorn hedgehog cactus, magenta-flowered
11 hedgehog cactus, giant sedge, littleleaf false tamarind, needle-spined pineapple cactus, San Carlos wild-
12 buckwheat, San Pedro River wild-buckwheat, varied fishhook cactus, and Wilcox pincushion cactus have
13 some potential to occur in segments U1, U2, and U3 (see table 4.8-8).

14 Construction impacts to special status species relating to the Upgrade Section, and implementation and
15 effects of mitigation measures would be the same as described for “Impacts Common to All Action
16 Alternatives.” In addition, the Huachuca water umbel could be negatively impacted if construction
17 activities alter riparian environments by increasing or decreasing watershed runoff, or by increasing
18 invasive noxious weeds such as tamarisk. Adherence to mitigation measures would result in short-term,
19 minor impacts to vegetation communities.

20 ***Noxious Weeds***

21 The primary noxious weed of concern in the vicinity of route group 2 is buffelgrass, which is not known
22 to occur in segments U1, U2, or U3. The exotic, invasive species Russian thistle, mustards, kochia,
23 Lehman lovegrass, and filaree occur throughout the route group (see table 4.8-8).

24 Construction impacts to noxious species relating to the Upgrade Section, and implementation and effects of
25 mitigation measures would be the same as described for “Impacts Common to All Action Alternatives.”
26 Adherence to mitigation measures would result in short-term, minor impacts to vegetation communities.

27 **Operation and Maintenance**

28 Subroute 3.1 totals 1,278.6 acres. Total permanent disturbance would result in nearly 5.4 percent being
29 disturbed, or approximately 68.7 acres.

30 ***Vegetation Communities***

31 Operation and maintenance impacts to vegetation communities relating to the Upgrade Section, and
32 implementation and effects of mitigation measures would be the same as described for “Impacts Common
33 to All Action Alternatives.” Since the subroute already has a significant amount of existing disturbance,
34 any additional disturbance could be reduced by adherence to mitigation measures that would result in
35 only short-term, minor impacts to vegetation communities.

36 ***Special Status Species***

37 Operation and maintenance impacts to special status species relating to the Upgrade Section, and
38 implementation and effects of mitigation measures would be the same as described for Impacts Common
39 to All Action Alternatives (page 146). In addition, the Huachuca water umbel could be negatively
40 impacted if construction activities alter riparian environments by increasing or decreasing watershed
41 runoff, or by increasing invasive noxious weeds such as tamarisk. Adherence to mitigation measures
42 would result in short-term, minor impacts to vegetation communities.

Table 4.8-8. Route Group 3 Vegetation Resource Inventory Data Showing Acres of each Vegetation Type in each Alternative Segment

Segment	Total Miles	Vegetation Communities																	
		Agriculture	Apachean-Chihuahuan Mesquite Upland Scrub	Apachean-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	Chihuahuan Mixed Salt Desert Scrub	Chihuahuan Stabilized Copice Dune and Sand Flat Scrub	Developed, Medium - High Intensity	Developed, Open Space - Low Intensity	Madrean Encinal	Mogollon Chaparral	North American Arid West Emergent Marsh	North American Warm Desert Bedrock Cliff and Outcrop	North American Warm Desert Riparian Mesquite Bosque	Open Water	Sonoran Paloverde-Mixed Cactus Desert Scrub	Sonora-Mojave Creosotebush-White Bursage Desert Scrub	Sonoran Mid-Elevation Desert Scrub	
Subroute 3.1, Proponent Preferred																			
U1a	16.1	14.5	88.4	125.4	50.4	9.1	0	0	0.0	3.8	0	0	0	0.3	0	0	0	0	0
U1b	2.9	0	18.7	14.7	14.5	2.4	0	2.7	0	0	0	0	0	0	0	0	0	0	0
U2	15.8	14.8	100.8	56.5	56.2	23.1	0	12.5	16.7	0	0	3.4	2.4	0	0.7	0	0	0	0
U3a	35.6	0	200.0	59.2	11.2	3.7	0	45.7	8.5	0.3	0	0	1.2	1.6	0	210.7	90.3	14.1	
Route Group 3, Local Alternative																			
H	19.3	9.3	198.1	62.8	38.3	35.3	0.6	1.7	0	1.3	0	0	0	2.8	0	0	0	0	0

Table 4.8-9. Route Group 3 Vegetation Resource Inventory Data

Segment	Total Miles	Special Status Species																Noxious Weeds/ Invasive Exotic Weeds						
		Button Cactus	Chihuahua Scurtpea	Devilthorn Hedgehog Cactus	Giant Sedge	Needle-spined Pineapple Cactus	San Pedro River Wild Cactus	Buckwheat	Wilcox Pincushion Cactus	Broadleaf Ground Cherry	Littleleaf False Tamarind	San Carlos Wild Buckwheat	Varied Fishhook Cactus	Huachuca Water Umbel	Magenta Flowered Hedgehog Cactus	Kevin Cholla	Night-blooming Cereus	Pima Indian Mallow	Pima Pineapple Cactus	Staghorn Cholla	Tumamoc Globeberry	Buttelfgrass	Invasive Exotic Weeds	
Subroute 3.1, Proponent Preferred																								
U1a	16.1	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
U1b	2.9	X	X	X		X	X	X	X	X	X	X	X	X										X
U2	15.8			X	X	X	X	X																X
U3a	35.6				X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Route Group 3, Local Alternative																								
H	19.3			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Note: Data come from SWReGAP GIS desktop analysis and not actual ground surveys.

1 **Noxious Weeds**

2 Operation and maintenance impacts to noxious species relating to the Upgrade Section, and
3 implementation and effects of mitigation measures would be the same as described for “Impacts Common
4 to All Action Alternatives.” Adherence to mitigation measures would result in short-term, minor impacts
5 to vegetation communities.

6 **LOCAL ALTERNATIVES**

7 There is one local alternative for route group 3–local alternative H.

8 **Construction**

9 This local alternative comprises 350.2 acres. Total temporary disturbance from construction would result
10 in nearly 28.1 percent of the ROW being disturbed and total permanent disturbance would result in nearly
11 8.1 percent being disturbed, or approximately 98.4 acres and 28.4 acres respectively.

12 **Vegetation Communities**

13 Local alternative H provides an alternative loop around the north side of Benson, Arizona, to connect
14 segment U1 with segment U3. This route comprises 350.2 acres and is characterized by the Apacherian-
15 Chihuahuan Mesquite Upland Scrub (198.1 acres), the Apacherian-Chihuahuan Piedmont Semi-Desert
16 Grassland and Steppe (62.8 acres), and the Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub
17 (38.3 acres) plant associations (see table 4.8-8). Existing impacts are associated with a variety of roads,
18 ranches, grazing, agriculture, transmission lines, and a railroad.

19 Construction impacts to vegetation communities relating to the Upgrade Section, and implementation and
20 effects of mitigation measures would be the same as described for “Impacts Common to All Action
21 Alternatives.” Since the subroute already has a significant amount of existing disturbance, any additional
22 disturbance could be reduced by adherence to mitigation measures that would result in only short-term,
23 minor impacts to vegetation communities.

24 **Special Status Species**

25 The Huachuca water umbel, listed as endangered under the ESA, has some potential to be present on local
26 alternative H, if suitable habitat is available on this portion of the San Pedro River. This species is known
27 to be present on other parts of the San Pedro River. Of the other sensitive plant species considered in this
28 analysis, the giant sedge, littleleaf false tamarind, needle-spined pineapple cactus, San Carlos wild-
29 buckwheat, San Pedro River wild-buckwheat, varied fishhook cactus, and Wilcox pincushion cactus have
30 some potential to occur in local alternative H (see table 4.8-8).

31 Construction impacts to special status species relating to the Upgrade Section, and implementation and
32 effects of mitigation measures would be the same as described for “Impacts Common to All Action
33 Alternatives.” In addition the Huachuca water umbel could be negatively impacted if construction
34 activities alter riparian environments by increasing or decreasing watershed runoff, or by increasing
35 invasive noxious weeds such as tamarisk. Adherence to mitigation measures would result in short-term,
36 minor impacts to vegetation communities.

37 **Noxious Weeds**

38 The primary noxious weed of concern in the vicinity of route group 3 is buffelgrass, which is not known
39 to occur in local alternative H. Exotic, invasive species Russian thistle, mustards, and filaree occur
40 throughout route group 3 (see table 4.8-8).

1 Construction impacts to noxious species relating to the Upgrade Section, and implementation and
2 effects of mitigation measures would be the same as described for “Impacts Common to All Action
3 Alternatives.” Adherence to mitigation measures would result in short-term, minor impacts to vegetation
4 communities.

5 **Operation and Maintenance**

6 This local alternative comprises 350.2 acres. Total permanent disturbance would result in nearly 8.1
7 percent being disturbed, or approximately 28.4 acres.

8 ***Vegetation Communities***

9 Operation and maintenance impacts to vegetation communities relating to the Upgrade Section, and
10 implementation and effects of mitigation measures would be the same as described for “Impacts Common
11 to All Action Alternatives.” Since the subroute already has a significant amount of existing disturbance,
12 any additional disturbance could be reduced by adherence to mitigation measures that would result in
13 only short-term, minor impacts to vegetation communities.

14 ***Special Status Species***

15 Operation and maintenance impacts to special status species relating to the Upgrade Section, and
16 implementation and effects of mitigation measures would be the same as described for “Impacts Common
17 to All Action Alternatives.” In addition the Huachuca water umbel could be negatively impacted if
18 construction activities alter riparian environments by increasing or decreasing watershed runoff, or by
19 increasing invasive noxious weeds such as tamarisk. Adherence to mitigation measures would result in
20 short-term, minor impacts to vegetation communities.

21 ***Noxious Weeds***

22 Operation and maintenance impacts to noxious species relating to the Upgrade Section, and
23 implementation and effects of mitigation measures would be the same as described for “Impacts Common
24 to All Action Alternatives.” Adherence to mitigation measures would result in short-term, minor impacts
25 to vegetation communities.

26 ***Route Group 4 – Pantano Substation to Saguaro Substation***

27 **SUBROUTE 4.1 – PROPONENT PREFERRED**

28 Route segments U3 (U3a, U3b, U3c, U3d, U3e, U3f, U3g, U3h, U3i, U3j, U3k, U3l, and U3m) and U4,
29 make up subroute 4.1.

30 **Construction**

31 Subroute 4.1 comprises 874.8 acres. Total temporary disturbance from construction would result in nearly
32 28.1 percent of the ROW being disturbed and total permanent disturbance would result in nearly 4.2
33 percent being disturbed, or approximately 246.2 acres and 36.9 acres respectively.

34 ***Vegetation Communities***

35 Segment U3 extends from the junction with segment U4 northwest around Tucson to the Saguaro
36 Substation. This segment is characterized by the Sonoran Paloverde-Mixed Cacti Desert Scrub plant
37 association, which covers about 36 percent of this subroute (322.1 acres). The Sonora-Mojave Creosote-
38 White Bursage Desert Scrub (3.2 acres) and the Apacherian-Chihuahuan Mesquite Upland Scrub plant
39 (3.2 acres) are also present in the segment (table 4.8-10). Low-, medium-, and high-density urban
40 development cover another 21 percent of this segment (125.3 acres). Existing impacts are associated with
41 urban development, agriculture, a variety of roads and highways, transmission lines, and pipelines.

Table 4.8-10. Route Group 4 Vegetation Resource Inventory Data Showing Acres of each Vegetation Type in each Alternative Segment

Segment	Total Miles	Vegetation Communities																		
		Agriculture	Apachean-Chihuahuan Mesquite Upland Scrub	Apachean-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	Barren Lands, Non-Specific	Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	Chihuahuan Mixed Salt Desert Scrub	Developed, Medium - High Intensity	Developed, Open Space - Low Intensity	Madrean Encinal	Madrean Juniper Savanna	North American Warm Desert Bedrock Cliff and Outcrop	North American Warm Desert Riparian Mesquite Bosque	North American Warm Desert Riparian Woodland and Shrubland	North American Warm Desert Wash	Open Water	Sonora-Mojave Creosotebush-White Bursage Desert Scrub	Sonoran Mid-Elevation Desert Scrub	Sonoran Paloverde-Mixed Cacti Desert Scrub	
Subroute 4.1, Proponent Preferred																				
U3b	0.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8.2
U3c	1.0	0	0	0	0	0	8.2	0	0	0	0	0	0	0	0	0	0.4	0.3	0	8.5
U3d	3.4	0	0.1	0	0	0	36.5	5.6	0	0	0	0	0	0	0	0	0	2.2	0	18.0
U3e	0.9	0	0	0	0	0	3.9	0	0	0	0	2.4	0	0	0	0	0	0	0	9.8
U3f	0.7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12.4
U3g	0.9	0	0	0	0	0	15.4	0	0	0	0	0	0	0	0	0.0	0	0	0	0.9
U3h	1.1	0	0	0	0	0	19.8	0	0	0	0	0	0	0	0	0.0	0	0	0	0
U3i	18.2	19.4	0.6	0	0.3	0	117.4	26.0	0	0	0	0	3.0	0	0.0	0.0	31.2	1.3	128.3	0
U3j	0.9	15.9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
U3k	16.7	34.6	2.5	0	10.2	0	0.1	13.9	0	0	0	14.5	15.3	1.1	0	0	78.0	0	133.3	0
U3l	1.6	0	0	0	3.9	0	1.1	0	0	0	0	0	0	0	0	0	20.4	0	2.7	0
U3m	0.6	0	0	0	0	0	8.8	0	0	0	0	0	0	0	0	0	0.1	0	0.0	0
U4	1.9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3.3	0	31.4	0

Table 4.8-10. Route Group 4 Vegetation Resource Inventory Data Showing Acres of each Vegetation Type in each Alternative Segment
(Continued)

Segment	Total Miles	Vegetation Communities																			
		Agriculture	Apacherian-Chihuahuan Mesquite Upland Scrub	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	Barren Lands, Non-Specific	Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	Chihuahuan Mixed Salt Desert Scrub	Developed, Medium - High Intensity	Developed, Open Space - Low Intensity	Madrean Encinal	Madrean Juniper Savanna	North American Warm Desert Bedrock Cliff and Outcrop	North American Warm Desert Riparian Mesquite Bosque	North American Warm Desert Riparian Woodland and Shrubland	North American Warm Desert Wash	Open Water	Sonora-Mojave Creosotebush-White Bursage Desert Scrub	Sonoran Mid-Elevation Desert Scrub	Sonoran Paloverde-Mixed Cacti Desert Scrub		
Route Group 4, Local Alternatives																					
MA1	1.1	19.0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TH1a	1.4	0	0	0	0	0	0.0	0	0	0	0	0	0	0	0	0	0	0	0	0	23.7
TH1b	1.6	0	0	0	0	0	12.0	0	0	0	0	0	0	0	0	0	0	0	0	0	16.5
TH1c	0.3	0	0	0	0	0	4.8	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TH1-Option	1.0	0	0	0	0	0	0.0	0	0	0	0	0	0	0	0	0	0	0	0	0	7.7
TH3-OptionA	0.8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1.8	0	0	13.3
TH3-OptionB	0.8	0	1.3	0	0	0	6.3	0	0	0	0	0	0	0	0	0	0	0.3	0.5	0	6.2
TH3-Optionc	1.8	0	0.0	0	0	0	7.6	0	0	0	0	0	0	0	0	0	0	0	1.5	0	20.2
TH3a	2.7	0	0	0	0	0	22.5	0	0	0	0	0	0	0	0	0	0	0	0	0	25.4
TH3b	4.5	0	0	0	0	0	72.8	0	0	0	0	0	0	0	0	0	0	1.1	0.6	0	6.9

Note: Data come from SWReGAP GIS desktop analysis and not actual ground surveys.

Table 4.8-11. Route Group 4 Vegetation Resource Inventory Data

Segment	Total Miles	Special Status Species													Noxious Weeds/ Invasive Exotic Weeds									
		Needle-spined pineapple cactus	San Pedro River wild buckwheat	Varied fishhook cactus	Button cactus	Littleleaf false tamarind	San Carlos wild buckwheat	Thorber fishhook cactus	Huachuca water umbel	Magenta flowered hedgehog cactus	Kevin cholla	Night-blooming cereus	Pima Indian mallow	Pima pineapple cactus	Staghorn cholla	Tumamoc globeberry	Desert barrel cactus	Engelmann pricklypear (var. <i>flavispa</i>)	Giant sedge	Devilhorn hedgehog cactus	Slender needle corycactus	Buffelgrass	Invasive Exotic Weeds	
Route Group 4. Local Alternatives																								
MA1	1.1																							X
TH1a	1.4							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH1b	1.6							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH1c	0.3							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH1-Option	1.0							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH3-Option A	0.8							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH3-Option B	0.8							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH3-Option C	1.8							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH3a	2.7							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
TH3b	4.5							X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

1 Segment U4 provides a short segment of new construction to connect the proposed corridor to the Vail
2 Substation, near the Pima County Fairgrounds. This segment is characterized by the Sonoran Paloverde-
3 Mixed Cacti Desert Scrub plant association (31.4 acres).

4 Construction impacts to vegetation communities relating to the Upgrade Section, and implementation and
5 effects of mitigation measures would be the same as described for “Impacts Common to All Action
6 Alternatives.” The subroute already has a significant amount of existing disturbance, most notably urban
7 development with accompanying exotic plantings and urban yards, therefore the relative portion of the
8 subroute that comprises native vegetation associations is reduced. Any additional disturbance could be
9 reduced by adherence to mitigation measures that would result in only short-term, minor impacts to
10 vegetation communities.

11 ***Special Status Species***

12 The Pima pineapple cactus, listed as endangered under the ESA, has potential to be present on the
13 southern parts of segments U3 and U4. This species is known to be present in this vicinity. Recent spring
14 surveys in 2013 have documented the Pima pineapple cactus between I-19 and Davidson Canyon in the
15 existing Western ROW (Johnida Dockens, personal communication). Additionally, the Huachuca water
16 umbel, listed as endangered under the ESA, has slight potential to be present in segment U3, if suitable
17 habitat is present where it crosses arroyos that feed into Cienega Creek to the north of the Project
18 footprint. This species is known to be present along Cienega Creek. Of the other sensitive plant species
19 considered in this analysis, the desert barrel cactus, Engelmann pricklypear, giant sedge, littleleaf false
20 tamarind, magenta-flowered hedgehog cactus, needle-spined pineapple cactus, night-blooming cereus,
21 Pima Indian mallow, San Carlos wild-buckwheat, San Pedro River wild buckwheat, staghorn cholla,
22 Thornber fishhook cactus, Tumamoc globeberry, varied fishhook cactus, and hybrid Kelvin cholla have
23 some potential to occur in segments U3 and U4 (see table 4.8-11).

24 Construction impacts to special status species relating to the Upgrade Section, and implementation and
25 effects of mitigation measures would be the same as described for “Impacts Common to All Action
26 Alternatives.” In addition the Huachuca water umbel could be negatively impacted if construction
27 activities alter riparian environments by increasing or decreasing watershed runoff, or by increasing
28 invasive noxious weeds such as tamarisk. The Pima pineapple cactus could be negatively impacted by
29 direct impacts to individuals and the vegetation community habitat, and by the establishment of invasive
30 weeds such as buffelgrass that increase wildfire. Adherence to mitigation measures would result in short-
31 term, minor impacts to vegetation communities.

32 ***Noxious Weeds***

33 The primary noxious weed of concern in the vicinity of route group 4 is buffelgrass, which has been
34 documented in the Tucson vicinity (NIISS 2013). It is known to be present in segment U3, and likely to
35 occur in segment U4. Other invasive species in this route group include Russian thistle, filaree, and
36 mustards, but these are not classified as noxious weeds (see table 4.8-11).

37 Construction impacts to noxious species relating to the Upgrade Section, and implementation and effects
38 of mitigation measures would be the same as described for “Impacts Common to All Action
39 Alternatives.” Adherence to mitigation measures would result in short-term, minor impacts to vegetation
40 communities.

41 **Operation and Maintenance**

42 Subroute 4.1 comprises 874.8 acres. Total permanent disturbance would result in nearly 4.2 percent being
43 disturbed, or approximately 36.9 acres.

1 **Vegetation Communities**

2 Operation and maintenance impacts to vegetation communities relating to the Upgrade Section, and
 3 implementation and effects of mitigation measures would be the same as described for “Impacts Common
 4 to All Action Alternatives.” The subroute already has a significant amount of existing disturbance, most
 5 notably urban development with accompanying exotic plantings and urban yards, therefore the relative
 6 portion of the subroute that comprises native vegetation associations is reduced. Any additional
 7 disturbance could be reduced by adherence to mitigation measures that would result in only short-term,
 8 minor impacts to vegetation communities.

9 **Special Status Species**

10 Operation and maintenance impacts to special status species relating to the Upgrade Section, and
 11 implementation and effects of mitigation measures would be the same as described for “Impacts Common
 12 to All Action Alternatives.” In addition the Huachuca water umbel could be negatively impacted if
 13 construction activities alter riparian environments by increasing or decreasing watershed runoff, or by
 14 increasing invasive noxious weeds such as tamarisk. The Pima pineapple cactus could be negatively
 15 impacted by direct impacts to individuals and the vegetation community habitat, and by the establishment
 16 of invasive weeds such as buffelgrass that increase wildfire. Adherence to mitigation measures would
 17 result in short-term, minor impacts to vegetation communities.

18 **Noxious Weeds**

19 Operation and maintenance impacts to noxious species relating to the Upgrade Section, and
 20 implementation and effects of mitigation measures would be the same as described for “Impacts Common
 21 to All Action Alternatives.” Adherence to mitigation measures would result in short-term, minor impacts
 22 to vegetation communities.

23 **LOCAL ALTERNATIVES**

24 There are 10 local alternatives available for route group 4: TH1a, TH1b, TH1c, TH1-Option, TH3a,
 25 TH3b, TH3-Option A, TH3-Option B, TH3-Option C, and MA1. Table 4.8-12 lists the acres of
 26 disturbance proposed under the route group 4 local alternatives.

27 **Table 4.8-12.** Temporary and Permanent Disturbance Acreages for Route Group 4 Local Alternatives

Alternative	Total Acres within Representative ROW	Temporary Disturbance (percent of ROW)	Temporary Disturbance (acres)	Permanent Disturbance (percent of ROW)	Permanent Disturbance (acres)
TH1a	25.7	28.1	7.2	1.2	0.3
TH1b	28.4	28.1	8.0	2.1	0.6
TH1c	4.8	35.2	1.7	3.1	0.1
TH1 Option	17	29.2	5.0	0.9	0.2
TH3-Option A	15.1	28.1	4.2	5.8	0.9
TH3-Option B	14.5	28.8	4.2	4.4	0.6
TH3-Option C	29.3	31.4	9.2	8.8	2.6
TH3a	49.7	28.1	13.9	5.4	2.7
TH3b	81.4	28.2	23	4.0	3.3
MA1	19.0	29.4	5.6	1.6	0.3

28 Note: Data come from SWReGAP GIS desktop analysis and not actual ground surveys.

1 **Construction**

2 Table 4.8-12 lists the acres of temporary and permanent disturbance proposed under the route group 4
3 local alternatives.

4 ***Vegetation Communities***

5 The majority of the alternatives for route group 4, with the exception of MA1, are characterized by
6 Sonoran Paloverde-Mixed Cacti Desert Scrub and Developed, Medium – High Intensity plant
7 associations. Existing impacts are associated with a transmission line, commercial and residential
8 development, and a variety of roads.

9 Local alternative TH1a is characterized by Sonoran Paloverde-Mixed Cacti Desert Scrub (23.7 acres)
10 (see table 4.8-10). The alternative TH1b is characterized by Sonoran Paloverde-Mixed Cacti Desert Scrub
11 (16.5 acres) and Developed, Medium - High Intensity (12.0 acres) (see table 4.8-10).

12 Local alternative TH1c is characterized by Developed, Medium - High Intensity (4.8 acres) (see table
13 4.8-10). The alternative TH1 Option is characterized by Sonoran Paloverde-Mixed Cacti Desert Scrub
14 (7.7 acres) (see table 4.8-10). The alternative TH3-Option A is characterized by Sonora-Mojave
15 Creosotebush-White Bursage Desert Scrub (1.8 acres) and Sonoran Paloverde-Mixed Cacti Desert Scrub
16 (13.3 acres) (see table 4.8-10).

17 Local alternative TH3-Option B is characterized by Developed, Medium - High Intensity (6.3 acres) and
18 Sonoran Paloverde-Mixed Cacti Desert Scrub (6.2 acres) (see table 4.8-10). Local alternative TH3-Option
19 C is characterized by Developed, Medium - High Intensity (7.6 acres), Sonoran Mid-Elevation desert
20 scrub (1.5 acres), and Sonoran Paloverde-Mixed Cacti Desert Scrub (20.2 acres) (see table 4.8-10).
21 The alternative TH3a is characterized by Developed, Medium - High Intensity (22.5 acres), Sonoran Mid-
22 Elevation desert scrub (1.7 acres), and Sonoran Paloverde-Mixed Cacti Desert Scrub (25.4 acres) (see
23 table 4.8-10). The alternative TH3b is characterized by Developed, Medium - High Intensity (72.8 acres),
24 Sonora-Mojave Creosotebush-White Bursage Desert Scrub (1.1 acres), and Sonoran Paloverde-Mixed
25 Cacti Desert Scrub (6.9 acres) (see table 4.8-10). Route segment MA1 is characterized by the Agriculture
26 plant association which accounts for over 99 percent of the acreage (19.0 acres) (see table 4.8-10).
27 The North American Warm Desert Riparian Woodland and Shrubland plant association accounts for the
28 remaining percentage of the acreage for this segment. Existing impacts are associated with agriculture,
29 canals, and dirt roads.

30 Construction impacts to vegetation communities relating to the Upgrade Section, and implementation and
31 effects of mitigation measures would be the same as described for “Impacts Common to All Action
32 Alternatives.” The subroute already has a significant amount of existing disturbance, most notably urban
33 development with accompanying exotic plantings and urban yards, therefore the relative portion of the
34 subroute that comprises native vegetation associations is reduced. Any additional disturbance could be
35 reduced by adherence to mitigation measures that would result in only short-term, minor impacts to
36 vegetation communities.

37 ***Special Status Species***

38 No ESA-listed plant species are considered to have the potential to occur along local alternatives TH1a,
39 TH1b, TH1c, TH3a, TH3b, and TH1 Option. Of the other sensitive plant species considered in this
40 analysis, the magenta-flowered hedgehog cactus, night-blooming cereus, Pima Indian mallow, staghorn
41 cholla, Tumamoc globeberry, and hybrid Kelvin cholla have some potential to occur in local alternatives
42 TH1a, TH1b, TH1c, TH1-Option, TH3a, and TH3b (see table 4.8-11).

1 Construction impacts to special status species relating to the Upgrade Section, and implementation and
2 effects of mitigation measures would be the same as described for “Impacts Common to All Action
3 Alternatives.” In addition the Huachuca water umbel could be negatively impacted if construction
4 activities alter riparian environments along arroyos feeding into Cienega Creek by increasing or
5 decreasing watershed runoff, or by increasing invasive noxious weeds such as tamarisk. The Pima
6 pineapple cactus could be negatively impacted by direct impacts to individuals and the vegetation
7 community habitat, and by the establishment of invasive weeds such as buffelgrass that provide increased
8 fuel for wildfire. Adherence to mitigation measures would result in short-term, minor impacts to
9 vegetation communities.

10 ***Noxious Weeds***

11 The primary noxious weed of concern in the vicinity of route group 4 is buffelgrass, which has been
12 documented in the Tucson vicinity (NIISS 2013). It is known to be present in local alternative TH1a,
13 TH1b, TH1c, TH1 Option, TH3a, TH3b, TH3 (Options A, B, and C), and MA1. Two other noxious weed
14 species, field bindweed and hydrilla, have also been documented near the Santa Cruz River on the west
15 edge of Tucson (NIISS 2013) and could be present in local alternative TH3a. Other invasive species in
16 this route group include Russian thistle, filaree, and mustards, but these are not classified as noxious
17 weeds (see table 4.8-11).

18 Construction impacts to noxious species relating to the Upgrade Section, and implementation and effects
19 of mitigation measures would be the same as described for “Impacts Common to All Action
20 Alternatives.” In addition, bindweed, if present in the ROW, can spread prolifically, even when
21 aboveground portions of the plant are removed; continued maintenance is often required in order to
22 control the species. The greatest impacts from bindweed could be felt in adjacent agricultural lands,
23 particularly in segment MA1 which is predominantly agricultural; indirect impacts of the disturbance in
24 these areas could be reduced crop yields due to bindweed infestation. Hydrilla is an aquatic species that
25 will grow with less light and is more efficient at taking up nutrients than native species, therefore
26 outcompeting native aquatic species. Indirect impacts of hydrilla resulting from disturbance could be
27 effects to recreation and destruction of habitat. Adherence to mitigation measures would result in short-
28 term, minor impacts to vegetation communities.

29 **Operation and Maintenance**

30 Table 4.8-12 lists the potential permanent disturbance acres for the route group 4 local alternatives that
31 would result from operation and maintenance of the facilities.

32 ***Vegetation Communities***

33 Operation and maintenance impacts to vegetation communities relating to the Upgrade Section, and
34 implementation and effects of mitigation measures would be the same as described for “Impacts Common
35 to All Action Alternatives.” The subroute already has a significant amount of existing disturbance, most
36 notably urban development with accompanying exotic plantings and urban yards, therefore the relative
37 portion of the subroute that comprises native vegetation associations is reduced. Any additional
38 disturbance could be reduced by adherence to mitigation measures that would result in only short-term,
39 minor impacts to vegetation communities.

40 ***Special Status Species***

41 Operation and maintenance impacts to special status species relating to the Upgrade Section, and
42 implementation and effects of mitigation measures would be the same as described for “Impacts Common
43 to All Action Alternatives.” In addition the Huachuca water umbel could be negatively impacted if

1 construction activities alter riparian arroyo environments that feed in to Cienega Creek, by increasing or
2 decreasing watershed runoff, or by increasing invasive noxious weeds such as tamarisk. The Pima
3 pineapple cactus could be negatively impacted by direct impacts to individuals and the vegetation
4 community habitat, and by the establishment of invasive weeds such as buffelgrass that increase fuel for
5 wildfire. Adherence to mitigation measures would result in short-term, minor impacts to vegetation
6 communities.

7 ***Noxious Weeds***

8 Operation and maintenance impacts to noxious species relating to the Upgrade Section, and
9 implementation and effects of mitigation measures would be the same as described for “Impacts Common
10 to All Action Alternatives.” In addition the aquatic noxious weed hydrilla might be easily introduced into
11 streams and ponds by transporting small pieces of the living plants on equipment, and noxious field
12 bindweed seeds are easily transported in soils on construction equipment. Adherence to mitigation
13 measures would result in short-term, minor impacts to vegetation communities.

14 ***Agency Preferred Alternative***

15 Impacts resulting from the construction and maintenance of the Agency Preferred Alternative would be
16 similar to those described under “Impacts Common to All Action Alternatives.”

17 As described in “Impacts Common to All Action Alternatives,” the Agency Preferred Alternative would
18 involve the removal of vegetation during construction activities resulting in the direct loss of plant
19 communities, potential impacts to special status species, and impacts associated with noxious weeds.

20 No ESA-listed species have the potential to occur within the New Build Section of the Agency Preferred
21 Alternative. However, the following sensitive species—dune pricklypear, slender needle corycactus,
22 devilthorn hedgehog cactus, Wilcox pincushion cactus, San Carlos wild-buckwheat, varied fishhook
23 cactus, playa spider plant, and Sneed’s pin-cushion cactus—have potential to occur along the Agency
24 Preferred Alternative (see tables 4.8-2 and 4.8-5). Additionally, some exotic invasive species, not
25 classified as noxious (including Lehmann lovegrass, Russian thistle, filaree, and mustards) occur
26 throughout the region of the Agency Preferred Alternative.

27 Within the Upgrade Section of the Agency Preferred Alternative, the Huachuca water umbel, listed as
28 endangered under the ESA, has some potential to be present along segment U2, if suitable habitat is
29 available on this portion of the San Pedro River. This species is known to be present on other parts of the
30 San Pedro River. Additionally, the Huachuca water umbel has some potential to be present in segment
31 U3, if suitable habitat is present where it crosses Cienega Creek. This species is known to be present on
32 other parts of Cienega Creek. The Pima pineapple cactus, listed as endangered under the ESA, has
33 potential to be present on the southern parts of segments U3 and U4. This species is known to be present
34 in this vicinity. Recent spring surveys in 2013 have documented the Pima pineapple cactus between I-19
35 and Davidson Canyon in the existing Western ROW (Johnida Dockens, personal communication). Of the
36 other sensitive plant species considered in this analysis, the broadleaf ground cherry, button cactus,
37 devilthorn hedgehog cactus, desert barrel cactus, Engelmann pricklypear, magenta-flowered hedgehog
38 cactus, giant sedge, littleleaf false tamarind, needle-spined pineapple cactus, San Carlos wild-buckwheat,
39 littleleaf false tamarind, San Pedro River wild buckwheat, staghorn cholla, Thornber fishhook cactus,
40 Tumamoc globeberry, varied fishhook cactus, night-blooming cereus, Pima Indian mallow, hybrid Kelvin
41 cholla, and Wilcox pincushion cactus have some potential to occur in segments U1, U2, U3, and U4 (see
42 tables 4.8-9 and 4.8-11).

43 The primary noxious weed of concern along the Upgrade Section of the Agency Preferred Alternative is
44 buffelgrass, which has been documented in the Tucson vicinity (NISS 2013). It is known to be present in

1 segment U3, and likely to occur in segment U4. Other invasive species of concern along the Upgrade
2 Section of the Agency Preferred Alternative are Russian thistle, filaree, and mustards, but these are not
3 classified as noxious weeds.

4 ***Additional Mitigation Measures***

5 As previously stated, the Southline PPMs under section 8.3.12 of the POD provides plans to minimize,
6 mitigate, and/or restore vegetation disturbance (PPM VEG-1 through PPM VEG-6).

7 **VEGETATION COMMUNITIES**

8 Additional ground-truthing field surveys will be conducted for any SWReGAP plant associations
9 (communities) that are considered to be environmentally sensitive, such as wetlands, riparian areas,
10 drainages, and special status species habitats, to confirm the presence and extent of such communities.
11 If any such sensitive plant communities are identified and documented, the first response would be a
12 determination on whether the sensitive community can be avoided. If avoidance is not possible, a
13 mitigation plan would be developed as needed for those vegetation communities, including options to
14 reduce impacts to those communities. Exclusion zones (at least 10 feet around the perimeter of the plant
15 community) would be delineated around any such plant communities and marked with flagging.
16 Construction monitoring shall be employed around any such sensitive plant communities, and the
17 biological monitor shall have the authority to halt any construction activity deemed intrusive and causing
18 impacts beyond those stated in the mitigation plan. Any changes in construction plans that occur after the
19 Project approval would require additional field presence/absence surveys for such sensitive plant
20 communities, would require a variance request from the BLM, and the above mitigation measures would
21 apply.

22 **SPECIAL STATUS SPECIES**

23 Field presence/absence surveys would be conducted for special status species in locations where such
24 species are likely to occur within the Project ROW, and specifically locations where vegetation would be
25 impacted, prior to any actual impacts. Surveys would be conducted following established protocols by
26 qualified biologists approved by BLM. For example, pre-impact presence/absence surveys would be
27 conducted for the federally protected Huachuca water umbel and the Pima pineapple cactus within the
28 Project ROW of the final alternative Project route. Additional surveys also would be conducted for other
29 agency special status species within impact locations of the final Project ROW on an as-needed basis.
30 Exclusion zones (at least 10 feet around the perimeter of any individual special status plants) would be
31 delineated around any such special status species and marked with flagging. Construction monitoring
32 would be employed around any such special status plant species, and the biological monitor would have
33 the authority to halt any construction activity deemed intrusive and causing impacts beyond those stated
34 in the mitigation plan. Any actions affecting special status plant species found in Arizona must comply
35 with the Arizona Native Plant Law, permits may be obtained for salvage and/or transplanting. New
36 Mexico does not require such transplant actions for special status species. Any changes in construction
37 plans that occur after the Project approval would require additional field presence/absence surveys for
38 such special status plant species, would require a variance request from the BLM, and the above
39 mitigation measures would apply.

40 **NOXIOUS WEEDS**

41 Noxious weeds and other exotic invasive plant species would be inventoried by a qualified biologist in
42 the immediate proximity to any sensitive plant communities and any special status species populations.
43 Such a detailed noxious weed inventory would then provide information to supplement mitigation plans

1 for sensitive plant communities and/or special status species habitats, to prevent the expansion of any
2 noxious weeds or other exotic invasive plant species into those locations. Any changes in construction
3 plans that occur after the Project approval would require additional field presence/absence surveys for
4 such noxious weeds and other exotic invasive plant species, would require a variance request from the
5 BLM, and the above mitigation measures would apply.

6 **COMPENSATORY MITIGATION**

7 In addition to a Mitigation Plan that addresses additional mitigation for impacted species, a Compensation
8 Plan would be developed to meet BLM requirements and approval. The Compensation Plan would
9 include calculations of compensation ratios and mitigation acreages for special status plant species
10 requiring additional mitigation. Compensatory mitigation could include payment of an in lieu fee;
11 acquiring mitigation land or conservation easements; or a combination of the two.

12 ***Residual Impacts***

13 Mitigation efforts would not alleviate all environmental impacts to vegetation. Despite attempts to
14 minimize temporary and permanent environmental disturbance to vegetation, minor short-term and long-
15 term impacts would occur.

16 **VEGETATION COMMUNITIES**

17 As efforts are made to minimize initial impacts to sensitive vegetation communities and special status
18 species, those impacts would be shifted to less sensitive communities and species. Revegetation would
19 produce vegetation communities similar to those disturbed, but actual species composition and vegetation
20 spatial patterns would likely differ from pre-impact conditions.

21 **SPECIAL STATUS SPECIES**

22 Special status species would be avoided or restored by relocating plants and/or restoring habitats.
23 Avoidance of individual plants would be the preferred approach to mitigation. Such restoration efforts
24 would help and would likely save individual special status plants, but restored habitats would likely be
25 different than the original natural habitats and transplanted special status plants would be moved to
26 different environments where survival rates may be greater or less than the natural setting. Efforts would
27 be made to monitor such mitigation efforts as outlined in the Proponent prepared/agency approved
28 restoration plan in order to verify the success or failure of such restoration efforts for special status
29 species.

30 **NOXIOUS WEEDS**

31 Mitigation efforts to prevent noxious and other exotic invasive weeds from colonizing disturbed soils
32 could possibly not be effective in some cases. In areas where some noxious weeds are particularly likely
33 to have indirect effects on sensitive vegetation communities or special status species, additional post
34 construction monitoring would be conducted, and decisions would be made as to provide or not provide
35 control measures for noxious weed encroachment on sensitive vegetation resources.

36 ***Unavoidable Adverse Impacts***

37 The Proponent has selected the route analysis area to avoid areas of critical environmental concern and
38 sensitive habitat; however, some environmental impacts resulting from the Project would be unavoidable,
39 and no mitigation measures were deemed feasible. Such impacts include permanent or long-term impact

1 effects, such as the construction of substation enhancements, permanent access roads, and other
2 permanent constructed features which would destroy vegetation communities to some extent.

3 **VEGETATION COMMUNITIES**

4 In cases where adverse impacts to vegetation are unavoidable, those impacts would be planned in such a
5 way as to affect less environmentally sensitive vegetation resources. For example, common and
6 widespread vegetation communities would be negatively impacted instead of sensitive plant communities.
7 Specifically how such mitigation will be implemented will depend upon each situation where a sensitive
8 vegetation resource is encountered and alternate disturbance plans will be developed. The initial analysis
9 of vegetation resources indicates that such alterations of disturbance plans will be minor.

10 **SPECIAL STATUS SPECIES**

11 Locations that do not support special status species would be impacted instead of areas that do support
12 special status species. The negative adverse impacts would occur, but not at the expense of any special
13 status species.

14 **NOXIOUS WEEDS**

15 Locations that support sensitive plant communities or special status species would not be impacted, so the
16 introduction and colonization of those locations should be averted. However noxious and other exotic
17 invasive weeds could increase in other impacted areas with less-sensitive vegetation resources.

18 ***Short-term Uses versus Long-term Productivity***

19 The productivity or function of vegetation would be affected by both short-term or temporary impacts,
20 and long-term or permanent impacts.

21 **VEGETATION COMMUNITIES**

22 Temporary impacts to vegetation communities would be present until restoration is conducted, resulting
23 in short-term production loss. Following restoration, temporary impact effects would be alleviated to
24 vegetation communities and long-term productivity will be reestablished. Restoration of herbaceous
25 vegetation (e.g., perennial native grasses) should take less than 5 years, depending on climate during that
26 time. Long-term establishment of native woody species (e.g., shrubs and riparian trees) would take longer
27 periods of time, from 5 to 20 years to restore long-term woody vegetation productivity. Relative to
28 temporary impacts that would include both short-term and long-term restoration of native vegetation
29 production, permanent loss of vegetation communities would be minimal in spatial scale. Vegetation of
30 semi-arid regions generally takes years (herbaceous) to decades (woody) to recover from disturbances
31 that impact the aboveground plants themselves, but not the topsoils. Such recovery is very dependent on
32 rainfall and temperature conditions during the recovery period.

33 **SPECIAL STATUS SPECIES**

34 If restoration and relocation methods are employed for any special status plant species, the temporary
35 impacts would be during the restoration activities. Productivity of such plants would be reduced in the
36 short-term, but would be unaffected in the long-term once such plants have become reestablished.
37 Permanent impacts to those plant species (individuals) would be based on survival of transplanted
38 individuals, and persistence of restored habitat. Long-term loss of productivity would result if such plants
39 do not survive, or suffer reduced growth following relocation. Given the importance of special status
40 species, all efforts would be made to ensure the survival and continued productivity levels of such plants.

1 The health of any transplanted individuals would be monitored for at least 5 years comparatively to other
2 non-transplanted individuals of the same species in the same area, to provide reference growth and
3 survival conditions.

4 **NOXIOUS WEEDS**

5 The introduction and colonization of noxious weeds and other exotic invasive plant species would be
6 temporary if monitoring and control are performed. Colonization of noxious weeds and other exotic
7 invasive plant species would be permanent if such monitoring and control measures are not implemented.

8 ***Irreversible and Irretrievable Commitments of Resources***

9 Environmental impacts that have irreversible negative effects on vegetation are situations where
10 vegetation and topsoils are impacted and not restored. In most cases, restoration efforts would be made,
11 and irreversible impacts to vegetation would be minor, including unavoidable adverse impacts and
12 residual impacts discussed above.

13 **VEGETATION COMMUNITIES**

14 In areas of sub-station expansions, vegetation communities and their habitat (topsoils) would be
15 destroyed, but these structure foundations would be minimal in extent, and vegetation community loss
16 minimal relative to the acreage of each community in the region, and would focus on low-sensitivity or
17 low-value communities. Vegetation would take many decades to recover in such locations, and may never
18 recover under current climate regimes without soil nutrient enhancements.

19 **SPECIAL STATUS SPECIES**

20 Although environments of special status species throughout the analysis area have been recognized and
21 would be avoided to the greatest extent, avoidance of every individual of all special status species is
22 unlikely. Where individuals would be impacted, restoration should mitigate such impacts, but relocation
23 to suboptimal habitats or inadequate habitat restoration could result in permanent declines for the species
24 in those locations.

25 **NOXIOUS WEEDS**

26 Despite restoration and control efforts, introduction and colonization of noxious weeds and other exotic
27 invasive plant species could occur and persist in some areas.

28 **4.8.2 Wildlife**

29 ***Introduction***

30 This section describes the impacts to wildlife and special status wildlife species associated with the
31 construction, operation and maintenance of the proposed transmission line, substations, and ancillary
32 facilities. Impacts to wildlife and special status wildlife species are discussed in terms of impacts on the
33 species and their habitat(s). The impacts described in this section are based on the “Southline
34 Transmission Project Resource Report 18: Wildlife” (CH2M Hill 2013h) and presented in chapter 3.
35 Temporary effects (end with completion of construction activities); short-term (less than 5 years) and
36 long-term (greater than 5 years) impacts are evaluated relative to wildlife resources. Cumulative effects
37 are also evaluated; impacts added to the impacts of past, present, and foreseeable future actions,
38 regardless of the cause or source of other impacts.

1 **Methodology and Assumptions**

2 **ANALYSIS AREA**

3 The analysis area for wildlife resources includes the representative ROW, staging areas, substations, and
4 access roads. This area is used to identify resources that could be directly impacted by ground disturbance
5 and where construction materials, equipment, and workers may be present. The ROW for the New Build
6 Section is 200 feet wide, and the ROW for the Upgrade Section is 150 feet wide. This analysis area is
7 sufficient to identify wildlife habitat that could be directly impacted by ground disturbance during
8 construction, operation and maintenance of the proposed line. Some indirect impacts to wildlife could
9 occur outside of the analysis area but these would occur within the analysis area given in chapter 3.
10 Indirect impacts are described below in “Impacts Common to All Action Alternatives.”

11 **ANALYSIS ASSUMPTIONS**

12 The primary assumption for analyzing impacts to wildlife is that the PPMs would be in place and would
13 limit impacts on wildlife and wildlife habitat. These measures are listed below in “Impacts Common to
14 All Action Alternatives.”

15 **IMPACT INDICATORS**

- 16 • Loss or degradation of habitat:
 - 17 ◦ Loss or degradation of terrestrial habitat from clearing of vegetation during construction.
 - 18 ◦ Degradation of terrestrial habitat due to increased soil erosion or introduction of invasive
19 non-native plants.
 - 20 ◦ Degradation of aquatic and wetland habitat from increased soil erosion and/or chemical
21 contamination.
- 22 • Increased risk of electrocution or predation due to construction of linear transmission line.
- 23 • Increased risk of vehicular mortality (direct and indirect) due to construction activities.
- 24 • Displacement or decrease in fitness due to noise and human activity associated with all aspects of
25 construction, operation, and maintenance.
- 26 • Decreased forage availability and foraging habitat quality due to the spread of invasive and
27 noxious weed species and the removal of habitat.
- 28 • Indirect impacts related to loss of habitat or direct loss of wildlife individuals due to increased
29 risk of wildfire from the introduction of invasive and noxious weed species.
- 30 • Habitat fragmentation, including a decrease in function to wildlife corridors, due to the
31 construction of linear features (power lines and roads) and large areas of habitat (power
32 facilities).

33 **SIGNIFICANT IMPACTS**

34 A significant impact to wildlife special status species and/or special designation areas would result if any
35 of the following were to occur:

- 36 • Loss to any population of special status species that would jeopardize the continued existence of
37 that population;

- 1 • Loss to any population of special status species that would result in the species being listed or
2 proposed for listing as endangered or threatened;
- 3 • Introduction of constituents into a water body in concentrations that could cause adverse effects
4 on wildlife;
- 5 • Interference with the movement (including special designation areas such as wildlife corridors) of
6 any native, resident, or migratory special status species for more than two reproductive seasons;
- 7 • Local loss of special status species habitat and/or special designation areas (as compared to total
8 available resources within the area) or habitat productivity;
- 9 • Any activity that would violate the ESA, MBTA, or the BGEPA;
- 10 • Adverse modification of designated critical habitat;
- 11 • Modification of habitat used by special status species for breeding, rearing, foraging, and
12 dispersal;
- 13 • Interference with nesting or breeding periods of any species; and
- 14 • Reduction in the range of occurrence of any special status species.

15 ***Impacts Analysis Results***

16 **NO ACTION ALTERNATIVE**

17 Under the no action alternative, the proposed Project would not be developed. No construction would take
18 place in the New Build Section; therefore, there would be no additional impacts to wildlife, wildlife
19 habitat, or special status species habitat. The existing transmission line would remain in place in the
20 Upgrade Section and ongoing maintenance activities would occur which could result in impacts to
21 wildlife and wildlife habitat. Even under the no action alternative, Western still plans to upgrade the
22 existing lines between the Apache and Saguaro substations within the next 10 years, in accordance with
23 Western's 10-year capital improvement plan (Western 2012a).

24 **IMPACTS COMMON TO ALL ACTION ALTERNATIVES**

25 **Construction**

26 Potential construction-related impacts from the proposed Project common to all wildlife groups would
27 include the loss, degradation, and /or fragmentation of breeding, rearing, foraging, and dispersal habitats;
28 collisions with and crushing by construction vehicles; loss of burrowing animals in burrows in areas
29 where grading would occur, increased invasive and noxious weed establishment and spread; and
30 increased noise/vibration levels. Construction-related impacts would be minor/negligible to moderate and
31 short-term to long-term.

32 Noise and vibration associated with construction activities would change habitat use patterns for some
33 species. Some individuals would move away from the source(s) of the noise/vibration to adjacent or
34 nearby habitats; which may increase competition for resources within these areas. Noise/vibration and
35 other disturbances may also lead to increased stress on individuals, which could decrease their overall
36 fitness due to increased metabolic expenditures. These effects would be temporary and of short duration
37 and would cease with the completion of construction activities.

38 Proponent proposed measures to minimize the impacts to wildlife and wildlife habitat are given below
39 (Southline 2013).

- 1 PPM VEG-1: Minimize Vegetation Effects. Every effort would be made to minimize vegetation removal
2 and permanent loss at construction sites to the extent practicable. Final structure and spur road locations
3 would be selected to avoid sensitive vegetation to the greatest extent feasible.
- 4 PPM VEG-2: Reclamation, Restoration, and Revegetation Plan. Southline would develop a reclamation,
5 restoration, and revegetation plan that would guide restoration and revegetation activities for all disturbed
6 lands associated with construction of the proposed Project and its eventual termination and
7 decommissioning. The plan would address all Federal, state, and private land disturbances. It would be
8 developed in consultation with appropriate agencies and landowners, and would be provided to these
9 entities for review and concurrence. The plan would provide details on topsoil segregation and
10 conservation, vegetation treatment and removal, salvage of succulent species, revegetation methods,
11 including use of native seed mixes, application rates, transplants, and criteria to monitor and evaluate
12 revegetation success.
- 13 PPM VEG-3: Special Status Plants Restoration and Compensation. Special status plants, including Pima
14 pineapple cactus, would be restored by relocating plants and/or reseeded, replacing topsoil with existing
15 topsoil that was removed, and regarding in compliance with local ordinances (Pima County) and/or
16 measures in the biological opinion, if an ESA Section 7 consultation is required. Measures to restore
17 special status plants would be implemented through the reclamation, restoration, and revegetation plan.
- 18 PPM VEG-4: Vegetation Clearing. Removal of riparian scrubland vegetation would be avoided where
19 possible. Natural regeneration of native plants would be supported by cutting vegetation with hand tools,
20 moving, trimming, or using other removal methods that allow root systems to remain intact.
- 21 PPM VEG-5: Invasive Plant Management Plan. In consultation with local BLM Field Offices and local
22 resource agencies, Southline would develop an invasive plant management plan.
- 23 PPM VEG-6: Equipment Washing. As feasible, equipment would be washed prior to entering, to
24 minimize the potential for the spread of invasive species.
- 25 PPM WILD-1: Worker Environmental Awareness Training. A WEAP would be prepared in consultation
26 with BLM and Western and a point of contact designated for any reportable events. All construction
27 crews and contractors would be required to participate in WEAP training prior to starting work on the
28 proposed Project. The WEAP training would include a review of the special status species; WUS; riparian
29 habitat; cultural, paleontological, and other sensitive resources that could exist in the proposed Project
30 footprint; the location of sensitive biological resources and their legal status and protections; reporting
31 process, contacts and reporting time frames; hazardous material information; and measures to be
32 implemented for avoidance of these sensitive resources. A record of all trained personnel would be
33 maintained during the construction period.
- 34 PPM WILD-2: Biological Monitoring Plan. In consultation with the BLM and Western, Southline would
35 prepare a biological monitoring plan for construction that would specify the level of biological monitoring
36 to be provided throughout construction activities in all construction zones with the potential for presence
37 of sensitive biological resources. The number of monitors and monitoring frequency would be specified
38 for each work zone.
- 39 PPM WILD-3: Preconstruction Surveys. Preconstruction surveys would be required in areas where
40 Morafka's desert tortoise (also known as Sonoran desert tortoise), Gila monster (*Heloderma suspectum*),
41 and Tucson shovel-nosed snake (*Chionactis occipitalis klauberi*) would be expected to occur.
42 In consultation with the BLM and Western, Southline would hire qualified biologists to conduct
43 preconstruction surveys in ground-disturbance areas within habitat for appropriate special status species
44 and their habitats.

- 1 PPM WILD-4: Morafka’s Desert Tortoise Impact Reduction Measures. To reduce impacts on the
2 Morafka’s desert tortoise known to exist in the western portion of the proposed Project, only authorized
3 biologists with a valid AGFD permit would handle desert tortoises if encountered within the proposed
4 Project footprint, following the most current desert tortoise handling guidelines published by the AGFD.
- 5 PPM WILD-5: Migratory Birds and Raptors Impacts Reduction Measures. To reduce impacts on
6 migratory birds and raptors, especially near the Willcox Playa: (1) Southline would consult with FWS on
7 a case-by-case basis if active nests were found in the proposed Project footprints, unless directed to do
8 otherwise by these same agencies; (2) active bird nests would not be moved during breeding season, in
9 compliance with the MBTA, unless the proposed Project is expressly permitted to do so by the FWS ;
10 (3) all active nests and disturbance or harm to active nests would be reported to the FWS or BLM upon
11 detection; and (4) work would halt if it is determined that active nests would be disturbed by construction
12 activities, until further direction or approval to work is obtained from the appropriate agencies. Clearing,
13 grubbing, blading, and access road improvements occurring within identified sensitive areas would be
14 conducted outside of the breeding season for most desert-nesting migratory birds.
- 15 PPM WILD-6: Bird and Bat Conservation Strategy, Bald and Golden Eagle Protection Act. To reduce
16 impacts on golden eagles and other raptors, Southline would submit a Bird and Bat Conservation Strategy
17 Plan to BLM and Western for approval. The plan would be prepared according to guidance provided by
18 the FWS (2011), and in consultation with best practices such as the “Suggested Practices for Avian
19 Protection on Power Lines” (APLIC 2006).
- 20 PPM WILD-7: Western Burrowing Owl Guidelines. Southline would follow Pima County guidelines for
21 surveys prior to disturbance in priority conservation areas for western burrowing owls.
- 22 PPM WILD-8: Facility Siting. Final structure and spur road locations would be adjusted to avoid
23 sensitive wildlife resources to the greatest extent feasible.
- 24 PPM HAZ-4: Soil Management Plan. A soil management plan would be developed and implemented for
25 construction of the proposed Project. The objective of the soil management plan is to provide guidance
26 for the proper handling, onsite management, and disposal of impacted soil that might be encountered
27 during construction activities. Appropriately trained personnel would be onsite during preparation,
28 grading, and related earthwork activities to monitor the soil conditions encountered.
- 29 PPM HAZ-5: Spill Prevention, Countermeasure, and Control Plan. In the event of a spill, workers would
30 immediately cease work, begin spill cleanup operations, and notify appropriate agencies as required by
31 law. Southline would prepare an SPCC Plan for proposed and/or expanded substations with the applicable
32 quantity of oil in order to minimize, avoid, and/or clean up unforeseen spills during facility operation and
33 maintenance. Appropriate clean-up materials including plastic sheeting and absorbent materials would be
34 available at each work site.
- 35 PPM HAZ-6: Nonhazardous Construction Waste Disposal Plan. All construction and demolition waste,
36 including trash and litter, garbage, and other solid waste, would be removed and transported to an
37 appropriately permitted recycling or disposal facility. Southline would prepare a construction waste
38 disposal plan for all nonhazardous wastes generated during construction of the proposed Project. The plan
39 would contain a description of all nonhazardous solid and liquid construction wastes, recycling plans, and
40 waste management methods to be used for each type of waste.
- 41 PPM HAZ-7: Equipment and Vehicle Maintenance. Southline or the applicable contractors would
42 maintain all vehicles in good working order. Equipment would be properly tuned and maintained to avoid
43 leaks of fluids.

1 PPM HAZ-8: Refueling Procedures. Service and refueling procedures would not be conducted within 500
2 feet of a seep, wash, or other water body.

3 PPM HEA-3: Fire Management Plan. Southline would develop and implement a fire management plan
4 for the proposed Project.

5 PPM WAT-1: Stormwater Pollution Prevention Plan. A Project-specific construction SWPPP would be
6 prepared and implemented prior to the start of construction of the transmission line and substation in
7 compliance with any CWA Section 404 Permit terms and conditions, if required. The SWPPP would use
8 BMPs to address the storage and handling of hazardous materials and sediment runoff during construction
9 activities to minimize the risk of an accidental release. As part of the SWPPP, soil disturbance at structure
10 construction sites and access roads would be the minimum necessary for construction and designed to
11 prevent long-term erosion through the following activities: restoration of disturbed soil, revegetation,
12 and/or construction of permanent erosion-control structures.

13 PPM WAT-2: Avoid Stream and Active Drainage Channels. Construction equipment would be kept out
14 of flowing stream channels to the extent possible. Structures would be located to avoid active drainage
15 channels, especially downstream of steep slope areas, to minimize the potential for damage by flash
16 flooding and mud and debris flows.

17 PPM WAT-3: Ditch and Drainage Design and Runoff Management. Flood control devices would be
18 located where required to protect structures or other Project structures from flooding or erosion.
19 Appropriate design of structure foundations would be used to prevent scour or inundation by a 100-year
20 flood to avoid disturbed areas. The locations of transmission structures would be designed to avoid steep,
21 disturbed, or otherwise unstable slopes. If drainages cannot be avoided by structure placement, Southline
22 would design drainage crossings to accommodate estimated peak flows and ensure that natural volume
23 capacity could be maintained throughout construction and upon post-construction restoration.

24 PPMs would reduce the amount of habitat that would be lost or degraded/fragmented during construction
25 activities. Some of the habitat would be restored after the completion of construction activities; however,
26 restoration in arid environments is difficult and slow and may require 50 to 100 or more years. As such,
27 impacts from ground disturbance would be long-term.

28 A Project speed limit for construction areas and spur roads would be implemented to reduce the potential
29 for construction activities leading to wildlife collisions with construction equipment. Burial of some
30 individuals would occur during ground-disturbing activities. The presence of construction-related trash
31 and debris would be an attractant for some wildlife species. This would be minimized by PPM HAZ-6.

32 Proponent proposed measures PPM Veg-4 and PPM Veg-5 would minimize the introduction and spread
33 of invasive and noxious weeds within or to the analysis area from construction equipment. Minimization
34 of ground-disturbing activities (PPM Veg-1) would decrease conditions that favor the establishment and
35 spread of invasive and noxious weed species. These species could adversely modify wildlife habitat by
36 changing vegetation composition and altering fire regimes. In areas that are not adapted to fire, increased
37 frequency and intensity of fires could lead to dramatic changes in the overall vegetation community and
38 available habitat for wildlife. Impacts from fire would be minimized through PPM HEA-3.

39 **Operation and Maintenance**

40 Potential impacts from maintenance activities would be similar in nature to those previously described
41 above for construction activities. However, the scope of maintenance impacts would be lower in
42 magnitude than those for construction as there would be less equipment and fewer people working.
43 Maintenance impacts would be temporary and would occur sporadically over the life of the proposed

1 Project. It is estimated that maintenance activities would occur once or twice a year under normal
2 circumstances.

3 Impacts from the operation and maintenance of the proposed Project would be minor/negligible and long-
4 term. These would include habitat loss, fragmentation and degradation; changes to species movement
5 corridors; and increased access for OHV users. The transmission line ROW would serve as a movement
6 corridor for some species and as a barrier to others. Transmission structures may provide some of the only
7 available shade in the area for some species. This could be a beneficial impact for those species that
8 would utilize the increased shade.

9 The proposed Project would increase the amount of edge habitat along the ROW. Effects from increased
10 amounts of edge would include decreased habitat block size. Decreased habitat block size may negatively
11 impact those species that require large blocks of contiguous habitat and benefit other species that utilize
12 edge habitats or have more general habitat requirements.

13 Proponent proposed measure PPM REC-2 to provide spur and access road closure signage at the
14 entrances to these roads would reduce the potential for impacts from habitat disturbance, OHV collisions
15 with wildlife, and increased fire ignition sources from increased OHV access along access and spur roads.
16 While mitigation would minimize OHV use along the transmission line and access roads, trespass use of
17 the area could still occur. The increased potential for fire ignition could lead to fires that dramatically
18 modify habitat over large areas, especially in habitat types that are not adapted to fire.

19 Potential decommissioning-related impacts from the proposed Project common to all wildlife groups
20 would include the loss, degradation, and/or fragmentation of breeding, rearing, foraging, and dispersal
21 habitats; collisions with and crushing by construction vehicles; loss of burrowing animals in burrows in
22 areas where grading would occur, increased invasive and noxious weed establishment and spread; and
23 increased noise/vibration levels. Impacts on habitat would be minimized as areas decommissioned would
24 be reclaimed including pad sites, substations, and access roads. Proponent proposed measures PPM Veg-4
25 and PPM Veg-5 would minimize the introduction and spread of invasive and noxious weeds within or to
26 the analysis area from construction equipment. Minimization of ground-disturbing activities (PPM Veg-1)
27 would decrease conditions that favor the establishment and spread of invasive and noxious weed species.
28 Decommissioning-related impacts would be temporary to short-term and would cease with the completion
29 of restoration activities.

30 **ADDITIONAL IMPACTS**

31 **Mammals**

32 Potential impacts on mammals from the proposed Project would include those described above as
33 common to all species. Small mammals that shelter underground would be susceptible to being crushed
34 by construction equipment. Potential impacts on mammals would be long-term and minor/negligible for
35 most mammal species. The lesser long-nosed bat and Mexican long-nosed bat would experience
36 moderate, long-term effects from removal of foraging habitat. Operation and maintenance impacts would
37 be minor/negligible and long-term for mammal species.

38 **Birds**

39 Potential impacts on bird species from the proposed Project would include those described above as
40 common to all species. Additional impacts to bird species outside of the ROW would occur and would
41 include disturbance from noise as well as changes to habitat use. Noise-related construction activities
42 could affect nesting, roosting, and foraging activities. Changes to behavior could include increased
43 alertness, turning toward the disturbance, fleeing the disturbance, changes in activity patterns, and nest

1 abandonment. Raptors would be especially susceptible to noise disturbance early in the breeding season,
2 when it can cause nest abandonment and failure. Measures to avoid working in sensitive habitats during
3 the breeding season would reduce these impacts (PPM WILD-5). Potential impacts from operation and
4 maintenance would be from birds striking electrical transmission lines and towers. With the application of
5 PPMs, operation and maintenance impacts would be reduced and would be long-term and
6 minor/negligible.

7 Proponent proposed measures to design the transmission lines and structures in accordance with
8 “Reducing Avian Collision with Power Lines” (APLIC 2012) would minimize the potential for bird
9 collisions with transmission lines or poles (PPM WILD-6). However, during poor weather conditions and
10 along elevated terrain migrating birds and raptors would be at greater risk for collisions as they would fly
11 nearer to transmission line facilities.

12 The presence of transmission poles would provide perches as well as nesting habitat for some species.
13 In some areas the transmission poles may be the only suitable nesting structures for some species. This
14 would allow some species to utilize areas that would otherwise be unsuitable.

15 The increased amount of edge habitat created by the proposed Project would allow for an increase in
16 species that use edge habitats, such as brown-headed cowbirds (*Molothrus ater*). This would change the
17 species composition of the ROW area and impact species that utilize larger blocks of habitat as they
18 would be subject to increased predation and nest parasitism. Other species that utilize edge habitats or
19 have more general habitat requirements would benefit from the increased amount of edge habitat.

20 **Fish**

21 All aquatic sites would be spanned and construction equipment would be kept out of flowing stream
22 channels and active drainages to the extent possible to avoid directly impacting fish habitat (PPM
23 WAT-2). Potential construction impacts on fish species would be short-term and minor/negligible.
24 No operational or maintenance impacts on fish species are anticipated.

25 Increases in soil erosion from ground-disturbing activities would be avoided through the development and
26 implementation of a SWPPP (PPM WAT-1). A spill prevention plan (PPM HAZ-5) would be developed
27 that would limit the potential for construction equipment to leak any hazardous materials that could
28 impact water quality. Proponent proposed measures PPMs VEG-6 and WAT-2 requiring equipment to be
29 washed prior to entering the analysis area and avoiding flowing stream channels would minimize the
30 potential for construction equipment to spread non-native species such as crayfish from one water body to
31 another.

32 Areas of ground disturbance would be restored to the extent possible upon completion of construction
33 activities. If restoration activities were successful potential erosion would be minimized. However, if
34 restoration activities were not successful erosion could continue to impact water quality for fish species
35 throughout the operation and maintenance of the transmission line.

36 **Reptiles**

37 Potential impacts on reptile species from the proposed Project would include those described above as
38 common to all species. In addition, reptile species that shelter underground would be susceptible to being
39 crushed by construction equipment. Construction-related trash may attract reptile predators such as ravens
40 (*Corvus corax*) and raptor species. The presence of the transmission line and poles could provide
41 perching and nesting habitat for ravens and other species. In some instances this may provide the only
42 roosting/nesting habitat in the area and may increase raven and other reptile predator numbers along the
43 transmission line. Potential construction impacts on reptiles would be long-term and moderate. Impacts

1 from the operation and maintenance of the proposed Project on reptiles would be long-term and
2 minor/negligible.

3 **Amphibians**

4 Potential impacts on amphibian species from the proposed Project would include those described above as
5 common to all species. Amphibian species would also be affected by any changes to water quality.
6 Potential construction impacts on amphibian species would be short-term and minor/negligible.
7 No operational or maintenance impacts on amphibians are anticipated.

8 Increases in erosion from ground-disturbing activities would be avoided through the development and
9 implementation of a SWPPP (PPM WAT-1). A spill prevention plan (PPM HAZ-5) would be developed
10 that would limit the potential for construction equipment to leak any hazardous materials that could
11 impact water quality. Proponent proposed measures PPM VEG-6 and WAT-2 requiring equipment to be
12 washed prior to entering the analysis area and avoiding flowing stream channels would minimize the
13 potential for construction equipment to spread non-native species such as crayfish and diseases such as
14 Chytridiomycosis from one water body to another.

15 Areas of ground disturbance would be restored to the extent possible upon completion of construction
16 activities. If restoration activities were successful potential erosion would be minimized. However, if
17 restoration activities were not successful erosion could continue throughout the life of the transmission
18 line operation and maintenance, which may contribute to long-term impacts to water quality for
19 amphibian species.

20 **Invertebrates**

21 Potential impacts on invertebrate species from the proposed Project would include those described above
22 as common to all species such as habitat loss and collisions with construction equipment. Impacts on
23 aquatic invertebrates would be similar in nature to those described above such as changes to water quality
24 from increased erosion and direct habitat loss. However, habitat loss would be a greater impact on some
25 invertebrates that have very limited geographic distributions, limited localized populations, and specific
26 foraging and reproductive requirements. Potential construction impacts on invertebrates would be short-
27 term and minor/negligible. No operational or maintenance impacts on invertebrates are anticipated.

28 ***Route Group 1 – Afton Substation to Hidalgo Substation***

29 Tables 4.8-13 and 4.8-14 give the amount of each habitat type within the representative ROW for route
30 group 1 and the associated substations and staging areas. Within route group 1 the estimated percentage
31 of the ROW to be disturbed would be approximately 23 percent.

32 **Table 4.8-13.** Route Group 1 Wildlife Resource Inventory Data

Habitat Type	Subroute 1.1	Subroute 1.2	DN1	A	B	C	D
Agriculture	5.6	55.1	-	-	-	5.8	20.9
Apacherian-Chihuahuan Mesquite Upland Scrub	241	345.8	12.1	94.6	13	0.8	3.5
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	1,526.10	1,255.10	764.7	-	12.3	114.6	380.1
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	640.4	904.4	147.2	92.8	99.1	78.3	135.1
Chihuahuan Gypsophilous Grassland and Steppe	5.3	-	-	-	-	-	4
Chihuahuan Mixed Salt Desert Scrub	69.9	94.9	3.1	-	2.4	-	-

1 **Table 4.8-13.** Route Group 1 Wildlife Resource Inventory Data (Continued)

Habitat Type	Subroute 1.1	Subroute 1.2	DN1	A	B	C	D
Chihuahuan Sandy Plains Semi-Desert Grassland	45.2	4.6	0.6	-	-	0.1	-
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	984.2	570.7	58.1	197.7	104.4	16.1	3.3
Chihuahuan Succulent Desert Scrub	29.1	10.6	-	-	1.4	-	-
Developed, Medium - High Intensity	6.6	2	-	-	-	-	1.9
Developed, Open Space - Low Intensity	1.6	-	-	-	-	-	-
Inter-Mountain Basins Semi-Desert Shrub Steppe	-	2.9	-	-	-	-	-
Madrean Encinal	-	-	2.2	-	-	-	-
Madrean Juniper Savanna	2.7	25.9	-	-	-	-	-
Madrean Pinyon-Juniper Woodland	0.3	0.2	-	-	-	-	-
Mogollon Chaparral	-	1.3	-	-	-	-	-
North American Warm Desert Active and Stabilized Dune	12.2	113.8	-	26.5	58.7	-	-
North American Warm Desert Bedrock Cliff and Outcrop	3.1	0.7	-	3.3	-	-	-
North American Warm Desert Pavement	6.9	2.9	-	-	-	-	1.8
North American Warm Desert Playa	2.6	1.9	-	1.5	-	-	-
North American Warm Desert Riparian Mesquite Bosque	-	-	0*	-	-	-	-
North American Warm Desert Riparian Woodland and Shrubland	1.1	0.3	-	-	-	-	-
North American Warm Desert Volcanic Rockland	12	22.3	43	-	-	-	-
North American Warm Desert Wash	-	8.5	-	-	-	-	0.5

2 0* = greater than zero but less than 0.1

3 Table 4.8-14 shows impacts by habitat type for substations and staging areas for route group 1.

4 **Table 4.8-14.** Route Group 1 Wildlife Resource Inventory Data for Substations and Staging Areas

Habitat Types	Subroute 1.1	Subroute 1.2
Apacherian-Chihuahuan Mesquite Upland Scrub	8.9	20.7
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	43.1	97.0
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	90.6	98.1
Chihuahuan Gypsophilous Grassland and Steppe	-	1.3
Chihuahuan Mixed Salt Desert Scrub	0.2	11.2
Chihuahuan Sandy Plains Semi-Desert Grassland	5.3	0.4
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	47.5	235.5
North American Warm Desert Active and Stabilized Dune	0.2	-
North American Warm Desert Bedrock Cliff and Outcrop	3.3	-

1 Acres of impacts on general wildlife and special status species from route group 1 are given in table
2 4.8-15.

3 **SUBROUTE 1.1 – PROPONENT PREFERRED**

4 **General Wildlife**

5 **Construction**

6 Impacts on general wildlife species would be as described above in the “Impacts Common to All Action
7 Alternatives” and “Additional Impacts” sections. Acres of impacts are given in table 4.8-15.

8 **Operation and Maintenance**

9 Impacts from the operation and maintenance of subroute 1.1 would include those described above for the
10 “Impacts Common to All Action Alternatives” and “Additional Impacts” sections.

11 **Special Status Species**

12 **Federally Listed Species**

13 The northern aplomado falcon (*Falco femoralis septentrionalis*) and the Sprague’s pipit (*Anthus*
14 *spragueii*) were identified as possible to occur because this subroute would be within the species’ range
15 and habitat parameters would be present. In addition, the interior population of the least tern (*Sterna*
16 *antillarum*) would be considered unlikely to occur because although it could migrate through the area,
17 habitat parameters would not be present. Therefore, the Project activities in the Afton to Hidalgo route
18 group would have no effect to the populations of interior least tern or its habitat.

19 **Construction**

20 Potential impacts on northern aplomado falcon and Sprague’s pipit from construction activities would
21 include those described above as common to all bird species. Acres of impacts are given in table 4.8-15.
22 However, there would be no detectable effect on the viability of the non-essential experimental
23 population of northern aplomado falcon or a detectable effect on the viability of Sprague’s pipit or
24 contribution towards a downward population trend or listing of this species as threatened or endangered.
25

26 **Operation and Maintenance**

27 Potential impacts on northern aplomado falcon and Sprague’s pipit from operation and maintenance
28 activities would include those described above as common to all bird species. There would be no
29 detectable effects on the viability of the non-essential experimental population of aplomado falcon or on
30 the viability of Sprague’s pipit or contribution towards a downward population trend or listing of this
31 species as threatened or endangered.

32 **BLM Sensitive Species**

33 Of the 45 species listed as BLM Sensitive for this region, 16 species were identified as possible to occur
34 because the analysis area would be within their range and habitat parameters would be present. These
35 species include the Colorado River toad also known as the Sonoran desert toad (*Anaxyrus alvarius*),
36 Texas horned lizard (*Phrynosoma cornutum*), New Mexico population of the burrowing owl, loggerhead
37 shrike (*Lanius ludovicianus*), white-faced ibis (*Plegadis chihi*), Mexican long-tongued bat, pale
38 Townsend’s big-eared bat, spotted bat (*Euderma maculatum*), Allen’s big-eared bat (*Idionycteris*

1 *phylotis*), western small-footed myotis (*Myotis ciliolabrum melanorhinus*), little brown myotis (*Myotis*
2 *lucifugus occultus*), fringed myotis (*Myotis thysanodes thysanodes*), cave myotis (*Myotis velifer*), long-
3 legged myotis (*Myotis volans*), Yuma myotis (*Myotis yumanensis yumanensis*), and big free-tailed bat
4 (*Nyctinomops macrotis*).

5 **Construction**

6 Potential impacts on BLM Sensitive Species would be as described in “Impacts Common to All Action
7 Alternatives” and “Additional Impacts” sections. Acres of impacts on BLM Sensitive Species are given in
8 table 4.8-15.

9 Potential impacts on Colorado River toad from construction activities would include those described
10 above as common to all amphibian species. There would be no detectable effect on the viability of this
11 species by Project-related activities or contribution towards a downward population trend or listing of this
12 species as threatened or endangered.

13 Potential impacts on Texas horned lizard from construction-related activities would include those
14 described above as common to all reptile species. Based on the amount of available Texas horned lizard
15 habitat in the analysis area, there would be no detectable effect on the viability of this species or
16 contribution towards a downward population trend or listing of this species as threatened or endangered.

17 Potential impacts on western burrowing owl from construction activities in this subroute group would
18 include those described above as common to all bird species. As this species shelters underground
19 impacts could include burial in burrows during ground disturbing activities. In addition, burrows of this
20 ground-nesting bird have the potential to occur within portions of the analysis area in this subroute.
21 In order to minimize impacts on burrowing owls, PPM 7 would be implemented. Additionally, in New
22 Mexico the NMDGF protocols for surveying for burrowing owls would be followed in areas where the
23 species could potentially occur (NMDGF 2007).

24 Based on the amount of available burrowing owl habitat in the analysis area, construction-related
25 activities would have no detectable effect on the viability of this species or to contribute towards a
26 downward population trend or listing of this species as threatened or endangered.

27 Potential impacts on loggerhead shrike from construction activities would include those described above
28 as common to all bird species. Based on the amount of available foraging habitat in the analysis area,
29 construction-related activities would have no detectable effect on the viability of this species or contribute
30 towards a downward population trend or listing of this species as threatened or endangered.

31 Potential impacts on white-faced ibis from construction activities would include those described above as
32 common to all bird species. Individuals may experience impacts common to migratory birds during
33 migration as they move through the subroute group during construction with the potential for strikes to
34 transmission lines and structures (see migratory species impacts describe below). However, construction-
35 related activities would have no detectable effect on the viability of this species or to contribute towards a
36 downward population trend or listing of this species as threatened or endangered.

37 Potential impacts on the 11 bat species noted above from construction activities would include
38 disturbance to habitat and a decrease in potential foraging habitat. However, there would be no potential
39 roost sites in the ROW corridor that would provide shelter for these species. Based on the amount of
40 available foraging habitat in the analysis area, construction-related activities would have no detectable
41 effect on the viability of these species or contribute towards a downward population trend or listing of
42 these species as threatened or endangered.

Table 4.8-15. Route Group 1 Acres of Impacts on BLM Sensitive Wildlife Species

Common name	Subroute 1.1	Subroute 1.2	Local Alt A	Local Alt B	Local Alt C	Local Alt D	Local Alt DN-1
General Wildlife Species	1,036.1	1,275.6	342.0	239.3	177.2	453.0	237.1
Federally Listed Species							
Northern aplomado falcon	336.7	312.2	2.5	2.8	26.4	87.4	175.9
Sprague's pipit	375.0	324.8	2.5	2.8	27.7	92.3	175.9
BLM Sensitive Species							
Allen's big-eared bat	0.3	0.1	-	-	-	-	-
Big free-tailed bat	191.1	232.3	21.3	23.7	18.0	32.0	34.6
Cave myotis	168.1	230.6	21.3	22.8	18.0	31.1	33.9
ringed myotis	591.0	654.2	44.6	29.5	44.6	120.2	213.2
Little brown myotis	1,036.1	1,275.6	342.0	239.3	177.2	453.0	237.1
Long-legged myotis	191.1	232.3	21.3	23.7	18.0	32.0	34.6
Mexican long-tongued bat	0.3	0.1	0	0	0	0	0
Pale Townsend's big-eared bat	191.8	263.5	21.3	29.5	18.0	32.0	34.6
Spotted bat	863.1	881.2	97.2	67.0	48.2	121.9	237.0
Western small-footed myotis	0.3	0.1	0	0	0	0	0
Yuma myotis	191.1	232.3	21.3	23.7	18.0	32.0	34.6
Loggerhead shrike	273.9	347.7	43.1	26.7	18.2	32.8	37.4
Western burrowing owl (NM population)	625.9	666.2	44.6	29.2	45.9	125.0	213.3
White-faced ibis	0.9	0.5	0.3	-	-	-	-
Texas horned lizard	852.8	842.5	68.3	66.3	48.3	121.0	226.6
Colorado River toad (aka Sonoran desert toad)	591.0	654.2	44.6	29.5	44.6	120.2	213.2

Table 4.8-15. Route Group 1 Acres of Impacts on BLM Sensitive Wildlife Species (Continued)

Common name	Subroute 1.1	Subroute 1.2	Local Alt A	Local Alt B	Local Alt C	Local Alt D	Local Alt DN-1
State of New Mexico Wildlife Conservation Act Species							
Desert bighorn sheep	0.7	5.8	0.8	-	-	-	-
Abert's towhee	577.2	815.0	88.6	50.7	21.9	32.6	50.7
American peregrine falcon	386.7	1,149.3	97.3	67.0	48.3	122.0	237.1
Bell's vireo	577.2	815.0	88.6	50.7	21.9	32.6	50.7
Gila woodpecker	577.2	815.0	88.6	50.7	21.9	32.6	50.7
Lucifer hummingbird	577.2	815.0	88.6	50.7	21.9	32.6	50.7
Varied bunting	577.2	815.0	88.6	50.7	21.9	32.6	50.7
Gila monster	975.1	1,114.1	90.0	53.5	48.3	121.0	226.7
Great Plains narrow-mouthed toad	373.8	312.4	1.5	2.8	26.4	87.4	175.9
State of New Mexico Species of Greatest Conservation Need							
Pocketed free-tailed bat	863.1	881.2	97.2	67.0	48.2	121.9	237.0
Western red bat	0.3	0.1	0	0	0	0	0
American bittern	0	0	0	-	-	-	-
Bank swallow	0.3	2.0	-	-	-	0.1	-
Common black hawk	0.3	2.0	-	-	-	0.1	-
Eared grebe	0	0	0	-	-	-	-
Northern harrier	625.9	666.2	44.6	29.2	45.9	125.0	213.3
Northern pintail	0.8	0.5	0.4	-	-	-	-
Painted bunting	577.2	815.0	88.6	50.7	21.9	32.6	50.7
Sandhill crane	0.8	0.5	0.4	-	-	-	-
Yellow warbler	577.2	815.0	88.6	50.7	21.9	32.6	50.7
Arizona toad	251.7	342.2	21.7	26.7	18.2	1.8	34.6

1 **Operation and Maintenance**

2 White-faced ibis, burrowing owl, and loggerhead shrike impacts would include the potential for strikes to
3 transmission lines and structures. These impacts are not anticipated to reach population levels or lead to
4 the species being listed as threatened or endangered.

5 There would be no operational or maintenance impacts detectable at the population level for the Mexican
6 long-tongued bat, pale Townsend’s big-eared bat, spotted bat, Allen’s big-eared bat, western small-footed
7 myotis, little brown myotis, fringed myotis, cave myotis, long-legged myotis, Yuma myotis, and big free-
8 tailed bat, Colorado River toad, and Texas horned lizard.

9 ***State of New Mexico Wildlife Conservation Act Species***

10 Eleven New Mexico Wildlife Conservation Act species were identified as possibly occurring in route
11 group 1. Of these 11 species, 9 could potentially occur within subroute 1.1. These would include the
12 spotted bat, Gila monster, Gila woodpecker (*Melanerpes uropygialis*), Lucifer hummingbird (*Calothorax*
13 *lucifer*), Bell’s vireo, varied bunting (*Passerina versicolor*), Abert’s towhee, northern aplomado falcon,
14 and American peregrine falcon (*Falco peregrinus*). Impacts on northern aplomado falcon and spotted bat
15 are addressed above in “Federally Listed Species” and “BLM Sensitive Species” sections, respectively.
16 Impacts on the remaining seven species are given below.

17 **Construction**

18 Potential impacts on State of New Mexico Wildlife Conservation Act bird species would be as described
19 above in “Additional Impacts.”

20 Potential impacts on the Gila monster would include those described above as common to all species and
21 specifically to reptiles as described above. As this species spends the majority of its life underground, it
22 would be more susceptible than non-burrowing species to burial during construction activities. Based on
23 the amount of habitat for these species in the analysis area, there would be no detectable effect on the
24 viability of these species or contribution towards a downward population trend or listing of these species
25 as threatened or endangered.

26 **Operation and Maintenance**

27 Potential operational and maintenance impacts on State of New Mexico Wildlife Conservation Act
28 species would be as described above in the “Impacts Common to All Action Alternatives” and
29 “Additional Impacts” sections.

30 ***State of New Mexico Species of Greatest Conservation Need***

31 Seventeen New Mexico Species of Greatest Conservation Need were identified as possibly occurring in
32 subroute 1.1. Of these 17, five are addressed above (white-faced ibis, spotted bat, and Allen’s big-eared
33 bat are addressed in the “BLM Sensitive Species” section and Bell’s vireo and American peregrine falcon
34 are addressed in the “State of New Mexico Wildlife Conservation Act Species” section). The other 12
35 species are addressed below.

36 **Construction**

37 Potential impacts on Species of Greatest Conservation Need mammal species from the proposed Project
38 would include those described above as common to all species and specifically to mammals as described

1 above in “Additional Impacts.” Mammal species impacts would include western red bat and pocketed
2 free-tailed bat (*Nyctinomops femorosacca*).

3 Potential impacts on Species of Greatest Conservation Need bird species from the proposed Project would
4 include those described above as common to all species and specifically to birds as described above in
5 “Additional Impacts.” Bird species impacted would include common black hawk, yellow warbler
6 (*Setophaga petechia*), northern pintail (*Anas acuta*), American bittern (*Botaurus lentiginosus*), eared
7 grebe (*Podiceps nigricollis*), bank swallow (*Riparia riparia*), northern harrier (*Circus cyaneus*), sandhill
8 crane, and painted bunting (*Passerina ciris*). Impacts on American bittern and eared grebe habitat would
9 be avoided by placing structures and access roads outside of wetland and open water areas.

10 Impacts on sandhill cranes would include impacts to habitat, including migratory and stopover habitat.
11 Within subroute 1.1 approximately 1,359.0 acres of migratory/stopover habitat occurs, of this area
12 approximately 312.6 acres would be disturbed. Based on the amount of migratory/stopover habitat for this
13 species in the analysis area, there would be no detectable effect on the viability of this species or
14 contribution towards a downward population trend or listing of this species as threatened or endangered.
15 Potential impacts on the Arizona toad (*Anaxyrus microscaphus*) from the proposed Project would include
16 those described above as common to all species and specifically to amphibians.

17 Based on the amount of habitat for these species in the analysis area, there would be no detectable effect
18 on the viability of these species or contribution towards a downward population trend or listing of these
19 species as threatened or endangered.

20 **Operation and Maintenance**

21 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
22 be as described in “Impacts Common to All Action Alternatives” and “Additional Impacts” above.
23 Acreages of potential impacts on species habitat would be as described above in “Construction” for the
24 areas to be disturbed.

25 ***Migratory Birds***

26 **Construction**

27 Impacts on migratory birds would include those described above for additional impacts on birds.

28 The representative ROW would contain approximately 1.1 acres of North American Warm Desert
29 Woodland and Shrubland, 5.6 acres of Agricultural, and 2.6 acres of North American Warm Desert Playa,
30 all of which may have higher concentrations of birds than other habitat types during nesting, wintering, or
31 migration. No open water would be found in this subroute. A total of approximately 990.3 acres of
32 migratory bird habitat would be disturbed by subroute 1.1. Based on the amount of habitat for these
33 species in the analysis area, there would be no detectable effect on the viability of these species or
34 contribution towards a downward population trend or listing of these species as threatened or endangered.

35 Impacts on migrating sandhill cranes would be as described above under State of New Mexico Species of
36 Greatest Conservation Need.

37 **Operation and Maintenance**

38 The habitats mentioned above may harbor higher concentration of migratory birds than surrounding areas,
39 and may be associated with an elevated risk of collision events. However, that risk would still be unlikely
40 to reach population-level impacts given the amount of available habitat in the area.

1 **Wildlife Special Designation Areas**

2 **Construction**

3 Wildlife designated habitat for the northern aplomado falcon and the Big Burro Mountains to Cedar
4 Mountains Potential Cougar Corridor would occur within the ROW for subroute 1.1. Northern aplomado
5 falcon habitat areas are recognized as avoidance areas by the Mimbres RMP. Disturbance would occur
6 on 30.6 acres. An additional 16.5 acres for a staging area would also be disturbed. This would total
7 approximately 47.1 acres of disturbance to designated aplomado falcon habitat from subroute 1.1.
8 Potential impacts on northern aplomado falcon habitat would include habitat loss, degradation, and
9 fragmentation as well as increased OHV access due to the presence of access roads. This could lead to
10 increased use of areas by OHV users, which could conflict with management objectives. Based on the
11 amount of designated habitat in the analysis area, there would be no detectable effect on the function of
12 those habitats.

13 The Big Burro Mountains to Cedar Mountains Potential Cougar Corridor would occur on approximately
14 316 acres of the ROW, of which approximately 72.7 acres would be disturbed. Impacts on the potential
15 cougar corridor would include habitat loss, degradation, and fragmentation as well as increased OHV
16 access due to the presence of access roads. Habitat fragmentation creates more isolated and smaller
17 patches of habitat. As cougars are a wide-ranging species and impacts would occur on a small portion of
18 the corridor, it is not anticipated that the proposed Project would create a significant barrier to cougar
19 movement along the corridor. Based on the amount of designated habitat and the area of the potential
20 cougar corridor in the analysis area, there would be no detectable effect on the function of those habitats
21 or wildlife corridors.

22 **Operation and Maintenance**

23 Potential operational and maintenance impacts on northern aplomado falcon designated habitat areas
24 would include habitat loss, degradation, and fragmentation as described above for construction. Impacts
25 on the cougar corridor would include habitat loss, degradation and fragmentation, and potential barriers to
26 movement along the corridor. Impacts on Special Designations, including designated northern aplomado
27 falcon habitat, are analyzed in section 4.12.

28 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

29 **General Wildlife**

30 **Construction**

31 Impacts on general wildlife species would be as described above for subroute 1.1. Acres of impacts are
32 given in table 4.8-15. Disturbance to habitat would be long-term.

33 **Operation and Maintenance**

34 Impacts from the operation and maintenance of subroute 1.2 would include those described above
35 subroute 1.1. Based on the amount of habitat for these species in the analysis area, there would be no
36 detectable effect on the viability of these species or contribution towards a downward population trend or
37 listing of these species as threatened or endangered.

1 **Special Status Species**

2 ***Federally Listed Species***

3 **Construction**

4 The construction impact types and intensities to northern aplomado falcon and Sprague's pipit would be
5 the same as described under subroute 1.1. Acres of habitat impacted are given in table 4.8-15. Based on
6 the amount of habitat for these species in the analysis area, there would be no detectable effect on the
7 viability of these species or contribution towards a downward population trend or listing of these species
8 as threatened or endangered.

9 **Operation and Maintenance**

10 The operation and maintenance impact types and intensities to northern aplomado falcon and Sprague's
11 pipit would be the same as described under subroute 1.1.

12 ***BLM Sensitive Species***

13 **Construction**

14 The construction impact types and intensities to the BLM Sensitive Species Colorado River toad (also
15 known as Sonoran desert toad), Texas horned lizard, desert ornate box turtle, New Mexico population of
16 the burrowing owl, loggerhead shrike, white-faced ibis, Mexican long-tongued bat, pale Townsend's big-
17 eared bat, spotted bat, Allen's big-eared bat, western small-footed myotis, little brown myotis, fringed
18 myotis, cave myotis, long-legged myotis, Yuma myotis, and big free-tailed bat would be the same as
19 described under subroute 1.1. Acres of impacts are given in table 4.8-15.

20 **Operation and Maintenance**

21 The operation and maintenance impact types and intensities to BLM sensitive species would be the same
22 as described under subroute 1.1.

23 ***State of New Mexico Wildlife Conservation Act Species***

24 Eleven New Mexico Wildlife Conservation Act species were identified as possibly occurring in route
25 group 1. All of these species could potentially occur within subroute 1.2. These would include desert
26 bighorn sheep (*Ovis canadensis mexicana*), spotted bat, Gila woodpecker, Lucifer hummingbird, Bell's
27 vireo, varied bunting, Abert's towhee, northern aplomado falcon, peregrine falcon, Gila monster, and
28 Great Plains (western) narrow-mouthed toad (*Gastrophryne olivacea*). Impacts on northern aplomado
29 falcon and spotted bat are addressed above in "Federally Listed Species" and "BLM Sensitive Species"
30 sections, respectively. Impacts on the remaining species are given below; acres of impacts are given in
31 table 4.8-15.

32 **Construction**

33 Potential impacts on desert bighorn sheep, State of New Mexico Wildlife Conservation Act bird species,
34 Gila monster, and Great Plains narrow-mouthed toad would be as described for subroute 1.1.

35 Based on the amount of habitat for these species in the analysis area, there would be no detectable effect
36 on the viability of these species or contribution towards a downward population trend or listing of these
37 species as threatened or endangered.

1 **Operation and Maintenance**

2 Potential operational and maintenance impacts on State of New Mexico Wildlife Conservation Act
3 species would be as described for subroute 1.1.

4 ***State of New Mexico Species of Greatest Conservation Need***

5 Twelve New Mexico Species of Greatest Conservation Need were identified as possible to occur in
6 subroute 1.2. Of these 12, six are addressed above (white-faced ibis, spotted bat, and Allen’s big-eared bat
7 are addressed in the “BLM Sensitive Species” section and Bell’s vireo, peregrine falcon, and desert
8 bighorn sheep are addressed in the “State of New Mexico Wildlife Conservation Act Species” section).
9 The remaining five species are addressed below. Acres of impacts are given in table 4.8-15.

10 **Construction**

11 Potential impacts on the western red bat and Species of Greatest Conservation Need bird species would be
12 as described for subroute 1.1.

13 A sandhill crane migratory flyway and a wintering site near Columbus, New Mexico would be located in
14 subroute 1.2 (Mitchusson 2003). Sandhill crane migratory/stopover habitat would occur on approximately
15 750.4 acres of which 172.6 acres would be disturbed.

16 **Operation and Maintenance**

17 Sandhill crane mortality by collision with power lines has been documented in several recent studies.
18 During spring 2006, Wright et al. (2009) recorded 61 carcasses of sandhill cranes during twice-weekly
19 searches below two 69-kV power line arrays at the National Audubon Society’s Lillian Rowe Sanctuary.
20 In 2007, they searched more intensively and, after accounting for several potential detectability biases,
21 estimated 165 to 219 sandhill cranes were killed by colliding with the power lines (Wright et al. 2009).
22 While the proposed transmission lines would be larger than the 69-kV lines in the study there would
23 be more lines. As such it would not be possible to quantify the potential impacts on sandhill cranes.
24 However, the movement of sandhill cranes along segment S5 would be associated with a risk of collision
25 with the transmission lines.

26 ***Migratory Birds***

27 **Construction**

28 Impacts on migratory birds would be as described above for subroute 1.1. The representative ROW
29 contains approximately 0.3 acre of North American Warm Desert Woodland and Shrubland, 42.4 acres
30 of Agricultural, and 1.9 acres of North American Warm Desert Playa, all of which may have higher
31 concentrations of birds than other habitat types during nesting, wintering, or migration. Avian protection
32 areas and bird habitat conservation areas would occur on approximately 1,581.9 acres of subroute 1.2
33 with 363.8 acres of disturbance. No open water would be found in this subroute. A total of approximately
34 1,168.8 acres of migratory bird habitat would be affected by subroute 1.2. This would be 178.5 acres
35 greater than disturbance levels for subroute 1.1.

36 **Operation and Maintenance**

37 The habitats mentioned above may harbor higher concentration of migratory birds than surrounding areas,
38 and may thus be associated with an elevated risk of collision events. That risk would still be unlikely to
39 reach population-level impacts.

1 Impacts on the sandhill crane migratory flyway and a wintering site near Columbus, New Mexico are
 2 described above in State of New Mexico Species of Greatest Conservation Need.

3 The ROW lies within close proximity of several high ridges and low passes (table 4.8-16), which would
 4 increase the possibility of somewhat higher impacts on migratory birds.

5 **Table 4.8-16.** Route Group 1 Proximity of Mountain Ridges and Low Passes to the ROW of Proposed
 6 Subroutes

Subroutes	Ridge or Low Pass	Distance (miles)
Subroute 1.1, Proponent Preferred	Highest ridge in the Aden Hills	0.94
Subroute 1.2, Proponent Alternative	Nearest high ridge in the East Potrillo Mountains	0.27
	Highest ridge of Camel Mountain	0.27
	Highest ridge of the Carrizalillo Hills	1.17
	Lowest pass in the Carrizalillo Hills	0.36
	Nearest high ridge in the Cedar Mountains	2.18
	High ridges in the Flat Hill	0.86
Route Group 1 Local Alternatives		
Local Alternatives for Subroute 1.2		
Local Alternative C	Nearest ridges in the Cedar Mountains	1.21
	Nearest ridges in the Carrizalillo Hills	0.80
	Low pass between the Cedar Mountains and the Carrizalillo Hills	0.00
Local Alternative D	Nearest high ridge in the Pyramid Mountains	0.62
	Nearest low pass in the Pyramid Mountains	0.15
Local Alternatives for Subroute 1.2	NA*	NA

7 * No ridge or low pass present within proximity of any of the segments of the proposed subroute's ROW
 8 Note: NA = not applicable.

9 **Wildlife Special Designation Areas**

10 Impacts on Wildlife Special Designation Areas would be as described above for subroute 1.1.

11 **Construction**

12 Wildlife designated habitat for the northern aplomado falcon and suitable/occupied bighorn habitat would
 13 occur within the ROW for subroute 1.2. Bighorn habitat within the representative ROW is suitable but is
 14 not currently occupied by the species and is over 50 miles from the nearest occupied habitat. If this
 15 designated bighorn habitat were to become occupied by the species then no Project facilities other than
 16 the transmission line would be built in this area. Disturbance would occur on approximately 33.3 acres of
 17 aplomado falcon habitat and 4.7 acres of suitable/occupied bighorn habitat. This would be a decrease of
 18 13.8 acres from subroute 1.1 for aplomado falcon and an increase of 4.7 acres for suitable/occupied
 19 bighorn habitat. Impacts on Special Designations would not be significant when compared to the total
 20 area of this resource along subroute 1.2.

21 **Operation and Maintenance**

22 Potential operational and maintenance impacts on northern aplomado falcon and suitable/occupied
 23 bighorn habitat areas would be as described above for subroute 1.1. Impacts on Special Designations,

1 including designated northern aplomado falcon and suitable/occupied bighorn habitat, are analyzed in
2 section 4.12.

3 **Local Alternatives**

4 There are five local alternatives available for route group 1. These local alternatives include DN1, A, B,
5 C, and D.

6 ***General Wildlife***

7 **Construction**

8 Construction-related impacts for the local alternatives would be similar to those described above for
9 subroute 1.1. Acres of impacts are given in table 4.8-15.

10 **Operation and Maintenance**

11 Impacts from the operation and maintenance of the local alternatives would include those described above
12 for subroute 1.1.

13 ***Special Status Species***

14 **Federally Listed Species**

15 *Construction*

16 The construction impact types and intensities to northern aplomado falcon and Sprague's pipit would be
17 the same as described under subroute 1.1 for all local alternatives. Acres of impacts are given in table
18 4.8-15.

19 *Operation and Maintenance*

20 The operation and maintenance impact types and intensities to both the northern aplomado falcon and
21 Sprague's pipit would be the same as described under subroute 1.1 for all local alternatives.

22 **BLM Sensitive Species**

23 The construction impact types and intensities to the BLM Sensitive Species Colorado River toad, Texas
24 horned lizard, New Mexico population of the burrowing owl, loggerhead shrike, white-faced ibis,
25 Mexican long-tongued bat, pale Townsend's big-eared bat, spotted bat, Allen's big-eared bat, western
26 small-footed myotis, little brown myotis, fringed myotis, cave myotis, long-legged myotis, Yuma myotis,
27 and big free-tailed bat would be the same as described under subroute 1.1 for all the local alternatives.
28 Acres of impacts are given in table 4.8-15.

29 *Construction*

30 Under local alternative DN1 Texas horned lizard, burrowing owl, loggerhead shrike, and bat species
31 habitat would be impacted as described for subroute 1.1.

32 Under local alternative A Texas horned lizard, burrowing owl, loggerhead shrike, white-faced ibis and bat
33 species habitat would be impacted as described for subroute 1.1.

1 Under local alternative B Texas horned lizard, burrowing owl, loggerhead shrike, and bat species habitat
2 would be impacted as described for subroute 1.1.

3 Under local alternative C Texas horned lizard, burrowing owl, loggerhead shrike, and bat species habitat
4 would be impacted as described for subroute 1.1.

5 Under local alternative D Texas horned lizard, burrowing owl, loggerhead shrike, and bat species habitat
6 would be impacted as described for subroute 1.1.

7 *Operation and Maintenance*

8 The operation and maintenance impact types and intensities to BLM Sensitive Species would be the same
9 as described under subroute 1.1. The ROW under all the local alternatives (DN1, A, B, C, and D) would
10 be greater than the corresponding segments (portion of P2, S2, S4, S6, and S8, respectively). Therefore
11 there would be a slightly greater chance for impacts to BLM sensitive avian species from striking the
12 transmission lines and structures under all the local alternatives.

13 **State of New Mexico Wildlife Conservation Act Species**

14 Ten New Mexico Wildlife Conservation Act species were identified as possibly occurring on the local
15 alternatives. The northern aplomado falcon was previously described in the “Federally Listed Species”
16 section above and the spotted bat was described in the ‘BLM Sensitive Species’ above. The remaining
17 eight species are addressed below. Impacts on these species would be as described for subroute 1.1 for
18 each of the local alternatives. Acres of impacts are given in table 4.8-15.

19 *Construction*

20 Local alternative DN1 would intersect habitat for the Gila monster, peregrine falcon, Abert’s towhee, Gila
21 woodpecker, Lucifer hummingbird, varied bunting, and Bell’s vireo. The representative ROW would
22 intersect foraging habitat for the peregrine falcon as well as foraging and nesting habitat for the Abert’s
23 towhee, Gila woodpecker, Lucifer hummingbird, varied bunting, and Bell’s vireo.

24 Local alternative A would intersect with habitat for Gila monster, Abert’s towhee, peregrine falcon,
25 Lucifer hummingbird, Gila woodpecker, varied bunting, and Bell’s vireo. Local alternative B would
26 intersect with habitat for Gila monster, peregrine falcon, Lucifer hummingbird, varied bunting, and Bell’s
27 vireo. Local alternative C would intersect with habitat for Great Plains narrow-mouthed toad, Gila
28 monster, peregrine falcon, Lucifer hummingbird, varied bunting, and Bell’s vireo.

29 Local alternative D would intersect with habitat for Gila monster, peregrine falcon, Lucifer hummingbird,
30 varied bunting, Bell’s vireo, Abert’s towhee, and Gila woodpecker.

31 *Operation and Maintenance*

32 Potential operation and maintenance impacts on State of New Mexico Wildlife Conservation Act species
33 would be as described above for subroute 1.1.

34 **State of New Mexico Species of Greatest Conservation Need**

35 Fourteen New Mexico Species of Greatest Conservation Need were identified as possible to occur on the
36 local alternatives. Of these, five are addressed above (white-faced ibis, spotted bat, and Allen’s big-eared
37 bat are addressed in the “BLM Sensitive Species” section and Bell’s vireo and American peregrine falcon
38 are addressed in the “State of New Mexico Wildlife Conservation Act Species” section). The other nine
39 species are addressed below. Impacts on these species would be as previously described for subroute 1.1.

1 Local alternative DN1 could impact habitat for Arizona toad, northern harrier, and painted bunting. Based
2 on the amount of habitat for these species in the analysis area it is not anticipated that local alternative A
3 would cause any significant population-level impacts for these species or contribution towards a
4 downward population trend or listing of this species as threatened or endangered.

5 Local alternative A would intersect with habitat for Arizona toad, northern harrier, sandhill crane,
6 northern pintail, American bittern, eared grebe, and painted bunting. Habitat for eared grebe and
7 American bittern would be avoided. No migratory/stopover habitat for sandhill cranes would be impacted
8 by local alternative A. Based on the amount of habitat for these species in the analysis area it is not
9 anticipated that local alternative A would cause any significant population-level impacts for these species.

10 Local alternative B would intersect with habitat for Arizona toad, northern harrier, and painted bunting as
11 well as migratory/stopover habitat for sandhill crane. Migratory/stopover habitat would occur on 16.1
12 acres, of which 3.7 acres would be disturbed. Based on the amount of habitat for these species in the
13 analysis area, including migratory/stopover habitat for sandhill crane, it is not anticipated that local
14 alternative B would cause any significant population-level impacts for these species.

15 Local alternative C would intersect with habitat for Arizona toad, northern harrier, and painted bunting.
16 Based on the amount of habitat for these species in the analysis area it is not anticipated that local
17 alternative C would cause any significant population-level impacts for these species.

18 Local alternative D would intersect with habitat for Arizona toad, northern harrier, bank swallow, painted
19 bunting, and pocketed free-tailed bat as well as migratory/stopover habitat for sandhill crane. Migratory/
20 stopover habitat would occur on 180.3 acres, of which 41.5 acres would be disturbed. Based on the
21 amount of habitat for these species in the analysis area, including migratory/stopover habitat for sandhill
22 crane, it is not anticipated that local alternative D would cause any significant population-level impacts
23 for these species.

24 **Migratory Birds**

25 *Construction*

26 Impacts on migratory birds would include those described above for subroute 1.1 for all local alternatives.
27 Local alternative DN1 would occur on approximately 1,031.0 acres of ROW, approximately 237.1 acres
28 of which would be disturbed.

29 Local alternative A would occur on approximately 416.4 acre, which would include 1.5 acres of playa
30 habitat that could have a higher concentration of migratory birds. The potential area to be disturbed would
31 be approximately 95.8 acres.

32 Local alternative B would occur on approximately 291.3 acres of the ROW with a disturbance area of
33 70.0 acres.

34 Local alternative C would occur on approximately 215.7 acres of the ROW, including 5.8 acres of
35 Agricultural lands, which could have a higher concentration of migratory birds. The approximate area of
36 disturbance would be 49.6 acres. This entire local alternative would occur within the Cedar Mountain
37 Range/Continental Divide Avian Protection Area for raptor species.

38 Local alternative D would occur on approximately 551.5 acres of the ROW, including 20.9 acres of
39 Agriculture and 0.5 acre of riparian woodland and shrubland, which could have a higher concentration of
40 migratory birds. Disturbance would occur on approximately 126.8 acres.

1 *Operation and Maintenance*

2 The habitat mentioned above may harbor higher concentrations of migratory birds than surrounding areas,
 3 and may thus be associated with an elevated risk of collision events. Other impacts would be as described
 4 above for subroute 1.1.

5 The ROW for local alternative C crosses a low pass between the Cedar Mountains and the Carrizalillo
 6 Hills (see table 4.8-16), raising the possibility of somewhat higher impacts on migratory birds.

7 The ROW for local alternative D lies near a low pass in the Pyramid Mountains (see table 4.8-7), raising
 8 the possibility of somewhat higher impacts on migratory birds.

9 **Wildlife Special Designation Areas**

10 Impacts on Wildlife Special Designation Areas would be as described above for subroute 1.1.

11 *Construction*

12 The Big Burro Mountains to Cedar Mountains Potential Cougar Corridor would occur on approximately
 13 140.8 acres within the ROW for local alternative DN-1; of this area approximately 32.4 acres would be
 14 disturbed. Northern aplomado falcon habitat would occur on approximately 141.0 acres of the ROW.
 15 Disturbance would occur on approximately 32.4 acres. No other local alternatives intersect with special
 16 designation areas. Based on the area of northern aplomado falcon habitat in the area it is not anticipated
 17 that impacts from local alternative DN-1 would reach population levels. As cougars are a wide-ranging
 18 species and impacts would occur on a small portion of the corridor, it is not anticipated that the proposed
 19 Project would create a significant barrier to cougar movement along the corridor.

20 *Operation and Maintenance*

21 Impacts on Wildlife Special Designation Areas from operation and maintenance s would be as described
 22 for subroute 1.1.

23 **Route Group 2 – Hidalgo Substation to Apache Substation**

24 Table 4.8-17 gives the approximately acreage of habitat types that would be within the representative
 25 ROW for route group 2 in New Mexico. Approximately 23 percent of the ROW would be disturbed
 26 within route group 2.

27 **Table 4.8-17.** Route Group 2 Wildlife Resource Inventory Data for New Mexico

Habitat Type	Subroute 2.1 (acres)	Subroute 2.2 (acres)	LD1 (acres)	LD2 (acres)	LD3a (acres)	LD3b (acres)	LD4 (acres)	LD4-Option 4 (acres)	LD4-Option 5 (acres)	WC1 (acres)
Apacherian-Chihuahuan Mesquite Upland Scrub	2.1	0.5	3.0	3.8	17.0	-	9.3	-	-	-
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	547.6	246.5	231.8	172.5	401.7	27.1	16.7	-	-	-
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	76.2	56.5	108.7	35.9	137.2	18.4	64.5	-	-	-

1 **Table 4.8-17.** Route Group 2 Wildlife Resource Inventory Data for New Mexico (Continued)

Habitat Type	Subroute 2.1 (acres)	Subroute 2.2 (acres)	LD1 (acres)	LD2 (acres)	LD3a (acres)	LD3b (acres)	LD4 (acres)	LD4-Option 4 (acres)	LD4-Option 5 (acres)	WC1 (acres)
Chihuahuan Mixed Salt Desert Scrub	35.0	37.9	4.9	21.1	3.7	-	-	-	-	-
Chihuahuan Sandy Plains Semi-Desert Grassland	5.2		1.0	-	11.5	-	-	-	-	-
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	47.9	5.1	42.3	-	79.4	-	-	-	-	-
Developed, Medium - High Intensity	-	-	27.9	-	-	-	-	-	-	-
Madrean Pinyon-Juniper Woodland	-	-	-	-	-	-	5.5	-	-	-
Madrean Juniper Savanna	-	-	0.1	-	-	-	-	-	-	-
North American Warm Desert Bedrock Cliff and Outcrop	2.4	0*	-	-	-	-	-	-	-	-
North American Warm Desert Pavement	-	-	0.4	-	-	-	-	-	-	-
North American Warm Desert Wash	5.7	0.8	-	-	27.0	1.0	-	-	-	-

2 0*- greater than 0 but less than 0.1 acre

3 Table 4.8-18 gives the acreage of habitat types that would be within the representative ROW for route
4 group 2 in Arizona.

5 **Table 4.8-18.** Route Group 2 Wildlife Resource Inventory Data for Arizona

Habitat Type	Subroute 2.1 (acres)	Subroute 2.2 (acres)	LD1 (acres)	LD2 (acres)	LD3a (acres)	LD3b (acres)	LD4 (acres)	LD4-Option 4 (acres)	LD4-Option 5 (acres)	WC1 (acres)
Agriculture	50.0	70.9	69.3	-	-	-	-	-	-	-
Apacherian-Chihuahuan Mesquite Upland Scrub	681.2	886.4	168.9	-	-	-	298.8	17.0	48.3	85.3
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	522.4	638.4	29.2	-	-	-	206.7	99.4	152.8	251.8
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	201.6	252.7	102.1	-	-	-	404.3	31.4	68.9	0.3
Chihuahuan Mixed Salt Desert Scrub	101.8	60.9	40.8	-	-	-	263.3	5.1	14.0	11.5

6

1 **Table 4.8-18.** Route Group 2 Wildlife Resource Inventory Data for Arizona (Continued)

Habitat Type	Subroute 2.1 (acres)	Subroute 2.2 (acres)	LD1 (acres)	LD2 (acres)	LD3a (acres)	LD3b (acres)	LD4 (acres)	LD4-Option 4 (acres)	LD4-Option 5 (acres)	WC1 (acres)
Chihuahuan Sandy Plains Semi-Desert Grassland	0.7	-	-	-	-	-	-	-	-	-
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	12.2	7.5	0*	-	-	-	28.3	-	4.0	0.5
Developed, Medium - High Intensity	1.2	5.5	-	-	-	-	-	2.1	1.6	7.6
Developed, Open Space - Low Intensity	-	-	-	-	-	-	-	-	-	1.3
Madrean Encinal	-	3.3	-	-	-	-	11.0	1.0	0.6	-
Madrean Pinyon-Juniper Woodland	-	1.2	-	-	-	-	22.1	0.1	-	-
Madrean Juniper Savanna	0.4	-	-	-	-	-	6.2	-	-	-
Mogollon Chaparral	0.6	1.0	-	-	-	-	8.1	-	6.7	-
North American Arid West Emergent Marsh	5.6	11.0	13.5	-	-	-	-	-	-	-
North American Warm Desert Bedrock Cliff and Outcrop	4.7	0.2	-	-	-	-	-	-	-	-
North American Warm Desert Pavement	1.2	-	-	-	-	-	-	-	-	-
North American Warm Desert Riparian Mesquite Bosque	2.3	22.8	12.4	-	-	-	2.2	-	-	-
North American Warm Desert Volcanic Rockland	-	-	-	-	-	-	1.2	-	-	-
North American Warm Desert Wash	-	7.5	1.1	-	-	-	0*	-	-	0.9
Sonoran Mid-Elevation Desert Scrub	-	-	-	-	-	-	0.2	-	-	-
Sonoran Paloverde-Mixed Cacti Desert Scrub	-	-	-	-	-	-	0.9	-	-	-

2 0*- greater than 0 but less than 0.1 acre

1 Table 4.8-19 gives the acreage of habitat types that would be within the staging areas and substations for
2 route group 2 in New Mexico.

3 **Table 4.8-19.** Route Group 2 Wildlife Resource Inventory Data for Staging Areas and Substations in New
4 Mexico

Habitat Types	Subroute 2.1 (acres)	Subroute 2.2 (acres)	Local Alternative LD1 (acres)
Apacherian-Chihuahuan Mesquite Upland Scrub	0.6	-	-
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	28.1	26.4	19.7
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	38.4	10.8	-
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	1.9	-	19.9
Developed, Medium - High Intensity	3.2	-	-
North American Warm Desert Pavement	0.6	-	-
North American Warm Desert Wash	5.4	2.4	-

5 Table 4.8-20 gives the acreage of habitat types that would be within the staging areas and substations for
6 route group 2 in Arizona.

7 **Table 4.8-20.** Route Group 2 Wildlife Resource Inventory Data for Staging Areas and Substations in
8 Arizona

Habitat Types	Subroute 2.1 (acres)	Subroute 2.2 (acres)	Local Alternative LD1 (acres)	Local Alternative WC1 (acres)
Agriculture	11.9	-	0.3	-
Apacherian-Chihuahuan Mesquite Upland Scrub	85.5	63.7	2.3	17.7
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	37.8	3.1	-	-
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	0.5	-	-	-
Chihuahuan Mixed Salt Desert Scrub	3.4	11.8	17.0	-
Developed, Medium - High Intensity	-	-	-	0.6
North American Warm Desert Riparian Mesquite Bosque	-	-	0*	-
North American Warm Desert Wash	-	-	-	1.5

9 0*- greater than 0 but less than 0.1 acre

10 Table 4.8-21 gives the acres of impacts on general wildlife and special status species for route group 2.

1 **Table 4.8-21. Route Group 2 Acres of Impacts on Wildlife**

Common name	Subroute 2.1	Subroute 2.2	Local Alt LD1	Local Alt LD2	Local Alt LD3a	Local Alt LD3b	Local Alt LD4	Local Alt LD4-Opt4	Local Alt LD4-Opt5	Local Alt WC-1
General wildlife	574.5	522.0	197.2	53.6	155.8	10.8	288.2	35.9	68.3	82.6
Federally Listed Species										
Lesser long-nosed bat	349.3	324.3	125.6	52.7	133.6	10.7	219.5	31.8	54.6	62.9
Mexican long-nosed bat	349.3	324.3	125.6	52.7	133.6	10.7	219.5	31.8	54.6	62.9
Northern aplomado falcon	262.6	210.3	64.8	39.7	95.0	10.7	48.9	22.8	35.1	57.9
Southwestern willow flycatcher	-	-	-	-	-	-	-	-	-	-
Sprague's pipit	276.8	242.9	80.8	39.7	95.0	10.7	53.6	22.8	35.1	57.9
Chiricahua leopard frog	-	-	-	-	-	-	-	-	-	-
BLM Sensitive Species										
Allen's big-eared bat	285.1	327.9	101.6	14.1	42.5	4.5	223.6	12.3	30.2	22.8
Big free-tailed bat	105.5	98.8	59.2	13.2	38.6	4.5	154.0	0.5	19.1	3.2
Cave myotis	105.5	98.8	59.2	13.2	38.6	4.5	154.0	8.4	85	3.2
Fringed myotis	386.2	312.0	119.5	52.9	133.6	10.7	206.7	31.3	46.2	61.1
Greater western mastiff bat	105.5	98.8	59.2	13.2	38.6	4.5	154.0	8.4	85	3.2
Little brown myotis	367.7	328.2	138.6	52.9	133.6	10.7	202.9	31.3	47.7	61.1
Long legged-myotis	105.5	98.8	62.3	13.2	38.6	4.5	154.0	8.4	19.1	3.2
Mexican long-tongued bat	105.5	98.8	62.3	13.2	38.6	4.5	154.0	8.4	19.1	3.2
Pale Townsend's big-eared bat	106.0	99.0	59.2	13.2	38.6	4.5	154.0	8.4	19.1	3.2
Western small-footed myotis	-	-	-	-	-	-	-	-	-	-
Yuma myotis	105.5	98.8	62.3	13.2	38.6	4.5	154.0	8.4	19.1	3.2
Burrowing owl (New Mexico population)	382.0	311.8	119.5	52.9	133.6	10.7	202.9	31.3	46.2	61.1
Loggerhead shrike	435.4	101.8	59.2	13.2	38.6	4.5	160.3	8.4	19.1	3.2
White-faced ibis	16.8	18.8	19.0	-	-	-	-	-	-	-
Desert ornate box turtle	385.7	311.8	119.5	52.9	133.6	10.7	207.5	31.3	46.2	61.1
Texas horned lizard	385.7	311.8	119.5	52.9	133.6	10.7	201.3	31.3	46.2	61.1
Colorado River toad (aka Sonoran green toad).	385.7	311.8	119.5	52.9	133.6	10.7	201.3	31.3	46.2	61.1
Lowland leopard frog	1.3	2.5	-	-	-	-	-	-	-	-
New Mexico Wildlife Conservation Act Species- Acreages given are for the portion of route group 2 in New Mexico										
Desert bighorn sheep	325.7	87.7	84.2	52.9	133.6	10.7	18.7	-	-	-
Abert's towhee	37.7	24.9	32.5	13.2	38.6	4.5	14.8	-	-	-
American peregrine falcon	81.7	30.5	26.1	13.2	38.6	4.5	14.8	-	-	-
Arizona grasshopper sparrow	170.6	87.7	84.2	52.9	133.6	10.7	18.7	-	-	-
Bell's vireo	-	-	-	-	-	-	-	-	-	-
Gila woodpecker	37.7	24.9	32.5	13.2	38.6	4.5	14.8	-	-	-
Lucifer hummingbird	34.4	30.5	26.1	13.2	38.6	4.5	14.8	-	-	-
Varied bunting	28.9	16.2	25.0	13.2	31.6	4.2	14.8	-	-	-
Gila monster	325.1	87.7	84.2	52.9	133.6	10.7	18.7	-	-	-

2

1 **Table 4.8-21. Route Group 2 Acres of Impacts on Wildlife (Continued)**

Common name	Subroute 2.1	Subroute 2.2	Local Alt LD1	Local Alt LD2	Local Alt LD3a	Local Alt LD3b	Local Alt LD4	Local Alt LD4-Opt4	Local Alt LD4-Opt5	Local Alt WC-1
State of Arizona Wildlife Species of Concern- Acreages given are for the portion of route group 2 in Arizona										
Pocketed free-tailed bat	249.2	302.8	82.1	-	-	-	207.9	12.3	30.2	3.2
Western red bat	-	-	-	-	-	-	-	-	-	-
Abert's towhee	70.9	76.6	36.8	-	-	-	138.9	8.4	19.3	5.2
Bank swallow	1.3	4.3	3.1	-	-	-	0.5	-	-	-
Bell's vireo	-	-	-	-	-	-	-	-	-	-
Gila woodpecker	70.9	79.1	79.8	-	-	-	138.9	8.4	19.3	5.2
Northern harrier	226.1	226.6	62.9	-	-	-	182.6	31.3	46.2	61.1
Yellow warbler	0.5	7.8	6.0	-	-	-	0.5	-	-	-
State of New Mexico Species of Greatest Conservation Need- Acreages given are for the portion of route group 2 in New Mexico										
Pocketed free-tailed bat	37.6	27.6	27.5	14.1	42.5	4.5	16.9	-	-	-
Western red bat	-	-	-	-	-	-	-	-	-	-
American bittern	0	-	-	-	-	-	-	-	-	-
Bank swallow	2.6	-	-	-	-	-	-	-	-	-
Eared grebe	0	-	-	-	-	-	-	-	-	-
Northern harrier	170.6	87.7	84.2	52.9	133.6	10.7	18.7	-	-	-
Northern pintail	-	-	-	-	-	-	-	-	-	-
Sandhill crane	133.6	62.8	58.1	39.7	95.0	6.2	3.8	-	-	-
Varied bunting	28.9	15.5	25.0	8.3	31.6	4.5	14.8	-	-	-
Yellow warbler	-	-	-	-	-	-	-	-	-	-
Arizona toad	37.0	24.9	26.1	13.2	38.6	4.5	14.8	-	-	-
State of Arizona Species of Greatest Conservation Need- Acreages given are for the portion of route group 2 in Arizona										
Desert bighorn sheep	200.8	222.4	43.5	-	-	-	182.6	31.3	46.2	61.1
American bittern	1.3	2.5	3.1	-	-	-	-	-	-	-
American peregrine falcon	76.7	21.6	39.9	-	-	-	143.5	8.4	19.1	61.1
Eared grebe	1.3	2.5	3.1	-	-	-	-	-	-	-
Northern harrier	215.2	241.2	62.9	-	-	-	182.6	31.3	46.2	61.1
Northern pintail	1.3	2.5	3.1	-	-	-	-	-	-	-
Sandhill crane	144.5	166.4	9.8	-	-	-	43.7	-	35.1	57.9
Arizona toad	70.6	79.1	39.9	-	-	-	143.5	8.4	19.1	61.1

2

1 **SUBROUTE 2.1 – PROPONENT PREFERRED**

2 **General Wildlife**

3 ***Construction***

4 Impacts on general wildlife species would be as described above for subroute 1.1. Acres of impacts are
5 given in table 4.8-21. Some of the habitat would be restored after the completion of construction
6 activities; however, restoration in arid environments would be difficult and slow and as such, there would
7 be short-term impact in areas where restoration activities would be successful, and long-term impact in
8 areas where they would be unsuccessful. Based on the amount of available habitat in the analysis area it is
9 not anticipated that subroute 2.1 would significantly impact general wildlife populations or contribute to a
10 need to list species as threatened or endangered.

11 ***Operation and Maintenance***

12 Impacts from the operation and maintenance of subroute 2.1 would be as described above for
13 subroute 1.1.

14 **Special Status Species**

15 ***Federally Listed Species***

16 Within this route group, six federally listed species were identified as possible to occur because the
17 analysis area would be within their range and habitat parameters would be present. These species include
18 the Chiricahua leopard frog (*Lithobates chiricahuensis*), southwestern willow flycatcher (*Empidonax*
19 *traillii extimus*), Sprague's pipit, lesser long-nosed bat (*Leptonycteris curasoae yerbabuenae*), Mexican
20 long-nosed bat (*Leptonycteris nivalis*), and the northern aplomado falcon. Acres of impacts to federally
21 listed species are given in table 4.8-21.

22 In addition, three other species—the Sonoran desert tortoise, the interior population of the least tern, and
23 the ocelot (*Leopardus pardalis*)—could also occur but would be considered unlikely to occur, because
24 although habitat parameters may be present, the analysis area within this route group would not be within
25 the species' typical range. Therefore the Project activities in the Hidalgo to Apache route group would
26 have no effect on the populations of Sonoran desert tortoise, interior least tern, or ocelot.

27 ***Construction***

28 Potential impacts to Chiricahua leopard frog from construction activities would include those described
29 above as common to all amphibian species. There would be no perennial or intermittent waterways in this
30 subroute analysis area that would be similar to those used by this species, and pole structures and
31 laydown areas would not be placed in ephemeral waterways that could provide dispersal habitats for
32 Chiricahua leopard frogs. Therefore, construction-related impacts would be related to the potential for
33 crushing by vehicles, especially after precipitation events when this species could be active in the analysis
34 area. There would be no effect on this species' designated critical habitat and no detectable effect on the
35 viability of this species from Project-related activities.

36 Potential impacts on southwestern willow flycatcher from construction activities in this subroute group
37 would include those described above as common to all bird species. However, there would be no
38 perennial or intermittent waterways in this subroute that would provide nesting habitat for this species and
39 this subroute group would not intersect with any designated critical habitat for this species. Individuals
40 could experience impacts common to migratory birds during migration as they move through the subroute

1 group during construction with the potential for strikes to transmission lines and structures (see migratory
2 species impacts described below). However, given the small size and mobility of this species, it would be
3 anticipated to be a very low potential. Based on the lack of nesting habitat and the mobility of the species,
4 construction-related activities would have no detectable effect on the viability of this species.

5 Potential impacts on Sprague's pipit from construction activities would include those described above for
6 subroute 1.1. Based on the amount of available habitat in the analysis area, construction-related activities
7 would have no detectable effect on the viability of the local population of this species and no detectable
8 effect on the viability of this species or contribution towards a downward population trend or listing of
9 this species as threatened or endangered.

10 Potential impacts on the lesser long-nosed bat and Mexican long-nosed bat from construction activities
11 would include those described above for mammals. Habitat for these species along subroute 2.1 is within
12 40 miles of known roost sites in the Peloncillo and Chiricahua Mountains and is therefore within the
13 foraging range of these species. Approximately 2,459 acres of foraging habitat for lesser long-nosed bat
14 and Mexican long-nosed bat would occur within the analysis area. However, there would be no roost sites
15 in the 200-foot-wide corridor that would provide shelter for these species. Based on the amount of
16 available foraging habitat in the analysis area and lack of roosting sites within the area to be disturbed,
17 construction-related activities would have a minor/negligible, long-term effect on these species.

18 Potential impacts on northern aplomado falcon from construction activities would include those described
19 above for subroute 1.1. Based on the amount of available habitat in the analysis area, construction-related
20 activities would have no detectable effect on the viability of this species.

21 **Operation and Maintenance**

22 There would be no perennial or intermittent waterways in this subroute analysis area that are similar to
23 those used by Chiricahua leopard frogs, and pole structures and laydown areas would not be placed in
24 ephemeral waterways that could provide dispersal habitats for the species. As such, there would likely not
25 be operational and maintenance impacts to individual Chiricahua leopard frogs or to any populations of
26 Chiricahua leopard frogs under this subroute group. In addition, there would be no operational and
27 maintenance impacts to Chiricahua leopard frog designated critical habitat.

28 There would be no perennial or intermittent waterways in this subroute that would provide nesting habitat
29 for southwestern willow flycatcher and this subroute group would not intersect with any designated
30 critical habitat for this species. As such, there would likely not be operational or maintenance impacts to
31 individual southwestern willow flycatchers nor to any populations of southwestern willow flycatchers
32 under this subroute group. In addition, there would be no operational and maintenance impacts to
33 southwestern willow flycatcher designated critical habitat.

34 There would be no detectable operational or maintenance impacts on lesser long-nosed bat and Mexican
35 long-nosed bat and there would be no impact on the viability of this species.

36 Potential impacts on Sprague's pipit from operation and maintenance activities would be as described for
37 subroute 1.1. However, based on the amount of available foraging habitat in the analysis area there would
38 be no detectable effect on the viability of this species or contribution towards a downward population
39 trend or listing of this species as threatened or endangered.

40 Potential impacts on northern aplomado falcon from operation and maintenance activities would be as
41 described for subroute 1.1. Based on the amount of available foraging habitat in the analysis area there
42 would be no detectable effects on the viability of the non-essential experimental population of aplomado
43 falcon.

1 **BLM Sensitive Species**

2 In total, 18 BLM Sensitive Species were identified as possible to occur because the analysis area would
3 be within the species' range and habitat parameters for the species would be present. These species
4 include the Colorado River toad (also known as Sonoran desert toad), lowland leopard frog, Texas horned
5 lizard, desert ornate box turtle, New Mexico population of the burrowing owl, loggerhead shrike, white-
6 faced ibis, Mexican long-tongued bat, pale Townsend's big-eared bat, spotted bat, Allen's big-eared bat,
7 western small-footed myotis, little brown myotis, fringed myotis, cave myotis, long-legged myotis, Yuma
8 myotis, big free-tailed bat, and greater western mastiff bat (*Eumops perotis californicus*). Acres of
9 impacts on these species are given in table 4.8-21. Based on the amount of available habitat for these
10 species in the analysis area, construction-related activities would have no detectable effect on the viability
11 of these species, or contribute towards a downward population trend or listing of these species as
12 threatened or endangered.

13 An additional seven BLM Sensitive species—the Slevin's bunchgrass lizard (*Sceloporus slevini*), Baird's
14 sparrow (*Ammodramus bairdii*), desert pocket gopher (*Geomys arenarius arenarius*), desert sucker
15 (*Catostomus clarki*), giant spotted whiptail, ferruginous hawk (*Buteo regalis*), and yellow-nosed cotton
16 rat (*Sigmodon ochrognathus*)—could also occur but would be considered unlikely to occur because
17 although habitat parameters may be present, the analysis area within this route group would not be within
18 the species' typical range. There would be no effect on habitat for these seven species and no detectable
19 effect on the viability of these species from Project-related activities, or contribution towards a downward
20 population trend or listing of these species as threatened or endangered.

21 **Construction**

22 Potential impacts on Colorado River toad and lowland leopard frog from construction activities would
23 include those described above as common to all amphibian species. However, there would be no
24 perennial or intermittent waterways in this subroute and pole structures and laydown areas would not be
25 placed in ephemeral waterways that could provide dispersal habitats for Colorado River toads or lowland
26 leopard frog.

27 Potential impacts on Texas horned lizard, western burrowing owl, loggerhead shrike, white-faced ibis,
28 and the 12 bat species from construction-related activities would be as described above for subroute 1.1.

29 Potential impacts on desert ornate box turtle from construction-related activities would include those
30 described above as common to all reptile species. Based on the amount of available habitat in the analysis
31 area, there would be no detectable effect on the viability of these species or contribution towards a
32 downward population trend or listing of any of these species as threatened or endangered.

33 **Operation and Maintenance**

34 Potential impacts from operation and maintenance activities to the white-faced ibis would be related to
35 individuals striking the transmission lines and structures. Colorado River toad, lowland leopard frog,
36 Texas horned lizard, New Mexico population of the burrowing owl, loggerhead shrike and bat species
37 would likely not experience operational and maintenance impacts detectable at the population level.

38 **State of New Mexico Wildlife Conservation Act Species**

39 Sixteen New Mexico Wildlife Conservation Act species were identified as possibly occurring in route
40 group 2. Of these 16 species, 12 could potentially occur within subroute 2.1. These would include the
41 lowland leopard frog, Gila monster, Gila woodpecker, Bell's vireo, varied bunting, Abert's towhee,
42 Arizona grasshopper sparrow (*Ammodramus savannarum ammolegus*), northern aplomado falcon,

1 peregrine falcon, Lucifer hummingbird, desert bighorn sheep, and lesser long-nosed bat. Impacts on
2 northern aplomado falcon, lesser long-nosed bat and lowland leopard frog are addressed above in
3 “Federally Listed Species” and “BLM Sensitive Species” sections, respectively. Impacts on the remaining
4 9 species are given below. Acres of impacts on these species are given in table 4.8-21. Based on the
5 amount of habitat for these species in the analysis area, there would be no detectable effect on the
6 viability of these species or contribution towards a downward population trend or listing of these species
7 as threatened or endangered.

8 **Construction**

9 Potential impacts on desert bighorn sheep and State of New Mexico Wildlife Conservation Act bird
10 species would be as described above for subroute 1.1.

11 Potential impacts on the Gila monster would include those described above as common to all species and
12 specifically to reptiles as described above. As this species spends the majority of its life underground it
13 would be more susceptible than non-burrowing species to burial during construction activities.

14 **Operation and Maintenance**

15 Potential operational and maintenance impacts on State of New Mexico Wildlife Conservation Act
16 species would be as described above for subroute 1.1.

17 ***State of Arizona Wildlife Species of Concern***

18 Eight Arizona listed Wildlife Species of Concern were identified as possibly occurring in subroute 2.1.
19 One of these species, white-faced ibis is addressed in the “BLM Sensitive Species” section. The other
20 seven species are addressed below. Acres of impacts on these species are given in table 4.8-21.

21 **Construction**

22 Potential impacts on Arizona Wildlife Species of Concern mammal species from the proposed Project
23 would include those described above as common to all species and specifically to mammals as described
24 above in “Additional Impacts.” Mammal species impacts would include impacts to pocketed free-tailed
25 bat and western red bat. Construction-related impacts would be short-term with impacts on habitat being
26 long-term.

27 Potential impacts on Arizona Wildlife Species of Concern bird species from the proposed Project would
28 include those described above as common to all species and specifically to birds as described above in
29 “Additional Impacts.” Bird species impacted would include Bell’s vireo, Abert’s towhee, Gila
30 woodpecker, bank swallow, and yellow warbler.

31 **Operation and Maintenance**

32 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
33 be as described above in the “Impacts Common to All Action Alternatives” and “Additional Impacts”
34 sections.

35 ***State of New Mexico Species of Greatest Conservation Need***

36 Eighteen New Mexico Species of Greatest Conservation Need were identified as possibly occurring in
37 subroute 2.1. Of these, seven are addressed above (white-faced ibis and spotted bat are addressed in the
38 “BLM Sensitive Species” section and Bell’s vireo, Abert’s towhee, Gila woodpecker, peregrine falcon

1 and desert bighorn sheep are addressed in the “State of New Mexico Wildlife Conservation Act Species”
2 section). The other 11 species are addressed below. Acres of impacts on these species are given in table
3 4.8-21.

4 **Construction**

5 Potential impacts on Species of Greatest Conservation Need mammal species and the Arizona toad from
6 the proposed Project would be as described above for subroute 1.1. Mammal species impacted would be
7 western red bat and pocketed free-tailed bat.

8 Potential impacts on Species of Greatest Conservation Need bird species from the proposed Project would
9 include those described above as common to all species and specifically to birds as described above in
10 “Additional Impacts.” Bird species impacted would include yellow warbler, northern pintail, American
11 bittern, eared grebe, bank swallow, northern harrier and sandhill crane. Habitat for American bittern and
12 eared grebe would be avoided.

13 **Operation and Maintenance**

14 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
15 be as described above in the “Impacts Common to All Action Alternatives” and “Additional Impacts”
16 sections.

17 ***State of Arizona Species of Greatest Conservation Need***

18 Ten Arizona Species of Greatest Conservation Need were identified as possibly occurring in subroute 2.2.
19 Of these 10 species, two are addressed (the southwestern willow flycatcher is addressed in the “Federally
20 Listed Species” section and the spotted bat is addressed in the “BLM Sensitive Species” section).
21 The other eight species are addressed below.

22 **Construction**

23 Potential impacts on desert bighorn sheep from the proposed Project would include those described above
24 as common to all species and specifically to mammals as described above for subroute 1.1. Potential
25 impacts on the Arizona toad from the proposed Project would include those described above as common
26 to all species and specifically to amphibians as described above.

27 Potential impacts on Species of Greatest Conservation Need bird species from the proposed Project would
28 include those described above as common to all species and specifically to birds as described above in
29 “Additional Impacts.” Bird species impacted would include northern harrier, peregrine falcon, eared
30 grebe, northern pintail, sandhill crane, and American bittern.

31 Habitat for the American bittern, eared grebe and northern pintail would occur within the ROW. As this
32 area would likely be spanned by the transmission lines and access would be from either side no
33 disturbance of habitat for these species would be anticipated.

34 Habitat for the sandhill crane would occur within the ROW; potential impacts on sandhill crane from
35 striking transmission lines and structures could occur at Willcox Playa. Acres of impacts on sandhill
36 cranes are given in table 4.8-21. Near Willcox Playa, subroute 2.1 would cross near the AGFD-owned
37 Willcox Playa Wildlife Area and would be near to Crane Lake. Crane Lake has high biological and
38 economic value to AGFD and sandhill cranes use the lake as a roost. Increased mortality to sandhill
39 cranes from collisions with the proposed transmission line could affect management of the species by
40 AGFD and would conflict with the AGFD conservation mission.

1 **Operation and Maintenance**

2 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
3 be as described above in the “Impacts Common to All Action Alternatives” and “Additional Impacts”
4 sections.

5 Potential impacts on sandhill cranes could occur during operation/maintenance. Sandhill cranes make a
6 daily migration during wintering from Willcox Playa to the agricultural fields to the east. Subroute 2.1
7 would cross this area of daily migration and would lead to increased numbers of collisions of sandhill
8 cranes and transmission lines/structures. The risk of collision of sandhill cranes and other birds with the
9 proposed transmission line in the Willcox Playa area would be minimized through utilization of line
10 marking devices. With mitigation, impacts on sandhill cranes would be minor/negligible to moderate and
11 long-term.

12 ***Migratory Birds***

13 Impacts on migratory birds would be as described above for subroute 1.1.

14 **Construction**

15 The ROW for subroute 2.1 contains a total of 70.8 acres of agricultural lands, found along segments E
16 (62.7 acres), F (1.9 acres), and Ga (6.2 acres), of which 19.8 acres would be disturbed.

17 A total of 22.8 acres of North America Warm Desert Riparian Mesquite Bosque would occur in the ROW
18 of subroute 2.2, of which 6.4 acres would be disturbed. The two segments with this land cover type would
19 be E (10.9 acres) and F (11.9 acres).

20 No wetlands or bodies of perennial water would be present in the analysis area of subroute 2.1. However,
21 11 acres of Arid West Emergent Marsh would occur in the ROW along segment F. Proposed structure
22 locations should incorporate avoidance and BMPs to avoid this wetland. Construction of access roads
23 would likely not impact these features within the ROW if avoidance measures were incorporated and with
24 the implementation of BMPs.

25 Subroute 2.1 would cross approximately 84.6 acres of the Lordsburg Playas avian protection area.
26 Approximately 19.5 acres of this area would be disturbed.

27 **Operation and Maintenance**

28 Under this alternative, a significant risk of collision would exist for the many species of waterfowl,
29 waders, and shorebirds documented at Willcox Playa. Sandhill cranes, waterfowl, and migrant shorebirds
30 can be found throughout Willcox Playa depending on the presence of water. However, AGFD pumps
31 water into Crane Lake to ensure the lake does not dry. As a result, birds consistently use the lake as a
32 roost, including sandhill cranes. When cranes take flight from the lake, they initially circle it before
33 turning towards their preferred foraging areas (agricultural fields) to the southeast. Sandhill cranes usually
34 leave and return at least twice a day. The risk of collision of sandhill cranes and other birds with the
35 proposed transmission line in the Willcox Playa area would be minimized through utilization of line
36 marking devices.

37 The ROW falls within close proximity of a low pass in the Peloncillo Mountains (segment P5) and
38 another in the Dos Cabezas Range (segments P7 and P8), which would increase the possibility of
39 somewhat higher impacts on migratory birds (table 4.8-22).

1 **Table 4.8-22.** Route Group 2 Proximity of Mountain Ridges and Low Passes to the ROW of Proposed
 2 Subroutes

Subroutes	Ridge or Low Pass	Distance (miles)
Subroute 2.1, Proponent Preferred	Roostercomb Ridge in the Peloncillo Mountains	0.31
	Nearest low pass in the Peloncillo Mountains	0.03
	Nearest high ridge in the Dos Cabezas Range	0.19
Subroute 2.2, Proponent Alternative	Nearest ridge in the Peloncillo Mountains	0.83
	Powers Canyon (low pass in the Peloncillo Mountains)	0.00
	Highest ridge in the Circle I Hills	1.10
Route Group 2 Local Alternatives		
Local Alternatives for Subroute 2.1		
Local Alternative LD3b	Eastern ridgeline of the Peloncillo Mountains near Rustler Draw	0.49
Local Alternatives for Subroute 2.2		
Local Alternative LD1	Nearest ridge in the Peloncillo Mountains	0.10
	Nearest ridge of Cedar Mountain within the Peloncillo Mountains	0.85

3 **Wildlife Special Designation Areas**

4 Impacts on Wildlife Special Designation Areas would be as described for subroute 1.1.

5 **Construction**

6 Wildlife designated habitat for the desert bighorn sheep would occur within the ROW for subroute 2.1.
 7 The desert bighorn habitat would occur on approximately 74.5 acres of the ROW. Desert bighorn habitat
 8 areas are recognized as avoidance areas by the Mimbres RMP. Disturbance would occur on
 9 approximately 17.1 acres.

10 Subroute 2.1 would cross two wildlife linkage areas: the Willcox Playa-Winchester-Pinaleño-Dos
 11 Cabezas and the Pinaleno-Dos Cabezas-San Simon Valley PLZs. These linkages would occur on
 12 approximately 981.2 acres of the ROW, of which approximately 225.7 acres would be disturbed. Impacts
 13 on these linkages would be as described for the potential cougar corridor in route group 1.

14 Subroute 2.1 would cross approximately 200.4 acres of the Willcox Playa/Lake Cochise Important Bird
 15 Area. Approximately 46.1 acres of the Important Bird Area would be disturbed.

16 Based on the amount of designated habitat for desert bighorn sheep in the analysis area and the acreage of
 17 wildlife linkage areas it is not anticipated that subroute 2.1 would cause any significant population-level
 18 impacts to the northern aplomado falcon, IBA, or form a significant barrier to wildlife movement.

19 **Operation and Maintenance**

20 Potential operational and maintenance impacts would be as described for subroute 1.1. Impacts on Special
 21 Designations, including designated northern aplomado falcon habitat, are analyzed in section 4.12.

1 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

2 **General Wildlife**

3 ***Construction***

4 Impacts on general wildlife species would be as described above for subroute 1.1. Acres of impacts are
5 given in table 4.8-21.

6 ***Operation and Maintenance***

7 Impacts from the operation and maintenance of subroute 2.2 would be as described above for
8 subroute 1.1.

9 **Special Status Species**

10 ***Federally Listed Species***

11 **Construction**

12 Acres of impacts to federally listed species from subroute 2.2 are given in table 4.8-21.

13 The construction impact types to Chiricahua leopard frog would be the same as described under subroute
14 2.1. There would be a lack of perennial and intermittent water that could provide habitats for this species
15 and there would be no critical habitat for this species in subroute 2.2. There would be no effect on this
16 species' designated critical habitat and no detectable effect on the viability of this species by Project-
17 related activities.

18 The construction impact types and intensities to southwestern willow flycatcher would be the same as
19 described under subroute 2.1. There would be a lack of perennial and intermittent water that could provide
20 habitats for this species and there would be no critical habitat for this species in subroute 2.2. Based on
21 the lack of nesting habitat and the mobility of the species, construction-related activities would have no
22 detectable effect on the viability of this species under subroute 2.2.

23 The construction impact types and intensities to lesser long-nosed bat, Mexican long-nosed bat, northern
24 apomado falcon, and Sprague's pipit would be the same as described under subroute 2.1. Habitat for the
25 lesser long-nosed bat and the Mexican long-nosed bat along subroute 2.2 is within 40 miles of known
26 roost sites in the Peloncillo and Chiricahua Mountains and is therefore within the foraging range of these
27 species. However, there would be no roost sites in the 200-foot-wide corridor that would provide shelter
28 for lesser long-nosed bat or Mexican long-nosed bat. Based on the amount of foraging habitat for these
29 species in the analysis area; there would be a minor/negligible, long-term impact on these species.

30 **Operation and Maintenance**

31 The operation and maintenance impact types and intensities to Chiricahua leopard frog, southwestern
32 willow flycatcher, northern apomado falcon, Sprague's pipit, lesser long-nosed bat, and Mexican long-
33 nosed bat would be the same as described under subroute 2.1.

34 ***BLM Sensitive Species***

35 The Project-related subroute 2.2 impact types and intensities to the BLM Sensitive Species Colorado
36 River toad (also known as Sonoran desert toad), lowland leopard frog, Texas horned lizard, desert ornate
37 box turtle, New Mexico population of the burrowing owl, loggerhead shrike, white-faced ibis, Mexican

1 long-tongued bat, pale Townsend's big-eared bat, spotted bat, Allen's big-eared bat, western small-footed
2 myotis, little brown myotis, fringed myotis, cave myotis, long-legged myotis, Yuma myotis, big free-
3 tailed bat, and the greater western mastiff bat would be the same as described under subroute 2.1.

4 There would be no effect on these species habitat and no detectable effect on the viability of these species
5 by Project-related activities or contribution towards a downward population trend or listing of these
6 species as threatened or endangered. Acres of impacts are given in table 4.8-21.

7 **Construction**

8 The construction impact types to the Texas horned lizard, desert ornate box turtle, western burrowing owl,
9 loggerhead shrike, and bat species would be as described under subroute 2.1.

10 **Operation and Maintenance**

11 The operation and maintenance impact types and intensities to BLM sensitive species would be the same
12 as described under subroute 2.1.

13 ***State of New Mexico Wildlife Conservation Act Species***

14 Sixteen New Mexico Wildlife Conservation Act species were identified as possibly occurring in subroute
15 2.2. These would include the lowland leopard frog, Gila monster, Gila woodpecker, Bell's vireo, varied
16 bunting, Abert's towhee, Arizona grasshopper sparrow, northern aplomado falcon, peregrine falcon,
17 Lucifer hummingbird, desert bighorn sheep, and lesser long-nosed bat. Impacts on northern aplomado
18 falcon and lesser long-nosed bat are addressed above in the "Federally Listed Species" section and
19 lowland leopard frog addressed in the "BLM Sensitive Species" section. Impacts on the remaining 10
20 species are given below. Acres of impacts on these species are given in table 4.8-21.

21 Based on the amount of habitat for these species in the analysis area, there would be no detectable effect
22 on the viability of these species or contribution towards a downward population trend or listing of these
23 species as threatened or endangered.

24 **Construction**

25 Potential impacts on desert bighorn sheep and Gila monster would be as described above in for
26 subroute 2.1.

27 Potential impacts on State of New Mexico Wildlife Conservation Act bird species would be as described
28 above for subroute 2.1.

29 **Operation and Maintenance**

30 Potential operational and maintenance impacts on State of New Mexico Wildlife Conservation Act
31 species would be as described above for subroute 1.1.

32 ***State of Arizona Wildlife Species of Concern***

33 Eight Arizona listed Wildlife Species of Concern were identified as possible to occur in subroute 2.2. One
34 of these species, white-faced ibis, is addressed in the "BLM Sensitive Species" section. The other seven
35 species are addressed below. Acres of impacts on these species are given in table 4.8-21.

1 **Construction**

2 Potential impacts on Arizona listed Wildlife Species of Concern mammal species from the proposed
3 Project would be as described above for subroute 2.1. These species would include pocketed free-tailed
4 bat and western red bat. Based on the amount of habitat for these species in the analysis area it is not
5 anticipated that subroute 2.2 would cause any significant population-level impacts for these species or
6 contribution towards a downward population trend or listing of this species as threatened or endangered.

7 Potential impacts on Arizona listed Wildlife Species of Concern bird species from the proposed Project
8 would be as described above for subroute 2.1. Based on the amount of habitat for these species in the
9 analysis area it is not anticipated that subroute 2.2 would cause any significant population-level impacts
10 for these species or contribution towards a downward population trend or listing of this species as
11 threatened or endangered.

12 **Operation and Maintenance**

13 Potential operational and maintenance impacts on Arizona listed Wildlife Species of Concern species
14 would be as described above in subroute 2.1.

15 ***State of New Mexico Species of Greatest Conservation Need***

16 Seventeen New Mexico Species of Greatest Conservation Need were identified as possibly occurring in
17 subroute 2.2. Of these seven are addressed above (white-faced ibis and spotted bat are addressed in the
18 “BLM Sensitive Species” section and Bell’s vireo, Abert’s towhee, Gila woodpecker, peregrine falcon,
19 and desert bighorn sheep are addressed in the “State of New Mexico Wildlife Conservation Act Species”
20 section). The other 10 species are addressed below. Acres of impacts on these species are given in table
21 4.8-21.

22 Potential impacts on the western red bat, pocketed free-tailed bat, Species of Greatest Conservation Need
23 bird species and the Arizona toad would be as described for subroute 2.1. Based on the amount of habitat
24 for these species in the analysis area it is not anticipated that subroute 2.2 would cause any significant
25 population-level impacts for these species or contribution towards a downward population trend or listing
26 of this species as threatened or endangered.

27 ***State of Arizona Species of Greatest Conservation Need***

28 Ten Arizona Species of Greatest Conservation Need were identified as possibly occurring in subroute 2.2.
29 Of these 10 species, two are addressed above (the southwestern willow flycatcher is addressed in the
30 “Federally Listed Species” section and the spotted bat is addressed in the “BLM Sensitive Species”
31 section). The other eight species are addressed below. Acres of impacts are given in table 4.8-21.

32 **Construction**

33 Potential impacts on desert bighorn, Species of Greatest Conservation Need bird species, and Arizona
34 toad from the proposed Project would be as described above for subroute 2.1. Based on the amount of
35 habitat for these species in the analysis area it is not anticipated that subroute 2.2 would cause any
36 significant population-level impacts for these species or contribution towards a downward population
37 trend or listing of this species as threatened or endangered.

1 **Operation and Maintenance**

2 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
3 be as described above for subroute 2.1. Potential impacts on sandhill cranes would be from striking
4 transmission lines and structures could occur at Willcox Playa. Subroute 2.2 avoids crossing the daily
5 migration corridor between Willcox Playa and the agricultural fields to the east. This impact would be
6 mitigated with the use of line marking devices. This alignment would have a lower likelihood of
7 collisions of sandhill cranes and transmission lines/structures than subroute 2.1.

8 ***Migratory Birds***

9 Impacts on migratory birds would be as described above for subroute 1.1. Additional impacts on sandhill
10 crane and the many species of waterfowl, waders, and shorebirds documented at Willcox Playa. The risk
11 would be mitigated with use of line marking devices.

12 **Construction**

13 The ROW for subroute 2.2 contains a total of 50 acres of agricultural lands, found along segments P6a
14 (0.2 acre) and P6b (49.8 acres). 11.5 acres of agricultural lands would be disturbed.

15 A total of 2.3 acres of North America Warm Desert Riparian Mesquite Bosque would occur in the ROW
16 of subroute 2.2. The three segments with North America Warm Desert Riparian Mesquite Bosque would
17 be P5b (0.6 acre), P6a (1.2 acres), and P6b (0.5 acre) of which a total of 0.5 acre would be disturbed.

18 According to the National Wetlands Inventory, two wetlands totaling 111.8 acres occur within the ROW
19 along segment P7. These features would be associated mainly with the Willcox Playa (109.6 acres).
20 SWReGAP mapping indicates 0.6 acre of North America Arid West Emergent Marsh would occur in the
21 ROW along segment P6a and another 5 acres of this same land cover type along segment P6b. Proposed
22 structure locations should incorporate avoidance and BMPs to avoid any wetland, playa, and open water.
23 Construction of access roads would likely not impact these features within the ROW if avoidance
24 measures were incorporated and with the implementation of BMPs.

25 Subroute 2.2 would cross approximately 114.0 acres of the Lordsburg Playas avian protection area.
26 Approximately 26.2 acres of this area would be disturbed.

27 **Operation and Maintenance**

28 The habitats and land cover types mentioned above may harbor higher concentration of migratory birds
29 than surrounding areas, and may thus be associated with an elevated risk of collision events. However,
30 that risk is still unlikely to reach population-level impacts for most species.

31 The ROW for segment E crosses Powers Canyon, a low pass in the Peloncillo Mountains, raising the
32 possibility of somewhat higher impacts on migratory birds (see table 4.8-19).

33 ***Wildlife Special Designation Areas***

34 Impacts on Wildlife Special Designation Areas would be as described above for subroute 1.1.

35 **Construction**

36 Wildlife designated habitat for the desert bighorn sheep would occur within the ROW for subroute 2.2.
37 The desert bighorn habitat would occur on approximately 71.3 acres of the ROW. Desert bighorn habitat

1 areas are recognized as avoidance areas by the Mimbres RMP. Disturbance would occur on 16.4 acres of
2 the ROW.

3 Subroute 2.2 would cross two wildlife linkage areas: the Willcox Playa-Winchester-Pinaleño-Dos
4 Cabezas and the Pinaleño-Dos Cabezas-San Simon Valley PLZs. Impacts on linkages would occur on
5 approximately 1,573.5 acres of the ROW, of which approximately 361.9 acres would be disturbed.
6 Impacts on these linkages would be as described for the potential cougar corridor in route group 1.

7 **Operation and Maintenance**

8 Potential operation and maintenance impacts on desert bighorn habitat would be as described above for
9 subroute 2.1. Impacts on Special Designations, including desert bighorn habitat, are analyzed in section
10 4.12.

11 **LOCAL ALTERNATIVES**

12 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
13 4, LD4-Option 5, and WC1.

14 **General Wildlife**

15 Impacts on general wildlife species would be as described above for subroute 1.1. Acres of impacts on
16 general wildlife for the local alternatives are given in table 4.8-21.

17 **Construction**

18 Construction impacts from the local alternatives would be as described above for subroute 1.1. Based on
19 the amount of habitat for these species in the analysis area it is not anticipated that the eight local
20 alternatives would cause any significant population-level impacts for these species or contribute towards a
21 downward population trend or listing of this species as threatened or endangered.

22 **Operation and Maintenance**

23 Impacts from the operation and maintenance of the local alternatives would include those described above
24 for subroute 1.1.

25 **Special Status Species**

26 **Federally Listed Species**

27 **Construction**

28 Local alternative LD1 would cross and closely parallel I-10 throughout its length, as such it would
29 be unlikely that northern aplomado falcon or Sprague's pipit would occur in this alternative. The
30 construction impact types and intensities to northern aplomado falcon and Sprague's pipit would be the
31 same as described under subroute 2.1. In addition, because of a lack of perennial or intermittent water and
32 no designated critical habitat for Chiricahua leopard frog and southwestern willow flycatcher in local
33 alternative LD1, there would be no effect on these species' designated critical habitat and no detectable
34 effect on the viability of either of these species by Project-related activities. The construction impact types
35 and intensities to lesser long-nosed bat and Mexican long-nosed bat would be the same as described under
36 subroute 2.1.

1 The construction impact types and intensities to northern aplomado falcon and Sprague's pipit from local
2 alternative LD2 would be the same as described under subroute 2.1. In addition, because of a lack of
3 perennial or intermittent water and no designated critical habitat for Chiricahua leopard frog and
4 southwestern willow flycatcher in local alternative LD2, there would be no effect on these species'
5 designated critical habitat and no detectable effect on the viability of either of these species by Project-
6 related activities. The construction impact types and intensities to lesser long-nosed bat and Mexican
7 long-nosed bat would be the same as described under subroute 2.1.

8 The construction impact types and intensities to northern aplomado falcon and Sprague's pipit from local
9 alternative LD3a would be the same as described under subroute 2.1. In addition, because of a lack of
10 perennial or intermittent water and no designated critical habitat for Chiricahua leopard frog and
11 southwestern willow flycatcher in local alternative LD3a, there would be no effect on these species'
12 designated critical habitat and no detectable effect on the viability of either of these species by Project-
13 related activities. The construction impact types and intensities to lesser long-nosed bat and Mexican
14 long-nosed bat would be the same as described under subroute 2.1.

15 The construction impact types and intensities to northern aplomado falcon and Sprague's pipit from local
16 alternative LD3b would be the same as described under subroute 2.1. In addition, because of a lack of
17 perennial or intermittent water and no designated critical habitat for Chiricahua leopard frog and
18 southwestern willow flycatcher in local alternative LD3b, there would be no effect on these species'
19 designated critical habitat and no detectable effect on the viability of either of these species by Project-
20 related activities under local alternative LD3b.

21 The construction impact types and intensities from local alternative LD-4 to lesser long-nosed bat,
22 Mexican long-nosed bat would be the same as described under subroute 2.1. Sprague's pipit and northern
23 aplomado falcon habitat would be impacted through loss and fragmentation under this alternative.
24 In addition, because of a lack of perennial or intermittent water and no designated critical habitat for
25 Chiricahua leopard frog and southwestern willow flycatcher in local alternative LD4, there would be no
26 effect on these species' designated critical habitat and no detectable effect on the viability of either of
27 these species by Project-related activities. The construction impact types and intensities to lesser long-
28 nosed bat and Mexican long-nosed bat would be the same as described under subroute 2.1.

29 Construction impact types and intensities to northern aplomado falcon and Sprague's pipit for local
30 alternative LD4-Option 4 would be the same as described under subroute 2.1. In addition, because of a
31 lack of perennial or intermittent water and no designated critical habitat for Chiricahua leopard frog and
32 southwestern willow flycatcher in local alternative LD4-Option 4, there would be no effect on these
33 species' designated critical habitat and no detectable effect on the viability of either of these species by
34 Project-related activities. The construction impact types and intensities to lesser long-nosed bat and
35 Mexican long-nosed bat would be the same as described under subroute 2.1.

36 Construction impact types and intensities to northern aplomado falcon and Sprague's pipit for local
37 alternative LD4-Option 5 would be the same as described under subroute 2.1. In addition, because of a
38 lack of perennial or intermittent water and no designated critical habitat for Chiricahua leopard frog and
39 southwestern willow flycatcher in local alternative LD4-Option 5, there would be no effect on these
40 species' designated critical habitat and no detectable effect on the viability of either of these species by
41 Project-related activities. The construction impact types and intensities to lesser long-nosed bat and
42 Mexican long-nosed bat would be the same as described under subroute 2.1

43 Construction impact types and intensities to northern aplomado falcon and Sprague's pipit for local
44 alternative WC-1 would be the same as described under subroute 2.1. In addition, because of a lack of
45 perennial or intermittent water and no designated critical habitat for Chiricahua leopard frog and
46 southwestern willow flycatcher in local alternative WC1, there would be no effect on these species'

1 designated critical habitat and no detectable effect on the viability of either of these species from
2 Project-related activities. The construction impact types and intensities to lesser long-nosed bat and
3 Mexican long-nosed bat would be the same as described under subroute 2.1

4 **Operation and Maintenance**

5 The operation and maintenance impact types and intensities to Chiricahua leopard frog, southwestern
6 willow flycatcher, northern aplomado falcon, Sprague's pipit, lesser long-nosed bat, and Mexican long-
7 nosed bat would be the same for all the local alternatives (LD1, LD2, LD3a, LD3b, LD4, LD4-Option 4,
8 LD4-Option 5, and WC1) as described under subroute 2.1. There would be about the same chance for
9 impacts to northern aplomado falcons from striking the transmission lines and structures under any of the
10 local alternatives relative to the length of the local alternative.

11 ***BLM Sensitive Species***

12 The Project-related impact types and intensities to the BLM Sensitive Species Colorado River toad (also
13 known as Sonoran desert toad), lowland leopard frog, Texas horned lizard, desert ornate box turtle, New
14 Mexico population of the burrowing owl, loggerhead shrike, white-faced ibis, Mexican long-tongued bat,
15 pale Townsend's big-eared bat, spotted bat, Allen's big-eared bat, western small-footed myotis, little
16 brown myotis, fringed myotis, cave myotis, long-legged myotis, Yuma myotis, big free-tailed bat, and the
17 greater western mastiff bat would be the same as described under subroute 2.1 for all the local alternatives
18 (LD1, LD2, LD3a, LD3b, LD4, LD4-Option 4, LD4-Option 5, and WC1). Acres of impacts are given in
19 table 4.8-21. There would be no detectable effect on the viability of these species from Project-related
20 activities or contribution towards a downward population trend or listing of these species as threatened or
21 endangered.

22 **Construction**

23 Habitat for the Texas horned lizard, desert ornate box turtle, western burrowing owl, loggerhead shrike
24 and bat species would be impacted under local alternative LD1.

25 Under local alternative LD2 habitat for Texas horned lizard, desert ornate box turtle, western burrowing
26 owl, loggerhead shrike and bat species would be impacted.

27 Under local alternative LD3a habitat for the Texas horned lizard, western burrowing owl, loggerhead
28 shrike, and bat species would be impacted.

29 Under local alternative LD3b habitat for the Texas horned lizard, western burrowing owl, loggerhead
30 shrike, and bat species would be impacted.

31 Under local alternative LD4 habitat for the Texas horned lizard, desert ornate box turtle, western
32 burrowing owl, loggerhead shrike and bat species would be impacted.

33 Under local alternative LD4-Option 4 habitat for the Texas horned lizard, desert ornate box turtle, western
34 burrowing owl, loggerhead shrike, and bat species would be impacted.

35 Under local alternative LD4-Option 5 habitat for the Texas horned lizard, desert ornate box turtle, western
36 burrowing owl, loggerhead shrike and bat species would be impacted.

37 Under local alternative WC1 habitat for the Texas horned lizard, desert ornate box turtle, western
38 burrowing owl, loggerhead shrike, and bat species would be impacted.

1 **Operation and Maintenance**

2 The operation and maintenance impact types to BLM Sensitive Species would be the same as described
3 under subroute 2.1. The ROW length under all the local alternatives (LD1, LD2, LD3a, LD3b, LD4, LD4-
4 Option 4, LD4-Option 5, and WC1) would determine the relative chance for impacts to BLM sensitive
5 avian species from striking the transmission lines and structures.

6 ***State of New Mexico Wildlife Conservation Act Species***

7 Sixteen New Mexico Wildlife Conservation Act species were identified as possibly occurring on the local
8 alternatives. Impacts on northern aplomado falcon and lesser long-nosed bat are addressed above in
9 Federally Listed Species and lowland leopard frog is addressed above in BLM Sensitive Species.
10 The remaining 14 species are addressed below. Potential impacts for all local alternatives would be
11 similar in nature to those described for subroute 2.1. Acres of impacts are given in table 4.8-21. There
12 would be no detectable effect on the viability of these species from Project-related activities or
13 contribution towards a downward population trend or listing of these species as threatened or endangered.

14 **Construction**

15 Local alternative LD1 would intersect habitat for the Gila monster, Gila woodpecker, Bell’s vireo, varied
16 bunting, Abert’s towhee, Arizona grasshopper sparrow, peregrine falcon, Lucifer hummingbird, and
17 desert bighorn sheep.

18 Local alternative LD2 would intersect with habitat for Gila monster, Gila woodpecker, Bell’s vireo,
19 varied bunting, Abert’s towhee, Arizona grasshopper sparrow, peregrine falcon, Lucifer hummingbird,
20 and desert bighorn sheep.

21 Local alternative LD3a would intersect with habitat for Gila monster, Gila woodpecker, Bell’s vireo,
22 varied bunting, Abert’s towhee, Arizona grasshopper sparrow, peregrine falcon, Lucifer hummingbird,
23 and desert bighorn sheep.

24 Local alternative LD3b would intersect with habitat for Gila monster, Gila woodpecker, Bell’s vireo,
25 varied bunting, Abert’s towhee, Arizona grasshopper sparrow, peregrine falcon, Lucifer hummingbird,
26 and desert bighorn sheep.

27 Local alternative LD4 would intersect with habitat for Gila monster, Gila woodpecker, Bell’s vireo,
28 varied bunting, Abert’s towhee, Arizona grasshopper sparrow, peregrine falcon, Lucifer hummingbird,
29 and desert bighorn sheep.

30 Local alternatives LD4-Option 4, LD4-Option 5, and WC1 would not occur in New Mexico.

31 **Operation and Maintenance**

32 Potential operational and maintenance impacts on State of New Mexico Wildlife Conservation Act
33 species would be as described for subroute 2.1.

34 ***State of Arizona Wildlife Species of Concern***

35 Eight Arizona listed Wildlife Species of Concern were identified as possible to occur in the local
36 alternatives routes. One of these species, white-faced ibis is addressed in the “BLM Sensitive Species”
37 section. The other seven species are addressed below. Acres of impacts are given in table 4.8-21. There

1 would be no detectable effect on the viability of these species from Project-related activities or
2 contribution towards a downward population trend or listing of these species as threatened or endangered.

3 **Construction**

4 Local alternative LD1 would intersect habitat for pocketed free-tailed bat, western red bat, Bell's vireo,
5 Abert's towhee, Gila woodpecker, bank swallow, and yellow warbler.

6 Local alternative LD4 would intersect habitat for pocketed free-tailed bat, western red bat, Bell's vireo,
7 Abert's towhee, Gila woodpecker, bank swallow, and yellow warbler.

8 Local alternative LD4-Option 4 would intersect habitat for pocketed free-tailed bat, western red bat,
9 Bell's vireo, Abert's towhee, and Gila woodpecker.

10 Local alternative LD4-Option 5 would intersect habitat for pocketed free-tailed bat, western red bat,
11 Bell's vireo, Abert's towhee, and Gila woodpecker.

12 Local alternative WC1 would intersect habitat for pocketed free-tailed bat, Bell's vireo, Abert's towhee,
13 and Gila woodpecker.

14 **Operation and Maintenance**

15 Potential operational and maintenance impacts on Arizona listed Wildlife Species of Concern species
16 would be as described above for subroute 2.1.

17 ***State of New Mexico Species of Greatest Conservation Need***

18 Seventeen New Mexico Species of Greatest Conservation Need were identified as possibly occurring
19 within the local alternatives. Of these, seven are addressed above (white-faced ibis and spotted bat are
20 addressed in the "BLM Sensitive Species" section and Bell's vireo, Abert's towhee, Gila woodpecker,
21 peregrine falcon, and desert bighorn sheep are addressed in the "State of New Mexico Wildlife
22 Conservation Act Species" section). The other 10 species are addressed below. Impacts on these species
23 would be as previously described for subroute 2.1 with acreages of impacts given in table 4.8-21. There
24 would be no detectable effect on the viability of these species from Project-related activities or
25 contribution towards a downward population trend or listing of these species as threatened or endangered.

26 Local alternative LD1 would intersect with habitat for western red bat, pocketed free-tailed bat, northern
27 pintail, eared grebe, American bittern, northern harrier, sandhill crane, yellow warbler, bank swallow, and
28 Arizona toad. Habitat for American bittern and eared grebe would be avoided.

29 Local alternative LD2 could impact habitat for western red bat, pocketed free-tailed bat, northern harrier,
30 yellow warbler, and Arizona toad.

31 Local alternative LD3a would intersect habitat for western red bat, pocketed free-tailed bat, northern
32 harrier, yellow warbler, and Arizona toad.

33 Local alternative LD3b would intersect habitat for western red bat, pocketed free-tailed bat, northern
34 harrier, yellow warbler, and Arizona toad.

35 Local alternative LD4 would intersect habitat for western red bat, pocketed free-tailed bat, northern
36 pintail, eared grebe, American bittern, northern harrier, sandhill crane, yellow warbler, bank swallow, and
37 Arizona toad. No structures, access roads or other disturbance would occur in American bittern and eared
38 grebe habitat. Local alternatives LD4-Option 4, LD4-Option 5, and WC1 do not occur in New Mexico.

1 **State of Arizona Species of Greatest Conservation Need**

2 Ten Arizona Species of Greatest Conservation Need were identified as possibly occurring in the local
3 alternatives. Of these 10 species, two are addressed above (the southwestern willow flycatcher is
4 addressed in the “Federally Listed Species” section and the spotted bat is addressed in the “BLM
5 Sensitive Species” section). The other eight species are addressed below. Acreages of impacts on these
6 species are given in table 4.8-21. There would be no detectable effect on the viability of these species
7 from Project-related activities or contribution towards a downward population trend or listing of these
8 species as threatened or endangered.

9 **Construction**

10 Local alternative LD1 would intersect habitat for northern harrier, peregrine falcon, eared grebe, northern
11 pintail, sandhill crane, American bittern, and Arizona toad. No structures, access roads or other
12 disturbance would occur in American bittern and eared grebe habitat.

13 Local alternative LD4 would intersect habitat for desert bighorn sheep, northern harrier, peregrine falcon,
14 sandhill crane, American bittern, and Arizona toad. No structures, access roads or other disturbance
15 would occur in American bittern habitat.

16 Local alternative LD4-Option 4 would intersect habitat for northern harrier, peregrine falcon, and Arizona
17 toad.

18 Local alternative LD4-Option 5 would intersect habitat for northern harrier, peregrine falcon, and Arizona
19 toad.

20 Local alternative WC1 would intersect habitat for northern harrier, peregrine falcon, and Arizona toad.

21 Local alternative WC1 could also impact sandhill cranes at Willcox Playa. Potential impacts from striking
22 transmission lines and structures could occur at Willcox Playa. Local alternative WC1 would avoid
23 crossing the daily migration corridor between Willcox Playa and the agricultural fields to the east. This
24 alignment would have a lower likelihood of collisions of sandhill cranes and transmission lines/structures
25 than the corresponding segment of subroute 2.1.

26 **Operation and Maintenance**

27 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
28 be as described above for subroute 1.1.

29 **Migratory Birds**

30 Impacts on Migratory Birds from the local alternatives would be similar to those described above for
31 subroute 1.1.

32 **Construction**

33 A total of 69.3 acres of agricultural lands would occur within the analysis area for local alternative LD1,
34 of which approximately 15.9 acres would be disturbed. Also present in the analysis area for alternative
35 LD 1 would be 12.4 acres of North America Warm Desert Riparian Mesquite Bosque, of which 2.9 acres
36 would be disturbed. Local alternative LD1 would cross approximately 202.2 acres of the Lordsburg Playa
37 avian protection area. Approximately 46.5 acres of this area would be disturbed.

1 A total of 1.3 acres of agricultural lands would occur within the analysis area for local alternative LD4, of
2 which 0.3 acre would be disturbed. Also present in the analysis area for alternative LD4 would be 2.2
3 acres of North America Warm Desert Riparian Mesquite Bosque, of which 0.5 acre would be disturbed.

4 No wetlands or bodies of perennial water would occur in the analysis area for any of the local alternatives
5 according to the National Wetlands Inventory. However, SWReGAP mapping shows 13.5 acres of North
6 America Arid West Emergent Marsh for alternative LD1. Marsh areas would be avoided to the extent
7 possible.

8 **Operation and Maintenance**

9 The habitats and land cover types mentioned above may harbor higher concentration of migratory birds
10 than surrounding areas, and may thus be associated with an elevated risk of collision events. However,
11 that risk would still be unlikely to reach population-level impacts for most species.

12 The ROW for local alternative LD1 falls within approximately 0.1 mile of a ridge in the Peloncillo
13 Mountains (see table 4.8-22), raising the possibility of somewhat higher impacts on migratory birds.

14 **Wildlife Special Designation Areas**

15 Impacts on Wildlife Special Designation Areas would be as described for subroute 1.1 for all local
16 alternatives.

17 **Construction**

18 Local alternatives LD2 and LD4-Option4 would not cross any Wildlife Special Designation Areas.

19 Wildlife designated habitat for the northern aplomado falcon, desert bighorn sheep, and the Peloncillo
20 Bighorn Avoidance Area would occur within the ROW for local alternative LD1. The northern aplomado
21 habitat would occur on approximately 102.2 acres of which 23.5 would be disturbed. Desert bighorn
22 habitat would occur on approximately 41.5 acres of which 9.5 would be disturbed. Approximately 33.2
23 acres of the Peloncillo Bighorn Avoidance Area occur within the ROW. Of this area 7.6 acres would be
24 disturbed. Local alternative LD1 would cross the Willcox Playa-Winchester-Pinaleño-Dos Cabezas and
25 Pinaleño-Dos Cabezas-San Simon Valley PLZs on approximately 460.3 acres of which 105.9 acres would
26 be disturbed.

27 Local alternative LD3b would cross approximately 3.5 acres of desert bighorn habitat, of which 0.8 acre
28 would be disturbed.

29 Local alternative LD4 would cross the Willcox Playa-Winchester-Pinaleño-Dos Cabezas and Pinaleño-
30 Dos Cabezas-San Simon Valley, and the Pinaleno- San Simon Valley PLZs on approximately 311.7 acres
31 of which 71.7 acres would be disturbed.

32 Local alternative LD4-Option 5 would cross the Willcox Playa-Winchester-Pinaleño-Dos Cabezas and
33 Pinaleño-Dos Cabezas-San Simon Valley PLZs on approximately 296.8 acres of which 68.3 acres would
34 be disturbed.

35 Local alternative WC-1 would cross the Willcox Playa-Winchester-Pinaleño-Dos Cabezas PLZ on
36 approximately 355.2 acres of the ROW, of which approximately 81.7 acres would be disturbed. It would
37 also cross approximately 2.2 acres of the Willcox Playa/Lake Cochise I Important Bird Area, of which 0.5
38 acre would be disturbed.

1 **Operation and Maintenance**

2 Potential operation and maintenance impacts on desert bighorn habitat and the Peloncillo Bighorn
 3 Avoidance Area would be as described above for subroute 1.1. Potential operation and maintenance
 4 impacts on northern aplomado falcon would be as described above for subroute 2.1. Impacts on Special
 5 Designations, including designated northern aplomado falcon habitat, are analyzed in section 4.12.

6 **Route Group 3 – Apache Substation to Pantano Substation**

7 Tables 4.8-23 and 4.8-24 show impact acreages by habitat type for route group 3.

8 **Table 4.8-23.** Route Group 3 Wildlife Resource Inventory Data

Habitat Type	Subroute 3.1 (acres)	Local Alternative H (acres)
Agriculture	29.3	9.3
Apacherian-Chihuahuan Mesquite Upland Scrub	407.8	198.1
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	255.8	62.8
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	132.3	38.3
Chihuahuan Mixed Salt Desert Scrub	38.4	35.3
Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub	-	0.6
Developed, Medium - High Intensity	60.8	1.7
Developed, Open Space- Low Intensity	25.2	-
Madrean Encinal	0.3	1.3
Mogollon Chaparral	3.8	-
North American Arid West Emergent Marsh	3.4	-
North American Warm Desert Bedrock Cliff and Outcrop	3.6	-
North American Warm Desert Riparian Mesquite Bosque	1.9	2.8
Open Water	0.7	-
Sonora-Mojave Creosotebush-White Bursage Desert Scrub	90.3	-
Sonoran Mid-Elevation Desert Scrub	14.1	-
Sonoran Paloverde-Mixed Cacti Desert Scrub	210.7	-

9 **Table 4.8-24.** Route Group 3 Wildlife Resource Inventory Data for Substations and Staging Areas

Habitat Type	Subroute 3.1 (acres)	Local Alternative H (acres)
Apacherian-Chihuahuan Mesquite Upland Scrub	0.2	-
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	25.0	-
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	0.3	-

10 Table 4.8-25 gives the acreages of impacts on general wildlife and special status species for route
 11 group 3.

1

Table 4.8-25. Route Group 3 Acres of Impacts on Wildlife

Common name	Subroute 3.1	Local Alt H
General Wildlife	376.3	98.1
Federally Listed Species		
Lesser long-nosed bat	323.4	94.6
Mexican long-nosed bat	323.4	94.6
Southwestern willow flycatcher	0	0
Sprague's pipit	50.3	17.9
Western yellow-billed cuckoo	0	0
Northern Mexican gartersnake	0	0
Sonoran desert tortoise	250.8	77.1
Gila chub	0	0
BLM Sensitive Species		
Allen's big-eared bat	0.5	0.8
Arizona myotis	0	0
Banner-tailed kangaroo rat	71.6	17.6
California leaf-nosed bat	136.1	20.8
Cave myotis	125.3	10.7
Greater western mastiff bat	88.3	0
Mexican long-tongued bat	250.3	76.2
Pale Townsend's big-eared bat	250.3	76.2
Spotted bat	250.8	77.0
American peregrine falcon	323.4	94.6
Arizona grasshopper sparrow	159.9	17.6
Bald eagle	323.4	94.6
Desert purple martin	88.8	0.8
Gilded flicker	88.8	0.8
Golden eagle	323.4	94.6
Western burrowing owl	321.9	93.9
Arizona striped whiptail	71.6	17.6
Desert ornate box turtle	233.6	93.8
Sonoran mud turtle	0	0
Lowland leopard frog	0	0
Coronado National Forest Sensitive Species		
Cockrum's desert shrew	1.2	-
Greater western mastiff bat	2.5	-
Hooded skunk	2.5	-
Northern pygmy mouse	2.5	-
Pale Townsend's big-eared bat	2.5	-
Plains harvest mouse	2.0	-
Yellow-nosed cotton rat	2.0	-

1

Table 4.8-25. Route Group 3 Acres of Impacts on Wildlife (Continued)

Common name	Subroute 3.1	Local Alt H
Coronado National Forest Sensitive Species, cont'd.		
Abert's towhee	1.2	-
American peregrine falcon	2.5	-
Arizona grasshopper sparrow	2.0	-
Western burrowing owl	2.5	-
Reticulate Gila monster	2.5	-
Coronado National Forest Management Indicator Species		
White-tailed deer	2.5	-
American peregrine falcon	2.5	-
Bell's vireo	1.2	-
State of Arizona Wildlife Species of Concern		
Antelope jackrabbit	166.9	17.6
Harris' antelope squirrel	136.1	20.8
Mexican free-tailed bat	136.1	20.8
Common nighthawk	394.1	22.0
Dusky-capped flycatcher	1.2	0.4
Gila woodpecker	308.7	76.7
Rufous-winged sparrow	72.2	18.4
Savannah sparrow	71.6	17.6
Yellow warbler	1.5	1.2
Hooded nightsnake	324.9	95.0
Desert ornate box turtle	207.7	38.2
Regal horned lizard	214.8	38.4
Sonoran coral snake	207.7	38.2
Sonoran whipsnake	167.9	17.5
Tiger rattlesnake	250.3	34.0
State of Arizona Species of Greatest Conservation Need		
American bittern	0	0
Lincoln's sparrow	9.9	4.3
Mississippi kite	1.9	1.1
Western grasshopper sparrow	80.0	11.2
Wood duck	0	-

2

1 **SUBROUTE 3.1 – PROPONENT PREFERRED**

2 **General Wildlife**

3 ***Construction***

4 Impacts on general wildlife species would be as described above for subroute 1.1. However, as the
5 analysis area has been previously disturbed for the existing transmission line and access roads the scope
6 of impacts would be less than for route groups 1 and 2. Disturbance to wildlife habitat would occur on
7 approximately 28 percent of the analysis area in route groups 3 and 4. Acreages of impacts on general
8 wildlife habitat are given in table 4.8-25. Based on the amount of habitat for general wildlife in the
9 analysis area it is not anticipated that subroute 2.2 would cause any significant population-level impacts
10 for these species or contribute towards a downward population trend or listing of these species as
11 threatened or endangered.

12 ***Operation and Maintenance***

13 Impacts from the operation and maintenance of subroute 3.1 would be as described above for
14 subroute 1.1.

15 **Special Status Species**

16 ***Federally Listed Species***

17 Within this route group, seven species were identified as having the potential to occur because the
18 analysis area would be within their ranges and habitat parameters would be present: the lesser long-nosed
19 bat, Mexican long-nosed bat, northern Mexican gartersnake, Sonoran desert tortoise, southwestern willow
20 flycatcher, Sprague’s pipit, and western yellow-billed cuckoo. In addition, designated critical habitat for
21 the Gila chub (*Gila intermedia*) occurs downstream of the Project along Cienega Creek and north of I-10.
22 While there is no habitat for the Gila chub in the analysis area, impacts could occur that would affect the
23 species’ designated critical habitat. Potential impacts to these species are discussed below. Acreages of
24 impacts on these species are given in table 4.8-25.

25 In addition, six other species, the California least tern (*Sterna antillarum browni*), Chiricahua leopard
26 frog, Gila topminnow (*Poeciliopsis occidentalis occidentalis*), jaguar (*Panthera onca*), Mexican spotted
27 owl (*Strix occidentalis lucida*), and ocelot, could also occur but would be considered unlikely to occur
28 because although habitat parameters may be present, the analysis area within this route group would not
29 be within the species’ typical range or vice versa (i.e., the route group would be within the known range,
30 but habitat parameters would not be present). Therefore the Project activities in the Apache to Pantano
31 route group would have no effect to the populations of California least tern, Chiricahua leopard frog, Gila
32 topminnow, jaguar, or ocelot.

33 ***Construction***

34 Construction-related impacts would be similar to those described for route groups 1 and 2. However, as
35 the ROW has been previously disturbed for the existing transmission line and access roads the scope of
36 impacts would be less than for route groups 1 and 2.

37 Potential impacts on the lesser long-nosed bat and Mexican long-nosed bat from construction activities
38 would include foraging habitat loss and disturbance. Habitat for these species along subroute 3.1 is within
39 40 miles of a known roost site and is therefore within the foraging range of the species. However, there
40 would be no roost sites in the ROW that would provide shelter for this species. Habitat disturbance would

1 result in fragmentation of foraging areas for this bat species. Based on the amount of available foraging
2 habitat in the analysis area, construction-related activities would have no detectable effect on the viability
3 of this species.

4 Potential impacts on northern Mexican gartersnake from construction-related activities would include
5 those described above as common to all reptile species. The ROW would cross northern Mexican
6 gartersnake proposed critical habitat at two locations; approximately 1,550 feet across the San Pedro
7 River in segment U2 and approximately 1,280 feet across Cienega Creek at Empirita Ranch in segment
8 U3a. As siting of structures would be done to avoid critical habitat and riparian habitat, no disturbance
9 would occur in the riparian area, and access would come from outside of habitat and proposed critical
10 habitat for the species, construction-related impacts would avoid impacts on this species' and its proposed
11 critical habitat.

12 Potential impacts on Sonoran desert tortoise from construction-related activities would include those
13 described above as common to all reptile species. However, route group 3.1 would not intersect with any
14 BLM designated category of desert tortoise habitat. Based on the amount of available Sonoran desert
15 tortoise habitat in the analysis area, there would be no detectable effect on the viability of this species or
16 that would contribute towards a downward population trend or listing of this species as threatened or
17 endangered.

18 Potential impacts on southwestern willow flycatcher from construction activities in this subroute group
19 would include those described above as common to all bird species. However, there would be no
20 perennial or intermittent waterways in this subroute that would provide appropriate vegetation structure
21 for nesting habitat for this species and this subroute group would not intersect with any designated critical
22 habitat for this species. Foraging and migratory habitat for the species along the San Pedro River and
23 Cienega Creek would be spanned and no Project-related ground disturbance would occur in those areas.
24 Based on the lack of nesting habitat, the mobility of the species, and mitigation to avoid impacting
25 riparian habitat construction-related activities would have no detectable effect on individuals or the
26 viability of this species.

27 Potential impacts on Sprague's pipit from construction activities would include those described for
28 subroute 1.1. Based on the amount of habitat in the analysis area there would be no detectable effect on
29 the viability of this species or contribution towards a downward population trend or listing of this species
30 as threatened or endangered.

31 Potential impacts on western yellow-billed cuckoo from construction activities in this subroute group
32 would include those described above as common to all bird species. However, there would be no large
33 cottonwood and willow galleries that would provide nesting habitat for this species in the area to be
34 disturbed. Foraging and migratory habitat for the species along the San Pedro River and Cienega Creek
35 would be spanned and no Project-related ground disturbance would occur in those areas. Based on the
36 lack of nesting habitat, no impacts to foraging and migratory habitat, and the mobility of the species,
37 construction-related activities would have no detectable effect on individuals or the viability of this
38 species or contribution towards a downward population trend or listing of this species as threatened or
39 endangered.

40 Potential impacts on Gila chub designated critical habitat could include increased sedimentation levels
41 downstream from the Project. As the proposed ground-disturbing activities would not occur within the
42 area of riparian vegetation along Cienega Creek, no equipment would be used in the riparian area, access
43 roads would avoid the riparian area and approach Cienega Creek from both sides of the creek, and erosion
44 control measures would be in place there would be no Project-related sedimentation or channel alterations
45 at Cienega Creek that could impact designated critical habitat for the Gila chub. Therefore, there would be
46 no impacts on designated critical habitat for the Gila chub.

1 **Operation and Maintenance**

2 There would likely not be operational or maintenance impacts to lesser long-nosed bats and Mexican
3 long-nosed bats or their habitat under this subroute group.

4 There would likely not be operational or maintenance impacts to individual Sonoran desert tortoise or to
5 any populations of Sonoran desert tortoise or habitat under this subroute group.

6 There would likely not be operational or maintenance impacts to individual northern Mexican gartersnake
7 or to any populations of northern Mexican gartersnake or habitat under this subroute group.

8 There would likely not be operational or maintenance impacts to individual southwestern willow
9 flycatchers or to any populations of southwestern willow flycatchers or designated critical habitat under
10 this subroute group.

11 Potential impacts on Sprague’s pipit from operation and maintenance activities would include those
12 described above for subroute 1.1. There would be no operational or maintenance impacts to Sprague’s
13 pipit winter or migratory habitat. Therefore, there would be no detectable effect on the viability of this
14 species or contribution towards a downward population trend or listing of this species as threatened or
15 endangered.

16 Potential impacts on western yellow-billed cuckoo from operation and maintenance activities would
17 include those described above as common to all bird species. There would be no operational or
18 maintenance impacts to western yellow-billed cuckoo habitat. Individuals may experience impacts
19 common to migratory birds during migration as they move through the subroute group during
20 construction with the potential for strikes to transmission lines and structures (see migratory species
21 impacts described below). However, given the size and mobility of this species, it would be anticipated to
22 be a very low potential for collisions. Therefore, there would be no detectable effects on the viability of
23 the western yellow-billed cuckoo or contribution towards a downward population trend or listing of this
24 species as threatened or endangered.

25 ***BLM Sensitive Species***

26 Of the 45 species listed as BLM Sensitive Species for this region (the Gila District), 21 species were
27 identified as having the potential to occur because the analysis area would be within the species’ range
28 and habitat parameters would be present. These species include the lowland leopard frog, Arizona striped
29 whiptail (*Aspidoscelis arizonae*), Sonoran mud turtle (*Kinosternon sonoriense sonoriense*), desert ornate
30 box turtle, Arizona grasshopper sparrow, western burrowing owl, golden eagle, gilded flicker (*Colaptes*
31 *chrysoides*), American peregrine falcon, bald eagle, desert purple martin (*Progne subis hesperia*),
32 Mexican long-tongued bat, pale Townsend’s big-eared bat, banner-tailed kangaroo rat (*Dipodomys*
33 *spectabilis*), spotted bat, greater western mastiff bat, Allen’s big-eared bat, California leaf-nosed bat,
34 Arizona myotis (*Myotis occultus*), and cave myotis. Mexican long-tongued bat is addressed above in the
35 “Federally Listed Species” section.

36 In addition, five other species—longfin dace, Slevin’s bunchgrass lizard, Arizona Botteri’s sparrow
37 (*Aimophila botterii arizonae*), the ferruginous hawk, and the black-tailed prairie dog—could also occur
38 but would be considered unlikely to occur because either habitat parameters would be present
39 (e.g., healthy grasslands for black-tailed prairie dog), but the analysis area within this route group would
40 not be within the species’ typical range, or the analysis area would be within the species’ typical range,
41 but habitat parameters would not be present (e.g., perennial streams for longfin dace). There would be no
42 effect on these species’ habitat and no detectable effect on the viability of these species from Project-

1 related activities or that would contribute towards a downward population trend or listing of these species
2 as threatened or endangered.

3 **Construction**

4 Construction-related impacts would be similar to those described for route groups 1 and 2. However, as
5 the ROW has been previously disturbed for the existing transmission line and access roads the scope of
6 impacts would be less than for route groups 1 and 2. Acres of impacts are given in table 4.8-25.

7 Potential impacts on lowland leopard frog from construction activities would include those described
8 above as common to all amphibian species. However, there would be no perennial waterways in this
9 subroute and pole structures and laydown areas would not be placed in ephemeral or intermittent
10 waterways that could provide dispersal habitats for toads or frogs. There would be no impacts on these
11 species' habitat and no detectable effect on the viability of these species by Project-related activities or
12 that would contribute towards a downward population trend or listing of these species as threatened or
13 endangered.

14 Potential impacts on Arizona striped whiptail, Sonoran mud turtle, and desert ornate box turtle from
15 construction-related activities would include those described above as common to all reptile species.
16 Construction-related impacts would be temporary and negligible to the species and consist of a small
17 detectable long-term disturbance of the species' habitat. Based on the amount of available reptile habitat
18 in the analysis area, there would be no detectable effect on the viability of these species or contribution
19 towards a downward population trend or listing of any of these species as threatened or endangered.

20 Potential impacts on Arizona grasshopper sparrow, western burrowing owl, golden eagle, gilded flicker,
21 American peregrine falcon, bald eagle, and desert purple martin from construction activities in this
22 subroute group would include those described above as common to all bird species. Based on the amount
23 of available bird nesting habitat in the analysis area, construction-related activities would have no
24 detectable effect on the viability of any of these bird species or contribute towards a downward population
25 trend or listing of the species as threatened or endangered.

26 Potential impacts on the banner kangaroo rat from construction-related activities would include those
27 described above as common to all mammal species. Based on the amount of available small mammal
28 habitat in the analysis area, there would be no detectable effect on the viability of this species or
29 contribution towards a downward population trend or listing of this species as threatened or endangered.

30 Potential impacts on the eight bat species noted above from construction activities would include those
31 described above for subroute 1.1. However, there would be no roost or nest sites in the Project footprint
32 that would provide shelter for these species. Based on the amount of available foraging habitat in the
33 analysis area, construction-related activities would have no detectable effect on the viability of these
34 species or to contribute towards a downward population trend or listing of these species as threatened or
35 endangered.

36 **Operation and Maintenance**

37 Potential impacts from operation and maintenance activities to the western burrowing owl, golden eagle,
38 gilded flicker, American peregrine falcon, bald eagle, and desert purple martin would be related to the
39 potential for individuals striking the transmission lines and structures.

40 Mexican long-tongued bat, pale Townsend's big-eared bat, spotted bat, greater western mastiff bat,
41 Allen's big-eared bat, California leaf-nosed bat, Arizona myotis, cave myotis, plains leopard frog,
42 lowland leopard frog, Sonoran green toad, Arizona striped whiptail, Sonoran mud turtle, desert ornate box

1 turtle, and banner-tailed kangaroo rat would likely not experience operational or maintenance impacts
2 detectable at the population level or contribute to a downward population trend or listing of these species
3 as threatened or endangered.

4 **Coronado National Forest Sensitive Species and Management Indicator Species**

5 **Coronado National Forest Sensitive Species**

6 The area of the Coronado National Forest that would be crossed by subroute 3.1 would be approximately
7 0.5 mile in length and would follow the route of the existing transmission line. Of the 87 species listed as
8 USFS sensitive in Coronado National Forest, 12 are identified as possible to occur because the analysis
9 area would be within their ranges and habitat parameters would be present. These species include the
10 reticulate Gila monster (*Heloderma suspectum suspectum*), Arizona grasshopper sparrow, western
11 burrowing owl, American peregrine falcon, Abert's towhee, northern pygmy mouse (*Baiomys taylori*
12 *ater*), pale Townsend's big-eared bat, greater western mastiff bat, hooded skunk (*Mephitis macroura*
13 *milleri*), Cockrum's desert shrew (*Notiosorex cockrumi*), plains harvest mouse (*Reithrodontomys*
14 *montanus*), and yellow-nosed cotton rat.

15 For all other sensitive species the analysis area would be either outside of the known range, would not
16 contain habitat or both. There would be no effect on these species habitat and no detectable effect on the
17 viability of these species from Project-related activities or that would contribute towards a downward
18 population trend or listing of these species as threatened or endangered.

19 *Construction*

20 Construction-related impacts would be similar to those described for route groups 1 and 2. However, as
21 the ROW has been previously disturbed for the existing transmission line and access roads and the area of
22 Coronado National Forest to be crossed is only 0.5 mile in length, the scope of impacts would be
23 minimal. Acres of impacts are given in table 4.8-25.

24 Potential impacts to the reticulate Gila monster would include those described above as common to all
25 reptile species. Gila monsters shelter in burrows and rock outcrops for shade and as winter hibernacula
26 and would be susceptible to being crushed by construction equipment. These construction-related impacts
27 would be temporary to individuals and consist of a small detectable long-term effect to this species'
28 habitat within Coronado National Forest. Based on the amount of available reticulate Gila monster habitat
29 in the analysis area, there would be no detectable effect on the viability of this species or contribution
30 towards a downward population trend or listing of this species as threatened or endangered.

31 Potential impacts to the Arizona grasshopper sparrow from construction activities in this subroute group
32 would include those described above as common to all bird species. These construction-related impacts
33 would be temporary to individuals and consist of a small detectable long-term effect to this species'
34 habitat within the Coronado National Forest. Based on the amount of available habitat in the analysis
35 area, there would be no detectable effect on the viability of this species or to contribute towards a
36 downward population trend or listing of this species as threatened or endangered.

37 Potential impacts on Abert's towhee, American peregrine falcon, and western burrowing owl from
38 construction activities in this subroute group would be as described above for subroute 1.1. Based on the
39 amount of available western burrowing owl habitat in the analysis area, construction-related activities
40 would have no detectable effect on the viability of this species or contribute towards a downward
41 population trend or listing of this species as threatened or endangered.

1 Potential impacts from construction activities on the northern pygmy mouse, Cockrum's desert shrew,
2 plains harvest mouse, yellow-nosed cotton rat, and hooded skunk would include those described as
3 common to all mammals. Based on the amount of available habitat for these species in the analysis area,
4 there would be no detectable effect on the viability of these species or contribution towards a downward
5 population trend or listing of these species as threatened or endangered.

6 Potential impacts from construction on the pale Townsend's big-eared bat and the greater western mastiff
7 bat would include habitat disturbance. It is unlikely that construction would impact any roost sites as the
8 pale Townsend's big-eared bat typically roosts in abandoned mines and buildings (AGFD 2003) and the
9 greater western mastiff bat roosts in horizontal crevices usually in steep canyon walls (AGFD 2002).
10 If roost sites were present in construction areas there would be the possibility that bats could be flushed.
11 Based on the lack of roost sites and the amount of available habitat for these species in the analysis area,
12 there would be no detectable effect on the viability of this species or contribution towards a downward
13 population trend or listing of this species as threatened or endangered.

14 *Operation and Maintenance*

15 Potential impacts from operation and maintenance activities to the Arizona grasshopper sparrow,
16 American peregrine falcon, and Abert's towhee would be related to individuals striking the transmission
17 lines and structures. Additionally, transmission structures may provide roosting sites for bat species.
18 Transmission structures may increase the presence of avian predators, primarily raptors and ravens, in the
19 analysis area and increase predation on the northern pygmy mouse, Cockrum's desert shrew, plains
20 harvest mouse, and yellow-nose cotton rat. Reticulate Gila monster, western burrowing owl, hooded
21 skunk, and the bat species would likely not experience operational and maintenance impacts detectable at
22 the population level.

23 **Coronado National Forest Management Indicator Species**

24 Coronado National Forest lists 33 species in total, as well as general groups of primary and secondary
25 cavity nesters, as management indicator species across eight management groups. MIS are "Plant and
26 animal species, communities or special habitats selected for emphasis in planning, and which are
27 monitored during forest plan implementation in order to assess the effects of management activities on
28 their populations and the populations of other species with similar habitat needs which they may
29 represent" (FSM 2620.5). Based on range and habitat, three MIS are identified as possible to occur within
30 the analysis area. These species include Bell's vireo, American peregrine falcon, and white-tailed deer
31 (*Odocoileus virginianus couesi*). For all other MIS the analysis area would be either outside of the
32 species' known range, would not contain habitat for the species, or both.

33 **Construction**

34 Bell's vireo is an indicator species in the riparian species, species needing dense canopy, and threatened
35 and endangered species management groups. Potential impacts on Bell's vireo from construction
36 activities include those described above as common to all bird species. Based on the amount of available
37 Bell's vireo habitat in the analysis area, there would be no detectable effect on the viability of this species
38 or contribution towards a downward population trend or listing of this species as threatened or
39 endangered.

40 The American peregrine falcon is an indicator species in the threatened and endangered management
41 group. Potential impacts from construction activities on the American peregrine falcon would be as
42 described above for the Coronado National Forest sensitive species.

1 The white-tailed deer is an indicator species in the species needing diversity, species needing herbaceous
2 cover, and game species management groups. Potential impacts from construction activities on the white-
3 tailed deer include those described above as common to all species with collisions, habitat loss, and
4 habitat fragmentation being the most likely to occur. Based on the amount of available white-tailed deer
5 habitat in the analysis area, there would be no detectable effect on the viability of this species or
6 contribution towards a downward population trend or listing of this species as threatened or endangered.

7 **Operation and Maintenance**

8 Potential impacts from operation and maintenance activities to Bell's vireo and the American peregrine
9 falcon would be related to individuals striking the transmission lines and structures. White-tailed deer
10 would likely not experience operational and maintenance impacts detectable at the population level.

11 **State of Arizona Wildlife Species of Concern**

12 In total, 15 Wildlife Species of Concern were identified as possible to occur because the analysis area
13 would be within the species' range and habitat parameters for the species would be present. These species
14 include antelope jackrabbit (*Lepus alleni*), common nighthawk (*Chordeiles minor*), dusky-capped
15 flycatcher (*Myiarchus tuberculifer*), Gila woodpecker, Harris' antelope squirrel (*Ammospermophilus*
16 *harrisi*), hooded nightsnake (*Hypsiglena* sp. nov.), Mexican free-tailed bat (*Tadarida brasiliensis*), desert
17 ornate box turtle, regal horned lizard (*Phrynosoma solare*), rufous-winged sparrow (*Aimophila carpalis*),
18 savannah sparrow (*Passerculus sandwichensis*), Sonoran coral snake (*Micruroides euryxanthus*), Sonoran
19 whipsnake (*Coluber bilineatus*), tiger rattlesnake (*Crotalus willardi obscurus*), and yellow warbler. Acres
20 of impacts on these species are given in table 4.8-25.

21 Six additional Wildlife Species of Concern—white-tailed deer, kit fox (*Vulpes macrotis*), American
22 beaver (*Castor canadensis*), northern rock mouse (*Peromyscus nasutus*), banded rock rattlesnake
23 (*Crotalus lepidus klauberi*), and Sonoran Desert toad (*Incilius alvarius*)— would be unlikely to occur
24 within the analysis area because it would be either outside of the species' known range, would not contain
25 habitat for the species, or both. There would be no effect on these species' habitat and no detectable effect
26 on the viability of these species by Project-related activities or that would contribute towards a downward
27 population trend or listing of these species as threatened or endangered.

28 **Construction**

29 Potential impacts from construction on antelope jackrabbit and Harris' antelope squirrel include those
30 described as common to all mammals. Based on the amount of available habitat for these two species in
31 the analysis area, there would be no detectable effect on the viability of these species and it would not
32 contribute towards a downward population trend or listing of these species as threatened or endangered.

33 Potential impacts on common nighthawk, dusky-capped flycatcher, Gila woodpecker, rufous-winged
34 sparrow, savannah sparrow, and yellow warbler from construction activities would include those
35 described above as common to all bird species. Based on the amount of available foraging and breeding
36 habitat in the analysis area, construction-related activities would have no detectable effect on the viability
37 of these species and it would not contribute towards a downward population trend or listing of these
38 species as threatened or endangered.

39 Potential impacts on Mexican free-tailed bat from construction activities would include habitat
40 disturbance. Based on the amount of available foraging and breeding habitat in the analysis area,
41 construction-related activities would have no detectable effect on the viability of these species and would
42 not contribute towards a downward population trend or listing of these species as threatened or
43 endangered.

1 Potential impacts to the desert ornate box turtle, hooded nightsnake, regal horned lizard, Sonoran
2 coralsnake, Sonoran whipsnake, and tiger rattlesnake from construction activities would include those
3 described above as common to all reptile species. Based on the amount of available habitat in the analysis
4 area, there would be no detectable effect on the viability of these species and no contribution towards a
5 downward population trend or listing of these species as threatened or endangered.

6 **Operation and Maintenance**

7 Potential impacts from operation and maintenance activities to the common nighthawk, dusky-capped
8 flycatcher, Gila woodpecker, rufous-winged sparrow, savannah sparrow, and yellow warbler would be
9 related to individuals striking the transmission conductors. Additional impacts may occur to antelope
10 jackrabbit, Harris' antelope squirrel, ornate box turtle, regal horned lizard, Sonoran coralsnake, Sonoran
11 whipsnake, and tiger rattlesnake due to increased predation from raptors hunting from transmission lines
12 and structures. No operation or maintenance impacts are expected for the Mexican free-tailed bat.

13 **State of Arizona Species of Greatest Conservation Need**

14 In total, five Species of Greatest Conservation Need were identified as possible to occur because the
15 analysis area would be within the species' range and habitat parameters for the species would be present.
16 These species include American bittern, Lincoln's sparrow (*Melospiza lincolni*), Mississippi kite, western
17 grasshopper sparrow (*Ammodramus savannarum perpallidus*), and wood duck (*Aix sponsa*). Acres of
18 impacts on these species are given in table 4.8-25.

19 Two additional Species of Greatest Conservation Need, southern pocket gopher (*Thomomys umbrinus*),
20 and sulphur-bellied flycatcher (*Myiodynastes luteiventris*) would be unlikely to occur within the analysis
21 area because it would be either outside of the species' known range, would not contain habitat for the
22 species, or both. There would be no effect on this species' habitat and no detectable effect on the viability
23 of this species by Project-related activities or contribution towards a downward population trend or listing
24 of this species as threatened or endangered.

25 **Construction**

26 Construction-related impacts would be similar to those described for route groups 1 and 2. However, as
27 the ROW has been previously disturbed for the existing transmission line and access roads, the scope of
28 impacts would be less than for route groups 1 and 2. There would be no effect on the viability of this
29 species by Project-related activities or that would contribute towards a downward population trend or
30 listing of this species as threatened or endangered.

31 Potential impacts on American bittern, Lincoln's sparrow, Mississippi kite, western grasshopper sparrow,
32 and wood duck from construction activities would include habitat disturbance and those described above
33 as common to all bird species.

34 **Operation and Maintenance**

35 Potential impacts from operation and maintenance activities to the American bittern, Lincoln's sparrow,
36 Mississippi kite, western grasshopper sparrow, and wood duck would be related to individuals striking the
37 transmission lines and structures. There would be no detectable effect on the viability of these species by
38 Project-related activities or contribution towards a downward population trend or listing of this species as
39 threatened or endangered.

40

1 **Migratory Birds**

2 Impacts on migratory birds would be as previously described for subroute 1.1.

3 **Construction**

4 Construction-related impacts would be similar to those described for route groups 1 and 2. However, as
5 the ROW has been previously disturbed for the existing transmission line and access roads, the scope of
6 impacts would be less than for route groups 1 and 2.

7 The ROW for subroute 3.1 contains a total of 29.3 acres of agricultural lands, found along segments U1a
8 and U2, of which 8.2 acres would be disturbed.

9 A total of 1.9 acres of North America Warm Desert Riparian Mesquite Bosque would occur in the ROW
10 of subroute 3.1, of which approximately 0.5 acre would be disturbed. The two segments with North
11 America Warm Desert Riparian Mesquite Bosque would be U1a (0.3 acre) and U3a (1.6 acres).

12 According to the National Wetlands Inventory, 157 feet of perennial water and two wetlands totaling 3.05
13 acres occur within the ROW along segment U2. SWReGAP mapping indicates 3.4 acres of North
14 American Arid West Emergent Marsh and 0.7 acre of open water along U2. The body of perennial water
15 and wetlands mapped within the ROW for subroute 3.1 would be located along the San Pedro River.
16 Construction-related impacts to the river and associated wetlands would be related to the construction of
17 the transmission line structures and temporary access roads.

18 Proposed structure locations would incorporate avoidance and BMPs to avoid any wetland and open
19 water. Construction of access roads would likely not impact the San Pedro River and Cienega Creek
20 within the ROW and downstream with the incorporation of avoidance measures and BMP
21 implementation.

22 **Operation and Maintenance**

23 The land cover types above may harbor higher concentration of migratory birds than surrounding areas,
24 and may thus be associated with an elevated risk of collision events. That risk would still be unlikely to
25 reach population-level impacts for all species, but the risk of collision for migratory birds would likely be
26 influenced by the exact placement of the San Pedro River and Cienega Creek crossings.

27 Table 4.8-26 gives the proximity of areas with elevated terrain to the ROW in route group 3.

28 **Table 4.8-26.** Route Group 3 Proximity of Mountain Ridges and Low Passes to the ROW of Proposed
29 Subroutes

Subroutes	Ridge or Low Pass	Distance (miles)
Subroute 3.1, Proponent Preferred	Low pass between the Dragoon Mountains and the Gunnison Hills	0.50
Route Group 3 Local Alternatives		
Local Alternatives for Subroute 3.1	NA*	NA

30 * No ridge or low pass present within proximity of any of the segments of the proposed subroute's ROW.
31 Note: NA = not applicable.

32 The ROW for route group 3 would not be near any mountain ridges and low passes and as such would
33 have a decreased risk for impacts on migratory birds.

1 **Wildlife Special Designation Areas**

2 Impacts on Wildlife Special Designation Areas would be as described for subroute 1.1. However, as the
3 ROW has been previously disturbed for the existing transmission line and access roads the scope of
4 impacts would be less than for route groups 1 and 2.

5 **Construction**

6 Pima County Biological Core Management Areas, Important Riparian Areas, Multiple Use Management
7 Areas, the Las Cienegas NCA, Pima County groundsnake PCA, Pima County Pima pineapple cactus
8 PCA, and Bar V Ranch would all intersect with subroute 3.1. Pima County Biological Core Management
9 Areas are managed to include a mitigation ratio of 5:1. Important Riparian Areas are managed to
10 "...protect, restore, and enhance the structure and functions of Important Riparian Areas, including their
11 hydrological, geomorphological, and biological functions." Multiple Use Management Areas are
12 managed to include a mitigation ratio of 2:1.

13 Approximately 137.2 acres of the rufous-winged sparrow PCA would intersect the ROW with 38.4 acres
14 of disturbance. Approximately 349.3 acres of the Pima pineapple cactus PCA would intersect the ROW
15 with 97.8 acres of disturbance.

16 Biological Core Management Areas would intersect the ROW on approximately 315.1 acres, of which
17 88.2 acres would be disturbed. Important Riparian Areas would intersect with the ROW on approximately
18 15.2 acres, of which 4.3 acres would be disturbed. Mitigation to minimize disturbance in riparian areas
19 would reduce the construction-related impacts. Multiple Use Management Areas would intersect the
20 ROW on approximately 41.8 acres of which 11.7 would be disturbed. Impacts on Pima County Biological
21 Core Management Areas, Important Riparian Areas, and Multiple Use Management Areas would require
22 mitigation. A compensatory mitigation plan would be developed upon completion of final plans for the
23 proposed Project.

24 Empirita Ranch would intersect the ROW on approximately 91.0 acres of which 25.5 would be disturbed.
25 The Bar V Ranch would intersect the ROW on approximately 107.1 acres of which 30.0 acres would be
26 disturbed.

27 Potential impacts on special designation areas from subroute 3.1 would include direct ground disturbance
28 and temporary increases in ambient noise levels in areas where the transmission line, substations, and
29 ancillary facilities intersect with special designations. Impacts on Special Designations, including
30 Empirita Ranch and Bar V Ranch, are analyzed in section 4.12.

31 Subroute 3.1 would cross the Galiuro-Winchester-Dragon PLZ, the Rincon-Whetstone-Santa Rita PLZ,
32 and the Rincon-Santa Rita-Whetstone PLZ. Approximately 873.3 acres of the ROW intersects with these
33 PLZs of which 244.5 acres would be disturbed. Impacts would be as described above for
34 subroute 2.1.

35 **Operation and Maintenance**

36 Potential operation and maintenance would include potential conflicts with management objectives for the
37 special designation areas.

38 **Local Alternatives**

39 There is one local alternative for route group 3—local alternative H. Acres of impacts from local
40 alternative H are given in table 4.8-25. Based on the amount of habitat in the analysis area it is not

1 anticipated that local alternative H would cause any significant population-level impacts for these species
2 or contribution towards a downward population trend or listing of this species as threatened or
3 endangered.

4 **General Wildlife**

5 **Construction**

6 Impacts on general wildlife species would be as described above for subroute 1.1. Disturbance to wildlife
7 habitat would occur on approximately 28 percent of the ROW. No staging areas or substations would be
8 proposed for local alternative H.

9 **Operation and Maintenance**

10 Potential impacts from the operation and maintenance of local alternative H would be as described above
11 for subroute 1.1.

12 **Special Status Species**

13 **Federally Listed Species**

14 Within local alternative H, four species were identified as having the potential to occur because the
15 analysis area would be within their ranges and habitat parameters would be present: the lesser long-nosed
16 bat, northern Mexican gartersnake with proposed critical habitat, Sonoran desert tortoise, and Sprague's
17 pipit. Potential impacts to these species are discussed below.

18 The remaining ESA listed species for Cochise County, Arizona would have no potential to occur within
19 local alternative H.

20 *Construction*

21 Potential impacts on the lesser long-nosed bat from construction activities would be as described for
22 subroute 3.1. Habitat for this species along local alternative H would be within 40 miles of a known roost
23 site and is therefore within the foraging range of the species. However, there would be no roost or nest
24 sites in the Project footprint that would provide shelter for this species. Based on the amount of available
25 foraging habitat in the analysis area, construction-related activities would have no detectable effect on the
26 viability of this species.

27 Potential impacts on northern Mexican gartersnake from construction-related activities would include
28 those described above for subroute 3.1. Local alternative H would cross more than 2,100 feet of northern
29 Mexican gartersnake proposed critical habitat at the San Pedro River. Construction-related impacts would
30 avoid adverse modification to this species' proposed critical habitat, as structures would be designed to
31 span the two critical habitat units and the specific siting of access roads would avoid those areas.

32 Potential impacts on Sonoran desert tortoise from construction-related activities would be as described for
33 subroute 3.1. Local alternative H would not intersect with any BLM-designated category of desert tortoise
34 habitat. Based on the amount of available Sonoran desert tortoise habitat in the analysis area, there would
35 be no detectable effect on the viability of this species or contribution towards a downward population
36 trend or listing of this species as threatened or endangered.

37 Potential impacts on Sprague's pipit from construction activities would be as described for subroute 1.1.
38 There would be no detectable effect on the viability of this species or contribution towards a downward
39 population trend or listing of this species as threatened or endangered.

1 *Operation and Maintenance*

2 There would likely not be operational and maintenance impacts to lesser long-nosed bats, Sonoran desert
3 tortoise, and Sprague's pipit or to any populations of these species under local alternative H. Therefore,
4 there would be no detectable effect on the viability of these species.

5 There would likely not be operational impacts to northern Mexican gartersnake or to any populations of
6 northern Mexican gartersnake under local alternative H. In addition, there would be no operational
7 impacts to northern Mexican gartersnake proposed critical habitat.

8 **BLM Sensitive Species**

9 Of the 45 species listed as BLM Sensitive for this region (the Gila District), 15 species were identified as
10 having the potential to occur in local alternative H because the analysis area would be within the species'
11 range and habitat parameters would be present. These species include the lowland leopard frog, Sonoran
12 mud turtle, desert ornate box turtle, gilded flicker, desert purple martin, Mexican long-tongued bat, pale
13 Townsend's big-eared bat, banner-tailed kangaroo rat, spotted bat, greater western mastiff bat, Allen's
14 big-eared bat, California leaf-nosed bat, Arizona myotis, and cave myotis. Acres of impacts on these
15 species are given in table 4.8-25. Mexican long-tongued bat is addressed above in the "Federally Listed
16 Species" section.

17 In addition, five other species—longfin dace, Slevin's bunchgrass lizard, Arizona Botteri's sparrow,
18 ferruginous hawk, and black-tailed prairie dog—could also occur but would be considered unlikely to
19 occur in local alternative H because either habitat parameters would be present (e.g., healthy grasslands
20 for black-tailed prairie dog), but the analysis area within this route group would not be within the species'
21 typical range, or the analysis area would be within the species' typical range, but habitat parameters
22 would not be present (e.g., perennial streams for longfin dace).

23 *Construction*

24 Potential impacts on lowland leopard frog from construction activities would be as described for subroute
25 3.1. There would be no impacts on this species habitat and no detectable effect on the viability of this
26 species by Project-related activities or contribute towards a downward population trend or listing of this
27 species as threatened or endangered.

28 Potential impacts on Sonoran mud turtle and desert ornate box turtle would be as described above for
29 subroute 3.1. Based on the amount of available reptile habitat in the analysis area, there would be no
30 detectable effect on the viability of these species or contribution towards a downward population trend or
31 listing of any of these species as threatened or endangered.

32 Potential impacts on gilded flicker and desert purple martin from construction activities in local
33 alternative H would be as described in subroute 3.1. Based on the amount of available bird nesting habitat
34 in the analysis area, construction-related activities would have no detectable effect on the viability of
35 these bird species or contribution towards a downward population trend or listing of the species as
36 threatened or endangered.

37 Potential impacts on the banner-tailed kangaroo rat from construction-related activities would be as
38 described in subroute 3.1. Based on the amount of available small-mammal habitat in the analysis area,
39 there would be no detectable effect on the viability of this species or contribution towards a downward
40 population trend or listing of this species as threatened or endangered.

41 Potential impacts on the eight bat species noted above from construction activities would be as described
42 for subroute 3.1. Based on the amount of available foraging habitat in the analysis area, construction-

1 related activities would have no detectable effect on the viability of these species or contribution towards
2 a downward population trend or listing of these species as threatened or endangered.

3 *Operation and Maintenance*

4 Potential impacts from operation and maintenance activities to the gilded flicker, and desert purple martin
5 would be related to the potential for individuals striking the transmission lines.

6 Lowland leopard frog, Sonoran mud turtle, desert ornate box turtle, banner-tailed kangaroo rat, Mexican
7 long-tongued bat, pale Townsend's big-eared bat, spotted bat, greater western mastiff bat, Allen's big-
8 eared bat, California leaf-nosed bat, Arizona myotis, and cave myotis would likely not experience
9 operational and maintenance impacts detectable at the population level or contribution towards a
10 downward population trend or listing of these species as threatened or endangered.

11 **State of Arizona Wildlife Species of Concern**

12 In total, 14 Wildlife Species of Concern were identified as possible to occur because the analysis area
13 would be within the species' range and habitat parameters for the species would be present. These species
14 include antelope jackrabbit, common nighthawk, Gila woodpecker, Harris' antelope squirrel, hooded
15 nightsnake, Mexican free-tailed bat, ornate box turtle, regal horned lizard, rufous-winged sparrow,
16 savannah sparrow, Sonoran coralsnake, Sonoran whipsnake, tiger rattlesnake, and yellow warbler. Acres
17 of impacts on these species are given in table 4.8-25. The dusky-capped flycatcher would be unlikely to
18 occur within local alternative H due to lack of habitat.

19 *Construction*

20 The construction impact types and intensities to antelope jackrabbit, common nighthawk, Gila
21 woodpecker, Harris' antelope squirrel, hooded nightsnake, Mexican free-tailed bat, desert ornate box
22 turtle, regal horned lizard, rufous-winged sparrow, savannah sparrow, Sonoran coralsnake, Sonoran
23 whipsnake, tiger rattlesnake, yellow warbler, and dusky-capped flycatcher would be the same as
24 described under subroute 3.1. Based on the amount of available habitat for these species in the analysis
25 area, construction-related activities would have no detectable effect on the viability of these species or
26 contribute towards a downward population trend or listing of these species as threatened or endangered.

27 *Operation and Maintenance*

28 The operation and maintenance impact types and intensities would be as described for subroute 3.1.

29 **State of Arizona Species of Greatest Conservation Need**

30 Three Arizona Species of Greatest Conservation Need would be likely to occur on local alternative H.
31 These species include American bittern, Lincoln's sparrow, and western grasshopper sparrow. All other
32 Species of Greatest Conservation Need that are listed under the ESA, BLM, and/or U.S. Forest Service
33 that would be likely to occur in the analysis area are discussed above. The Mississippi kite would be
34 unlikely to occur on local alternative H. The analysis area would be either outside of the species' known
35 range, would not contain habitat for the species, or both.

36 *Construction*

37 Construction-related impacts would be similar to those described for subroute 3.1. Acreages of impacts
38 are given in table 4.8-25.

1 The construction impact types and intensities to American bittern, Lincoln's sparrow, and western
2 grasshopper sparrow would be the same as described under subroute 3.1. Based on the amount of
3 available habitat for these species construction-related activities would have no detectable effect on the
4 viability of these species or contribute towards a downward population trend or listing of these species as
5 threatened or endangered.

6 *Operation and Maintenance*

7 The operation and maintenance impact types and intensities would be as described for subroute 3.1.

8 **Migratory Birds**

9 Impacts on migratory birds would be as described above for subroute 1.1. Based on the amount of
10 migratory bird habitat for these species in the analysis area it is not anticipated that any significant
11 population-level impacts for these species or contribution towards a downward population trend or listing
12 of this species as threatened or endangered would occur.

13 *Construction*

14 Approximately 9.3 acres of agricultural lands would be present in the ROW for alternative H, 2.6 acres of
15 which would be disturbed.

16 Approximately 2.8 acres of North America Warm Desert Riparian Mesquite Bosque would occur in the
17 ROW for alternative H, 0.8 acre of which would be disturbed.

18 According to the National Wetlands Inventory, the ROW for alternative H contains 409 feet of perennial
19 water as well as one wetland totaling 2.7 acres. These features would all be associated with the
20 intermittent reach of the San Pedro River. SWReGAP does not show any wetlands or open water.
21 Construction-related impacts to the river and associated wetlands would be related to the construction
22 of the transmission line structures and temporary access roads. Proposed structure locations would
23 incorporate avoidance and BMPs to avoid any wetland and open water. Construction of access roads
24 would likely not impact the San Pedro River within the ROW and downstream if avoidance measures
25 were incorporated and with the implementation of BMPs.

26 *Operation and Maintenance*

27 The land cover types above may harbor higher concentration of migratory birds than surrounding areas,
28 and may thus be associated with an elevated risk of collision events. That risk would still be unlikely to
29 reach population-level impacts for all species, but the risk of collision for migratory birds would likely be
30 influenced by the exact placement of the San Pedro River crossing.

31 **Wildlife Special Designation Areas**

32 Impacts on Wildlife Special Designation Areas would be as described for subroute 1.1.

33 *Construction*

34 Pima County Biological Core Management Areas and Important Riparian Areas would all intersect with
35 local alternative H. Biological Core Management Areas would intersect the ROW on approximately 46.1
36 acres, of which 12.9 acres would be disturbed. Important Riparian Areas would intersect with the ROW
37 on approximately 1.3 acres, of which 0.4 acre would be disturbed. Impacts would be as described above
38 for subroute 3.1. Impacts on Special Designations, including the Las Cienegas NCA and Bar V Ranch, are
39 analyzed in section 4.12.

1 Local alternative H would cross the Rincon-Whetstone-Santa Rita PLZ. Approximately 83.8 acres of the
2 representative ROW in the Rincon-Whetstone-Santa Rita PLZ would be crossed with 23.5 acres being
3 disturbed. Impacts would be as described above for subroute 2.1.

4 *Operation and Maintenance*

5 Operation-related impacts from local alternative H would be as described above for subroute 3.1.

6 **Route Group 4 – Pantano Substation to Saguaro Substation**

7 Tables 4.8-27 and 4.8-28 give the acres of impacted habitat types for the ROW as well as staging areas
8 and substations for route group 4.

9 **Table 4.8-27.** Route Group 4 Wildlife Resource Inventory Data

Habitat Type	Subroute 4.1 (acres)	MA1 (acres)	TH1a (acres)	TH1b (acres)	TH1c (acres)	TH1-Option (acres)	TH3a (acres)	TH3b (acres)	TH3-Option A (acres)	TH3-Option B (acres)	TH3-Option C (acres)
Agriculture	69.9	19.0	-	-	-	-	-	-	-	-	-
Apacherian-Chihuahuan Mesquite Upland Scrub	3.2	-	-	-	-	-	-	-	-	1.3	0*
Barren Lands, Non-specific	14.5	-	-	-	-	-	-	-	-	-	-
Developed, Medium - High Intensity	211.1	-	2.0	12.0	4.8	0.8	22.5	72.8	-	6.3	7.6
Developed, Open Space - Low Intensity	45.6	-	-	-	-	-	-	-	-	-	-
North American Warm Desert Riparian Mesquite Bosque	19.4	-	-	-	-	-	-	-	-	-	-
North American Warm Desert Riparian Woodland and Shrubland	18.2	-	-	-	-	-	-	-	-	-	-
North American Warm Desert Wash	1.1	-	-	-	-	-	-	-	-	-	-
Open Water	1.1	-	-	-	-	-	-	-	-	-	-
Sonora-Mojave Creosotebush-White Bursage Desert Scrub	133.3	-	-	-	-	-	-	1.1	1.8	0.3	-
Sonoran Mid-Elevation Desert Scrub	3.9	-	-	-	-	-	1.7	0.6	-	0.5	1.5
Sonoran Paloverde-Mixed Cacti Desert Scrub	353.5	-	23.7	16.5	-	16.18	25.4	6.9	13.3	6.2	20.2

10 0*- greater than zero acres but less than 0.1 acre

1 **Table 4.8-28.** Route Group 4 Wildlife Resource Inventory Data for Substations and Staging Areas

Habitat Type	Subroute 4.1 (acres)	Local Alternatives (acres)
Apacherian-Chihuahuan Mesquite Upland Scrub	33.5	-
Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe	7.6	-
Barren Lands, Non-specific	2.9	-
Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	12.0	-
Chihuahuan Mixed Salt Desert Scrub	0.2	-
Developed, Medium - High Intensity	26.2	-
North American Warm Desert Riparian Mesquite Bosque	0*	-
Sonora-Mojave Creosotebush-White Bursage Desert Scrub	105.9	-
Sonoran Mid-Elevation Desert Scrub	8.4	-
Sonoran Paloverde-Mixed Cacti Desert Scrub	83.8	-

2 0*- greater than zero acres but less than 0.1 acre

3 Table 4.8-29 gives the acreages of impacts on general wildlife and special status species for route
 4 group 4.

5 **SUBROUTE 4.1 – PROPONENT PREFERRED**

6 **General Wildlife**

7 ***Construction***

8 Construction-related impacts would be similar to those described for subroute 3.1. Impact levels from
 9 disturbance would be lower than for route groups 1 and 2 as the ROW has been previously disturbed for
 10 the existing transmission line. Acreages of impacts are given in table 4.8-29. Based on the amount of
 11 available habitat for general wildlife species, construction-related activities would have no detectable
 12 effect on the viability of these species or contribute towards a downward population trend or listing of
 13 these species as threatened or endangered.

14 ***Operation and Maintenance***

15 Impacts from the operation and maintenance of subroute 4.1 would be as described above for
 16 subroute 3.1.

17 **Special Status Species**

18 ***Federally Listed Species***

19 Within this route group, six federally listed species were identified as having the potential to occur
 20 because the analysis area would be within the species’ range and habitat parameters would be present:
 21 the lesser long-nosed bat, northern Mexican gartersnake, Sonoran desert tortoise, Tucson shovel-nosed
 22 snake, southwestern willow flycatcher, and western yellow-billed cuckoo. Acres of impacts on these
 23 species are given in table 4.8-29.

1 In addition, 9 other species, the ocelot, California least tern, Mexican spotted owl, Chiricahua leopard
2 frog, Gila chub, Gila topminnow, jaguar, ocelot, and Sprague's pipit, could also occur but would be
3 considered unlikely to occur because although habitat parameters would be present the analysis area
4 within this route group would not be within the species' typical range, or the route group would be within
5 the species' typical range, but habitat parameters would not be present. Therefore the Project activities in
6 subroute 4.1 would have no effect to the populations of California least tern, Chiricahua leopard frog,
7 Gila chub, Gila topminnow, jaguar, ocelot, or Sprague's pipit.

8 **Construction**

9 Construction-related impacts would be as described for subroute 3.1.

10 There would be no roost sites for lesser long-nosed bat in the ROW that would provide shelter for this
11 species. However, subroute 4.1 would be within 40 miles of a known roost site, and would be within the
12 foraging range of the species. Based on the amount of available foraging habitat in the analysis area,
13 construction-related activities would have no detectable effect on the viability of this species.

14 Potential impacts on northern Mexican gartersnake would be as described for subroute 3.1. As the Project
15 facilities would be located to avoid habitat and proposed critical habitat for the species there would be no
16 impact on habitat or proposed critical habitat.

17 Potential impacts on Tucson shovel-nosed snake would include those described previously for all reptiles.
18 Habitat for the species occurs in Pinal County where segment UK3 would cross the Santa Cruz River
19 floodplain. Mitigation measures to close areas of Tucson shovel-nosed snake habitat to OHV use, use of
20 drift fencing, worker education programs, and revegetation of disturbed areas with plants to support prey
21 species would minimize impacts on the species. Based on the amount of available habitat in the analysis
22 area, construction-related impacts would have a long-term, minor/negligible effect on Tucson shovel-
23 nosed snake and its habitat.

24 The ROW for subroute 4.1 would intersect desert tortoise habitat. Based on the amount of available
25 Sonoran desert tortoise habitat in the analysis area, there would be no detectable effect on the viability of
26 this species or contribution towards a downward population trend or listing of this species as threatened
27 or endangered.

28 Potential impacts on southwestern willow flycatcher would be as described for subroute 3.1. However,
29 there would be no perennial or intermittent waterways in this subroute that would provide appropriate
30 vegetation structure for nesting habitat for this species and this subroute group would not intersect with
31 any designated critical habitat for this species. Based on the lack of nesting habitat and the mobility of the
32 species, construction-related activities would have no detectable effect on individuals or the viability of
33 this species.

34 Potential impacts on western yellow-billed cuckoo from construction activities in this subroute group
35 would be as described for subroute 3.1. However, there would be no large cottonwood and willow
36 galleries that would provide nesting habitat for this species in the ROW. Based on the lack of nesting
37 habitat in the Project footprint and the mobility of the species, construction-related activities would have
38 no detectable effect on individuals or the viability of this species or contribution towards a downward
39 population trend or listing of this species as threatened or endangered.

1 **Table 4.8-29.** Route Group 4 Acres of Impacts on Wildlife

Common name	Subroute 4.1	Local Alt MA-1	Local Alt TH1a	Local Alt TH1b	Local Alt TH1c	Local Alt TH1-Option	Local Alt TH3a	Local Alt TH3b	Local Alt TH3-Option A	Local Alt TH3-Option B	Local Alt TH3-Option C
General Wildlife	621.7	5.3	7.2	8.0	1.3	4.8	13.9	22.8	4.2	4.0	8.1
Federally Listed Species											
Lesser long-nosed bat	262.7	-	7.2	8.0	1.1	4.8	13.9	22.8	4.2	3.7	8.1
Southwestern willow flycatcher	0	-	-	-	-	-	-	-	-	-	-
Western yellow-billed cuckoo	0	-	-	-	-	-	-	-	-	-	-
Northern Mexican gartersnake	0	-	-	-	-	-	-	-	-	-	-
Sonoran desert tortoise	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Tucson shovel-nosed snake	8.3	-	-	-	-	-	-	-	-	-	-
BLM Sensitive Species											
Allen's big-eared bat	193.6	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Arizona myotis	5.1	-	-	-	-	-	-	-	0.2	-	-
Banner-tailed kangaroo rat	209.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
California leaf-nosed bat	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Cave myotis	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Greater western mastiff bat	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Mexican long-tongued bat	262.7	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Pale Townsend's big-eared bat	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Spotted bat	20.8	-	-	-	-	-	-	-	-	-	-
American peregrine falcon	190.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Arizona grasshopper sparrow	190.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Bald eagle	190.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Cactus ferruginous pygmy-owl	196.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Desert purple martin	196.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Gilded flicker	196.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Golden eagle	5.1	-	-	-	-	-	-	-	-	-	-
Western burrowing owl	224.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Ornate box turtle	4.6	-	-	-	-	-	-	-	-	-	-
Sonoran mud turtle	5.4	-	-	-	-	-	-	-	0.2	-	-
Great Plains narrow-mouthed toad	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Lowland leopard frog	5.4	-	-	-	-	-	-	-	0.2	-	-
Plains leopard frog	2.1	-	-	-	-	-	-	-	-	-	-
State of Arizona Wildlife Species of Concern											
Sonoran green toad	185.3	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Antelope jackrabbit	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Arizona pocket mouse	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Harris' antelope squirrel	191.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Kit fox	207.3	5.3	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Little pocket mouse	2.1	-	-	-	-	-	-	-	-	-	-

1 **Table 4.8-29.** Route Group 4 Acres of Impacts on Wildlife (Continued)

Common name	Subroute 4.1	Local Alt MA-1	Local Alt TH1a	Local Alt TH1b	Local Alt TH1c	Local Alt TH1-Option	Local Alt TH3a	Local Alt TH3b	Local Alt TH3-Option A	Local Alt TH3-Option B	Local Alt TH3-Option C
Pocketed free-tailed bat	196.4	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Abert's towhee	262.7	-	7.2	8.0	1.1	4.8	13.9	22.8	4.2	3.7	8.1
Bell's vireo	5.1	-	-	-	-	-	-	-	-	-	-
Crested caracara	191.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Gila woodpecker	275.3	-	7.2	8.0	1.1	4.8	13.9	22.8	4.2	3.7	8.1
Canyon spotted whiptail	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Gila monster	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Regal horned lizard	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Saddled leaf-nosed snake	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Sonora mud turtle	0.3	-	-	-	-	-	-	-	0.2	-	-
Sonoran collared lizard	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Sonoran coralsnake	209.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Sonoran whipsnake	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Tiger rattlesnake	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Variable sandsnake	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Colorado River toad (aka Sonoran desert toad)	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
State of Arizona Species of Greatest Conservation Need											
Mexican free-tailed bat	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	183.1
Western yellow bat	5.1	-	-	-	-	-	-	-	-	-	-
Buff-collared nightjar	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Savannah sparrow	21.7	5.3	-	-	-	-	-	-	-	-	-
Goode's horned lizard	183.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1
Pima County Species											
Merriam's mesquite mouse	20.8	-	-	-	-	-	-	-	-	0.4	-
Western red bat	5.1	-	-	-	-	-	-	-	-	-	-
Rufous-winged sparrow	17.9	-	-	-	-	-	-	-	-	0.4	-
Swainson's hawk	191.1	-	6.6	4.6	-	4.8	7.6	2.1	4.2	4.1	8.1
Ground snake	186.8	-	6.6	4.6	-	4.8	7.6	2.1	4.2	3.7	8.1

2

1 **Operation and Maintenance**

2 There would likely not be operational impacts to lesser long-nosed bats, Sonoran desert tortoise,
3 southwestern willow flycatcher, Sprague's pipit, western yellow-billed cuckoo, or to any populations of
4 these species under this subroute group. There would likely not be operational impacts to northern
5 Mexican gartersnake or to Tucson shovel-nosed snake under this subroute group. In addition, there would
6 be no operational impacts to northern Mexican gartersnake proposed critical habitat.

7 **BLM Sensitive Species**

8 Of the 45 species listed as BLM Sensitive for this region (the Gila District), 23 species were identified as
9 having the potential to occur in subroute 4.1, because the analysis area would be within the species' range
10 and habitat parameters would be present. These species include the plains leopard frog (*Lithobates blairi*),
11 lowland leopard frog, Sonoran green toad (*Bufo retiformis*), Great Plains narrow-mouthed toad, Sonoran
12 mud turtle, desert ornate box turtle, Arizona grasshopper sparrow, western burrowing owl, golden eagle,
13 gilded flicker, American peregrine falcon, cactus ferruginous pygmy-owl (*Glaucidium brasilianum*
14 *cactorum*), bald eagle, desert purple martin, Mexican long-tongued bat, pale Townsend's big-eared bat,
15 banner-tailed kangaroo rat, spotted bat, greater western mastiff bat, Allen's big-eared bat, California leaf-
16 nosed bat, Arizona myotis, and cave myotis. Acres of impacts on these species are given in table 4.8-29.

17 In addition, four other species—desert sucker, longfin dace, Slevin's bunchgrass lizard, and Arizona
18 Botteri's sparrow—could also occur but would be considered unlikely to occur because either habitat
19 parameters would be present (e.g., healthy grasslands for Slevin's bunchgrass lizard), but the analysis area
20 within this route group would not be within the species' typical range, or the analysis area would be
21 within the species' typical range, but habitat parameters would not be present (e.g., perennial streams for
22 longfin dace).

23 **Construction**

24 Construction-related impacts would be as described for subroute 3.1.

25 Potential impacts on plains leopard frog, lowland leopard frog, Sonoran green toad, and Great Plains
26 narrow-mouthed toad from construction activities would include those described above as common to all
27 amphibian species and subroute 3.1. There would be no perennial waterways in this subroute and pole
28 structures and laydown areas would not be placed in ephemeral or intermittent waterways that could
29 provide dispersal habitats for toads or frogs. There would be no impacts on these species' habitat and no
30 detectable effect on the viability of these species by Project-related activities or that would contribute
31 towards a downward population trend or listing of these species as threatened or endangered.

32 Potential impacts on Sonoran mud turtle and desert ornate box turtle from construction-related activities
33 would be as described for subroute 3.1. Construction-related impacts would include habitat disturbance.
34 Based on the amount of available reptile habitat in the analysis area, there would be no detectable effect
35 on the viability of these species or contribution towards a downward population trend or listing of any of
36 these species as threatened or endangered.

37 Potential impacts on Arizona grasshopper sparrow, western burrowing owl, golden eagle, gilded flicker,
38 American peregrine falcon, cactus ferruginous pygmy-owl, bald eagle, and desert purple martin from
39 construction activities would be as described for subroute 3.1. Based on the amount of available bird
40 nesting habitat in the analysis area, construction-related activities would have no detectable effect on the
41 viability of any of these bird species or to contribute towards a downward population trend or listing of
42 the species as threatened or endangered.

1 Potential impacts on the banner kangaroo rat from construction-related activities would include those
2 described above as common to all mammal species. Based on the amount of available small mammal
3 habitat in the analysis area, there would be no detectable effect on the viability of this species or
4 contribution towards a downward population trend or listing of this species as threatened or endangered.

5 Potential impacts on the eight bat species noted above from construction activities would include those
6 described above for subroute 3.1. However, there would be no roost or nest sites in the ROW that would
7 provide shelter for these species. Based on the amount of available foraging habitat in the analysis area,
8 construction-related activities would have no detectable effect on the viability of these species or
9 contribution towards a downward population trend or listing of these species as threatened or endangered.

10 **Operation and Maintenance**

11 Potential impacts from operation and maintenance activities to BLM Sensitive Species would likely not
12 experience operational impacts detectable at the population level or contribution towards a downward
13 population trend or listing of these species as threatened or endangered.

14 ***State of Arizona Wildlife Species of Concern***

15 Twenty-six Arizona listed Wildlife Species of Concern are identified as possibly occurring in subroute
16 4.1. Of these, five are addressed above (Sonoran green toad, ornate box turtle, cave myotis, pale
17 Townsend's big-eared bat, and gilded flicker are addressed in the "BLM Sensitive Species" section).
18 The other 20 species are addressed below. Acres of impacts on these species are given in table 4.8-29.

19 **Construction**

20 Construction-related impacts would be similar to those described for subroute 3.1.

21 Amphibian species impacted would include the Sonoran desert toad. Mammal species impacted would
22 include antelope jackrabbit, kit fox, Arizona pocket mouse (*Perognathus amplus*), little pocket mouse
23 (*Perognathus longimembris*), and Harris' antelope squirrel.

24 Bird species impacted would include Abert's towhee, Bell's vireo, crested caracara (*Caracara cheriway*) and
25 Gila woodpecker. The crested caracara is known to breed in areas approximately 4 miles north of the Project
26 terminus and is seen infrequently in the area near the Project terminus.

27 Reptile species impacted would include canyon spotted whiptail (*Aspidoscelus burti*), Gila monster, regal
28 horned lizard, saddled leaf-nosed snake (*Phyllorhynchus browni*), Sonora mud turtle, Sonoran collared
29 lizard (*Crotaphytus nebrius*), Sonoran coralsnake, Sonoran whipsnake, tiger rattlesnake, and variable
30 sandsnake (*Chilomeniscus stramineus*). Based on the amount of habitat for these species in the analysis
31 area it is not anticipated that subroute 4.1 would cause any significant population-level impacts for these
32 species or contribution towards a downward population trend or listing of these species as threatened or
33 endangered.

34 **Operation and Maintenance**

35 Potential operational impacts on Arizona listed Wildlife Species of Concern species would be as
36 described above for subroute 3.1.

37

1 **State of Arizona Species of Greatest Conservation Need**

2 Seventeen Arizona Species of Greatest Conservation Need were identified as possibly occurring in
3 subroute 4.1. Of these, 12 are addressed above (lesser long-nosed bat, cactus ferruginous pygmy-owl,
4 Sprague’s pipit, southwestern willow flycatcher, and Sonoran desert tortoise are addressed in the
5 “Federally Listed Species” section, and greater western mastiff bat, California leaf-nosed bat, spotted bat,
6 peregrine falcon, desert purple martin, western burrowing owl, and lowland leopard frog are addressed in
7 the “BLM Sensitive Species” section). The other five species are addressed below. Acres of impacts on
8 these species are given in table 4.8-29.

9 **Construction**

10 Construction-related impacts would be similar to those described for subroute 3.1. Mammal species
11 impacts would include Mexican free-tailed bat and western yellow bat. Bird species impacted would
12 include buff-collared nightjar (*Caprimulgus ridgwayi*) and savannah sparrow. Reptile species impacted
13 would include Goode’s horned lizard (*Phrynosoma goodei*). Based on the amount of habitat for these
14 species in the analysis area it is not anticipated that subroute 4.1 would cause any significant population-
15 level impacts for these species or contribute towards a downward population trend or listing of these
16 species as threatened or endangered.

17 **Operation and Maintenance**

18 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
19 be as described for subroute 3.1.

20 **Pima County Species**

21 Fifteen Priority Vulnerable Species in Pima County were identified as possibly occurring in subroute 4.1.
22 Of these, 10 are addressed above (California leaf-nosed bat, pale Townsend’s big-eared bat, Mexican
23 long-tongued bat, western burrowing owl, ornate box turtle, and lowland leopard frog are addressed in the
24 “BLM Sensitive Species” section and western yellow bat, Abert’s towhee, Bell’s vireo, and spotted
25 canyon whiptail are addressed in the “Arizona Species of Greatest Conservation Need” section).
26 The remaining five species are addressed below. Acres of impacts on these species are given in table
27 4.8-29.

28 **Construction**

29 Construction-related impacts would be as described for subroute 3.1.

30 Mammal species impacts would include western red bat and Merriam’s mesquite mouse. Bird species
31 impacted would include rufous-winged sparrow and Swainson’s hawk. Reptile species impacted would
32 include the ground snake. Based on the amount of habitat for these species in the analysis area it is not
33 anticipated that subroute 4.1 would cause any significant population-level impacts for these species or
34 contribution towards a downward population trend or listing of these species as threatened or endangered.

35 **Operation and Maintenance**

36 Potential operational and maintenance impacts on the Priority Vulnerable Species in Pima County species
37 would be as described for subroute 3.1.

38 **Migratory Birds**

39 Impacts on migratory birds would be as described for subroute 1.1.

1 **Construction**

2 The ROW for subroute 4.1 contains a total of 69.9 acres of agricultural lands, found along segments U3i
3 (19.4 acres), U3j (15.9 acres), and U3k (34.6 acres). Disturbance would occur on 19.6 acres.

4 In total, 19.4 acres of North America Warm Desert Riparian Mesquite Bosque and 18.2 acres of North
5 America Warm Desert Riparian Woodland and Shrubland habitat types occur in the ROW. The three
6 segments with those two cover types would be U3e (2.4 acres), U3i (5.6 acres), and U3k (29.8 acres).
7 Disturbance would occur on 5.4 acres of North America Warm Desert Riparian Mesquite Bosque and 5.1
8 acres of North America Warm Desert Riparian Woodland and Shrubland.

9 According to the National Wetlands Inventory, a total of four wetlands totaling 2.2 acres would occur
10 within the ROW, along segments U3b, U3c, U3h, and U3i. These would be associated with the ephemeral
11 reach of the Santa Cruz River that passes through Tucson. SWReGAP mapping indicates 1.1 acres of
12 open water along segment U3i. Proposed structure locations should incorporate avoidance and BMPs to
13 avoid any wetland and open water. Construction of access roads would likely not impact the Santa Cruz
14 River within the ROW and downstream if avoidance measures were incorporated and with the
15 implementation of BMPs.

16 **Operation and Maintenance**

17 The land cover types above may harbor higher concentration of migratory birds than surrounding areas,
18 and may thus be associated with an elevated risk of collision events. Due in part to the small size of the
19 wetlands in the ROW that risk would be unlikely to reach population-level impacts for all species, but the
20 risk of collision for migratory birds would likely be influenced by the exact placement of the Santa Cruz
21 River.

22 The ROW for subroute 4.1 lies less than 0.1 mile from an unnamed ridge near Ajo Way and Rattlesnake
23 Pass in the Tucson Mountains (table 4.8-30), raising the possibility of somewhat higher impacts on
24 migratory birds in that area.

25 **Table 4.8-30.** Route Group 4 Proximity of Mountain Ridges and Low Passes to the ROW of Proposed
26 Subroutes

Subroutes	Ridge or Low Pass	Distance (miles)
Subroute 4.1, Proponent Preferred	Unnamed ridge near Ajo Way and Rattlesnake Pass in the Tucson Mountains	0.06
Route Group 4 Local Alternatives		
Local Alternatives for subroute 4.1	NA*	NA

27 Note: NA = not applicable.

28 * No ridge or low pass present within proximity of any of the segments of the proposed subroute's ROW.

29 **Wildlife Special Designation Areas**

30 Impacts on Wildlife Special Designation Areas would be as described for subroute 1.1.

31 **Construction**

32 Subroute 4.1 would cross Tumamoc Hill as well as Pima County Biological Core Management Areas,
33 Important Riparian Areas, Multiple Use Management Areas, and Agricultural Inholdings. It would also

1 cross Tumamoc Hill, Tucson Mountain Park, and Pima County PCAs for western burrowing owl, cactus
2 ferruginous pygmy owl, rufous-winged sparrow, and Pima pineapple cactus.

3 Tumamoc Hill would intersect the ROW on approximately 14.7 acres of which 4.1 acres would be
4 disturbed. Tucson Mountain Park would intersect the ROW on 8.0 acres, 1.8 acres of which would be
5 disturbed. Pima County Biological Core Management Areas would intersect the ROW on approximately
6 18.8 acres of which 5.3 acres would be disturbed. Important Riparian Areas would intersect the ROW on
7 approximately 95.9 acres of which 26.9 acres would be disturbed. Agricultural Inholdings would intersect
8 the ROW on approximately 60.4 acres of which 16.9 acres would be disturbed.

9 Pima County Agricultural Inholdings are managed to “emphasize the use of native flora, facilitate the
10 movement of native fauna and pollination of native flora across and through the landscape, and conserve
11 on-site conservation values when they are present. Development within these areas would be configured
12 in a manner that would not compromise the conservation values of adjacent and nearby CLS lands.”
13 Impacts on these areas would be similar to those described for subroute 3.1.

14 Pima County PCAs would intersect the ROW. Approximately 773.1 acres of the western burrowing owl
15 PCA would intersect the ROW with 216.5 acres of disturbance. Approximately 335.4 acres of the cactus
16 ferruginous pygmy owl PCA would intersect the ROW with 93.9 acres of disturbance. Approximately
17 137.2 acres of the rufous-winged sparrow PCA would intersect the ROW with 38.4 acres of disturbance.
18 Approximately 218.9 acres of the ground snake PCA would intersect the ROW with 61.3 acres of
19 disturbance. Approximately 92.5 acres of the Pima pineapple cactus PCA would intersect the ROW with
20 25.9 acres of disturbance.

21 Subroute 4.1 would cross the Ironwood-Tortolita PLZ, Coyote-Ironwood-Tucson PLZ, the Ironwood-
22 Picacho PLZ, and the Tucson-Tortolita-Santa Catalina PLZ. Approximately 599.0 acres of the
23 representative ROW in these PLZs would be crossed with 167.7 acres of disturbance.

24 **Operation and Maintenance**

25 Operation-related impacts from subroute 4.1 would be as described above for subroute 3.1.

26 **Local Alternatives**

27 There would be 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option,
28 TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

29 ***General Wildlife***

30 Impacts on general wildlife would be as described for subroute 1.1.

31 **Construction**

32 Impacts on general wildlife from the local alternatives would be as described for subroute 1.1. Acreages
33 of impacts on general wildlife for each local alternative are given in table 4.8-29.

34 **Operation and Maintenance**

35 Potential impacts from operation and maintenance of the local alternatives would be similar in nature to
36 those described for subroute 3.1.

37

1 **Special Status Species**

2 **Federally Listed Species**

3 Impacts to federally listed species would be as described for subroute 4.1. Acres of impacts on these
4 species for the local alternatives are given in table 4.8-29.

5 *Construction*

6 Local alternative TH1a total representative ROW would comprise 25.7 acres, TH1b ROW would
7 comprise 28.4 acres, TH1c ROW would comprise 7.7 acres, TH1-Option would comprise 17.0 acres,
8 TH3-Option A ROW would comprise 15.1 acres, TH3-Option B ROW would comprise 14.5 acres, TH3-
9 Option C ROW would comprise 29.3 acres, TH3a ROW would comprise 49.7 acres, and TH3b ROW
10 would comprise 81.4 acres. Impacts on these species would be as described for subroute 3.1.

11 There would be no roost sites for lesser long-nosed bat in the ROW of any of the local alternatives that
12 would provide shelter for this species. However, the local alternatives, with the exception of MA-1
13 contain foraging habitat for the species and are within 40 miles of a known roost location and are within
14 the foraging range of the species. Based on the amount of available foraging habitat in the analysis area,
15 construction-related activities would have no detectable effect on the viability of this species under any of
16 these alternatives.

17 Sonoran desert tortoise habitat would be impacted by local alternatives. However, no BLM-designated
18 category of desert tortoise habitat would occur in any of the route group 4 local alternatives. Based on the
19 amount of available Sonoran desert tortoise habitat in the analysis area, there would be no detectable
20 effect on the viability of this species or contribution towards a downward population trend or listing of
21 this species as threatened or endangered under any of the alternatives.

22 The alternative TH1c total representative ROW comprises 4.8 acres and would be characterized by
23 Developed, Medium - High Intensity (4.8 acres). Route segment MA1 would be characterized by the
24 Agriculture plant association which accounts for over 99 percent of the acreage (19.0 acres). There would
25 be no federally listed species anticipated to occur in these two alternatives, therefore there would be no
26 effects to any federally listed species or their habitats.

27 *Operation and Maintenance*

28 Operational impacts on lesser long-nosed bat and Sonoran desert tortoise would be as described for
29 subroute 3.1.

30 There would be no effects to any threatened or endangered species or their habitat from operational and
31 maintenance activities under the remaining two local alternatives, TH1 and MA1.

32 **BLM Sensitive Species**

33 Of the 45 species listed as BLM Sensitive for this region (the Gila District), 20 species were identified as
34 having the potential to occur in the local alternatives of route group 4, because the analysis area is within
35 the species' range and habitat parameters would be present. These species are listed above for
36 subroute 4.1. Acres of impacts on these species are given in table 4.8-29.

37 In addition, four other species—desert sucker, longfin dace, Slevin's bunchgrass lizard, and Arizona
38 Botteri's sparrow—could also occur but would be considered unlikely to occur because either habitat
39 parameters would be present (e.g., healthy grasslands for Slevin's bunchgrass lizard), but the analysis area
40 within this route group would not be within the species' typical range, or the analysis area would be

1 within the species' typical range, but habitat parameters would not be present (e.g., perennial streams for
2 longfin dace).

3 *Construction*

4 Potential impacts on plains leopard frog, lowland leopard frog, Sonoran green toad, and Great Plains
5 narrow-mouthed toad from construction activities would be as described for subroute 4.1. However, there
6 would be no perennial waterways in the local alternatives and pole structures and laydown areas would
7 not be placed in ephemeral or intermittent waterways that could provide dispersal habitats for toads or
8 frogs. There would be no impacts on these species' habitat, limited temporary negligible impacts to
9 individuals, and no detectable effect on the viability of these species by Project-related activities or that
10 would contribute towards a downward population trend or listing of these species as threatened or
11 endangered.

12 Additional impacts would occur along the local alternatives for the remaining BLM Sensitive Species
13 would be as described for subroute 4.1. Acreages of impacts are given in table 4.8-29. Based on the
14 amount of available foraging habitat in the analysis area, construction-related activities would have no
15 detectable effect on the viability of these species or contribution towards a downward population trend or
16 listing of these species as threatened or endangered under any of the alternatives.

17 *Operation and Maintenance*

18 Potential impacts from operation and maintenance activities to the western burrowing owl, gilded flicker,
19 cactus ferruginous pygmy-owl, and desert purple martin would be related to the potential for individuals
20 striking transmission lines.

21 Mexican long-tongued bat, pale Townsend's big-eared bat, spotted bat, greater western mastiff bat,
22 Allen's big-eared bat, California leaf-nosed bat, Arizona myotis, cave myotis, Plains leopard frog,
23 lowland leopard frog, Sonoran green toad, Great Plains narrow-mouthed toad, Sonoran mud turtle, desert
24 ornate box turtle, and the banner-tailed kangaroo rat would likely not experience operational and
25 maintenance impacts detectable at the population level or contribution towards a downward population
26 trend or listing of these species as threatened or endangered under any of the local alternatives.

27 **State of Arizona Wildlife Species of Concern**

28 Twenty-six State of Arizona listed Wildlife Species of Concern Species were identified as possible to
29 occur on the local alternatives. Of these five are addressed above (Sonoran green toad, ornate box turtle,
30 cave myotis, pale Townsend's big-eared bat, and gilded flicker are addressed in the "BLM Sensitive
31 Species" section). The other 21 species are addressed below. Impacts on these species would be as
32 previously described for subroute 4.1. Acres of impacts on these species are given in table 4.8-29.

33 *Construction*

34 Local alternative MA1 could impact habitat for pocketed free-tailed bat and crested caracara. Impacts on
35 crested caracara would not occur in any other of the local alternatives.

36 Local alternatives TH1a, Th1b, TH1c, TH1-Option, TH3a, TH3b, TH3-Option A, TH3-Option B, and
37 TH3-Option C could impact habitat for Sonoran desert toad, antelope jackrabbit, kit fox, Arizona pocket
38 mouse, little pocket mouse, Harris' antelope squirrel, pocketed free-tail bat, Abert's towhee, Bell's vireo,
39 Gila woodpecker, canyon spotted whiptail, Gila monster, regal horned lizard, saddled leaf-nosed snake,
40 Sonora mud turtle, Sonoran collared lizard, Sonoran coralsnake, Sonoran whipsnake, tiger rattlesnake,
41 and variable sandsnake.

1 *Operation and Maintenance*

2 Potential operational and maintenance impacts on Arizona listed Wildlife Species of Concern species
3 would be as described above for subroute 4.1.

4 **State of Arizona Species of Greatest Conservation Need**

5 Thirteen Arizona Species of Greatest Conservation Need were identified as possible to occur on the local
6 alternatives. Of these, 10 are addressed above (Sprague’s pipit, southwestern willow flycatcher, and
7 Sonoran desert tortoise are addressed in the “Federally Listed Species” section and greater western
8 mastiff bat, California leaf-nosed bat, spotted bat, peregrine falcon, desert purple martin, western
9 burrowing owl, and lowland leopard frog are addressed in the “BLM Sensitive Species” section).
10 The other three species are addressed below. Impacts on these species would be as previously described
11 for subroute 4.1. Acres of impacts on these species are given in table 4.8-29.

12 *Construction*

13 Local alternative MA1 could impact habitat for Mexican free-tailed bat and savannah sparrow. Local
14 alternative TH1a could impact habitat for Mexican free-tailed bat, and Goode’s horned lizard. Local
15 alternative TH1b could impact habitat for Mexican free-tailed bat, pocketed free-tail bat, and Goode’s
16 horned lizard.

17 Local alternative TH1c would not intersect habitat for any Arizona Species of Greatest Conservation
18 Need.

19 Local alternative TH1-Option would intersect habitat for Mexican free-tailed bat and Goode’s horned
20 lizard.

21 Local alternative TH3a would intersect habitat for Mexican free-tailed bat, pocketed free-tail bat, and
22 Goode’s horned lizard.

23 Local alternative TH3b would intersect habitat for Mexican free-tailed bat and Goode’s horned lizard.

24 Local alternative TH3-Option A would intersect habitat for Mexican free-tailed bat and Goode’s horned
25 lizard.

26 Local alternative TH3-Option B would intersect habitat for Mexican free-tailed bat and Goode’s horned
27 lizard.

28 Local alternative TH3-Option C would intersect habitat for Mexican free-tailed bat and Goode’s horned
29 lizard.

30 *Operation and Maintenance*

31 Potential operational and maintenance impacts on Species of Greatest Conservation Need species would
32 be as described above for subroute 4.1.

33 **Pima County Species**

34 Thirteen Priority Vulnerable Species in Pima County were identified as possibly occurring in the local
35 alternatives. Of these 10 are addressed above (California leaf-nosed bat, pale Townsend’s big-eared bat,
36 Mexican long-tongued bat, western burrowing owl, ornate box turtle, and lowland leopard frog are
37 addressed in the “BLM Sensitive Species” section and western yellow bat, Abert’s towhee, Bell’s vireo,

1 and spotted canyon whiptail are addressed in “Arizona Species of Greatest Conservation Need” section).
2 The other three species are addressed below. Impacts on these species would be as previously described
3 for subroute 4.1. Based on the amount of habitat for these species in the analysis area it is not anticipated
4 that the local alternatives would cause any significant population-level impacts for these species or
5 contribution towards a downward population trend or listing of these species as threatened or endangered.

6 *Construction*

7 Local alternative MA1 could impact habitat for Swainson’s hawk. Local alternative TH1a, TH1b, TH1-
8 Option, TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C could impact habitat for
9 Merriam’s mesquite mouse and ground snake.

10 Local alternative TH1c would not impact habitat for any Priority Vulnerable Species in Pima County.

11 *Operation and Maintenance*

12 Impacts on Pima County Species from operation and maintenance activities would be as described for
13 subroute 4.1.

14 **Migratory Birds**

15 Impacts on migratory birds would be as described for subroute 1.1.

16 *Construction*

17 The ROW for local alternative MA1 would occur on 19 acres of agricultural lands of which 5.3 acres
18 would be disturbed. No other agricultural lands would be present along the other segments.

19 The National Wetlands Inventory records riverine wetlands totaling 7.6 acres associated with the
20 intermittent reaches of the Santa Cruz River that would pass through the ROW. The four alternatives
21 involved would be TH3-Option A, TH3-Option C, TH3a, and TH3b. Open water would occur on 0.7 acre
22 in the ROW for local alternative TH1c. Proposed structure locations would incorporate avoidance and
23 BMPs to avoid any wetland and open water.

24 *Operation and Maintenance*

25 The land cover types above may harbor higher concentration of migratory birds than surrounding areas,
26 and may thus be associated with an elevated risk of collision events. Due in part to the small size of the
27 wetlands in the ROW, that risk would still be unlikely to reach population-level impacts for all species,
28 but the risk of collision for migratory birds would likely be influenced by the exact placement of the
29 Project in relation to the Santa Cruz River.

30 **Wildlife Special Designation Areas**

31 Impacts on Wildlife Special Designation Areas would be as described for subroute 1.1.

32 *Construction*

33 Local alternatives would cross Pima County Important Riparian Areas and Multiple Use Management
34 Areas as well as Tumamoc Hill and the Santa Cruz River Park. Local alternatives would not intersect with
35 any PLZs or Tucson Mountain Park.

1 Local alternative TH1a would intersect Pima County Multiple Use Management Areas on approximately
2 25.7 acres of which 7.2 acres would be disturbed. It would also cross Tumamoc Hill on approximately
3 21.7 acres of which 6.1 acres would be disturbed.

4 Local alternative TH1b would intersect Pima County Multiple Use Management Areas on approximately
5 0.6 acre of which 0.2 acre would be disturbed.

6 Local alternative TH1-Option would intersect Pima County Multiple Use Management Areas on
7 approximately 17.0 acres of which 24.8 acres would be disturbed.

8 Local alternative TH3-Option A would intersect Pima County Important Riparian Areas on approximately
9 5.3 acres of which 1.5 acres would be disturbed. It would also intersect Pima County Multiple Use
10 Management Areas on approximately 3.4 acres of which 1.0 acres would be disturbed. TH3-Option A
11 would intersect with the River Park on approximately 3.6 acres of which 1.0 acres would be disturbed.
12 This local alternative would also intersect with the western burrowing owl PCA on approximately 15.1
13 acres of which 4.2 acres would be disturbed.

14 Local alternative TH3-Option B would intersect Pima County Important Riparian Areas on approximately
15 1.2 acres of which 0.3 acre would be disturbed. TH31-Option B would also intersect Pima County
16 Multiple Use Management Areas on approximately 1.3 acres of which 0.4 acre would be disturbed.
17 It would also intersect with the Santa Cruz River Park on approximately 0.3 acre of which 0.1 acre would
18 be disturbed. This local alternative would also intersect with the western burrowing owl PCA on
19 approximately 14.5 acres of which 4.1 acres would be disturbed.

20 Local alternative TH3-Option C would intersect on approximately 8.3 acres of which 2.3 acres
21 would be disturbed. TH3-Option C would intersect Pima County Multiple Use Management Areas on
22 approximately 14.5 acres of which 4.1 acres would be disturbed. It also would intersect with Santa Cruz
23 River Park on 9.2 acres of which 2.6 acres would be disturbed. This local alternative would also intersect
24 with the western burrowing owl PCA on approximately 29.3 acres of which 8.2 acres would be disturbed.

25 Local alternative TH3a would intersect Pima County Important Riparian Areas on approximately 7.1
26 acres of which 2.0 acres would be disturbed. It would also cross Pima County Multiple Use Management
27 Areas on less than 0.1 acre. This local alternative would also intersect with the western burrowing owl
28 PCA on approximately 49.7 acres of which 13.9 acres would be disturbed.

29 Local alternative TH3b would intersect with the Santa Cruz River Park on 36.4 acres of which 10.2 acres
30 would be disturbed. This local alternative would also intersect with the western burrowing owl PCA on
31 approximately 81.4 acres of which 22.8 acres would be disturbed.

32 Construction-related impacts on special designation areas would be as described for subroute 3.1. Impacts
33 on Special Designations are analyzed in section 4.12.

34 *Operation and Maintenance*

35 Operation-related impacts for local alternatives would be as described above for subroute 3.1.

36 **Agency Preferred Alternative**

37 Impacts on wildlife from the Agency Preferred Alternative would be similar to those described under
38 “Impacts Common to All Action Alternatives.” In route group 1 the Agency Preferred Alternative would
39 follow subroute 1.1. Thus impacts on wildlife in route group 1 from the preferred alternative would be the
40 same as described for subroute 1.1.

1 In route group 2, impacts on wildlife would be as described for portions of subroute 2.1 and local
2 alternative LD3a, as well as all of local alternatives LD4, and LD4-Option 5. For the portions of the New
3 Build Section of the Agency Preferred Alternative that would parallel the proposed SunZia project (LD4),
4 collocation of the transmission lines would minimize the cumulative impact of the proposed Project on
5 wildlife in this area. Utilizing local alternatives LD3a, LD4, and LD4-Option 5 would avoid the
6 Lordsburg Playa area, thus minimizing potential impacts on bird species near Lordsburg Playa.

7 In route group 2 near Willcox Playa, the Agency Preferred Alternative would be segment P7 around the
8 east side of the playa. The AGFD expressed concerns about segment P7 due to its close proximity to the
9 Willcox Playa Wildlife Watching Area. Additionally, segment P7 would pose a higher collision risk to
10 sandhill cranes and other birds that fly daily between the playa and agricultural fields to the south and
11 east.

12 In the Upgrade Section, route group 3, the Agency Preferred Alternative would follow subroute 3.1.
13 Impacts in this route group would be as described for subroute 3.1. Subroute 3.1 would cross a shorter
14 area of the San Pedro River than local alternative H, which would decrease impacts on species that utilize
15 riparian areas. Other impacts would be as described previously for subroute 3.1.

16 In route group 4, the Agency Preferred Alternative would follow subroute 4.1 except for where local
17 alternatives TH1a, TH1-Option, and MA-1 would deviate off of the existing ROW. These local
18 alternatives were selected as the Agency Preferred Alternative in order to avoid the Tumamoc Hill and
19 Marana Airport areas. Avoiding these areas would minimize resource conflicts and would reduce impacts
20 on wildlife habitat. Additional impacts would be as described above for subroute 4.1.

21 ***Additional Mitigation Measures***

- 22 • A Project speed limit of 25 mph would be designated for all construction areas, spur roads, and
23 new access roads to minimize the potential for construction equipment collisions with wildlife.
24 In areas with mountainous terrain and/or poor site distances, the Project speed limit would be 15
25 mph.
- 26 • In construction areas where recontouring is not required, vegetation would be left in place
27 wherever possible, to avoid excessive root damage and allow for resprouting.
- 28 • In designated areas, structures would be placed or rerouted so as to avoid sensitive features or to
29 allow conductors to clearly span the features, within limits of standard structure design.
- 30 • All ground-clearing/disturbance activities that could affect special status species or habitat would
31 be monitored. Where warranted, a qualified biologist would be retained to conduct pre-
32 construction activities to minimize or prevent impacts to sensitive species or habitat.
- 33 • Pre-construction surveys for federally listed species would occur in areas where the species
34 potentially occur.
- 35 • Pre-construction surveys would be implemented during the nesting season to locate raptor and
36 other migratory bird nests. If a nest were found, a timing or spatial buffer may be implemented
37 following BLM guidelines and in accordance with the MBTA.
- 38 • Surveys would be done following established protocols and would be done by qualified biologists
39 approved by BLM. In cases where established protocols do not exist, protocols would be
40 developed by the Proponent's biological consultant and approved by BLM and the wildlife
41 agencies.
- 42 • Surveys for western burrowing owl in New Mexico would follow the NMDGF Guidelines and
43 Recommendations for Burrowing Owl Surveys and Mitigation (NMDGF 2007).

- 1 • If designated suitable bighorn habitat along subroute 1.2 in segment S2 were to become occupied
2 by bighorn sheep then no Project facilities except transmission lines would be built in that area.
- 3 • Southline and its construction contractor would provide training to all personnel working on the
4 proposed Project to identify noxious weeds and prevent spread. Training would discuss known
5 invasive and noxious weed species, known locations, identification methods, and treatment
6 protocols. Training materials and a list of Project personnel completing the course would be
7 provided to BLM/Western.
- 8 • Invasive and noxious weed populations would be mapped and reported to BLM/Western.
9 BLM/Western would use the survey data and other available resources to determine in which
10 areas vehicle washing would be required based upon the results of the invasive/noxious weed
11 surveys.
- 12 • Access roads in Tucson shovel-nosed snake habitat would be posted closed to off-road vehicle
13 use and gated if appropriate to decrease the potential for vehicles striking the subspecies.
- 14 • Where appropriate, protective drift fencing would be placed along access roads and disturbance
15 areas in suitable Tucson shovel-nosed snake habitat during the active season of the snake to limit
16 the potential for vehicle strikes.
- 17 • In Tucson shovel-nosed snake habitat, temporarily disturbed areas would be revegetated with
18 native shrubs, grasses, and forbs to reduce impacts on habitat for prey populations of the Tucson
19 shovel-nosed snake.
- 20 • Tucson shovel-nosed snake identification and avoidance measures would be included in the
21 worker training program. If during construction activities Tucson shovel-nosed snakes are
22 discovered in or near areas being disturbed, biological monitors would be required to be present
23 on-site during construction activities.
- 24 • An agency-approved habitat compensation plan would be developed and compensatory
25 mitigation ratios established.

26 ***Residual Impacts***

27 Residual impacts as a result of this Project would include a permanent loss of breeding and foraging
28 habitat due to access roads and structure pads. Additional residual impacts would include increased
29 mortality to avian species due to collisions with the transmission line, increased predation on invertebrate,
30 reptile, and small mammal species due to predators using the transmission line as a hunting perch, and
31 increased hunting opportunities for raptors and corvids. The residual impacts to general wildlife are not
32 expected to be significant. The residual impacts to sandhill cranes at the Willcox Playa would be reduced,
33 but any mortality would be a significant impact.

34 ***Unavoidable Adverse Impacts***

35 Implementation of the proposed Project would result in short-term impacts to wildlife breeding and
36 foraging in the area. The construction activities coupled with the attempt to occupy new habitat may
37 result in the loss of some individuals. In addition, long-term impacts include increased mortality to avian
38 species due to collisions with the transmission line and increased predation on invertebrate, reptile, and
39 small mammal species due to predators, including raptors and corvids using the transmission line as a
40 hunting perch. A negligible loss of individuals from vehicle strikes could occur during maintenance
41 activities when vehicles/equipment would be present. There are no feasible mitigation measures that
42 would further reduce these impacts. Therefore, implementation of the proposed Project would result in
43 both Project-related and cumulative unavoidable adverse impacts (short-term and long-term) to the
44 wildlife in the area.

1 ***Short-term Uses versus Long-term Productivity***

2 Construction of the proposed transmission line would result in some short-term and long-term impacts to
3 wildlife resources and habitat. During construction, breeding and foraging within the area may decrease
4 due to temporary habitat loss, construction noise, and human presence. In addition, there may be
5 increased mortality due to collisions with construction equipment. The decrease in productivity during
6 construction would be expected to be short-term; breeding and foraging within the proposed Project
7 footprint would commence following construction activities. Long-term productivity of some species may
8 be impacted by increased mortality due to predation while some predator species, especially raptors and
9 corvids would benefit; collisions with power lines; as well as long-term habitat loss.

10 ***Irreversible and Irretrievable Commitments of Resources***

11 Irreversible and irretrievable commitment of resources would occur in cases of wildlife mortality due to
12 collisions with construction equipment, transmission lines, or structures. No other irreversible and/or
13 irretrievable commitments of resources would occur.

14 ***Cumulative impacts***

15 Reasonably foreseeable and future projects that could affect wildlife resources in the analysis area are
16 discussed below. Potential impacts from such projects would include the loss, degradation, and/or
17 fragmentation of breeding, rearing, foraging, and dispersal habitats; collisions with project vehicles and
18 equipment; increased invasive and noxious weed establishment and spread; and increased noise/vibration
19 levels during construction activities.

20 Solar energy projects that would contribute to cumulative impacts on wildlife resources include the enXco
21 Development Corporation, Solar Reserve, Lordsburg Mesa, and Safford Solar Energy projects in New
22 Mexico as well as the Whetstone Solar Ranch, University of Arizona Technology Park Thermal Storage,
23 Fotowatio Renewable Ventures, and Avra Valley Solar projects in Arizona. Typical impacts from solar
24 development would include wildlife habitat loss, degradation, fragmentation and would create barriers to
25 species movement and dispersal. These impacts would be most intensive if development were to occur in
26 previously undeveloped areas.

27 Power generation projects that would contribute to cumulative impacts on wildlife resources include the
28 Sapphire Energy Algae Facility, Lightning Dock Geothermal Power Plant, and Bowie Power Station.
29 Typical impacts from power generation projects would include wildlife habitat loss, degradation, and
30 fragmentation. These impacts would be most intensive if development were to occur in previously
31 undeveloped areas.

32 Transmission line projects that would contribute to cumulative impacts on wildlife resources include the
33 SunZia project, Bowie Power, Tortolita transmission lines, and the Willow Substation. Typical impacts
34 from transmission line development are described above in the “Impacts Common to All Action
35 Alternatives” section.

36 Other potential projects that could contribute to cumulative impacts on wildlife resources include the
37 Silverbell Road Improvements project and the Rosemont Copper Mine. These projects would contribute
38 to habitat loss, degradation, and fragmentation.

4.9 CULTURAL RESOURCES

4.9.1 Introduction

The following section details anticipated impacts to cultural resources, including archaeological sites, historic built environment resources, trails, and American Indian traditional use areas and sacred sites associated with the construction, operation, and maintenance of the proposed Project. Impacts to cultural resources are discussed in both terms of potential disturbance to previously recorded sites and historic built environment resources that are listed in, eligible for listing in, or that may be eligible for listing in the NRHP (historic properties), and predicted number of historic properties for areas not previously surveyed. The following analysis is based on the Class I data presented in Section 3.9, “Cultural Resources” and appendices G and H, and site forecasts provided in “Southline Transmission Project Resource Report 2: Cultural Resources” (CH2M Hill 2013i), as well as a BLM sensitivity model for southern New Mexico (Heilen et al. 2012). The Class I data include all Class III pedestrian survey data within the analysis area, including the surveys of the Upgrade Section existing transmission line ROW (Effland and Green 1985; Goldstein 2008; Hart 2012), and a survey performed by Western on portions of the line from the Tucson to the Saguaro substations (personal communication, Maria Martin, Galileo 2013).

4.9.2 Methodology and Assumptions

The following analysis is based on Class I records search data only; no field checks or pedestrian surveys have been conducted at this time. The Project-specific PA will stipulate the areas of potential effects (APEs) for this Project and the “direct effects” APE would be inventoried at the Class III level. For the New Build Section, the APE for direct effects as described in the PA consists of a 200-foot-wide permitted ROW corridor plus 100 feet on either side of the corridor (400 feet wide total). For the Upgrade Section, the APE for direct effects will consist of the 150-foot-wide permanent ROW corridor plus 100 feet on either side of the corridor (350 feet wide total). The APE will include the transmission corridor any associated access roads, substations, and temporary construction ROW. All cultural resources identified during the inventory would be evaluated for eligibility to the NRHP, based on the criteria set forth in federal regulation 36 CFR 60.4, which states the following:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) that are associated with the lives of persons significant in our past; or

(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) that have yielded, or may be likely to yield, information important in prehistory or history.

Adverse effects to individual historic properties will then be assessed as stipulated in the executed PA developed to comply with Section 106 of the NHPA. Assessment of adverse effects will be conducted according to BLM Manual MS-8110: “Identifying and Evaluating Cultural Resources” (BLM 2004c).

1 Measures to avoid, minimize, and/or mitigate any adverse effects on historic properties will then be
2 developed by BLM in consultation with the Section 106 consulting parties. Avoidance of sites during
3 final design is the preferred choice for impact reduction (see PPM CR-4: Avoid Direct Impacts on
4 Significant Cultural Resources through Final Design of the POD); impacts that cannot be avoided or
5 minimized through design will be mitigated by other measures such as data recovery as outlined in an HTPT
6 (see PPM CR-3: Historic Properties Treatment Plan of the POD).

7 Early in the Project planning, the BLM made an “adverse effect” determination based on the sheer scope
8 of the Project, and because of the clear potential for the Project to have adverse effects on previously
9 known historic properties. In compliance with 36 CFR 800.4(b)(2) and 800.14(b)(1)(ii), a PA for the
10 proposed Project is currently being developed. The PA is a legally binding document which will outline
11 the process that will be followed to identify, evaluate, and mitigate historic properties that may be
12 affected by the proposed Project.

13 **Analysis Area**

14 As discussed in chapter 3 (see section 3.9), the analysis area for direct impacts to cultural resources is 1
15 mile on either side of the centerline (2-mile corridor) for the New Build Section and the existing 500-foot
16 corridor for the Upgrade Section. The analysis area for visual and indirect effects is 5 miles on either side
17 of the centerline (10-mile corridor) for all alternatives.

18 For this analysis, a representative ROW has been developed by using the centerline as a base for the
19 proposed transmission line. Using Google Earth to identify impediments to structure siting, the
20 transmission line was moved off the centerline to avoid these impediments. The representative ROW then
21 follows the new alignment. The following analysis will discuss resources found or projected to be found
22 within the representative ROW.

23 Several approaches are taken in this analysis: impacts to known archaeological sites and historic built
24 environment resources within the representative ROW, predicted number of resources within the
25 representative ROW, and archaeological sensitivity data within the representative ROW (New Mexico
26 only).

27 **KNOWN ARCHAEOLOGICAL SITES AND HISTORIC BUILT ENVIRONMENT** 28 **RESOURCES**

29 In NEPA analysis, Federal agencies treat archaeological sites and historic built environment resources
30 with unevaluated and/or unknown NRHP eligibility the same as sites which are recommended or
31 determined eligible for the NRHP. The Class I includes all recorded data from previous Class III surveys
32 and potential historic features taken from historical maps. Using the Class I data, counts of NRHP- listed,
33 determined eligible, and unevaluated/unknown archaeological sites, and potential historic built
34 environment resources, are calculated for the proposed Project and the alternatives by alternative segment
35 for the representative ROW. Resources that have been determined to be not eligible for the NRHP are not
36 considered in this analysis.

37 **ARCHAEOLOGY SOUTHWEST’S CULTURAL RESOURCES PRIORITY AREAS**

38 Archaeology Southwest’s CRPAs as defined by Laurenzi et al. (2013) were also used in this analysis.
39 CRPAs crossed by the representative ROW for the proposed Project and the alternatives were identified
40 by segment, as well as for new and existing substation expansions.

1 **RESOURCE FORECASTS (NEW MEXICO AND ARIZONA)**

2 Data from the Class I records search was used to forecast the anticipated number of resources within each
3 segment’s representative ROW (CH2M Hill 2013i). The forecast represents an estimate of the number
4 of sites within a segment’s analysis area that would be expected if the entire analysis area had been
5 surveyed. Because systematic surveys represent the best available data, only resources that were part of a
6 formal, systematic inventory were used to create the forecasts. In addition, data from historical GLO and
7 USGS maps were included in the number of known resources. Although these forecasts are quantities,
8 they cannot be expressed in terms of probabilities or statistical significance because the data were not
9 collected according to statistical sampling methods (CH2M Hill 2013). In addition, because of the
10 variable survey coverage of the segments and the lack of consistent sampling, the forecasts must be
11 considered with caution.

12 The Class I inventory includes the data from the Class III inventories conducted on the existing ROW
13 along the Upgrade Section of the proposed Project (Effland and Greene 1985; Goldstein 2008; Hart
14 2012). Because a larger portion of the representative ROW within the Upgrade Section has been
15 inventoried for cultural resources, a greater amount of detailed information has been collected which will
16 affect the outcome of the predictive model for route groups 3 and 4. Please note that there is limited data
17 available for route groups 1 and 2 and that the predictions of numbers of resources may not be as accurate
18 or reliable than that for route groups 3 and 4. For that reason, a second predictive model based on data
19 collected for the New Mexico BLM is used in conjunction with the resource forecasts to gauge route
20 sensitivity.

21 The methodology used to arrive at the estimated number of archaeological sites for each segment follows
22 that of Mueller (1974), Plog (1976), Plog et al. (1978), and Schiffer et al. (1978). Corrections for
23 inventory area shape and sites size were factored into the analysis (CH2M Hill 2013i). These corrections
24 then create an “effective” coverage inventory area or sampling fraction. As discussed in chapter 3, the
25 formula used to generate the estimated number consists of the number of recorded resources within the
26 inventoried area of the segment multiplied by 1 divided by the effective sampling fraction, or

27
$$\text{Forecast resources} = \text{number of resources} \times \frac{1}{\text{effective sampling fraction}} \text{ (CH2M Hill 2013i).}$$

28 Number of forecast resource was calculated for each segment, as well as number of forecast NRHP-
29 eligible resources (historic properties). The forecast number of historic properties was calculated by
30 taking the percentage of recorded historic properties multiplied by the total number of forecast resources
31 for each segment. Predicted resource density was also calculated by dividing the number of predicted
32 resources by the acreage of each segment. Segments can then be compared based on total numbers of
33 forecast resource, forecast number of historic properties, and forecast site density to evaluate the potential
34 resource sensitivity of the segment. Longer routes can be compared by adding up the total numbers of
35 forecast resources; however, please note that longer routes will generally have more resources because of
36 their length.

37 It must be noted that there is much less resource data for the New Build Section (primarily located in New
38 Mexico) than the Upgrade Section (Arizona). As noted in section 3.9.8, only 3.7 to 9.1 percent of the New
39 Build Section has been previously surveyed, whereas 50 to 65 percent of the Upgrade Section has been
40 surveyed. The entire 100-foot ROW from Tucson to Saguaro substations was surveyed in 1985 (Effland
41 and Green 1985). Two recent surveys have been performed along the existing transmission line in the
42 Upgrade Section (Goldstein 2008; Hart 2012). Goldstein (2008) conducted a Class III pedestrian survey
43 along the existing Tucson-Apache 115-kV Transmission Line. The survey covered approximately 80
44 miles within a 200-foot wide corridor from the Tucson Substation to the Apache Substation. Hart (2012)
45 conducted a Class III survey of a 100-foot access road ROW between several pole structures along the

1 line between the Tucson and Apache substations for a total of 4.45 miles. An additional check for sites
2 along the ROW from the Tucson to the Saguaro Substation was conducted in 2012 by a Western
3 archaeologist but no survey corridor width was specified and no report was generated (personal
4 communication, Maria Martin, Galileo 2013). Because so little of the New Build Section has been
5 surveyed, the forecast resource numbers are lower than should be expected. For this reason, a second
6 model using BLM site sensitivity data was used to analyze the portion of the New Build Section that is
7 located within New Mexico (see below).

8 In addition, some segments have been identified “of potential cultural resource concern”:

9 Segments were designated “of potential cultural resource concern” if they contain any of the
10 following characteristics: anticipated resource densities greater than 50 resources per 100 acres;
11 State or National Register-listed properties; anticipated densities of Register eligible properties
12 greater than 10 properties per 100 acres; or groupings of prehistoric habitation sites. In many
13 cases, segments of potential concern possess more than one of these characteristics. (CH2M Hill
14 2013i:20)

15 Following the definitions provided in table 4.1-1, the following magnitude descriptions are used:

- 16 • No impact – Would not alter the characteristics of cultural resources that would make them
17 eligible for the NRHP or alter their integrity of location, design, setting, materials, workmanship,
18 feeling, or association.
- 19 • Minor – Impacts would occur but overall cultural resources would retain characteristics that
20 would make them eligible for the NRHP or alter their integrity of location, design, setting,
21 materials, workmanship, feeling, or association.
- 22 • Moderate – Impacts would occur, but overall cultural resources would partially retain
23 characteristics that would make them eligible for the NRHP or alter their integrity of location,
24 design, setting, materials, workmanship, feeling, or association.
- 25 • Major – Impacts would occur that overall, would substantially alter characteristics of cultural
26 resources that would make them eligible for the NRHP or alter their integrity of location, design,
27 setting, materials, workmanship, feeling, or association.

28 **INDEX OF TOTAL POTENTIAL EFFECT (NEW MEXICO)**

29 For the New Mexico portion of the proposed Project, an additional measure is available to quantitatively
30 estimate the number of archaeological sites present within the representative ROW. In 2012 the New
31 Mexico State Office of the BLM sponsored the creation of a quantitative sensitivity model of the southern
32 portion of the State (Heilen et al. 2012). For model development, southern New Mexico was divided into
33 seven modeling units based on environmental zones, hydrological basins, and culture areas. The New
34 Mexico portion of the proposed Project is contained within Modeling Units 1 (Southwestern New Mexico
35 Upland) and 2 (Southwestern New Mexico Lowland). Multiple sensitivity models were developed by
36 statistical techniques for each modeling unit using data on site locations and previous archaeological
37 surveys in conjunction with a variety of environmental and cultural variables.

38 For Modeling Units 1 and 2 models were created for Archaic sites, Formative period residential and non-
39 residential sites, Protohistoric sites, and historic residential sites. In addition, a model for historic period
40 non-residential sites was created for Modeling Unit 1 but not for Modeling Unit 2. Residential sites were
41 identified by the presence of features indicative of a residential function, such as rooms, pit houses, rock
42 shelters, foundations, kivas, cabins, tipi rings, wickiups, and hearths (Heilen et al. 2012: 3.4). The final
43 form of each model is a GIS raster data file, each cell of which contains a number between zero and one

1 representing the probability of that cell being a site as opposed to non-site cell. Each cell in the raster
2 matrix measures 30 x 30 m, or 0.222 acre.

3 Taken as a whole, these models provide a quantitative measure of the likelihood of archaeological site
4 occurrence throughout the Southline representative ROW. They therefore provide another method of
5 analyzing cultural resource impacts of the various route, subroutes, and segments of the Project within
6 New Mexico. The models were used to generate an Index of Total Potential Effect (TPE) in the following
7 manner:

- 8 1) For each of the models, probability values of each cell were summed for each segment, subroute,
9 and route group in New Mexico. The result is an estimate of the number of “site” (as opposed to
10 “non-site”) cells present in each segment—a direct measure of archaeological site area likely to
11 be present within each segment.
- 12 2) In this analysis we are primarily concerned with impacts to significant archaeological resources.
13 Since the sensitivity models predict the total area of all archaeological sites, the numbers needed
14 to be corrected by an estimate of significance for each site type. In other words, the total site cell
15 values for each segment need to be corrected using an “eligibility multiplier” reflecting the
16 percentage of sites of each type that are considered eligible for the NRHP. Eligibility multipliers
17 (*e*) for each site type were derived as follows:
 - 18 a. Unfortunately, Heilen et al. (2012) do not provide information on what percentage of
19 sites of each type have been recommended or determined eligible for inclusion in the
20 NRHP. No adequate data are presented by CH2M Hill (2013i) to allow for such a
21 calculation. In order to derive eligibility multipliers for the southwestern New Mexico
22 sensitivity models, a complete site database for the area of Modeling Units 1 and 2 was
23 obtained from the Archaeological Records Management Section in Santa Fe.
 - 24 b. Sites components were classified according to the criteria outlined in Heilen et al. (2012)
25 as Archaic, Formative residential, Formative non-residential, Protohistoric, and Historic
26 residential. The resulting site database therefore replicated as closely as possible the
27 database that was employed in producing the sensitivity model. Eligibility multipliers
28 were calculated directly from this database.
 - 29 c. Of 710 Archaic sites in the sample 191 were recommended or determined eligible, while
30 28 were recommended or determined not eligible (*e* = 0.87).
 - 31 d. Of 1471 Formative residential sites in the sample 434 were recommended or determined
32 eligible, while 11 were recommended or determined not eligible (*e* = 0.98).
 - 33 e. Of 2578 Formative non-residential sites in the sample 467 were recommended or
34 determined eligible, while 79 were recommended or determined not eligible (*e* = 0.86).
 - 35 f. Of 46 Protohistoric sites in the sample 12 were recommended or determined eligible,
36 while only two were recommended or determined not eligible (*e* = 0.86).
 - 37 g. Of 661 Historic residential sites in the sample 317 were recommended or determined
38 eligible, while 28 were recommended or determined not eligible (*e* = 0.88).
- 39 3) The total number of “site” cells for each segment was then multiplied by the value of *e* for each
40 site type to derive an estimate of the number of “eligible site cells” of each site type in each
41 segment.
- 42 4) The total number of eligible site cells for each segment was then multiplied by 0.222 to generate a
43 measure of total eligible site acres for each site type in each segment.

- 1 5) The total number of eligible site acres for each segment was then divided by the mean site size
2 (in acres) of each site type to derive an estimate of the number of eligible sites of each site type in
3 each segment (see tables 4.9-3 and 4.9-6). The mean site size was calculated using all single-
4 component eligible sites of each type in the database. Protohistoric sites were an exception to this
5 procedure since there was only one single-component eligible Protohistoric site in the database.
6 Mean site size for protohistoric sites was calculated using all available Protohistoric sites in the
7 database.
- 8 a. Mean site sizes (and sample sizes) were: 4.26 acres for Archaic (n=78), 3.23 acres for
9 Formative residential (n=308), 4.56 acres for Formative non-residential, 8.47 acres for
10 Protohistoric, and 14.72 acres for Historic residential.
- 11 6) An estimate of total eligible sites was produced by combining the five available sensitivity
12 surfaces to generate a layer representing probability of each cell containing an eligible site of any
13 time period. This was done by converting each period-specific sensitivity layer into a probability
14 of each cell being a non-eligible-site cell, multiplying the five model values together to generate a
15 probability that each cell does not contain an eligible site, and subtracting that value from 1.
16 The resulting cell values, representing the probability that each cell was located within an eligible
17 site, were summed by Project alternatives and corrected by mean eligible site size (6.22 acres), as
18 described above. This procedure eliminated errors related to double-counting multicomponent
19 sites.
- 20 7) Finally, an Index of TPE was calculated for each segment by standardizing the estimated number
21 of eligible sites as a percentage of the value for the segment with the largest number of total
22 eligible sites. The segment with the largest number of estimated eligible sites was segment P2
23 with 317.23 (see table 4.9-3), so that segment has a TPE value of 1.0.

24 This method is imperfect for a several reasons. First, multiplying the number of “site” cells by e is an
25 imperfect method since eligible sites of each type are probably larger on average than not-eligible sites of
26 the same type. Second, use of a raster grid automatically overestimates site acreage, since all cells which
27 intersect a site boundary are classified as “site” cells, even though only a portion of their area may be
28 within a site boundary. Both of these considerations mean that the method employed here will tend to
29 overestimate the number of eligible sites in a subroute or segment. However, imperfect as it may be, the
30 method is preferable to a straightforward count of “site” cells, since it does correct for different levels of
31 significance within the defined site types. In particular, Formative residential sites are weighted more
32 heavily other site types.

33 The TPE therefore provides a relative measure of probable impact to NRHP-eligible archaeological sites
34 that can be used to compare segments with one another. Moreover, segment TPE values can be summed
35 to calculate and compare the total probable impacts of subroutes. Although it does not consider impacts to
36 cultural resources other than archaeological sites, the TPE is nevertheless a valuable quantitative measure
37 that can be used to compare segments and subroutes in terms of their impacts to archaeological sites.
38 The sensitivity model is based on sound statistical procedures and generalizes from established site
39 location patterns in southwestern New Mexico. The regional archaeological sensitivity model derived
40 from this method is presented graphically in figure 4.9-1 in relation to the proposed Project. The
41 archaeological sensitivity of the subroutes and segments in New Mexico are depicted in figure 4.9-2.
42 Please note that Arizona is not shown because no data for this portion of the analysis were available for
43 Arizona.

44

1 **ARCHAEOLOGICAL SENSITIVITY**

2 As discussed in chapter 3, each site from the 2-mile analysis area was assigned a relative value based on
3 NRHP eligibility, site type, and site characteristics. Values assigned included unknown (0), low (1), low
4 to moderate (2), moderate (3), moderate to high (4), and high (5). Analysis was then run to determine the
5 numbers of each value present in the representative ROW for each alternative. Percentages for each value
6 were then calculated for each alternative within the representative ROW. Assuming that the percentage
7 for each value is consistent throughout each alternative by route group, the forecast percentage of each
8 sensitivity value was calculated by multiply the total number of forecast resources for each alternative by
9 the percentages for each value. For example, 67 percent of the previously recorded sites along subroute
10 1.1 are classified as moderate sensitivity (level 3). It is projected that 173 resources will be found in the
11 representative ROW for subroute 1.1; therefore, 67 percent of 173 totals 116 resources that will have
12 moderate sensitivity.

13 **VISUAL ANALYSIS**

14 The APE for indirect effects as described in the PA consists of areas visible and within 5 miles of any
15 Project component or to the visual horizon, whichever is closer. According to BLM VRI Handbook
16 H-8410-1 (BLM 1986a), the BLM divides landscapes into three zones: foreground-middleground (less
17 than 3 to 5 miles away), background (areas beyond the foreground-middleground but less than 15 miles
18 away), and seldom seen (areas not seen or hidden). Visual impacts to historic properties are not likely for
19 resources outside the foreground-middleground zone. Visual impacts to historic properties are those that
20 affect the integrity of setting, association, or feeling of those properties; for resources greater than 5 miles
21 away, any impacts to setting, association, or feeling would be minimal.

22 For towers up to 170 feet (New Build Section) and 140 feet (Upgrade Section), the area of visual effects
23 would generally be 3 miles or less; therefore, the analysis area was divided into three zones: from 0 to 0.5
24 mile from the centerline, 0.5 to 3 miles away from the centerline, and 3 to 5 miles away from the
25 centerline.

26 ***Analysis Assumptions***

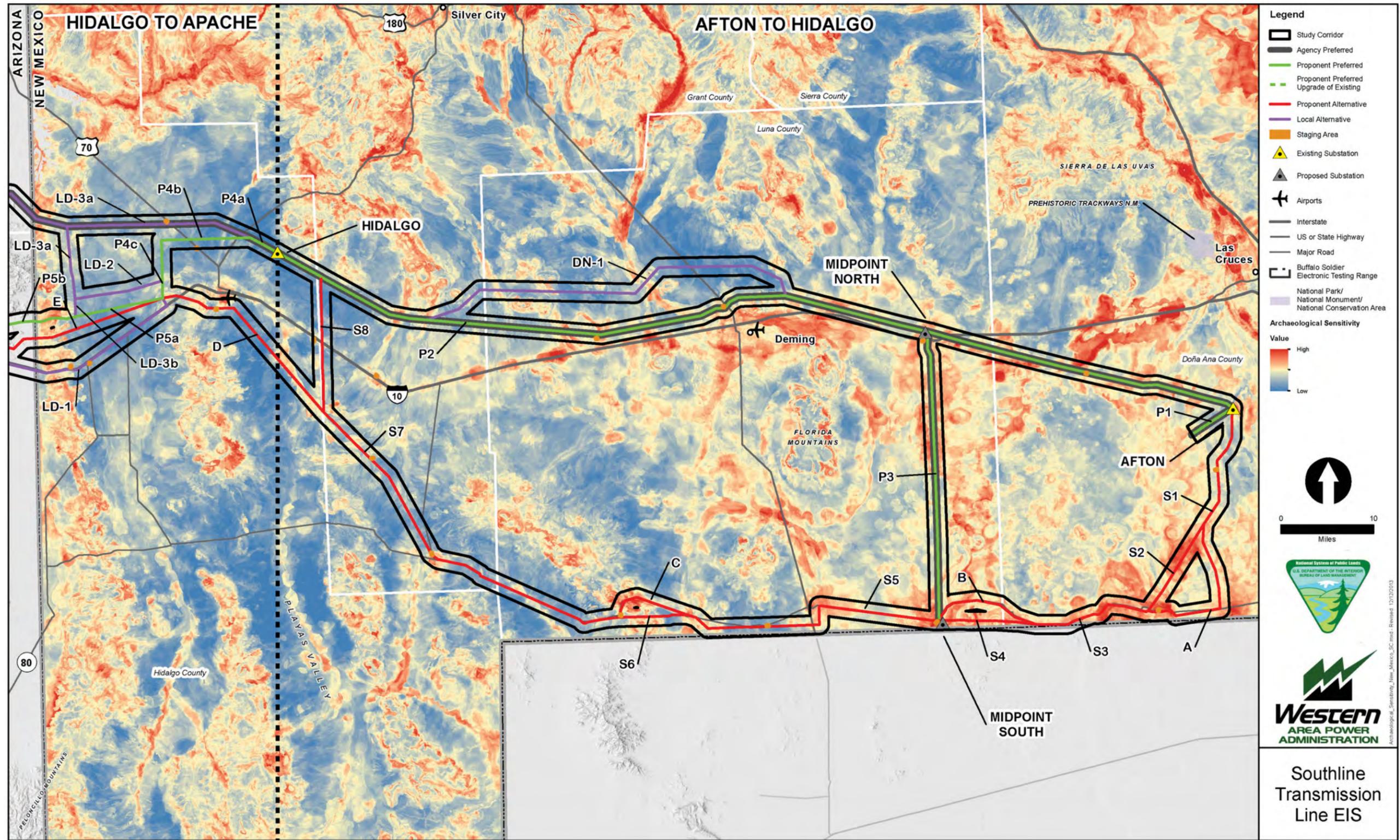
27 The analysis was conducted with the following assumptions:

- 28 • The Class I and BLM sensitivity model data are sufficient to assess impacts to cultural resources
29 within the analysis area. The Class I model data include data from the Class III surveys within the
30 representative ROW for the Upgrade Section (Effland and Green 1985; Goldstein 2008; Hart
31 2012). A Class III inventory would be conducted of the selected route in areas where no valid
32 Class III inventory exists in accordance with Section 106 of the NHPA.
- 33 • The analysis of the representative ROW will sufficiently characterize the potential impacts to
34 cultural resources. If the ROW is amended after the FEIS is complete, any additional areas would
35 be inventoried for the presence of cultural resources in accordance with the terms of
36 the PA.
- 37 • All access routes and substation locations are located within the analysis area. Any access routes
38 or substations outside the analysis area, if selected, would be inventoried for the presence of
39 cultural resources in accordance with the terms of the PA.

40 ***Impact Indicators***

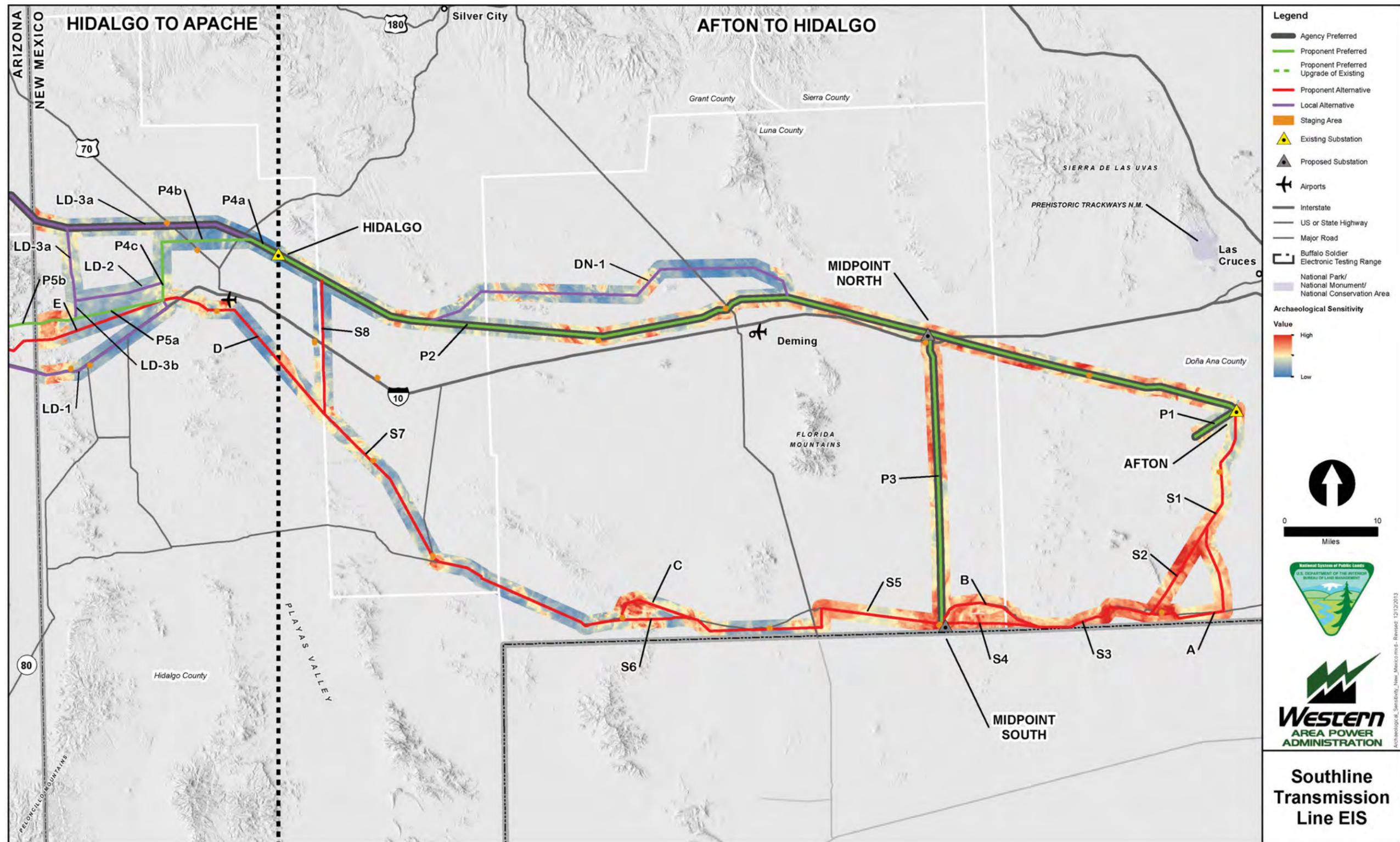
41 The primary direct impact to historic properties would consist of damage, loss, or disturbance from
42 construction that would alter the characteristic(s) which make it eligible for listing in the NRHP.

1 **Figure 4.9-1.** Regional archaeological sensitivity of southwestern New Mexico in relation to the Project footprint.



2

1 **Figure 4.9-2.** Archaeological sensitivity of Project subroutes and segments in New Mexico.



2

1 Therefore, the relative direct impacts were assessed by comparing the number of known resources and the
2 predicted number of resources within each alternative's representative ROW. Because the primary
3 indirect impact to cultural resources would consist of alterations to setting, feeling, or association of a
4 resource where setting is a significant component of its NRHP eligibility, the relative visual effects were
5 assessed by comparing numbers and types of historic properties listed on State or Federal registers and
6 historic properties which are eligible under Criterion A, B, or C.

7 Impacts to historic trails and historic trail corridors would consist mainly of alterations to the setting
8 and/or loss of recreational value of a historic trail or NHT corridor. Therefore, relative impacts were
9 assessed by comparing where and how many times an alternative's analysis area would cross a trail.

10 Direct impacts to historic properties is most often caused by ground disturbance, but can also result from
11 restricting access to a resource or from permanent visual or other intrusions within or adjacent to a
12 property. Because cultural resources are finite and fragile, direct impacts to cultural resources are usually
13 considered permanent and/or long-term, because ground disturbance generally results in damage to or loss
14 of a property's characteristics that make it eligible for listing in the NRHP. Direct impacts may also be
15 ongoing. Maintenance activities can result in continued degradation (direct and/or indirect impacts) of
16 resources from additional ground disturbance.

17 Indirect, primarily visual, impacts to cultural resources can be temporary or permanent and/or long-term.
18 Temporary indirect impacts are usually those caused by construction; permanent and/or long-term indirect
19 impacts are those caused by the structures themselves.

20 **IMPACT MAGNITUDE**

21 Impact magnitude for cultural resources follows that presented in table 4.1-1.

- 22 • No impact – Would not produce obvious changes in baseline condition of resource, e.g., no
23 changes to characteristics that contribute to a resource's eligibility for State or Federal registers.
- 24 • Minor/Negligible – Impacts would occur, but resource would retain existing character and overall
25 baseline conditions, e.g., some changes to characteristics that contribute to a resource's eligibility
26 would occur but would not alter that resource's eligibility for State or Federal registers.
- 27 • Moderate – Impacts would occur, but resource would partially retain existing character. Some
28 baseline conditions would remain unchanged, e.g., some changes to characteristics that contribute
29 to a resource's eligibility would occur which may alter that resource's eligibility for State or
30 Federal registers.
- 31 • Major – Impacts would occur that would create a high degree of change within the existing
32 resource character and overall condition of resource, e.g., changes to characteristics that
33 contribute to a resource's eligibility would occur that would alter that resource's eligibility for
34 State or Federal registers.

35 ***Significant Impacts***

36 For the purposes of this analysis, a significant impact on cultural resources under NEPA could result if
37 any of the following were to occur from construction or operation/maintenance of the proposed Project
38 that could not be mitigated:

- 39 • Loss, damage, or disturbance to resources (including trails) listed on State or Federal registers;
- 40 • Loss, damage, or disturbance to resources (including trails) that are eligible or may be eligible for
41 State and Federal registers;
- 42 • Loss, damage, or disturbance to resources of tribal concern;

- 1 • Alterations to setting, feeling, or association for an NRHP or State register-listed historic
- 2 property; and
- 3 • Alterations of the setting or feeling to resources of tribal concern.

4 **4.9.3 Impacts Analysis Results**

5 ***No Action Alternative***

6 Under the no action alternative, the BLM would not grant the ROW for the proposed Project. Analysis
7 area conditions would likely continue at current levels and trends. Even under the no action alternative,
8 Western still plans to upgrade the existing lines between the Apache and Saguaro Substations within the
9 next 10 years, in accordance with Western's 10-year capital improvement plan (Western 2012a).

10 Because under the no action alternative the existing lines would still be upgraded, impacts would be the
11 same as described under route groups 3 and 4 Proponent Preferred alternatives 3.1 and 4.1 (see sections
12 4.9.6 and 4.9.7). Importantly, in subroute 4.1, the representative ROW of segments U3d, U3e, U3f, and
13 U3g all cross the NRHP-listed Tumamoc Hill Archaeological District and Desert Laboratory NHL.
14 Although this is an existing line, direct and indirect impacts to the NHL would be expected to continue.

15 ***Impacts Common to All Action Alternatives***

16 **CONSTRUCTION**

17 Ground disturbance during construction is expected with all action alternatives and may result in the
18 damage or loss of cultural resources; however, the number and types of resources affected would vary
19 depending on the alternative. The primary contributions to ground disturbance would be access road
20 improvements, structure construction, and substation expansion and/or construction.

21 As discussed in section 4.9.2, adverse impacts to cultural resources would be mitigated in accordance
22 with the PA and the POD. As stated in the POD (Southline 2013), avoidance of resources during the final
23 design stage would be the preferred form of mitigation.

24 **OPERATION AND MAINTENANCE**

25 Indirect impacts would occur from the presence of towers in sight of NRHP-listed historic properties or
26 properties eligible under Criterion A, B, or C by altering the setting of the properties. However, the
27 number and types of historic properties affected would vary by alternative.

28 ***Route Group 1 – Afton Substation to Hidalgo Substation***

29 For the analysis of direct impacts, three data sets are discussed for each alternative within route group 1:
30 known cultural resources, forecast resources, and the Index of TPE for archaeological sites. Because
31 linear or large cultural resources may intersect with more than one segment within an alternative, each
32 segment within an alternative is discussed separately. For this route group, the forecast resource numbers
33 are based on very limited samples of surveyed space and are therefore likely to be unreliable. The Index
34 of TPE should be used for evaluating alternatives rather than the forecast resources. However, forecast
35 resources are presented here for the sake of completeness.

36

1 Table 4.9-1 presents counts of known cultural resources within the representative ROW for route group 1,
 2 Afton Substation to Hidalgo Substation. Table 4.9-2 presents forecast number of resources for the
 3 representative ROW. Table 4.9-3 presents the Index of TPE for archaeological sites based on BLM
 4 sensitivity data. Table 4.9.4 presents archaeological sensitivity of the representative ROW.

5 **Table 4.9-1.** Route Group 1 Cultural Resources Inventory Data within the Representative ROW

	Total Miles	Listed Sites	Determined Eligible Sites	Unevaluated or Unknown Sites	Resources from Historical Maps	Total Number of Resources
Subroute 1.1, Proponent Preferred						
P1	5.1				6	6
P2	102.0	1	2	16	70	89
P3	31.1			11	15	26
P4a	8.7				3	3
Subroute 1.2, Proponent Alternative						
S1	13.4			2	17	19
S2	11.1				8	8
S3	12.9		1		7	8
S4	10.6				5	5
S5	29.7		3	7	30	40
S6	7.4				9	9
S7	41.5		1	2	41	45
S8	14.6	1	1	1	10	13
Route Group 1 Local Alternatives						
DN1	42.5			5	28	33
A	17.5		1	5	17	23
B	12.2		2	3	3	8
C	9.0		1	1	11	13
D	22.8	1		2	30	33

6

1 **Table 4.9-2.** Route Group 1 Cultural Resources Projected Resource Numbers and Density within the
2 Representative ROW

	Total Miles	Projected Number of Resources	Projected Resources Density (per 100 acres)	Projected Number of NRHP-eligible Resources	Percentage of Representative ROW Surveyed	Segment of Cultural Concern
Subroute 1.1, Proponent Preferred						
P1	5.1	6	4.80	0	12.8	
P2	102.0	121	4.90	22	4.4	Yes
P3	31.1	43	5.70	1	1.8	
P4a	8.7	3	1.38	3	24.7	
Subroute 1.2, Proponent Alternative						
S1	13.4	29	8.88	2	4.3	
S2	11.1	8	2.99	0	1.0	
S3	12.9	7	2.19	1	8.4	
S4	10.6	5	1.96	1	0.1	
S5	29.7	66	9.16	20	8.7	Yes
S6	7.4	9	4.94	0	0.32	
S7	41.5	65	6.44	13	5.7	Yes
S8	14.6	41	11.66	8	14.0	Yes
Route Group 1 Local Alternatives						
DN1	42.5	143	13.9	0	1.6	
A	17.5	32	7.48	3	3.1	
B	12.2	31	10.55	9	1.7	
C	9.0	15	7.00	3	2.1	
D	22.8	53	9.71	9	1.8	Yes

3 **Table 4.9-3.** Route Group 1 Estimated Eligible Sites and Index of Total Potential Effect for Archaeological
4 Sites within the Representative ROW

Segment	Total Miles	Archaic	Formative Residential	Formative Non-Residential	Proto-Historic	Historic Residential	All Eligible Sites	Index of TPE	Eligible Sites/mile
Subroute 1.1, Proponent Preferred									
P1	5.1	2.75	4.59	2.74	1.10	1.33	15.33	0.05	3.01
P2	102.0	107.35	116.76	138.76	40.16	16.82	317.23	1.00	3.11
P3	31.1	31.95	42.44	37.56	9.13	5.30	105.40	0.33	3.39
P4a	8.7	6.84	5.80	6.73	3.46	0.05	16.31	0.05	1.87

1 **Table 4.9-3.** Route Group 1 Estimated Eligible Sites and Index of Total Potential Effect for Archaeological
 2 Sites within the Representative ROW (Continued)

Segment	Total Miles	Archaic	Formative Residential	Formative Non-Residential	Proto-Historic	Historic Residential	All Eligible Sites	Index of TPE	Eligible Sites/mile
Subroute 1.2, Proponent Alternative									
S1	13.4	5.46	8.08	10.12	2.97	2.16	40.49	0.13	3.02
S2	11.1	13.19	28.05	22.52	1.87	3.47	39.79	0.13	3.58
S3	12.9	16.03	23.21	19.94	8.17	4.04	46.66	0.15	3.62
S4	10.6	10.94	25.79	21.71	3.62	2.77	37.92	0.12	3.58
S5	29.7	23.39	24.97	41.48	17.57	5.92	90.49	0.29	3.05
S6	7.4	9.66	8.56	9.40	3.44	1.37	21.95	0.07	2.97
S7	41.5	29.42	24.14	39.26	32.13	3.45	108.15	0.34	2.61
S8	14.6	7.83	2.78	8.60	5.42	0.73	33.45	0.11	2.29
Route Group 1 Local Alternatives									
DN1	42.5	41.57	25.64	31.32	11.84	3.22	92.52	0.29	2.18
A	17.5	13.60	23.80	26.04	5.71	2.29	59.14	0.19	3.38
B	12.2	12.47	24.64	24.61	9.10	2.36	42.45	0.13	3.48
C	9.0	21.50	15.06	14.92	5.16	2.03	30.45	0.10	3.38
D	22.8	25.89	18.04	34.08	13.72	2.72	62.70	0.20	2.75

3 **Table 4.9-4.** Route Group 1 Archaeological Sensitivity within the Representative ROW

Alternative	Total Miles	Projected Number of Resources: Level 0 (%)	Projected Number of Resources: Level 1 (%)	Projected Number of Resources: Level 2 (%)	Projected Number of Resources: Level 3 (%)	Projected Number of Resources: Level 4 (%)	Projected Number of Resources: Level 5 (%)
Subroute 1.1	146.9	12 (7%)	7 (4%)	33 (19%)	116 (67%)	7 (4%)	0 (0%)
Subroute 1.2	141.2	32 (14%)	32 (14%)	41 (18%)	94 (41%)	32 (14%)	0 (0%)
DN1	42.5	86 (60%)	0 (0%)	0 (0%)	29 (20%)	29 (20%)	0 (0%)
A	17.5	0 (0%)	0 (0%)	0 (0%)	24 (75%)	8 (25%)	0 (0%)
B	12.2	13 (43%)	0 (0%)	0 (0%)	18 (57%)	0 (0%)	0 (0%)
C	9.0	0 (0%)	0 (0%)	0 (0%)	8 (50%)	0 (0%)	8 (50%)
D	22.8	0 (0%)	23 (43%)	0 (0%)	23 (43%)	0 (0%)	7 (14%)

4 **SUBROUTE 1.1 – PROPONENT PREFERRED**

5 Subroute 1.1 consists of segments P1, P2, P3, and P4a. Segment P1 connects the Afton Substation to an
 6 existing line to the southwest. Segments P2 and P4a are the primary route: it runs from the Afton
 7 Substation west and north-west past Deming to the Hidalgo Substation. Segment P3 is an interconnection
 8 route running north-south between I-10 and NM 9.

1 **Direct Impacts**

2 ***Known Cultural Resources***

3 For subroute 1.1, segments P1 and P4a have no previously recorded cultural resources which are eligible
4 or may be eligible for the NRHP within the representative ROW. Segment P1 has 6 potential historic
5 resources found on historical maps; segment P4a has 3 potential historic resources. Survey coverage of
6 the subroute 1.1 representative ROW is low and ranges from 1.8 percent for segment P1 to 24.7 percent
7 for segment P4a.

8 The representative ROW of segment P2 crosses the Butterfield Trail, which is NRHP-eligible. Two
9 NRHP-eligible (LA 15330 and LA 35176) and 16 unevaluated/unknown resources are also present in P2,
10 as well as 70 potential resources found on historical maps. Both eligible sites are prehistoric artifact
11 scatters.

12 Segment P3 has 11 unevaluated/unknown resources and 15 potential historic resources within the
13 representative ROW.

14 Though it is located slightly outside of the representative ROW, it is worth mentioning that the Black
15 Mountain site (LA 49) is located very close to local alternative DN1 northwest of Deming. This site is of
16 the greatest significance, and is listed on both the State and Federal registers.

17 ***Archaeology Southwest's Cultural Resources Priority Areas***

18 The representative ROW of segment P2 crosses the southern edge of the Burro Creek Cienega CRPA for
19 1.0 mile. The Burro Creek Cienega CRPA is an area of dense prehistoric and historic occupation, and
20 includes a section of the Butterfield Trail.

21 ***Forecast Resources***

22 For subroute 1.1, 173 resources are anticipated to be found in the representative ROW, with the majority
23 of those (121) located within segment P2. A total of 26 NRHP-eligible historic properties is predicted for
24 this subroute and resource density would range from 1.38 resources to 5.70 resources per 100 acres.
25 Segment P2 has been categorized as a segment of cultural concern; P2 is sensitive primarily because of its
26 length, which means more historic properties should be located within its representative ROW. However,
27 because of the low percentage of surveyed representative ROW, this forecast must be used with caution.

28 ***Index of Total Potential Effect***

29 Subroute 1.1 segments have TPE values ranging from 0.05 to 1.00, with segment P2 having the highest
30 value. Because segment P2 is the longest segment of the subroute, the greater projected impact is partially
31 due to its length. However, segment P2 also has a high number of eligible sites per mile at 3.39. It is both
32 long and is projected to have a relatively high density of eligible sites. Subroute 1.1 as a whole has a
33 total estimate number of eligible sites of 454, slightly higher than the subroute 1.2 estimate of 418. It is
34 therefore to be expected that subroute 1.1 would have slightly greater total effects on archaeological sites
35 than would subroute 1.2. However, the difference is a relatively subtle one.

36 ***Archaeological Sensitivity***

37 Sixty-seven percent of sites within subroute 1.1 are moderate sensitivity (level 3) which means 116 of the
38 173 projected resources for the representative ROW should be of moderate sensitivity. No resources
39 should be of high sensitivity (level 5) while only 7 (4%) of the Project resources should be of moderate to
40 high sensitivity (level 4).

1 **Historic Trails**

2 Subroute 1.1 would cross the Butterfield Trail and crosses the potential routes of the Mormon Battalion
3 Trail and the Janos Copper Road. Segment P2 would cross all three trails. Segment P2 would cross the
4 Butterfield Trail east of Lordsburg and the Mormon Battalion Trail and the Janos Copper Road just south
5 of Grandmother Mountain and north of I-10.

6 **Summary of Direct Impacts for Subroute 1.1**

7 Direct impacts to cultural resources for subroute 1.1 would be major and long-term. One NRHP-listed,
8 two NRHP-eligible, and 27 unevaluated resources are found within the representative ROW for subroute
9 1.1. Because only 1.8 to 24.7 percent of the representative ROW has been surveyed, projected resources
10 are anticipated to total 173 resources with 73 percent in the moderate to high or high sensitivity category.
11 However, adverse impacts to cultural resources would be mitigated in accordance with the terms of the
12 PA and the POD. As stated in the POD, avoidance of resources during the final design stage would be the
13 preferred form of mitigation.

14 **Visual Impacts**

15 Visual impacts data for subroute 1.1 consist of historic properties listed on State or Federal registers and
16 historic properties eligible for the NRHP under Criterion A, B, or C within 5 miles of the centerline
17 (10-mile corridor). As discussed in section 4.9.2, historic properties were divided into three categories
18 based on distance from the centerline: 0–0.5 mile, 0.5–3 miles, and 3–5 miles. Significant visual impacts
19 are more likely to occur in the 0–0.5 mile and 0.5–3 miles zones than the 3–5 miles zone due to the
20 increased distance in the 3–5 miles zone; however, the proposed 170-foot lattice structures for the New
21 Build Section and the 140-foot tubular steel poles for the Upgrade Section can be seen as far away as 3
22 miles (Jones and Jones 1976:table 11; BLM 2006).

23 **Listed Properties**

24 Twenty historic properties that are listed on State or Federal registers are located within the 10-mile visual
25 effects corridor. All of the properties are found in the 0.5- to 3-mile range along segment P2, but are
26 located at the far end (3-mile) of that range south of I-10 in Deming. Due to the distance few visual
27 impacts are expected. The properties are as follows:

- 28 • Deming Armory
- 29 • Seaman Field House
- 30 • Luna County Courthouse and Park
- 31 • Mahoney Building
- 32 • US Post Office–Deming Main
- 33 • 105–107 North, Silver Avenue, Deming
- 34 • Baker Hotel
- 35 • Diamond Furniture Warehouse, Deming
- 36 • 100 South Gold Avenue, Deming (Deming Art Council)
- 37 • 110 South Gold Avenue, Deming (Waymaker Christian Store)
- 38

- 1 • 200 South Gold Avenue, Deming (Mimbres Valley Brewing Company)
- 2 • 202 South Gold Avenue, Deming (Liberty Finance)
- 3 • Old Deming National Bank
- 4 • Palmas Restaurant
- 5 • 118 East Pine Street, Deming (The New T-Shirt Print Shop)
- 6 • 116 North Silver Avenue, Columbus (Star Barber Shop (possible location))
- 7 • 116 North Silver Avenue, Deming (Tinaja Alta Trading Co.)
- 8 • Silver Avenue, Deming (Antique Shop)
- 9 • 112–120 East Spruce Street, Deming
- 10 • 113 East Spruce Street, Deming (Delaney & Hernandez)

11 ***Determined Eligible Historic Properties***

12 There is one resource which has been determined eligible under Criterion A, B, or C within the 10-mile
13 visual analysis corridor for subroute 1.1. The historic site LA 164811, the Cambrey Civilian Conservation
14 Corps camp, is within 0.5 mile of the centerline of segment P2; visual impacts to the setting of this
15 property are expected due to the distance from the proposed transmission line.

16 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

17 Subroute 1.2 consists of segments S1 through S8. It begins at the Afton Substation and runs south and
18 southwest to NM 9. It then continues west along Columbus Road and eventually runs south of the town of
19 Columbus where it runs west along NM 9 until the intersection of NM 9 and NM 146. The subroute then
20 runs northwest just east of the Luna and Grant County line. Segment S8 then runs north to segment P4a of
21 subroute 1.1.

22 **Direct Impacts**

23 ***Known Cultural Resources***

24 For subroute 1.2, segments S2, S4, and S6 have no previously recorded NRHP-eligible or
25 unevaluated/unknown sites within the representative ROW; segment S2 has eight potential historic
26 resources, S4 has five potential historic resources, and S6 has nine potential historic resources. Previous
27 survey coverage of the subroute 1.2 representative ROW is lower than that of subroute 1.1; it ranges from
28 a low of 0.1 percent for segment S4 to 14.0 percent for segment S8.

29 One resource which is NRHP-unevaluated/unknown is found within the representative ROW for segment
30 S3, along with seven potential resources from historical maps.

31 In the representative ROW for segment S5, three NRHP-eligible resources (LA 54882, LA 54883, and
32 LA 76114) and seven unevaluated/unknown previously recorded resources are found. All three eligible
33 sites are historic and at least two are associated with the railroad; no information was available for
34 LA 76114. Segment S5 also has 30 potential historic resources.

35 In segment S7, one NRHP-eligible (LA 44811) and two unevaluated/unknown previously recorded
36 resources along with 41 potential historic resources are found. LA 44881 is the historic Victorio Station.

1 One listed property, the Butterfield Trail, crosses the representative ROW of segment P8. One NRHP-
2 eligible (LA 134502) and one unevaluated/unknown previously recorded resource are found within the
3 segment P8 representative ROW; 10 potential historic resources are also present. LA 134502 is a
4 prehistoric artifact scatter.

5 In addition, while not recorded as an archaeological site in New Mexico, or a historic built environment
6 resource, the historic railroad grade of the El Paso and Southwestern Railroad can be seen on historical
7 maps running alongside a large portion of subroute 1.2. It is labeled as OLD RAILROAD GRADE.
8 The grade originates southeast of segment S2 and is crossed by segment S3. The grade then runs along
9 the north side of segment S3, S5, and S6, although it is only found in the representative ROW where it is
10 crossed by S3. The El Paso and Southwestern Railroad grade is considered an NRHP-eligible site by the
11 BLM (personal communication, Jane Childress 2013).

12 ***Archaeology Southwest's Cultural Resources Priority Areas***

13 The representative ROW for subroute 1.2 does not cross any of the Archaeology CRPAs.

14 ***Forecast Resources***

15 Based on forecasted resources analysis, impacts to cultural resources for subroute 1.2 would be major and
16 long-term and more intense than that of subroute 1.1. For subroute 1.2, 170 cultural resources are
17 anticipated to be in the representative ROW, of which 45 are anticipated to be eligible for the NRHP.
18 Predicted resource density ranges from 1.96 to 11.66 resources per 100 acres. Segments S5, S7, and S8
19 have been flagged as segments of cultural concern.

20 ***Index of Total Potential Effect***

21 Subroute 1.2 segments have TPE values ranging from 0.07 to 0.34, with S7 having the highest value.
22 Because segment S7 is the longest segment of the subroute, the greater projected impact is due mainly to
23 its length; segments S2, S3, and S4 have much larger estimated numbers of eligible sites per mile.
24 Subroute 1.2 as a whole has a total estimated number of eligible sites of 418, slightly lower than the
25 subroute 1.1 estimated number of 454. Subroute 1.2 also has a slightly lower number of eligible sites per
26 mile (2.97) than does subroute 1.1 (3.09). Therefore, it is expected that subroute 1.2 would have slightly
27 lesser impact on archaeological sites than would subroute 1.1. However, the difference is a relatively
28 subtle one.

29 ***Archaeological Sensitivity***

30 Subroute 1.2 is projected to have 94 resources (41 percent) with moderate sensitivity (level 3); 41
31 resources (18 percent) at low to moderate (level 2); and 32 (14 percent) at both low and moderate to high
32 sensitivity. No resources are projected to be in the high sensitivity group (level 5).

33 **Historic Trails**

34 Subroute 1.2 crosses the Butterfield Trail and crosses the potential routes of the Mormon Battalion Trail
35 and the Janos Copper Road. Segment S6 crosses the Janos Copper Road, segment S7 crosses the Mormon
36 Battalion Trail, and segment S8 crosses the Butterfield Trail. Segment S6 crosses the Janos Copper Road
37 on the northeast side of the Carrizalillo Hills and west of Columbus. Segment S7 crosses the Mormon
38 Battalion Trail southeast of the Brockman Hills. Segment S8 crosses the Butterfield Trail east of
39 Lordsburg.

1 **Summary of Direct Impacts for Subroute 1.2**

2 Direct impacts to cultural resources for subroute 1.2 would be moderate/major and long-term. One
3 NRHP-listed, six NRHP-eligible, and 12 unevaluated resources are found within the representative ROW
4 for subroute 1.2. Projected resources are anticipated to total 230 resources with 55 percent in the moderate
5 to high or high sensitivity category. However, adverse impacts to cultural resources would be mitigated in
6 accordance with the terms of the PA and the POD. As stated in the POD, avoidance of resources during
7 the final design stage would be the preferred form of mitigation.

8 **Visual Impacts**

9 ***Listed Historic Properties***

10 Eight historic properties within the 10-mile visual corridor have been listed on State or Federal registers
11 for subroute 1.2. All listed properties are within the visual corridor for segments S5 and S7.

12 For segment S5, the Village of Columbus and Camp Furlong NHL are located within 0.5 mile of the
13 centerline. The transmission line would be located to the east of the Village of Columbus and Camp
14 Furlong NHL. Some impacts to setting would occur for the eastern edge of the NHL which is less than
15 0.5 mile from the line. Within 0.5 to 3 miles are: the Hoover Hotel, the Columbus Village Jail, the
16 Railroad Station Complex, the U.S. Army Headquarters, the U.S. Customs House, and the Camp Furlong
17 Recreation Hall. All of these historic properties are located within downtown Columbus, approximately
18 1.5 miles from the transmission line. Visibility of the line from these properties would be negligible;
19 therefore, few visual impacts are expected.

20 For segment S7, the Old Hatchet Mine in Hachita is within 3 to 5 miles of the centerline. Because the
21 mine is over 3 miles from the proposed transmission line, no visual impacts are expected.

22 ***Determined Eligible Historic Properties***

23 Along subroute 1.2, there is one resource which has been determined eligible under Criterion A, B, or C
24 within the visual impact analysis corridor. LA 12839 is within 0.5 to 3 miles of the centerline of segment
25 S5. LA 12839 is the El Paso and Southwestern Railroad Columbus Station. The station is located in
26 downtown Columbus, approximately 1.5 miles from the proposed transmission line and visibility of the
27 transmission line would be limited from the station; therefore, few visual impacts are expected.

28 The El Paso and Southwestern Railroad grade, which is considered an NRHP-eligible site by the BLM
29 (personal communication, Jane Childress 2013) is within the 0.5-mile visual impact zone. In many places
30 the railroad grade is less than 150 m from the centerline of subroute 1.2; therefore, visual impacts to the
31 railroad grade would be major and long-term.

32 **LOCAL ALTERNATIVES**

33 There are five local alternatives available for route group 1: DN1, A, B, C, and D. DN1 would run north
34 of subroute 1.1 and share ROW with the proposed SunZia project. Alternative A would follow existing
35 unpaved roads south and southeast of subroute 1.2; both alternatives B and C parallel NM 9 for 12 miles;
36 and alternative D runs from segment S7 to just south of Lordsburg where it continues west and northwest
37 to 1 mile north of I-10.

38

1 **Direct Impacts**

2 ***Known Cultural Resources***

3 The representative ROW for segment DN1 contains 5 unevaluated/unknown previously recorded
4 resources and 33 potential resources from historical maps; 1.6 percent of the representative ROW has
5 been previously surveyed.

6 Local alternative A has 1 eligible resource, 5 unevaluated/unknown previously recorded resources, and 17
7 potential resources from historical maps; 3.1 percent of local alternative A has been previously surveyed.
8 The eligible resource (LA 79551) is a prehistoric artifact scatter.

9 Local alternative B has two NRHP-eligible and three unevaluated/unknown previously recorded
10 resources, as well as three potential resources from historical maps. Within the representative ROW,
11 however, only 1.7 percent of the representative ROW has been surveyed. Both the eligible resources
12 (LA 54880 and LA 159468) are historic; however, no information was available for LA 159468.
13 LA 54880 is a railroad station.

14 Local alternative C has 1 eligible resource, 1 unevaluated/unknown resource, and 11 potential historic
15 resources; 2.1 percent of the representative ROW has been previously surveyed.

16 One NRHP-listed resource, the Town of Shakespeare, is located within the representative ROW of local
17 alternative D, along with 2 unevaluated/unknown previously recorded resources, and 30 potential
18 resources from historical maps; however, only 1.8 percent of the representative ROW has been surveyed.

19 In addition, the El Paso and Southwestern railroad grade begins approximately 150 m south of local
20 alternative A. Local alternative B and C run parallel approximately 100 m to the south of the railroad
21 grade along the same basic alignment; however, it is not found within the representative ROW for local
22 alternatives A, B, and C.

23 ***Archaeology Southwest's Cultural Resources Priority Areas***

24 The representative ROW for local alternative DN1 crosses the northwest portion of the Black Mountain
25 CRPA for 1.4 miles and the southern tip of the Burro Creek Cienega CRPA for 0.7 mile.

26 The Black Mountain CRPA includes the habitation site of Black Mountain and associated sites.
27 The Burro Creek Cienega CRPA is an area of dense prehistoric and historic occupation, and includes a
28 section of the Butterfield Trail.

29 ***Forecast Resources***

30 Local alternative A is predicted to have 32 cultural resources in the representative ROW, 3 of which
31 would be NRHP-eligible. Local alternative B is predicted to have 31 cultural resources, 9 of which would
32 be NRHP-eligible. Fifteen resources are also predicted for local alternative C; 3 of which would be
33 NRHP-eligible. Local alternative D is predicted to have 53 cultural resources with 9 resources eligible for
34 the NRHP. Resource density for local alternative D is anticipated to be 9.71 resources per 100 acres
35 within the representative ROW. Local alternative DN1 is forecast to have 143 resources but no resources
36 eligible for the NRHP. Local alternative D is the only local alternatives categorized as being of cultural
37 concern with route group 1.
38

1 ***Index of Total Potential Effect***

2 Local alternative DN1 has a TPE index of 0.29 with 93 estimated eligible sites. DN1 is 42.50 miles long;
3 there are 2.18 eligible sites per mile.

4 Local alternative A has a TPE index of 0.19 with 59 estimated eligible sites. DN2 is 17.50 miles long;
5 there are 3.38 eligible sites per mile.

6 Local alternative B has a TPE index of 0.13 with 42 estimated eligible sites. B is 12.20 miles long; there
7 are 3.48 eligible sites per mile.

8 Local alternative C has a TPE index of 0.10 with 30 estimated eligible sites. DNC is 9.00 miles long;
9 there are 3.38 eligible sites per mile.

10 Local alternative D has a TPE index of 0.23 with 94 estimated eligible sites. DND is 22.80 miles long;
11 there are 2.75 eligible sites per mile.

12 ***Archaeological Sensitivity***

13 Local alternative DN1 is projected to have 29 resources (20 percent) with moderate sensitivity (level 3)
14 and 29 resources with moderate to high sensitivity (level 4).

15 Local alternative A is projected to have 24 resources (75 percent) with moderate sensitivity (level 3) and
16 8 resources (25 percent) at moderate to high sensitivity (level 4). No resources are projected with high
17 sensitivity (level 5).

18 Eighteen resources (57 percent) with moderate sensitivity are projected for local alternative B; 13
19 resources (43 percent) are projected as unknown sensitivity (level 0). No resources are projected with
20 moderate to high (level 4) or high sensitivity (level 5).

21 Local alternative C is projected to have eight resources (50 percent) in both the moderate (level 3) and
22 high (level 5) sensitivity category.

23 Local alternative D is projected to have 23 resources (43 percent) in both the low (level 1) and moderate
24 (level 3) categories; seven resources (14 percent) are projected to be of high sensitivity (level 5).

25 **Historic Trails**

26 Local alternatives C and DN1 cross potential route of the Janos Copper Road. DN1 also crosses the
27 potential route of the Mormon Battalion Trail. Local alternative C crosses the potential route of the Janos
28 Copper Road northeast of the Carrizalillo Hills and north of where segment S6 crosses the road. Segment
29 DN1 crosses the potential Mormon Battalion Trail route west of Luna, just southwest of Clabber Top
30 Hill.

31 **Summary of Direct Impacts for Route Group 1 Local Alternatives**

32 Direct impacts to cultural resources for local alternative DN1 would be minor to moderate. Five
33 unevaluated resources have been previously recorded within the representative ROW. Projected resources
34 total 38, with 40 percent being of moderate and moderate to high sensitivity.

35 Direct impacts for local alternative A would be moderate: one eligible and five unevaluated resources are
36 located within the representative ROW. Projected resources total 32, with 100 percent being of moderate
37 or moderate to high sensitivity.

1 For local alternative B, direct impacts would be moderate: two eligible and two unevaluated resources
2 have been previously recorded in the representative ROW. Thirty-one resources are projected for the
3 representative ROW of local alternative B, with 57 percent falling in the moderate sensitivity category.

4 Direct impacts for local alternative C would be moderate. One eligible and one unknown resource have
5 been recorded in the representative ROW and only 15 resources are projected for local alternative C;
6 however, 50 percent of the projected resources are anticipated to fall in the high sensitivity category and
7 50 percent in the moderate sensitivity category.

8 For local alternative D, direct impacts would be moderate. One listed and two unevaluated resources have
9 been previously recorded in the representative ROW. Project resources total 53, with 43 percent having
10 moderate sensitivity and 14 percent having high sensitivity.

11 However, adverse impacts to cultural resources would be mitigated in accordance with the terms of the
12 PA and the POD. As stated in the POD, avoidance of resources during the final design stage would be the
13 preferred form of mitigation.

14 **Visual Impacts**

15 ***Listed Historic Properties***

16 For local alternative D, five historic properties which are listed on State or Federal registers are found
17 within the visual analysis corridor. Two properties, the Shakespeare Ghost Town and the Shakespeare
18 Cemetery, are found within 0.5 mile of the centerline. The centerline currently crosses the southwestern
19 corner of the Shakespeare Ghost Town. Alterations to setting for these two properties would be major or
20 moderate, depending on the exact location of the towers. Three properties, the Hidalgo County
21 Courthouse, the Hidalgo County Library, and the Lordsburg Coaling Tower which no longer exists, are
22 found within 0.5 to 3 miles of the centerline. These properties are all located in downtown Lordsburg on
23 the northern side of I-10; therefore the visibility of the transmission line would be limited from these
24 properties. Few to no impacts are expected to these properties.

25 One NRHP-listed historic property is found within 3 to 5 miles of local alternative DN1, the Luna County
26 Courthouse. Because of the distance from DN1, few to no visual impacts are anticipated for this property.

27 No listed historic properties are within the visual analysis corridor for local alternatives A, B, and C.

28 ***Determined Eligible***

29 No resources which have been determined eligible under Criterion A, B, or C are within the visual
30 analysis area for local alternative A, B, or C.

31 Two properties are between 0.5 to 3 miles of local alternative D: LA 50129 and LA 111003. Visual
32 impacts to the setting for these two sites would be minor.

33 The El Paso and Southwestern Railroad grade, which is considered an eligible site by the BLM (personal
34 communication, Jane Childress 2013), is within the 0.5-mile visual impact zone. In many places the
35 railroad grade is less than 150 m from the centerline of local alternatives A, B, and C; therefore, visual
36 impacts to the railroad grade would be major and long-term.

1 **Route Group 2 – Hidalgo Substation to Apache Substation**

2 There are three tables of data for direct analysis: table 4.9-5 presents counts of known cultural resources
3 within the representative ROW for route group 2, Hidalgo Substation to Apache Substation. Table 4.9-6
4 presents forecast number of resources for representative ROW for route group 2, Hidalgo Substation to
5 Apache Substation. Table 4.9-7 presents Index of TPE for archaeological sites based on BLM sensitivity
6 data for route group 2, Hidalgo Substation to Apache Substation (New Mexico portion only). Table 4.9-8
7 presents the archaeological sensitivity of route group 2, Hidalgo Substation to Apache Substation.

8 For this route group, the forecast resource numbers are based on very limited samples of surveyed space
9 and are therefore likely to be unreliable. Where available (in New Mexico), the Index of TPE should be
10 used for evaluating alternatives rather than the forecast resources. However, forecast resources are
11 presented here for the sake of completeness and due to the fact that no Index of TPE can be calculated for
12 the Arizona portion of this route group.

13 **Table 4.9-5. Route Group 2 Cultural Resource Inventory Data**

	Total Miles	Listed Sites	Determined Eligible Sites	Unevaluated or Unknown Sites	Resources from Historic Maps	Total Number of Resources
Subroute 2.1, Proponent Preferred						
P4b	14.0				5	5
P4c	1.9	1			2	3
P5a	9.6			1	5	6
P5b	21.1	1	2	5	17	25
P6a	0.9			1	2	3
P6b	22.5			12	37	49
P6c	2.8			1	7	8
P7	22.3		2	12	32	36
P8	0.5				2	2
Subroute 2.2, Proponent Alternative						
E	31.8	1		1	38	40
F	25.3			4	36	40
Ga	25.7			1	45	46
Gb	1.0				4	4
Gc	7.4		3	2	13	18
I	2.3				4	4
J	2.3				6	6

14

1 **Table 4.9-5.** Route Group 2 Cultural Resource Inventory Data (Continued)

	Total Miles	Listed Sites	Determined Eligible Sites	Unevaluated or Unknown Sites	Resources from Historic Maps	Total Number of Resources
Route Group 2 Local Alternatives						
LD1	35.4	1	1	11	46	59
LD2	9.6	1			3	4
LD3a	27.9	1			18	19
LD3b	1.9				2	2
LD4	51.7		1	4	13	18
LD4-Option 4	6.5				10	10
LD5-Option 5	12.3				17	17
WC1	14.8			1	82	83

2 **Table 4.9-6.** Route Group 2 Cultural Resources Projected Resources Numbers and Density within the
 3 Representative ROW

	Total Miles	Projected Number of Resources	Projected Resource Density (per 100 acres)	Projected Number NRHP-eligible Historic Properties	Percentage of Representative ROW Surveyed	Segment of Cultural Concern
Subroute 2.1, Proponent Preferred						
P4b	14.0	5	1.49	0	1.0	
P4c	1.9	3	6.68	1	1.7	Yes
P5a	9.6	7	2.86	0	16.5	
P5b	21.1	42	8.14	9	52.0	Yes
P6a	0.9	12	57.60	6	16.8	Yes
P6b	22.5	93	17.10	2	11.0	
P6c	2.8	19	27.71	0	2.6	
P7	22.3	58	10.79	1	82.5	Yes
P8	0.5	2	22.22	0	100.0	
Subroute 2.2, Proponent Alternative						
E	31.8	41	5.26	4	0.64	Yes
F	25.3	60	9.80	5	16.13	
Ga	25.7	73	11.67	3	2.1	
Gb	1.0	4	15.42	1	35.4	
Gc	7.4	24	13.02	3	67.2	
I	2.3	3	5.42	0	6.1	
J	2.3	5	7.72	0	14.8	

1 **Table 4.9-6.** Route Group 2 Cultural Resources Projected Resources Numbers and Density within the
2 Representative ROW (Continued)

	Total Miles	Projected Number of Resources	Projected Resource Density (per 100 acres)	Projected Number NRHP-eligible Historic Properties	Percentage of Representative ROW Surveyed	Segment of Cultural Concern
Route Group 2 Local Alternatives						
LD1	35.4	73	8.55	7	31.3	Yes
LD2	9.6	4	1.67	0	1.2	Yes
LD3a	27.9	61	8.77	0	11.0	Yes
LD3b	1.9	3	6.42	0	1.6	
LD4	51.7	45	3.6	0	2.1	
LD4-Option 4	6.5	0	0	0	29.1	
LD4-Option 5	12.3	0	0	0	77.6	
WC1	14.8	89	24.78	0	12.2	Yes

3 **Table 4.9-7.** Route Group 2 Estimated Eligible Sites and Index of Total Potential Effect for Archaeological
4 Sites within the Representative ROW (New Mexico)

Segment	Total Miles	Archaic	Formative Residential	Formative Non-Residential	Proto-Historic	Historic Residential	Eligible Sites	Index of TPE	Eligible Sites/mile
Subroute 2.1, Proponent Preferred									
P4b	14.00	7.41	5.27	10.14	3.81	0.80	28.46	0.09	2.03
P4c	1.90	1.07	2.29	2.10	0.72	0.52	5.29	0.02	2.79
P5a	9.60	6.41	2.69	7.61	1.20	0.48	21.03	0.07	2.19
P5b	21.10	10.11	10.28	5.63	1.36	0.82	14.64	0.05	0.69
Subroute 2.2, Proponent Alternative									
E	31.80	13.61	7.67	11.51	2.08	1.11	34.13	0.11	1.07
Route Group 2 Local Alternatives									
LD1	35.40	10.83	8.32	13.24	10.45	1.59	41.37	0.13	1.17
LD2	9.60	12.19	2.20	8.53	3.05	0.65	23.92	0.08	2.49
LD3a	27.90	14.72	11.88	24.28	8.01	1.01	63.36	0.20	2.27
LD3b	1.90	2.54	0.91	2.22	0.49	0.13	4.96	0.02	2.61
LD4	51.70	3.64	6.41	7.40	2.12	0.67	12.32	0.04	0.24

5

1 **Table 4.9-8.** Route Group 2 Archaeological Sensitivity within the Representative ROW

Alternative	Total Miles	Projected Number of Resources: Level 0 (%)	Projected Number of Resources: Level 1 (%)	Projected Number of Resources: Level 2 (%)	Projected Number of Resources: Level 3 (%)	Projected Number of Resources: Level 4 (%)	Projected Number of Resources: Level 5 (%)
Subroute 2.1	95.6	24 (10%)	0 (0%)	77 (32%)	77 (32%)	65 (27%)	0 (0%)
Subroute 2.2	95.8	0 (0%)	0 (0%)	48 (23%)	145 (69%)	17 (8%)	0 (0%)
LD1	35.4	5 (7%)	0 (0%)	9 (13%)	53 (73%)	5 (7%)	0 (0%)
LD2	9.6	0 (0%)	0 (0%)	0 (0%)	0 (0%)	4 (100%)	0 (0%)
LD3a	27.9	0 (0%)	0 (0%)	0 (0%)	0 (0%)	61 (100%)	0 (0%)
LD3b	1.9	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
LD4	51.7	9 (20%)	0 (0%)	9 (20%)	27 (60%)	0 (0%)	0 (0%)
LD4-Option 4	6.5	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
LD4-Option 5	12.3	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
WC1	14.8	0 (0%)	0 (0%)	0 (0%)	89 (100%)	0 (0%)	0 (0%)

2 **SUBROUTE 2.1 – PROPONENT PREFERRED**

3 Subroute 2.1 consists of segments P4b, P4c, P5a, P5b, P6a, P6b, P6c, P7, and P8. Beginning northeast of
 4 Lordsburg, subroute 2.1 travels west and south around Lordsburg. It then travels west across the New
 5 Mexico–Arizona State line and into Arizona, where it extends south and southwest around the eastern
 6 edge of Willcox Playa.

7 **Direct Impacts**

8 ***Known Cultural Resources***

9 Previous survey coverage for subroute 2.1 is variable, ranging from 1.0 percent for segment P4b to 100
 10 percent for segment P8.

11 Within subroute 2.1, segments P4b and P8 have no previously recorded resources which are eligible or
 12 unevaluated/unknown. Segment P4b has five potential resources digitized from historical maps; segment
 13 P8 has eight potential historic resources.

14 Segment P4c crosses the Butterfield Trail (historic property) twice and segment P5b once. Segment P4b
 15 has an additional two potential historic resources. Segment P5b also has 2 NRHP-eligible resources
 16 (LA 55762 and LA 130265), 5 unevaluated/unknown resources, and 17 potential resources from historical
 17 maps. LA 55762 is a habitation site with both prehistoric and historic components; LA 130265 is a
 18 historic habitation.

19 Segment P5a has one unevaluated/unknown resource and five potential historic resources; segment P6a
 20 has one unevaluated/unknown resource and two potential historic resources. Segment P6b has 12
 21 unevaluated/unknown resources and 37 potential historic resources; segment P6c has 1
 22 unevaluated/unknown resource and 7 potential historic resources.

23 Within segment P7, there are 2 eligible resources (AZ CC:3:91[ASM] and AZ FF:1:34[ASM]),
 24 12 unevaluated/unknown resources, and 32 potential resources from historical maps. AZ CC:3:91(ASM)
 25 is the historic alignment of U.S. 191 and U.S. 71; AZ FF:1:34(ASM) is the Arizona & Colorado Railroad.

1 **Archaeology Southwest’s Cultural Resource Priority Areas**

2 Subroute 2.1 does not cross any the Archaeology Southwest’s CRPAs.

3 **Forecast Resources**

4 For subroute 2.1, it is predicted that 241 cultural resources would be present within the representative
5 ROW; 19 of these resources would be eligible for the NRHP. Predicted resource density ranges from 1.49
6 to 57.60 per 100 acres. Segments P4c, P5b, 6a, and P7 have been categorized as being of cultural concern.
7 Impacts to cultural resources due to ground disturbance would be major for subroute 2.1.

8 **Index of Total Potential Effect (New Mexico only)**

9 Subroute 2.1 segments have TPE values ranging from 0.02 to 0.09, with P4b and P5a having the highest
10 values. P5b is the longest segment of the subroute, but has a relatively low TPE value reflecting its low
11 predicted site density. P5a has a higher density of eligible sites per mile. Subroute 2.1 as a whole has a
12 total estimated number of eligible sites of 69, significantly higher than the subroute 2.2 estimated number
13 value of 34. It is therefore to be expected that subroute 2.1 would have significantly greater total effects
14 on archaeological sites within New Mexico than would subroute 2.2. This greater effect is due both to the
15 greater length of subroute 2.1 and its higher resource density (1.49 eligible sites per mile, as opposed to
16 1.07 for segment 2.2).

17 **Archaeological Sensitivity**

18 Subroute 2.1 is projected to have 77 resources (32 percent) which fall in the low to moderate (level 2) and
19 77 resources in the moderate (level 3) sensitivity category. Sixty-five resources (27 percent) are projected
20 to have moderate to high sensitivity. No resources are projected to have high sensitivity (level 5).

21 **Summary of Direct Impacts for Subroute 2.1**

22 Direct impacts to cultural resources for subroute 2.1 would be moderate and long-term. Two listed, four
23 eligible, and 32 unevaluated resources are found within the representative ROW for subroute 2.1.
24 Projected resources are anticipated to total 241 resources with 59 percent in the moderate or moderate to
25 high sensitivity category. However, adverse impacts to cultural resources would be mitigated in
26 accordance with the terms of the PA and the POD. As stated in the POD, avoidance of resources during
27 the final design stage would be the preferred form of mitigation.

28 **Historic Trails**

29 Segments P4c and P5b of subroute 2.1 cross the Butterfield Trail. Segment P4c crosses the trail just west
30 of Lordsburg and segment P5b crosses it east of San Simon in the southwest foothills of the Peloncillo
31 Mountains.

32 **Visual Analysis**

33 **Listed Historic Properties**

34 One listed property (Stein’s Peak Station) is located within 0.5 to 3 miles of the centerline of subroute 2.1
35 along segment P5b. The station is approximately 2.5 miles from the line and there is a line of mountains
36 between it and the proposed transmission line; few to no visual impacts are anticipated.
37

1 **Determined Eligible**

2 Three resources which have been determined eligible under Criterion A, B, or C are found within the
3 visual analysis area. AZ Z:2:40(ASM) is found within 0.5 to 3 miles and AZ CC:3:91(ASM) is found
4 within 3 to 5 miles of P6b. AZ Z:2:40(ASM) is the Southern Pacific Mainline and is approximately 2
5 miles away from the centerline. The transmission line would be in the foothills while the railroad is in the
6 valley to the north; the transmission line may be visible but would only have a minor effect on the setting
7 of the railroad. AZ CC:3:91(ASM) is historic route US191/US71 and is over 3 miles from the
8 transmission line; no visual effects are anticipated because of the distance.

9 The proposed transmission line would cross AZ FF:1:34(ASM), the Arizona and Colorado Railroad,
10 south of Cochise near the edge of Wilcox Playa. Impacts to setting of the abandoned railroad are
11 expected.

12 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

13 Subroute 2.2 consists of segments E, F, Ga, Gb, Gc, I, and J. It begins south of the Lordsburg Playa and
14 travels west across the New Mexico–Arizona State line and north of San Simon. The subroute then travels
15 west-northwest to north of the Dos Cabezas Mountains and then northwest, west, and south around
16 Willcox Playa.

17 **Direct Impacts**

18 **Known Cultural Resources**

19 Survey coverage in the representative ROW of subroute 2.2 ranges from 0.6 percent for segment E to 35.4
20 percent for segment Gb.

21 For subroute 2.2, segments Ga, I, and J have no previously recorded cultural resources which are NRHP-
22 eligible or unevaluated/unknown within the representative ROW. Four potential resources from historical
23 maps are found in segments Ga and I; six potential historic resources are found in segment J.

24 Segment E crosses the Butterfield Trail. Also found in segment E are 1 unevaluated/unknown resource
25 and 38 potential historic resources.

26 In segment F, 4 unevaluated/unknown resources and 36 potential historic resources are found.

27 In segment Ga, one unevaluated/unknown resource and 45 potential historic resources are found.

28 In segment Gc, 3 eligible (AZ CC:3:91[ASM], AZ CC:13:5[ASM], and AZ FF:1:34[ASM]), 2
29 unevaluated/unknown resources, and 13 potential historic resources are found. AZ CC:3:91(ASM) is the
30 alignment of historic roads U.S. 191 and U.S. 71. AZ CC:13:5(ASM) is a prehistoric artifact scatter with
31 features. AZ FF:1:34(ASM) is the Arizona & Colorado Railroad.

32 **Archaeology Southwest’s Cultural Resource Priority Areas**

33 Subroute 2.2 does not cross any the Archaeology Southwest’s CRPAs.
34

1 **Forecast Resources**

2 Based on forecast resources, impacts to cultural resource due to ground disturbance along subroute 2.2
3 would be major but slightly less than that of subroute 2.1. The total anticipated number of resources
4 within the representative ROW for subroute 2.2 is 210; 16 resources are anticipated to be NRHP-eligible.
5 Predicted resource density ranges from 5.26 to 15.42 sites per 100 acres. Segment E has been categorized
6 as a segment of cultural concern.

7 **Index of Total Potential Effect (New Mexico only)**

8 The New Mexico portion of subroute 2.2 has a total estimated number of eligible sites of 34, significantly
9 lower than the subroute 2.1 estimated number of 69. It is therefore to be expected that subroute 2.2 would
10 have significantly fewer total effects on archaeological sites within New Mexico than would subroute 2.1.
11 This lesser effect is due both to the shorter length of subroute 2.2 and to its lower resource density (1.07
12 eligible sites/mile, as opposed to 1.49 for segment 2.1).

13 **Archaeological Sensitivity**

14 Subroute 2.2 is projected to have 145 resources (69 percent) with moderate sensitivity (level 3). Forty-
15 eight resources (23 percent) are projected to have low to moderate sensitivity (level 2). Seventeen
16 resources (8 percent) with moderate to high sensitivity (level 4) are projected for subroute 2.2.
17 No resources are projected to have high sensitivity (level 5).

18 **Summary of Direct Impacts for Subroute 2.2**

19 Direct impacts to cultural resources for subroute 2.2 would be major and long-term. One listed, three
20 eligible, and eight unevaluated resources are found within the representative ROW for subroute 2.2.
21 Projected resources are anticipated to total 210 resources, with 77 percent in the moderate and moderate
22 to high sensitivity category. However, adverse impacts to cultural resources would be mitigated in
23 accordance with all applicable regulations, guidelines, and Southline's POD. As stated in the POD,
24 avoidance of resources during the final design stage would be the preferred form of mitigation.

25 **Historic Trails**

26 Subroute 2.2 crosses the Butterfield Trail and the potential location of the Zuñiga Trail. Segment E
27 crosses the Butterfield Trail directly east of San Simon. Segment Ga crosses the potential Zuñiga Trail
28 route northeast of Willcox.

29 **Visual Analysis**

30 **Listed Historic Properties**

31 One listed historic property, the Cochise Hotel, is located within 0.5 to 3 miles of segment Gc. The
32 transmission line would pass by the hotel approximately 1.0 mile to the east on the other side of U.S.191;
33 because of the distance and the presence of the highway, few impacts to the hotel's setting are expected.

34 **Determined Eligible**

35 No resources which have been determined eligible under Criterion A, B, or C are found within the visual
36 analysis area for subroute 2.2.

1 **LOCAL ALTERNATIVES**

2 There are 10 local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option 1,
3 LD4-Option 2, LD4-Option 3, LD4-Option 4, and WC1. LD1 starts east of Lordsburg, crosses the
4 Peloncillo Mountains, and ends northwest of San Simon. LD2 starts northwest of Lordsburg and crosses
5 the Lordsburg Playa between the north and south Playa. LD3a and LD3b travel around the north sides of
6 the Lordsburg Playa. LD4 crosses the Peloncillo Mountains and the San Simon Valley and ends
7 northwest of Willcox. LD4-Option 4 begins in the foothills of the Peloncillo Mountains, travels south
8 across I-10 and ends at the Dos Cabezas Mountains. LD5-Option 5 runs southwest between LD4 and
9 segment P6c. WC1 runs roughly parallel to I-10 through the Sulphur Springs Valley.

10 **Direct Impacts**

11 ***Known Cultural Resources***

12 Local alternatives LD1, LD2, and LD3a cross the Butterfield Trail. In addition, 1 eligible resource
13 (LA 129570), 11 unevaluated/unknown resources, and 46 potential resources from historical maps are
14 found in LD1; 31.3 percent of the LD1 representative ROW has been previously surveyed. LA 129570 is
15 a historic artifact scatter.

16 In addition to the Butterfield Trail, 3 potential resources are found in LD2; 18 potential historic resources
17 are found in LD3a. Previous survey coverage for LD2 is 1.2 percent and for LD3a is 11.0 percent.

18 In segment LD3b, only 2 potential historic resources are found; only 1.6 percent of the representative
19 ROW of LD3b has been previously surveyed.

20 One eligible resource, 4 unevaluated/unknown resources, and 13 potential historic resources are found in
21 LD4; however, only 2.1 percent of the representative ROW has been surveyed.

22 LD4-Option 4 (29.1 percent surveyed) has 4 potential historic resources and LD4-Option 5 (77.6 percent
23 surveyed) has 8 potential resources. Neither segment has any previously recorded eligible or
24 unevaluated/unknown resources.

25 WC1 has 1 unevaluated/unknown resource and 82 potential resources from historical maps; 12.2 percent
26 of the representative ROW has been previously surveyed.

27 ***Archaeology Southwest's Cultural Resource Priority Areas***

28 Local alternative LD4 crosses the Peloncillo North Priority Area for 0.4 mile. The Peloncillo North
29 Priority Area consists of caves and rock shelters, some with rock art.

30 ***Forecast Resources***

31 Local alternative LD1 is predicted to have 73 cultural resources within the representative ROW; 7 of
32 those resources are anticipated to be NRHP eligible. Segment LD2 is anticipated to have 4 cultural
33 resources; LD3a is anticipated to have 61 resources; and LD3b is anticipated to have 3 resources.
34 No resource from LD2, LD3a, or LD3b is anticipated to be eligible for the NRHP; however, LD1, LD2,
35 and LD3a are classified as local alternatives of cultural concern.

36 Local alternative LD4 is forecast to have 70 resources but none eligible for the NRHP; LD4-Option 4 and
37 LD4-Option 5 are forecast to have no resources.

1 WC1 is forecast to have 89 resources with none eligible for the NRHP; however, due to the number of
2 potential resources, WC1 is a segment of cultural concern.

3 ***Index of Total Potential Effect (New Mexico Only)***

4 Local alternative LD1 has a TPE index of 0.13 with 41 estimated eligible sites. Local alternative LD1 is
5 35.40 miles long; there are 1.17 estimated eligible sites per mile.

6 Local alternative LD2 has a TPE index of 0.08 with 24 estimated eligible sites. Local alternative LD2 is
7 9.60 miles long; there are 2.49 estimated eligible sites per mile.

8 Local alternative LD3a has a TPE index of 0.20 with 63 estimated eligible sites. Local alternative LD3a is
9 27.90 miles long; there are 2.27 estimated eligible sites per mile.

10 Local alternative LD3b has a TPE index of 0.02 with 5 estimated eligible sites. Local alternative LD3b is
11 1.90 miles long; there are 2.61 estimated eligible sites per mile.

12 Local alternative LD4 has a TPE index of 0.04 with 12 estimated eligible sites. Local alternative LD4 is
13 51.70 miles long; there are 0.24 estimated eligible sites per mile.

14 ***Archaeological Sensitivity***

15 Local alternative LD1 is projected to have 53 resources (73 percent) with moderate sensitivity (level 3)
16 and 5 (7 percent) with moderate to high sensitivity (level 4)

17 Local alternative LD2 is projected to have four resources (100 percent) with moderate to high sensitivity
18 (level 4). Local alternative LD3a is projected to have 61 resources (100 percent) with moderate to high
19 sensitivity; local alternative WC1 is projected to have 89 resources (100 percent) with moderate
20 sensitivity. No resources are projected for LD3b, LD4-Option 4, or LD3-Option 5.

21 Local alternative LD4 is projected to have 9 resources (20 percent) with moderate to low sensitivity
22 (level 2) and 27 resources (60 percent) with moderate sensitivity.

23 **Summary of Direct Impacts for Route Group 2 Local Alternatives**

24 There are no direct impacts anticipated for LD4-Option 4 and LD4-Option 5 and minor impacts for LD3b
25 due to a low number of estimated resources.

26 For local alternative LD1, direct impacts would be moderate. Seventy-three resources are projected for
27 the representative ROW with 80 percent being of moderate or moderate to high sensitivity.

28 Direct impacts for local alternatives LD2 and LD3a may be major because all of the projected resources,
29 4 and 61 respectively, are anticipated to be of high sensitivity; however, only one resource, which is
30 listed, is present in both alternatives which has skewed the predictions towards the high sensitivity
31 category. It is more likely that impacts will be moderate for both alternatives.

32 Direct impacts for local alternatives LD4 and WC1 would be moderate. Projected resources for LD4 total
33 45 with 60 percent having moderate sensitivity. Projected resources for WC1 total 89 with 100 percent
34 having moderate sensitivity.

35 However, adverse impacts to cultural resources would be mitigated in accordance with all applicable
36 regulations, guidelines, and Southline's POD. As stated in the POD, avoidance of resources during the
37 final design stage would be the preferred form of mitigation.

1 **Historic Trails**

2 Several local alternatives cross the Butterfield Trail and the potential route of the Zuñiga Trail: local
3 alternatives LD1, LD2, and LD3a cross the Butterfield Trail and local alternatives LD4, LD4-Option 4,
4 and LD4-Option 5 cross the Zuñiga Trail. LD1 crosses the Butterfield Trail southeast of San Simon; LD 2
5 crosses the trail as LD2 enters the gap between the north and south playa of the Lordsburg Playa; and,
6 LD3a crosses it just east of the gap between the north and south playa of the Lordsburg Playa.

7 LD 4 crosses the potential Zuñiga Trail route north of Bowie; LD4-Option 4 crosses it north-northeast of
8 Willcox; and LD4-Option 5 crosses it north of the I-10 and SR 191 junction.

9 **Tribal Resources**

10 LD4 and LD4-Option are approximately 20 miles southeast of Mount Graham.

11 **Visual Analysis**

12 ***Listed Historic Properties***

13 No listed historic properties are found within the visual analysis area for LD1, LD2, LD3a, LD3b, and
14 LD4.

15 One listed historic property, the Hecker House, is found within 3 to 5 miles of LD4-Option 4 and LD4-
16 Option 5. Because of the distance from either local alternative, few to no impacts are expected for this
17 property.

18 Thirteen listed historic properties are found within the visual analysis area for WC1. All of the resources
19 are within 0.5 to 3 miles of the centerline in the town of Willcox:

- | | | | |
|----|-----------------------------|----|------------------------------------|
| 20 | • Benjamin E. Briscoe House | 27 | • John H. Norton and Company Store |
| 21 | • Crowley House | 28 | • Harry Saxon House |
| 22 | • John Gung'l House | 29 | • Schwertner House |
| 23 | • Hooker Town House | 30 | • Pablo Soto House |
| 24 | • Johnson-Tillotson House | 31 | • Willcox Women's Club |
| 25 | • Joe Mee House | 32 | • J. C. Wilson House |
| 26 | • Morgan House | | |

33 All of these resources are located in downtown Willcox between 0.5 and 1.5 miles from the proposed
34 transmission line which is located along I-10 in this section. Because they are located within the town the
35 visibility of the line from the historic properties is minimal; therefore, little impact to setting is expected.

36 ***Determined Eligible***

37 No resources that have been determined eligible under Criterion A, B, or C are found within the visual
38 analysis 10-mile corridor for any of the route group 2 local alternatives.

39

1 **Route Group 3 – Apache Substation to Pantano Substation**

2 Please note that the route group 3 data includes data from two recent surveys have been performed along
3 the existing transmission line in the Upgrade Section (Goldstein 2008; Hart 2012). Goldstein (2008)
4 conducted a Class III pedestrian survey along the existing Tucson-Apache 115-kV Transmission Line.
5 The survey covered approximately 80 miles within a 200-foot wide corridor from the Tucson Substation
6 to the Apache Substation. Hart (2012) conducted a Class III survey of a 100-foot access road ROW
7 between several pole structures along the line between the Tucson and Apache substations for a total of
8 4.45 miles. A very high percentage of the representative ROW has been previously surveyed, so forecast
9 resource numbers for this route group should be reliable.

10 For route group 3, there are two tables of data for direct analysis: table 4.9-9 presents counts of known
11 cultural resources within the representative ROW for route group 3, Apache Substation to Pantano
12 Substation. Table 4.9-10 presents forecast number of resources for the representative ROW for route
13 group 3, Apache Substation to Pantano Substation. Table 4.9-11 presents the archaeological sensitivity
14 within the representative ROW for route group 3, Apache Substation to Pantano Substation.

15 **Table 4.9-9.** Route Group 3 Cultural Resources Inventory Data

	Total Miles	Listed Sites	Determined Eligible Sites	Unevaluated or Unknown Sites	Resources from Historic Maps	Total Number of Resources
Subroute 3.1, Proponent Preferred						
U1a	16.1	1		18	29	48
U1b	2.9			1	2	3
U2	15.8	1	2	9	17	29
U3a	35.6	3		24	78	105
Route Group 3 Local Alternative						
H	19.3	1	2	5	6	14

16 **Table 4.9-10.** Route Group 3 Cultural Resources Projected Resources Numbers and Density within the
17 Representative ROW

	Total Miles	Projected Number of Resources	Projected Resource Density (per 100 acres)	Projected Number NRHP-eligible Historic Properties	Percentage of Representative ROW Surveyed	Segment of Cultural Concern
Subroute 3.1, Proponent Preferred						
U1a	16.1	53	18.08	0	93.9	Yes
U1b	2.9	4	6.77	0	89.4	
U2	15.8	27	9.41	5	90.4	Yes
U3a	35.6	109	16.86	3	89.6	Yes

18

1 **Table 4.9-10.** Route Group 3 Cultural Resources Projected Resources Numbers and Density within the
 2 Representative ROW (Continued)

	Total Miles	Projected Number of Resources	Projected Resource Density (per 100 acres)	Projected Number NRHP-eligible Historic Properties	Percentage of Representative ROW Surveyed	Segment of Cultural Concern
Route Group 3 Local Alternative						
H	19.3	40	11.35	6	7.25	Yes

3 **Table 4.9-11.** Route Group 3 Archaeological Sensitivity within the Representative ROW

Alternative	Total Miles	Projected Number of Resources: Level 0 (%)	Projected Number of Resources: Level 1 (%)	Projected Number of Resources: Level 2 (%)	Projected Number of Resources: Level 3 (%)	Projected Number of Resources: Level 4 (%)	Projected Number of Resources: Level 5 (%)
Subroute 3.1	70.4	21 (11%)	0 (0%)	14 (7%)	120 (62%)	23 (12%)	15 (8%)
H	19.3	0 (0%)	0 (0%)	14 (36%)	23 (57%)	3 (7%)	0 (0%)

4 **SUBROUTE 3.1 – PROPONENT PREFERRED**

5 Subroute 3.1 consists of the upgrade of the existing Western 115-kV line running from the Apache
 6 Substation north of the Dragoon Mountains and through the San Pedro Valley.

7 **Direct Impacts**

8 ***Known Cultural Resources***

9 Previous survey coverage for the subroute 3.1 representative ROW is excellent and is approximately 90
 10 percent for all segments.

11 In subroute 3.1, segment U1a crosses the Butterfield Trail and has 18 unevaluated/unknown sites and 29
 12 potential resources from historical maps.

13 Segment U1b has 1 unevaluated/unknown resource and 2 potential historic resources.

14 Segment U2 also crosses the Butterfield Trail, as well as having 2 eligible resources (AZ EE:3:74[ASM]
 15 and AZ FF:9:17[ASM]), 9 unevaluated/unknown resources, and 17 potential historic resources.
 16 AZ EE:3:74(ASM) is the El Paso&Southwestern Railroad. AZ FF:9:17(ASM) is the historic alignment of
 17 SR 80.

18 Three listed resources are located in segment U3a: the Valencia Site (AZ BB:13:15[ASM]),
 19 AZ BB:13:315(ASM), and the Empirita Ranch Historic District. Twenty-four unevaluated/unknown
 20 resources and 78 potential historic resources are also located in segment U3a.

21 ***Archaeology Southwest’s Cultural Resource Priority Areas***

22 Segment U3a of subroute 3.1 crosses the Zanardelli Priority Area for 1.0 mile; it crosses the Valencia
 23 Priority Area for 2.2 miles; and it crosses the Middle Santa Cruz Priority Area for 1.2 miles. The Valencia
 24 Priority Area is the area surrounding the Valencia Site; the Middle Santa Cruz Priority Area is the area
 25 surrounding the Julian Wash site; and the Zanardelli Priority Area is the area surrounding the Zanardelli
 26 site.

1 **Forecast Resources**

2 For subroute 3.1, 193 resources are predicted for the representative ROW; 8 of these are anticipated to
3 NRHP-eligible. Predicted resource density ranges from 9.41 to 18.08 resources per 100 acres. Segments
4 U1a, U2, and U3a are considered as being of cultural concern. Because subroute 3.1 is within the
5 Upgrade Section and less ground disturbance would be needed, impacts to cultural resources due to
6 ground disturbance would be minor.

7 **Archaeological Sensitivity**

8 Subroute 3.1 is projected to have 120 resources (62 percent) with moderate sensitivity; 23 resources
9 (12 percent) are projected to have moderate to high sensitivity (level 4); and 15 resources (8 percent) are
10 projected to have high sensitivity (level 5).

11 **Summary of Direct Impacts for Subroute 3.1**

12 Direct impacts to cultural resources for subroute 3.1 would be minor. Five listed, 2 eligible, and 52
13 unevaluated resources are found within the representative ROW for subroute 3.1. Although, projected
14 resources are anticipated to total 193 resources with 62 percent having moderate sensitivity, 12 percent
15 having moderate to high sensitivity, and 8 percent having high sensitivity, subroute 3.1 is an existing line
16 and less ground disturbance would be needed than for a new line; therefore, impacts would be minor.

17 In addition, any adverse impacts to cultural resources would be mitigated in accordance with the terms of
18 the PA and the POD. As stated in the POD, avoidance of resources during the final design stage would be
19 the preferred form of mitigation.

20 **Historic Trails**

21 Subroute 3.1 crosses the Butterfield Trail and the potential routes of the Mormon Battalion Trail and the
22 Zuñiga Trail. Segment U1a crosses the Butterfield Trail at West Dragoon Road just north of the Ammon
23 Airport and segment U2 crosses it just northeast of Benson. Segment U1b crosses the potential Mormon
24 Battalion Trail route in northwestern Benson and segment U3a crosses it northwest of Vail. Segment U1b
25 crosses the potential Zuñiga Trail route crosses west-northwest of Benson and segment U2 crosses it in
26 Mescal just north of I-10.

27 **Visual Analysis**

28 **Listed Historic Properties**

29 There are 12 listed historic properties within the visual analysis area of subroute 3.1. Two are within 0.5
30 mile of the centerline: the Empirita Ranch Historic District and the Valencia Site. The transmission line is
31 located along the northern border of the southern portion of Empirita Ranch Historic District and would
32 impact the setting of the property; however, because the line is existing, impacts would only be moderate.
33 Segment U3a crosses through the southern portion of the Valencia Site and then runs along its eastern
34 border; however, because the line is existing impacts would only be moderate.

35 Seven resources are within 0.5 to 3 miles of the centerline of segment U2 of subroute 3.1 in Benson:

- 36 • Benson Railroad Historic District
- 37 • Hi Wo Company Grocery
- 38 • W. D. Martinez General Merchandise Store

- 1 • Oasis Court
- 2 • Redfield-Romine House
- 3 • Smith-Beck House
- 4 • Max Treu Territorial Meat Company

5 All six properties are located in downtown Benson from 0.9 to 1.2 miles south from the proposed
6 transmission line. The transmission line is located on the northern side of I-10 in the Benson area.
7 Visibility of the transmission line would be limited from the historic properties, so little impact their
8 setting would be expected.

9 The Cienega Bridge is located slightly less than 3 miles north of the proposed transmission line on the
10 northern side of I-10. Several hills and mountain ridges are located between the bridge and the proposed
11 transmission line making it unlikely that the line could be seen from the bridge. No visual impacts are
12 expected.

13 The Old Vail Post Office is located about 3 miles north of the existing transmission line on the northern
14 side of I-10. Because it is an existing line and almost 3 miles away, no visual impacts would be expected.

15 San Xavier del Bac is located just less than 2 miles west of segment U3a on the eastern side of I-19.
16 Because this is an existing line and almost 2 miles away, visual impacts to the historic property would be
17 minimal.

18 One listed property, the Colossal Cave Preservation Park Historic District, is in the 3- to 5-mile zone.
19 No impacts would be expected due to the distance of the Project location from the resource.

20 ***Determined Eligible***

21 One resource that has been determined eligible under Criterion A is found within 0.5 mile of
22 segment U2 of subroute 3.1— AZ EE:3:74(ASM), the El Paso and Southwestern Railroad. The existing
23 transmission line crosses the railroad east of Benson. Some alternations in the setting of AZ
24 EE:3:74(ASM) would be expected with the upgrade of the line.

25 **LOCAL ALTERNATIVES**

26 There is one local alternative for route group 3—local alternative H, which runs around the northern side of
27 Benson.

28 **Direct Impacts**

29 ***Known Cultural Resources***

30 Located within local alternative H are 3 eligible resources (Butterfield Trail, AZ Z:2:40[ASM] and
31 AZ FF:9:17[ASM]), 5 unevaluated/unknown resources, and 6 potential historic resources.
32 AZ Z:2:40(ASM) is the Southern Pacific Railroad Mainline—Southern Route; AZ FF:9:17(ASM) is the
33 historic alignment of SR 80. Only 7.25 percent of local alternative H has been previously surveyed.

34 ***Archaeology Southwest's Cultural Resource Priority Areas***

35 Local alternative H does not cross any CRPAs.
36

1 **Forecast Resources**

2 For local alternative H, 40 cultural resources are predicted for a resource density of 11.35 resources per
3 100 acres. Six of the resources are anticipated to be NRHP eligible and local alternative H is considered a
4 segment of cultural concern.

5 **Archaeological Sensitivity**

6 For local alternative H, 23 resources (57 percent) are projected to have moderate sensitivity (level 3),
7 7 percent to have moderate to high sensitivity (level 4), and 14 resources (36 percent) are projected to
8 have low to moderate sensitivity (level 2).

9 **Summary of Direct Impacts for Route Group 3 Local Alternative H**

10 Direct impacts for local alternative H would be moderate. One listed, two eligible, and five unevaluated
11 cultural resources are found in the representative ROW for local alternative H. Project resources total 40
12 with 64 percent having moderate or moderate to high sensitivity. However, adverse impacts to cultural
13 resources would be mitigated in accordance with all applicable regulations, guidelines, and Southline’s
14 POD. As stated in the POD, avoidance of resources during the final design stage would be the preferred
15 form of mitigation.

16 **Historic Trails**

17 Local alternative H crosses the Butterfield Trail just north of where it leaves subroute 3.1 west of Benson,
18 the potential Mormon Battalion Trail route north of Mescal, and the potential route of the Zuñiga Trail
19 west of Mescal.

20 **Visual Analysis**

21 **Listed Historic Properties**

22 There are no listed historic properties within the visual analysis area for local alternative H.

23 **Determined Eligible**

24 AZ EE:3:74(ASM), the El Paso and Southwestern Railroad, is crossed by local alternative H.
25 The proposed transmission line crosses the railroad east of Benson. Impacts to the setting of the site
26 would be expected because a new transmission line would be constructed.

27 AZ FF:9:17[ASM], State Route 80, crosses local alternative H towards its eastern end. Impacts to the
28 setting of the site are expected because a new transmission line would be constructed.

29 **Route Group 4 – Pantano Substation to Saguaro Substation**

30 Please note that the route group 4 data includes data from three surveys that have been performed along
31 the existing transmission line in the Upgrade Section (Effland and Green 1985; Goldstein 2008; Hart
32 2012). Effland and Green (1985) surveyed the 100-foot ROW for the existing 115-kV transmission line
33 from the Tucson to the Saguaro substations, which is approximately 35 miles. Goldstein (2008)
34 conducted a Class III pedestrian survey along the existing Tucson-Apache 115-kV Transmission Line.
35 The survey covered approximately 80 miles within a 200-foot-wide corridor from the Tucson Substation
36 to the Apache Substation. Hart (2012) conducted a Class III survey of a 100-foot access road ROW
37 between several pole structures along the line between the Tucson and Apache substations for a total of
38 4.45 miles. An additional check for sites along the ROW from the Tucson to the Saguaro Substation was

1 conducted in 2012 by a Western archaeologist but no survey corridor width was specified and no report
 2 was generated (personal communication, Maria Martin, Galileo 2013). A very high percentage of the
 3 representative ROW has therefore been previously surveyed, so forecast resource numbers for this route
 4 group should be reliable.

5 For route group 4, there are two tables of data for direct analysis. Table 4.9-12 presents counts of known
 6 cultural resources within the representative ROW for route group 4, Pantano Substation to Saguaro
 7 Substation. Table 4.9-13 presents forecast number of resources for the representative ROW for route
 8 group 4, Pantano Substation to Saguaro Substation. Table 4.9-14 presents the archaeological sensitivity of
 9 the representative ROW for route group 4, Pantano Substation to Saguaro Substation.

10 **Table 4.9-12.** Route Group 4 Cultural Resource Inventory Data

	Total Miles	Listed Sites	Determined Eligible Sites	Unevaluated or Unknown Sites	Resources from Historical Maps	Total Number of Resources
Subroute 4.1, Proponent Preferred						
U3b	0.5		1	3	18	22
U3c	1.0			4	20	24
U3d	3.4	1	1	3	27	32
U3e	0.9	1		1	1	3
U3f	0.7	1		1	1	3
U3g	0.9	1	1	2	37	41
U3h	1.1		2	2	14	18
U3i	18.2		6	18	386	410
U3j	0.9			1	1	2
U3k	16.7	1	1	3	121	126
U3l	1.6		3	1	8	12
U3m	0.6		4	1	3	8
U4	1.9			2	4	6
Route Group 4 Local Alternatives						
MA1	1.1				1	1
TH1a	1.4	1		1		2
TH1b	1.6	1		2	11	14
TH1c	0.3		1	1	5	7
TH1-Option	1.0	1			2	3
TH3-Option A	0.8		1	4	30	35
TH3-Option B	0.8				3	3
TH3-Option C	1.8		1	2	22	24
TH3a	2.7		1	4	31	36
TH3b	4.5		4	4	43	51

11
 12

1 **Table 4.9-13.** Route Group 4 Cultural Resources Projected Resources Numbers and Density within the
2 Representative ROW

	Total Miles	Projected Number of Resources	Projected Resource Density (per 100 acres)	Projected Number NRHP-eligible Historic Properties	Percentage of Representative ROW Surveyed	Segment of Cultural Concern
Subroute 4.1, Proponent Preferred						
U3b	0.5	10	93.86	0	100.0	Yes
U3c	1.0	11	62.98	0	76.6	Yes
U3d	3.4	19	30.43	12	90.3	Yes
U3e	0.9	4	28.56	2	100.0	Yes
U3f	0.7	4	48.92	3	100.0	Yes
U3g	0.9	15	92.31	5	75.1	Yes
U3h	1.1	11	55.58	0	90.2	Yes
U3i	18.2	98	29.60	17	79.4	Yes
U3j	0.9	6	37.78	0	66.7	
U3k	16.7	51	16.80	15	52.5	Yes
U3l	1.6	9	80.55	9	99.3	Yes
U3m	0.6	8	40.38	3	100.0	Yes
U4	1.9	11	31.82	0	25.9	
Route Group 4 Local Alternatives						
MA1	1.1	1	5.27	0	0.0	
TH1a	1.4	3	52.75	2	100.0	Yes
TH1b	1.6	15	52.76	10	21.6	Yes
TH1c	0.3	7	160.81	0	33.2	Yes
TH1-Option	1.0	4	47.83	4	100.0	Yes
TH3-Option A	0.8	16	76.83	3	100.0	Yes
TH3-Option B	0.8	3	21.14	0	62.0	Yes
TH3-Option C	1.8	25	85.39	17	82.6	Yes
TH3a	2.7	39	79.73	7	91.8	Yes
TH3b	4.5	51	62.63	16	87.0	Yes

3

1 **Table 4.9-14.** Route Group 4 Cultural Resources Archaeological Sensitivity within the Representative
 2 ROW

Alternative	Total Miles	Projected Number of Resources: Level 0 (%)	Projected Number of Resources: Level 1 (%)	Projected Number of Resources: Level 2 (%)	Projected Number of Resources: Level 3 (%)	Projected Number of Resources: Level 4 (%)	Projected Number of Resources: Level 5 (%)
Subroute 4.1	20.8	54 (21%)	15 (6%)	5 (2%)	111 (43%)	51 (20%)	23 (9%)
MA1	1.1	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
TH1a	1.4	0 (0%)	0 (0%)	0 (0%)	1 (33%)	0 (0%)	2 (67%)
TH1b	1.6	0 (0%)	0 (0%)	0 (0%)	10 (67%)	0 (0%)	5 (33%)
TH1c	0.3	0 (0%)	0 (0%)	0 (0%)	7 (100%)	0 (0%)	0 (0%)
TH1-Option	1.0	0 (0%)	0 (0%)	0 (0%)	1 (33%)	0 (0%)	3 (67%)
TH3-Option A	0.8	0 (0%)	3 (17%)	0 (0%)	8 (50%)	5 (33%)	0 (0%)
TH3-Option B	0.8	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
TH3-Option C	1.8	0 (0%)	0 (0%)	0 (0%)	17 (67%)	8 (33%)	0 (0%)
TH3a	2.7	0 (0%)	0 (0%)	0 (0%)	16 (40%)	23 (60%)	0 (0%)
TH3b	4.5	0 (0%)	0 (0%)	0 (0%)	26 (50%)	26 (50%)	0 (0%)

3 **SUBROUTE 4.1 – PROPONENT PREFERRED**

4 Subroute 4.1 begins at the Pantano Substation and travels northwest and north through Green Valley to
 5 Tucson. It runs around the Tucson International Airport to the Del Bac Substation and then heads north
 6 and northwest across Tumamoc Hill. The line then continues north and northwest traveling northeast of
 7 the Tucson Mountains to Marana and ending at the Saguaro Substation.

8 **Direct Impacts**

9 ***Known Cultural Resources***

10 In subroute 4.1, the representative ROW of segments U3d, U3e, U3f, and U3g all intersect with the
 11 NRHP-listed Tumamoc Hill Archaeological District and Desert Laboratory NHL. In addition, 1 eligible
 12 resource (AZ AA:16:420[ASM]), 3 unevaluated/unknown resources, and 27 potential historic resources
 13 are found in segment U3d; 1 unevaluated/unknown resource and 1 potential historic resource are found
 14 both in segment U3e and segment U3f; and, 1 eligible resource (AZ AA:16:333[ASM]), 2 unevaluated
 15 resources, and 37 potential historic resources are found in segment U3g. Both AZ AA:16:420(ASM) and
 16 AZ AA:16:333(ASM) are prehistoric artifact scatters.

17 The representative ROW of segments U3h, U3i, and U3l all intersect with the Butterfield Trail.
 18 In addition, 1 eligible resource (AZ AA:16:333[ASM]), 2 unevaluated/unknown resources, and 14
 19 potential resources from historical maps are found in segment U3h. AZ AA:16:333(ASM) is a prehistoric
 20 artifact scatter.

21 In segment U3i, there are 5 eligible resources, 18 unevaluated/unknown resources, and 386 potential
 22 resources from historical maps in addition to the Butterfield Trail.

23 Two eligible resources (AZ Z:2:40[ASM] and AZ AA:2:118[ASM]), one unevaluated/unknown resource,
 24 and eight potential resources from historical maps are found in segment U3l along with the Butterfield
 25 Trail. AZ Z:2:40(ASM) is the Southern Pacific Railroad Mainline–Southern Route; AZ AA:2:118(ASM)
 26 is the historic alignment of SR 84.

1 One listed resource, the Los Robles Archaeological District, is found within segment U3k, as well as 1
2 eligible resource (AZ AA:1:95[ASM]), 3 unevaluated/unknown resources, and 121 potential historic
3 resources. AZ AA:1:95(ASM) is the Maricopa-Saguaro 115-kV transmission line.

4 Segment U3b has 1 eligible resource, 3 unevaluated/unknown resources, and 18 potential historic
5 resources. The eligible resource, AZ BB:13:102(ASM), is a prehistoric artifact scatter.

6 Segment U3c has 4 unevaluated/unknown resources and 20 potential historic resources. Segment U3j has
7 1 unevaluated/unknown resource and 1 potential historic resource.

8 Four eligible resources, one unevaluated resource, and three potential historic resources are found in
9 segment U3m. AZ Z:2:40(ASM) is the Southern Pacific Railroad Mainline–Southern Route; AZ
10 AA:2:118(ASM) is the historic alignment of SR 84. AZ AA:1:95(ASM) is the Maricopa-Saguaro 115-kV
11 transmission line. AZ AA:8:366(ASM) is the Saguaro-Oracle 115-kV transmission line.

12 Two unevaluated/unknown resources and 43 potential historic resources are found in segment U4.

13 Previous survey coverage is good to excellent for the subroute 4.1 representative ROW. Several segments
14 (U3b, U3e, U3f, and U3m) have 100 percent survey coverage. Segment U4 has the lowest with 25.9
15 percent. The remaining segments range from 50 percent to almost 100 percent.

16 ***Archaeology Southwest's Cultural Resource Priority Areas***

17 Segments U3b, U3c, U3e, U3f, U3g, U3h, and U3i of subroute 4.1 cross the Middle Santa Cruz Priority
18 Area for 12.6 miles. Segments U3b and U3c cross the Valencia Priority Area for 0.9 mile; segments U3c
19 and U3d cross the West Branch Priority Area for 1.4 miles. Segment U3i crosses the Los Morteros
20 Priority Area for 1.7 miles and the River Confluence Priority Area for 8.2 miles. Segment U3k crosses the
21 Los Robles Priority Area for 5.6 miles. The Valencia Priority Area is the area surrounding the Valencia
22 Site; the Middle Santa Cruz Priority Area is the area surrounding the Julian Wash site; and the West
23 Branch Priority Area is the area surrounding the West Branch site. The Los Morteros Priority Area is the
24 area surrounding the Los Morteros site. The River Confluence Priority Area is where the Santa Cruz and
25 Rillito rivers meet.

26 ***Forecast Resources***

27 For subroute 4.1, 257 cultural resources are anticipated within the representative ROW with 66 of the
28 resources being eligible for the NRHP. Predicted resource density is high for all segments and ranges
29 from 16.80 to 93.86 predicted resources per 100 acres. All segments except for segments U3j and U4
30 have been categorized as being of cultural concern. Although subroute 4.1 is within the Upgrade Section
31 and less ground disturbance would be needed, impacts to cultural resources due to ground disturbance
32 would range from moderate to major due to the greater number of predicted resources within this section.

33 ***Archaeological Sensitivity***

34 Subroute 4.1 is projected to have 111 resources (43 percent) with moderate sensitivity (level 3); 51
35 resources (20 percent) with moderate to high sensitivity (level 4); and 23 resources (9 percent) with high
36 sensitivity (level 5).

37 **Summary of Direct Impacts for Subroute 4.1**

38 Direct impacts to cultural resources for subroute 4.1 would be moderate. Several segments cross NRHP-
39 listed Tumamoc Hill Archaeological District and Desert Laboratory NHL. Fourteen eligible and 31
40 unevaluated cultural resources are also present within the representative ROW for subroute 4.1. Although

1 projected resources are anticipated to total 257 resources with 43 percent having moderate sensitivity, 20
2 percent having moderate to high sensitivity, and 9 percent having high sensitivity, subroute 4.1 is an
3 existing line and less ground disturbance would be needed than for a new line; therefore, impacts would
4 be moderate.

5 In addition, any adverse impacts to cultural resources would be mitigated in accordance with the terms of
6 the PA and the POD. As stated in the POD, avoidance of resources during the final design stage would be
7 the preferred form of mitigation.

8 **Historic Trails**

9 Subroute 4.1 crosses one National Historic Trail (the Anza Trail corridor) and one known and one
10 potential historic trail routes (the Butterfield Trail and the Mormon Battalion Trail). The various trails
11 all converge as they exit Tucson to the northwest and follow the same basic route as subroute 4.1.
12 The greatest concern along this route would be the visual effects from towers and lines; however, because
13 this is an already heavily developed corridor, additional visual effects would be minor. Segment U3i
14 crosses the Anza Trail south of West Grant Road and southwest of I-10; segment U3k crosses it north of
15 West Copper Street and west of I-10. Segment U3h crosses the Butterfield Trail at North Aztec Street in
16 Tucson, and segment U3i crosses it along The Loop north of West Grant Road and segment U3k crosses
17 the trail again at just before the Saguaro Substation. Segment U3f crosses the potential route of the
18 Mormon Battalion Trail north of West Starr Pass Boulevard, segment U3 crosses the potential route along
19 The Loop north of West Grant Road, and segment U3k crosses it southwest of the Saguaro Substation.

20 **Tribal Resources**

21 As discussed above, subroute 4.1 crosses Tumamoc Hill.

22 **Visual Analysis**

23 ***Listed Historic Properties***

24 One hundred and one listed historic properties are found within the visual analysis area for subroute 4.1.
25 Five are within 0.5 mile of the centerline: the Pascua Cultural Plaza, the Ghost Ranch, the Antonio Matus
26 House and Property, the Miracle Mile Historic District, and the Tumamoc Hill Archaeological District
27 and Desert Laboratory NHL. The existing line crosses through the center of the Tumamoc Hill
28 Archaeological District and Desert Laboratory NHL. Because this portion of the proposed Project consists
29 of upgrading an existing line, the alteration to setting for these resources would be moderate, rather than
30 major.

31 Seventy-three resources are within 0.5 to 3 miles:

- | | | | |
|----|---|----|---------------------------------------|
| 32 | • 4 th Avenue | 41 | • Barrio Santa Rosa Historic District |
| 33 | • Arizona Daily Star | 42 | • Bear Down Gym |
| 34 | • Arizona Hotel | 43 | • Blenman-Elm Historic District |
| 35 | • Armory Park Historic Residential | 44 | • Blixt-Avita House |
| 36 | District | 45 | • Boudreaux-Robison House |
| 37 | • Barrio Anita Historic District | 46 | • Bray-Valenzuela |
| 38 | • Barrio El Hoyo Historic District | 47 | • Dr. William Austin Cannon House |
| 39 | • Barrio El Membrillo Historic District | 48 | • Catalina Vista Historic District |
| 40 | • Barrio Libre Historic District | | |

1	• Copper Bell Bed and Breakfast	34	• Rialto Building
2	• Cordova House	35	• Rialto Racetrack Historic District
3	• Coronado Hotel	36	• Rialto Theatre
4	• Dodson-Esquivel House	37	• Rincon Heights Historic District
5	• Don Martin Apartments	38	• Ronstadt-Sims Warehouse
6	• Downtown Tucson Historic District	39	• Ronstadt House
7	• Eckbo Landscape	40	• Sabedra-Huerta House
8	• El Paso and Southwestern Railroad	41	• Santa Cruz Catholic Church
9	Depot	42	• Schwalen-Gomez House
10	• El Paso and Southwestern Historic	43	• Sixth Avenue Underpass
11	District	44	• Professor George E.P. Smith House
12	• El Presidio Historic District	45	• Sosa-Carillo-Fremont House
13	• El Tiradito	46	• Southern Pacific Railroad Locomotive
14	• Feldmans Historic District	47	No. 1673
15	• First Hittinger Block	48	• John Spring Neighborhood Historic
16	• Fox Commercial Building	49	District
17	• Fox Theatre	50	• Stone Avenue Underpass
18	• Haynes House	51	• Type A Joesler
19	• Hotel Congress	52	• Type B Joesler
20	• Iron Horse Expansion Historic District	53	• University Heights Elementary School
21	• J.C. Penny Store	54	• University of Arizona Historic District
22	• Jefferson Park Historic District	55	• University Library, Arizona State
23	• Julian-Drew Building	56	Museum, North
24	• Manning House	57	• US Post Office & James A. Walsh
25	• Marist College Historic District	58	Courthouse
26	• Menlo Park Historic District, Type A	59	• USDA Tucson Plant Materials Center
27	Joesler, and Type B Joesler, the	60	• Valley National Bank
28	• Old Adobe Patio	61	• Velasco House
29	• Old Main, University of Arizona	62	• Veterans Administration Hospital
30	• Owen Homesite	63	Historic District
31	• Pie Allen Residential Historic District	64	• Warehouse Historic District
32	• Pima County Courthouse	65	• Solomon Warner House and Mill
33	• Rebeil Building	66	• West University Historic District

67 This portion of the proposed Project consists of upgrading an existing line; therefore, additional
68 alterations to setting (visual impact) would be minor.

1 The remaining 23 properties are within 3 to 5 miles and, due to distance, no visual impacts are expected:

2	• James P. and Sarah Adams House	17	• Phillip G. McFadden House
3	• Binghampton Rural Historic Landscape	18	• Ramada House
4	• Erksine P. Caldwell House	19	• Rillito Racetrack-Chute
5	• John P. and Helen S. Corcoran House	20	• St. Philip's in the Hills Episcopal Church
6	• El Conquistador Water Tower	21	
7	• El Encanto Apartments	22	• Virginia Heights
8	• El Encanto Estates Residential Historic District	23	• Winterhaven Historic District
9		24	• Cocoraque Butte Archeological District
10	• El Montevideo Residential Historic District	25	• Los Robles Archeological District, Red Rock
11		26	
12	• P.W. Fletcher House	27	• Santa Ana del Chiquiburitac Mission Site
13	• Gabel House	28	
14	• Arthur C. Hall and Helen Neel House	29	• Valley of the Moon Historic District
15	• Sam Hughes Residential Historic District	30	• Villa Catalina
16			

31 ***Determined Eligible***

32 Two resources determined eligible under Criterion A, B, or C are found within 0.5 mile of the centerline
33 of subroute 4.1: AZ AA:2:118(ASM) and AZ AA:8:366(ASM). AZ AA:2:118(ASM) is SR 84;
34 AZ AA:8:366(ASM) is the Saguaro-Oracle 115-kV transmission line. No visual impacts are expected to
35 these two resources from the transmission line.

36 **LOCAL ALTERNATIVES**

37 There are 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a,
38 TH3b, TH3-Option A, TH3-Option B, and TH3-Option C. MA1 runs southwest of the Marana Airport in
39 an L shape to avoid the airport itself. The nine TH alternatives are all options for replacing the existing
40 line, which currently runs across Tumamoc Hill. The TH alternatives were developed by a working group
41 of stakeholders such as the University of Arizona, City of Tucson, Pima County, and the Tohono
42 O'odham Nation, to avoid or minimize impacts to the Tumamoc Hill Archeological District and Desert
43 Laboratory NHL.

44 **Direct Impacts**

45 ***Known Cultural Resources***

46 Local alternative MA1 has one potential resource from a historical map; however, none of the
47 representative ROW for MA1 has been previously surveyed.

48 The representative ROW for local alternatives TH1a, TH1b, and TH1-Option crosses one listed
49 property (Tumamoc Hill Archeological District and Desert Laboratory). In addition, TH1a has one
50 unevaluated/unknown resource; TH1b has two unevaluated/unknown resources and 11 potential
51 resources from historical maps; and TH1-Option has two potential resources from historical maps.

1 The representative ROWs for TH1a and TH1-Option have been 100 percent surveyed; TH1b has been
2 21.6 percent surveyed.

3 Local alternative TH1c has one eligible (AZ AA:16:333[ASM]), one unevaluated/unknown, and five
4 potential historic resources. AZ AA:16:333(ASM) is a prehistoric artifact scatter. The TH1c
5 representative ROW has been 33.2 percent surveyed.

6 TH3-Option A has one eligible resource (AZ BB:13:101[ASM]), four unevaluated/unknown, and five
7 potential historic resources. AZ BB:13:101(ASM) is a prehistoric artifact scatter. The TH3-Option A
8 representative ROW has been 100 percent surveyed.

9 TH3-Option B has three potential historic resources; 62.0 percent of the representative ROW has
10 been surveyed. TH3-OptionC, which has been 82.6 percent surveyed, has 1 eligible resource
11 (AZ BB:13:17[ASM]), 2 unevaluated/unknown resources, and 22 potential historic resources.
12 AZ BB:13:17(ASM) is a prehistoric artifact scatter.

13 One eligible resource (AZ BB:13:17[ASM]), 4 unevaluated/unknown resources, and 31 potential historic
14 resources are found in TH3a which has been 91.8 percent surveyed. AZ BB:13:17(ASM) is a prehistoric
15 artifact scatter.

16 The Butterfield Trail and 3 additional eligible resources (AZ BB:13:17[ASM], AZ BB:13:94[ASM], and
17 AZ BB:13:111[ASM]), 4 unevaluated/unknown resources, and 43 potential resources from historical
18 maps are found in local alternative TH3b. AZ BB:13:17(ASM) and AZ BB:13:94(ASM) are prehistoric
19 artifact scatters. AZ BB:13:111(ASM) is the historic Lee's Mill. The TH3b representative ROW has been
20 87.0 percent surveyed.

21 ***Archaeology Southwest's Cultural Resource Priority Areas***

22 TH1a crosses the Middle Santa Cruz Priority Area for 0.3 mile; TH1b and TH1c do not cross any Priority
23 Areas. TH1-Option crosses the Middle Santa Cruz Priority Area for 0.9 mile. The Valencia Priority Area
24 is the area surrounding the Valencia Site; the Middle Santa Cruz Priority Area is the area surrounding the
25 Julian Wash site.

26 TH3-Option A crosses both the Middle Santa Cruz and Valencia Priority Areas for 0.8 mile. TH3-Option
27 B crosses the Middle Santa Cruz Priority Area for 0.4 mile, the West Branch Priority Area for 0.3 mile,
28 and the Valencia Priority Area for 0.1 mile.

29 TH3a crosses the Middle Santa Cruz Priority Area for 1.7 miles and the Valencia Priority Area for 1.4
30 miles; TH3b crosses the Middle Santa Cruz Priority Area for 4.5 miles.

31 ***Forecast Resources***

32 Local alternative MA1 is predicted to have one cultural resource which would not be eligible for the
33 NRHP. Local alternative TH1a is anticipated to have three resources, two of which would be eligible for
34 the NRHP. Local alternative TH1b is anticipated to have 15 resources with 10 of them being eligible for
35 the NRHP; local alternative TH1c is anticipated to have seven resources with none of them being eligible
36 for the NRHP.

37 Local alternative TH3-Option A is anticipated to have 16 cultural resources, with 3 being eligible; local
38 alternative TH3-Option B is anticipated to have 3 resources with none being NRHP eligible; and local
39 alternative TH3-Option C is anticipated to have 25 resources with 17 being eligible for the NRHP. TH3a

1 is predicted to have 39 cultural resources; 7 of them are anticipated to be eligible. Local alternative TH3b
2 is forecast to have 52 resources with 16 of them being NRHP eligible.

3 ***Archaeological Sensitivity***

4 Local alternative TH1a is projected to have two resources (67 percent) with high sensitivity (level 5) and
5 one resource (33 percent) with moderate sensitivity (level 3). Local alternative TH1b is projected to have
6 10 resources (67 percent) with moderate sensitivity (level 3) and 5 resources (33 percent) with high
7 sensitivity (level 5). Local alternative TH1c is projected to have 7 resources (100 percent) with moderate
8 sensitivity (level 3).

9 Local alternative TH1-Option is projected to have 3 resources (67 percent) with high sensitivity (level 5)
10 and 1 resource (33 percent) with moderate sensitivity. TH13-Option A is projected to have 8 resources
11 (50 percent) with moderate sensitivity (level 3) and 5 resources (33 percent) with moderate to high
12 sensitivity (level 4). TH3-Option C is projected to have 17 resources (67 percent) with moderate
13 sensitivity (level 3) and 8 resources (33 percent) with moderate to high sensitivity (level 4).

14 Local alternative TH3a is projected to have 23 resources (60 percent) with moderate to high sensitivity
15 (level 4) and 16 resources (40 percent) with moderate sensitivity (level 3). Local alternative TH3b is
16 projected to have 26 resources (50 percent) in both the moderate sensitivity (level 3) and moderate to high
17 sensitivity (level 4) categories.

18 No resources are projected for local alternative MA1 or TH3-Option B.

19 **Summary of Direct Impacts for Route Group 4 Local Alternatives**

20 No direct impacts for local alternatives MA and TH3-Option B are anticipated.

21 Direct impacts for local alternative TH1a would be moderate because the representative ROW crosses
22 the Tumamoc Hill Archaeological District and Desert Laboratory NHL. Projected resources in the
23 representative ROW total 3 with 33 percent having moderate sensitivity and 67 percent having high
24 sensitivity. Direct impacts for local alternative TH1b would also be moderate because the representative
25 ROW crosses the Tumamoc Hill Archaeological District and Desert Laboratory NHL. Projected resources
26 in the representative ROW total 15 with 67 percent having moderate sensitivity and 33 percent having
27 high sensitivity.

28 For local alternative TH1c, direct impacts would be minor. One eligible and one unevaluated resource are
29 found within the representative ROW. Seven cultural resources are projected to be present; all resources
30 have moderate sensitivity.

31 For local alternative TH1-Option, direct impacts would be moderate because the representative ROW
32 crosses the Tumamoc Hill Archaeological District and Desert Laboratory NHL. Project resources total 4
33 with 33 percent having moderate sensitivity and 67 percent having high sensitivity.

34 Direct impacts for local alternative TH3-Option A would be minor. One eligible and 4 unevaluated
35 resources are present in the representative ROW. Sixteen resources are projected with 55 percent of them
36 falling in the moderate sensitivity category.

37 Direct impacts for local alternative TH3-Option B would be minor. One eligible and 2 unevaluated
38 resources are present in the representative ROW. Twenty-five resources are projected with 100 percent of
39 them falling in the moderate sensitivity category.

1 For local alternative TH3a, direct impacts would be minor. One eligible and 4 unevaluated resources are
2 present in the representative ROW. Thirty-nine resources are projected for the representative ROW with
3 100 percent of them falling in the moderate sensitivity category.

4 Direct impacts for local alternative TH3b would be moderate. Four eligible and 4 unknown cultural
5 resources are present in the representative ROW. Project resources within the representative ROW total
6 51 with 100 percent having moderate or moderate to high sensitivity.

7 However, adverse impacts to cultural resources would be mitigated in accordance with the terms of the
8 PA and the POD. As stated in the POD, avoidance of resources during the final design stage would be the
9 preferred form of mitigation.

10 **Historic Trails**

11 The local alternatives intersect with the Butterfield Trail, the potential routes of the Mormon Battalion
12 Trail and the Zuñiga Trail, and the Anza Trail.

13 Local alternative TH1c crosses the potential route of the Mormon Battalion Trail north of West Speedway
14 Boulevard.

15 TH3-Option B crosses the Anza Trail north of West Irvington Road.

16 Local alternatives TH3-Option C and TH3a cross the potential Zuñiga Trail route northwest of the West
17 Ajo Way exit off I-19.

18 Local alternative TH3b crosses the Anza Trail three times: south of West Silverlake Road, north of West
19 Cushing Street, and south of The Loop between West Grant Road and West Speedway Boulevard. Local
20 alternative TH3b crosses the Butterfield Trail south of West Speedway Boulevard.

21 **Tribal Resources**

22 Local alternatives TH1a, TH1b, and TH1 Option cross portions of Tumamoc Hill.

23 **Visual Analysis**

24 ***Listed Historic Properties***

25 No listed properties are within the visual analysis area for MA1.

26 One listed property is located within 0.5 mile of local alternatives TH1a, TH1b, TH1 Option: the
27 Tumamoc Hill Archaeological District and Desert Laboratory NHL. TH1a passes through the Tumamoc
28 Hill Archaeological District and Desert Laboratory NHL; TH1b is located just north of the property.
29 Moderate to major visual impacts due to alterations to the setting of Tumamoc Hill are expected for both
30 routes because a new transmission line would be constructed. Although Tumamoc Hill is located within a
31 residential area, the residential area itself contains several historic homes and Tumamoc Hill is considered
32 a component of that residential area (see section 4.10.7 in Visual Resources). As discussed in section
33 4.10.7, the visual sensitivity of Tumamoc Hill is moderate to high because of the NHL itself and the
34 surrounding community; therefore, visual impact of the new tower structures along the route would be
35 moderate to high. However, because routing the line along TH1a, TH1b, or TH1 Option would entail
36 removing the existing line across Tumamoc Hill visual impacts from the existing line would be reduced.

37 Ninety-six listed historic properties are located within the visual analysis area of TH3b. Twenty-four
38 listed historic properties are located within 0.5 mile of the TH3b centerline:

1	• Barrio Anita Historic District	14	• Antonio Matus House and Property
2	• Blixt–Avitia House	15	• Pascua Cultural Plaza
3	• Bray–Valenzuela House	16	• Pima County Courthouse
4	• Cordova House	17	• Ronstadt–Sims Adobe Warehouse
5	• Dodson–Esquivel House	18	• Sabedra–Huerta House
6	• Eckbo Landscape	19	• Schwalen–Gomez House
7	• El Paso and Southwestern Railroad	20	• Sosa-Carrillo-Fremont House
8	Depot	21	• Solomon Warner House and Mill
9	• El Paso and Southwestern Historic	22	• Barrio El Hoyo Historic District
10	District	23	• Barrio El Membrillo Historic District
11	• El Presidio Historic District	24	• San Agustin del Tucson
12	• El Tiradito	25	• Menlo Park Historic District
13	• Levi H. Manning House	26	• Warehouse Historic District

27 These properties are part of an urban environment and many are located on the eastern side of I-10 while
 28 the proposed transmission line would be located on the western side of I-10; therefore, alterations to
 29 setting (visual impact) would be minor to properties on the eastern side of I-10. The Menlo Park Historic
 30 District, the Blixt–Avitia House, the Bray-Valenzuela House, the Dodson-Esquivel House, the Schwalen-
 31 Gomez House, the Solomon Warner House and Mill are located just east of TH3b on the eastern side of
 32 Tumamoc Hill; visual impacts would be greater to these properties than on the other side of I-10 in this
 33 distance category.

34 Sixty-three listed historic properties which are also part of an urban environment and are mostly located
 35 on the eastern side of I-10 are found within the 0.5- to 3-mile range of the local alternative:

- 36 • 4th Avenue (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 37 • Arizona Daily Star Building (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 38 • Arizona Hotel (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 39 • Arizona Inn (TH3b)
- 40 • Armory Park Historic Residential District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-
 41 OptionC)
- 42 • Bear Down Gym (TH3b)
- 43 • Barrio Libre (TH3b)
- 44 • Barrio Santa Rosa Historic District
- 45 • Boudreax-Robinson House (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 46 • Dr. William Austin Cannon House (TH1c, TH3b)
- 47 • Catalina Vista Historic District (TH3b)
- 48 • Copper Bell Bed and Breakfast (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 49 • Coronado Hotel (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 50 • Don Martin Apartments (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)

- 1 • Downtown Tucson Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-
2 OptionC)
- 3 • El Encanto Apartments (TH3b)
- 4 • El Tiradito (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 5 • First Hittinger Block (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 6 • Fourth Avenue Underpass (TH3b)
- 7 • Fox Commercial Building (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 8 • Fox Theatre (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 9 • Ghost Ranch Lodge (TH1b, TH1c, TH3b, TH1-Option)
- 10 • Haynes House (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 11 • Hotel Congress (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 12 • Sam Hughes Neighborhood Historic District (TH3b)
- 13 • Iron Horse Expansion Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-
14 OptionC)
- 15 • J. C. Penney–Chicago Store (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 16 • Jefferson Park Historic District (TH1b, TH1c, TH3b)
- 17 • Julian-Drew Building (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 18 • Marist College Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 19 • Men’s Gymnasium, University of Arizona (TH3b)
- 20 • Old Adobe Patio (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 21 • Old Library Building (TH3b)
- 22 • Old Main, University of Arizona (TH1c, TH3b)
- 23 • Pascua Cultural Plaza (TH1a, TH1b, TH1c, TH3b, TH1-Option)
- 24 • Pie Allen Historic District (TH1b, TH1c, TH3a, TH3b, TH3-OptionC)
- 25 • Pima County Courthouse (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 26 • Rebeil Block (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 27 • Rialto Building (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 28 • Rialto Theatre (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 29 • Rincon Heights Historic District (TH1c, TH3a, TH3b, TH3-OptionC)
- 30 • Ronstadt House (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 31 • Sam Hughes Neighborhood Historic District (Boundary Increase) (TH3b)
- 32 • Santa Cruz Catholic Church (TH1a, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 33 • Sixth Avenue Underpass (TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 34 • Professor George E. P. Smith House (TH1c, TH3b)
- 35 • Southern Pacific Railroad Locomotive No. 1673 (TH1b, TH1c, TH3a, TH3b, TH1-Option,
36 TH3-OptionC)

- 1 • Speedway–Drachman Historic District (TH3b)
- 2 • John Spring Neighborhood Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option,
- 3 TH3-OptionC)
- 4 • Stone Avenue Underpass (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 5 • Tucson Warehouse Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option,
- 6 TH3-OptionC)
- 7 • Type A Joesler (TH3b)
- 8 • Type B Joesler (TH3b)
- 9 • U.S. Post Office and Courthouse (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 10 • University Heights Elementary School (TH1b, TH1c, TH3b)
- 11 • University of Arizona Campus Historic District (TH1c, TH3b)
- 12 • University Library, Arizona State Museum North (TH1c, TH3b)
- 13 • USDA Tucson Plant Materials Center (TH1b, TH1c, TH3b, TH1-Option)
- 14 • Valley National Bank Building (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 15 • Velasco House (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 16 • Veterans Administration Hospital Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-
- 17 Option, TH3-OptionC)
- 18 • West University Historic District (TH1a, TH1b, TH1c, TH3a, TH3b, TH1-Option, TH3-OptionC)
- 19 • Hotel Heidel (TH3b)

20 No visual impacts are expected for these listed historic properties.

21 Nine listed properties are found within 3 to 5 miles of the route group 4 local alternatives and, due to
22 distance, no visual impacts are anticipated: Blenman-Elm Historic District, the Villa Catalina, the
23 Catalina American Baptist Church, Colonia Solana Residential Historic District, the El Conquistador
24 Water Tower, El Encanto Estates Historic District, El Montevideo Residential Historic District, the First
25 Joesler House, and Virginia Heights.

26 ***Determined Eligible***

27 There are no historic properties which have been determined eligible under Criterion A, B, or C within
28 the visual analysis areas for local alternatives MA1, TH1a, TH1b, TH1c, TH3-Option A, TH3-Option B,
29 TH3-Option C, TH3a, and TH3b; therefore, there would be no visual effects to determined eligible
30 properties.

31 ***Substation and Substation Expansions***

32 One new substation and expansion of 14 existing substations is planned for the proposed Project. The new
33 substation (Midpoint) would be located along the subroute 1.1 (Proposed Midpoint) or subroute 1.2
34 (Alternative Midpoint). The existing stations are: Adams Tap Substation, Afton Substation, Apache
35 Substation, De Bac Substation, DeMoss Petrie Substation, Hidalgo Substation, Marana Substation,
36 Nogales Substation, Pantano Substation, Rattlesnake Substation, Saguaro Substation, Tortolita
37 Substation, Tucson Substation, and Vail Substation. Table 4.9-15 summarizes the known resources within
38 each substation footprint.

1 **Table 4.9-15. Substations, Cultural Resource Inventory Data**

Substation	Total Acreage of Disturbance	Listed Sites	Determined Eligible Sites	Unevaluated or Unknown Sites	Resources from Historical Maps	Total Number of Resources
Proposed Midpoint	35	0	0	0	0	0
Alternative Midpoint	35	0	0	2	0	2
Adams Tap Substation	4	0	0	1	0	1
Afton Substation	20	0	0	0	2	2
Apache Substation	38	0	0	0	4	4
De Bac Substation	10	1	0	1	5	7
DeMoss Petrie Substation	0	0	0	0	4	4
Hidalgo Substation	35	0	0	0	1	1
Marana Substation	10	0	1	1	1	3
Nogales Substation	9	0	0	0	0	0
Pantano Substation	10	0	0	0	0	0
Rattlesnake Substation	10	0	0	0	1	1
Saguaro Substation	14	0	0	0	2	2
Tortolita Substation	1.4	0	0	0	0	0
Tucson Substation	3.7	0	0	0	0	0
Vail Substation	10	0	0	0	1	1

2 **KNOWN CULTURAL RESOURCES**

3 One listed historic property, the Valencia Site, is within the footprint of the De Bac Substation expansion.
 4 One determined eligible historic property is found within the footprint of the Marana Substation
 5 expansion.

6 **Archaeology Southwest’s Cultural Resource Priority Areas**

7 The Del Bac Substation is located within the Middle Santa Cruz and Valencia Priority Areas.
 8 The DeMoss Petrie Substation is located with the Middle Santa Cruz Priority Area. The Marana
 9 Substation is located with the Los Robles Priority Area. The Valencia Priority Area is the area
 10 surrounding the Valencia site. The Los Robles Priority Area corresponds to the Los Robles
 11 Archaeological District.

1 **Agency Preferred Alternative**

2 The Agency Preferred Alternative for route group 1 consists of P1, P2, P3, and P4a. Segment P2 is the
3 segment of primary concern for cultural resource mainly because of its length at 102 miles. Within the
4 representative ROW of P1, P2, P3, and P4a, 30 cultural resources have been recorded. Forecast number
5 of resources for the entire representative ROW of route group 1 total 173 resources with 121 of those
6 resources located in P2. Seventy-three of the 173 resources are anticipated to be of moderate to high or
7 high sensitivity. Segment P2 is expected to have direct and indirect impacts to the Butterfield Trail (which
8 it crosses) and visual impacts to one NRHP-eligible historic property.

9 The Agency Preferred Alternative for route group 2 consists of P7, LD3a, LD4, and LD4-Option 5.
10 The LD3a, LD4, and LD4-Option 5 local alternatives were designed to go around the Lordsburg and
11 Willcox playas and parallel existing or proposed transmission lines. Within the representative ROW,
12 segment P7 has 14 previously recorded and 58 projected cultural resources. Fifty-nine percent of the
13 projected resources would be classified as moderate or moderate to high sensitivity. Segment P7 does not
14 cross any historic trails and has no visual impacts to NRHP-listed or eligible historic properties. Local
15 alternative LD3a has one recorded and 61 projected cultural resources. All of the cultural resources are
16 anticipated to be of moderate to high sensitivity. LD3a does cross the Butterfield Trail. LD4 has 5
17 recorded and 45 projected cultural resources; 60 percent of the projected resources are expected to be of
18 moderate to high sensitivity. LD4-Option 5 has no recorded and no Project resources. LD3a, LD4, and
19 LD4-Option 5 are not expected to have visual impacts on historic properties other than on the Butterfield
20 Trail for LD3a.

21 The Agency Preferred Alternative for route group 3 consists of U1a, U1b, U2, and U3a which all consist
22 of an existing Western transmission line. Segment U3a is of greatest cultural concern because it travels
23 through an area of dense resources. Within U1a, U1b, U2, and U3a there are 29 recorded resources; three
24 of those resource are listed on the NRHP (the Valencia Site, AZ BB:13:315[ASM], and the Empirita
25 Ranch Historic District) and are within the representative ROW of U3a. Projected resources within the
26 route group representative ROW total 193, with 109 of those resources in U3a. Of the total projected
27 resources, 62 percent would be of moderate sensitivity, 12 percent of moderate to high sensitivity, and 8
28 percent of high sensitivity. Segment U3a also crosses three CRPAs, but U1a is the only segment that
29 crosses the Butterfield Trail. Although there are several existing and projected resources for the route, the
30 route is an existing line and ground disturbance would be significantly less than that of the New Build
31 Section. The fact that this is an existing line also would minimize additional visual impacts to the several
32 historic properties found within 3 miles of the centerline.

33 The Agency Preferred Alternative for route group 4 consists of U3b, U3c, U3f, U3g, U3h, U3i, U3k, U3l,
34 U3m, U4, MA1, TH1a, and TH1 Option. Segments U3b, U3c, U3f, U3g, U3h, U3i, U3k, U3l, U3m, and
35 U4 consist of the existing Western transmission line. Local alternative MA1 was developed to route
36 around the Marana Airport and will minimize impacts to military training at the airport. Local alternatives
37 TH1a and TH1 Option were designed to minimize impacts to the Tumamoc Hill Archaeological District
38 and Desert Laboratory NHL.

39 While all of segments U3b, U3c, U3f, U3g, U3h, U3i, U3k, U3l, U3m, and U4 are in culturally sensitive
40 areas with dense resources, segments U3f, U3g, U3i, and U3k are of particular concern. Within U3b, U3c,
41 U3f, U3g, U3h, U3i, U3k, U3l, U3m, and U4, 57 cultural resources have been recorded within the
42 representative ROW including two NRHP-listed historic properties: Tumamoc Hill Archaeological
43 District and Desert Laboratory NHL (U3f and U3g) and the Los Robles Archaeological District (U3k).
44 Two hundred and twenty-eight cultural resources have been projected for the representative ROW; 98 of
45 which are in U3i and 51 of which are in U3k. Almost all of the projected resources are expected to fall in
46 the moderate, moderate to high, and high sensitivity categories. Six CRPAs are crossed by the route.

1 The Butterfield Trail is crossed by U3h, U3i, and U3k and the Anza Trail is crossed by U3i and U3k.
2 Seventy-eight historic properties are within 3 miles of the route as well. Although there are several
3 existing and projected resources for the route, the route is an existing line and ground disturbance would
4 be significantly less than that of the New Build Section. The fact that this is an existing line also would
5 minimize additional visual impacts to the historic properties found within 3 miles of the centerline.

6 Local alternative MA1 has no recorded and one anticipated cultural resource. No impacts are anticipated
7 for MA1.

8 Local alternative TH1a and TH1 Option go around the southern, western, and northern edges of
9 Tumamoc Hill but are still within the boundaries of the NHL. Project resources in local alternative TH1a
10 total 3 and in TH1 Option total 4; for both alternatives, 67 percent of those resources are anticipated to
11 have moderate sensitivity and 33 percent to have high sensitivity. Visual impacts to Tumamoc Hill
12 created by the new tower structures would be moderate to high. However, because routing the line along
13 TH1a and TH1 Option would entail removing the existing line across Tumamoc Hill visual impacts from
14 the existing line would be reduced.

15 Based on this analysis, several issues have been identified for cultural resources:

- 16 • Direct and visual impacts are expected to the Butterfield Trail in segments P2, LD3a, U1a, U3h,
17 U3i, and U3k and to the Anza Trail in segments U3i and U3k.
- 18 • The Agency Preferred Alternative in route group 1 is culturally sensitive, especially segment P2.
19 A high number of cultural resources is forecast for this segments which can be partially attributed
20 to the overall length of the segment.
- 21 • Segments U3a of route group 3 and U3i and U3k of route group 4 are also culturally sensitive.
22 These routes travel through areas of high cultural density and/or importance including several
23 CRPAs. However, because these segments represent an existing line impacts due to ground
24 disturbance will be reduced.
- 25 • Several segments cross portions of Tumamoc Hill (U3f, U3g, TH1a, and TH1 Option); however,
26 the selection of TH1a and TH1 Option will reduce visual impacts by routing the line around the
27 NHL rather than through it and will allow the existing line crossing through the NHL to be
28 removed.

29 The above issues mean that adverse impacts to cultural resources for the Agency Preferred Alternative
30 will be long-term and major; however, adverse effects to historic properties will be mitigated in
31 accordance with the terms of the PA. According to Southline's POD (PPM CR-4: Avoid Direct Impacts
32 on Significant Cultural Resources through Final Design), the preferred choice for impact reduction will be
33 avoidance of resources. If resources cannot be avoided other types of mitigation would be developed and
34 implemented including an HPTP, data recovery, construction monitoring, and public outreach. Provided
35 that mitigation measure appropriate to the resource are implemented prior to, during, and/or after
36 construction, impacts to historic properties would be reduced to moderate but still long-term.

37 ***Additional Mitigation Measures***

38 The Section 106 PA would stipulate the development of an HPTP which would detail mitigation
39 measures for this Project. If possible, direct impacts to historic properties and other cultural resources
40 would be avoided through engineering design, such as spanning.

41 For unavoidable direct impacts to resources which are eligible for the NRHP under Criterion D
42 (the potential to provide important information about the past), mitigation measures prior to construction
43 may include NRHP-eligibility testing and data recovery for prehistoric archaeological sites and NRHP-

1 eligibility testing, data recovery, documentary research, and oral history for historic archaeological sites
2 and built environment historic resources.

3 In addition, a NAGPRA Plan of Action will be developed to outline the procedures to be followed in the
4 event human remains are encountered during ground disturbance. The NAGPRA Plan of Action would be
5 applicable to discoveries of human remains on Federal and Tribal land, and in consideration of State laws
6 from Arizona and New Mexico which protect human remains on State or private lands, may also be
7 applicable to discoveries on those lands. For State and private lands in Arizona, “burial agreements” are
8 developed with each tribe that may claim cultural affiliation to possible human remains discoveries.

9 Adverse direct impacts to historic properties which are eligible for the NRHP under Criterion A, B, or C
10 are more difficult to mitigate. Measures may include education, interpretation, signage, and community
11 outreach.

12 During construction and maintenance, all vehicle movement would be restricted to designated access
13 routes. If necessary, a cultural resources/archaeological monitor would be present at all construction
14 activities in or near a resource to ensure the resource was not disturbed. Construction crews would be
15 required to report any unanticipated subsurface resources to the proper agency.

16 ***Residual Impacts***

17 For resources eligible for the NRHP under Criterion D, provided that the data recovery plan as detailed in
18 the HPTP is followed, there would be no residual impacts. For resources eligible for the NRHP under
19 Criteria A, B, or C, there may still be residual impacts associated with alterations to integrity of setting,
20 feeling, or association due to the presence of the transmission line and associated facilities. Resources
21 would partially retain characteristics that make them eligible under Criteria A, B, and C, and residual
22 impacts from the presence of the proposed Project would be moderate.

23 ***Unavoidable Adverse Impacts***

24 If resources cannot be avoided due to Project design, any disturbance, damage, or loss of cultural
25 resources that are or may be eligible for the NRHP due to ground disturbance is considered an
26 unavoidable adverse impact.

27 ***Short-term Uses versus Long-term Productivity***

28 The short-term use of the ROW during construction of the transmission line and its associated facilities
29 would result in ground disturbance. If that ground disturbance results in the disturbance, damage, or loss
30 of cultural resources that are or may be eligible for the NRHP, the long-term productivity of that resource
31 is reduced or eliminated. This is primarily true of resources eligible under criterion D; however, if a
32 resource eligible under Criteria A, B, or C is damaged or lost due to construction, that would also affect
33 its long-term productivity.

34 ***Irreversible and Irrecoverable Commitments of Resources***

35 Because cultural resources are non-renewable resources, any disturbance, damage, or loss to a resource
36 that is or may be eligible for the NRHP would constitute an irreversible and irretrievable impact to that
37 resource. However, archaeological data recovery of sites along the proposed transmission line would
38 increase knowledge and understanding about the history of southwestern New Mexico and southeastern
39 Arizona which would be a benefit (positive impact) to science.

1 **4.10 VISUAL RESOURCES**

2 **4.10.1 Introduction**

3 This section addresses the potential impacts to visual resources from Southline’s preferred, proposed, and
4 local alternatives during construction and operation and maintenance of the transmission line, substations,
5 and ancillary facilities. The potential Project routes would traverse multiple landscape types, viewing
6 areas, and land jurisdiction as identified in Chapter 3, “Affected Environment.” The visual resources
7 analysis provides an assessment of impacts to existing conditions given the introduction of the proposed
8 Project into the aesthetic environment. Impacts from construction and operation and maintenance of the
9 New Build and Upgrade Sections are disclosed in this visual resources analysis. The degree of impact to
10 visual resources was measured in terms of proportionate change to the aesthetic environment using
11 defined criteria such as visual contrast.

12 **4.10.2 Methodology and Assumptions**

13 The methodology used for the impact analysis of the visual resources is three-tiered. The first level of
14 analysis is a discussion of the changes to the landscape in the areas of analysis resulting from the actions
15 prescribed under each alternative. The second level of analysis is an assessment of impacts resulting from
16 those same actions as seen from KOPs along the potential project routes. The third level of analysis is an
17 assessment of whether the proposed changes to the landscape would meet BLM’s objectives for
18 management of visual resources where the potential project routes crossed BLM-managed lands.
19 The three-tiered methodology was based primarily upon the BLM VRM 8400 Series guidance, BLM
20 third-party contractor experience with visual resource analyses for transmission line and substation
21 projects, and extensive project-level coordination with BLM, NPS, U.S. Forest Service, and inclusion of
22 several tiers of agency staff.

23 Specifically, GIS technology was used to assess initial impacts to scenery and views by establishing a
24 viewshed. Comprehensive field reconnaissance informed the baseline conditions, described in Chapter 3,
25 “Affected Environment.” Visual contrast as defined in BLM Manual 8431 was used in the site analysis
26 from the perspective of each selected KOP (BLM 1986a).

27 Visual contrast, or the degree of visual change to the landscape, based on construction and operation and
28 maintenance of the proposed Project, was used as the primary indicator of impacts. Visual contrast rating
29 analysis is the assessment performed by evaluating the visual elements of form, line, color, and texture of
30 the existing landscape. Contrast results from landform modifications necessary to prepare the ROW for
31 construction including removal of vegetation, or creation of permanent access roads to build structures.

32 The degree of impact to visual resources to determine what is allowable administratively based on VRM
33 Class allocations was measured in terms of: high, moderate, and low (as defined by BLM VRM
34 guidance). A “high” degree of impact occurs where the project facilities would dominate the landscape in
35 areas of remarkable scenic quality, landscape character, and visual sensitivity, meaning the landscape is
36 unique, rare, and important to the community, and has no or little tolerance for change to the form, line,
37 color, and texture features. A “moderate” degree of impact occurs when project facilities would co-exist
38 within the landscape but would be apparent from viewing locations, and changes would modify the
39 inherent quality of the landscape but the facilities would blend with the existing form, line, color, and
40 texture. A “low” degree of visual impact would be a change that is subordinate, or not readily apparent.
41 Low impacts are considered minimal changes to the existing landscape character, such as parallel existing
42 facilities or placement within an existing utility corridor with a similar form, line, color, and texture.

- 1 The visual resource evaluation began with the establishment of the area of exposure; identification of the
2 sensitive receptors (e.g., public and stakeholders) within the area of exposure; identifying issues of
3 concern as expressed during scoping, public outreach, field reconnaissance, and specific communications
4 with property owners; an assessment of scenic values (as expressed by the public); and the assessment
5 and description of the degree of effect on public scenic value as required by NEPA.
- 6 Though the proposed Project traverses several jurisdictions, the visual resource assessment was conducted
7 consistently throughout the analysis area and objectivity and consistency was applied to reduce the
8 subjectivity associated with assessing visual quality.
- 9 The assessment of visual contrast was based upon 10 environmental factors: distance, angle of
10 observation, length of time the project is in view, relative size or scale, season of use, light conditions,
11 recovery time, spatial relationships, atmospheric conditions, and motion. The BLM Manual 8431, Visual
12 Contrast Rating (BLM 1986a) defines these factors as follows:
- 13 **Distance.** The contrast created by a project usually is less as viewing distance increases.
- 14 **Angle of Observation.** The apparent size of a project is directly related to the angle between the viewer's
15 line-of-sight and the slope upon which the project is to take place. As this angle nears 90 degrees (vertical
16 and horizontal), the maximum area is viewable.
- 17 **Length of Time the proposed Project is in View.** If the viewer has only a brief glimpse of the project,
18 the contrast may not be of great concern. If, however, the project is subject to view for a long period, as
19 from an overlook, the contrast may be very significant.
- 20 **Relative Size or Scale.** The contrast created by the project is directly related to its size and scale as
21 compared to the surroundings in which it is placed.
- 22 **Season of Use.** Contrast ratings consider the physical conditions that exist during the heaviest or most
23 critical visitor use season, such as snow cover and tree defoliation during the winter, leaf color in the fall,
24 and lush vegetation and flowering in the spring.
- 25 **Light Conditions.** The amount of contrast can be substantially affected by the light conditions.
26 The direction and angle of lighting can affect color intensity, reflection, shadow, form, texture, and many
27 other visual aspects of the landscape. Light conditions during heavy periods of rain must be a
28 consideration in contrast ratings.
- 29 **Recovery Time.** The amount of time required for successful revegetation should be considered. Few
30 projects meet the VRM management objectives during construction activities. Recovery usually takes
31 several years and goes through several phases (e.g., bare ground to grasses, shrubs, trees, etc.). It may
32 be necessary to conduct contrast ratings for each of the phases that extend over long time periods. Those
33 conducting contrast rating should verify the probability and timing of vegetative recovery.
- 34 **Spatial Relationships.** The spatial relationship within a landscape is a major factor in determining the
35 degree of contrast.
- 36 **Atmospheric Conditions.** The visibility of projects due to atmospheric conditions such as air pollution or
37 natural haze should be considered.
- 38 **Motion.** Movement such as waterfalls, vehicles, or plumes draws attention to a project.

1 Because it is not possible to analyze every view toward proposed Project features, the contrast rating
2 process requires selection of representative views, or KOPs. KOPs represent a range of views available to
3 the public, including common views and sensitive views; sensitive views are those from communities,
4 recreational areas, and travel routes. In consultation with the BLM Field Office representatives, a list of
5 potential KOP locations was compiled. Based on observations made during the field visit, 79 KOPs were
6 identified, of which 29 were selected as candidates for visual simulation. No simulation would be created
7 for the remaining 50 KOPs. The agencies made additional recommendations over time, resulting in a final
8 total of 96 KOPs, with 40 being simulated. Visual simulations were prepared using computer modeling
9 techniques to depict the view as it would appear were the proposed Project completed. A combination of
10 computer-aided drafting, GIS tools, and rendering programs was used to produce images of the proposed
11 Project facilities, which were then superimposed on photographs.

12 The KOPs are discussed in detail in section 3.10 and, along with visual contrast rating sheets (VCRSs) are
13 summarized in appendix I. Simulations for select KOPs can be found in appendix K. For each KOP, the
14 existing and with-project conditions are assessed for land and water features, vegetation, and structures in
15 terms of the elements of form, line, color, and texture. The degree of contrast—strong, moderate, weak, or
16 none—is assessed for each of these features and elements. The visual resources impact analysis was
17 largely based upon BLM Visual Contrast Ratings and the assessment of the degree of potential impact on
18 viewers, based upon the level of viewer sensitivity combined with proposed Project visibility and contrast
19 within the existing landscape.

20 ***Analysis Area***

21 The analysis area for visual resources was established through preliminary assessment of scenic quality,
22 visual sensitivity, and the derivation of a viewshed analysis using digital elevation modeling and ESRI
23 ArcGIS viewshed tools. Field reconnaissance was conducted to verify onsite existing conditions, establish
24 or validate boundaries for scenic quality, identify sensitive viewers, and determine visual contrast. Field
25 reconnaissance and application of distance zones revealed an analysis area between 2 and 10 miles either
26 side of centerline. Typically, views beyond 5 miles result in the visual deterioration of transmission line
27 structures, although lattice-type structures begin to deteriorate in visibility beginning at 0.25 mile, and
28 monopole structures begin to blend into the landscape at further distances (dependent upon the
29 background or horizon line conditions).

30 All action alternatives are located within the Basin and Range physiographic province and are split
31 between the Mexican Highlands (roughly within the New Mexico area) and Sonoran Desert
32 (roughly within the Arizona area) (USGS 2003). Both of these physiographic subregions are distinctive in
33 the topography and vegetation that they comprise; however, the proposed Project is located entirely
34 within desert landscape characterized by large swaths of open space, variation of the degree of vegetation
35 growth, topography, and color contrast (i.e., form, line, color, and texture). Additionally, the proposed
36 transmission line traverses varying degrees of human-made development ranging from highly rural, low-
37 density communities, to moderate- to high-density urban landscape (within the city of Tucson).

38 Though the proposed Project traverses several landowner jurisdictions, the visual resource assessment
39 was conducted consistently throughout the analysis area, and objectivity and uniformity in the analysis
40 was applied to reduce the subjectivity associated with assessing visual quality.

41 ***Analysis Assumptions***

42 The analysis assumptions for visual resources include both temporal and spatial dimensions.
43 The temporal bounds of analysis include the phasing of construction and operation and maintenance.
44 The spatial bounds of analysis are defined by areas in which the proposed Project would be visible, or its

1 viewshed. However, the concept of analyzing visual contrast, or the degree of change to the existing
2 landscape, was used to determine the level of visual impact within the viewshed as a result of the
3 proposed Project. Lastly, the cumulative effect of the proposed Project is disclosed to illustrate the
4 potential impacts to visual resources for viewers, residents, and visitors in the lands adjacent to or
5 surrounding the Project footprint. Past, present, and reasonably foreseeable future actions are described
6 and considered that could cumulatively contribute to visual impacts.

7 The analysis area included a 10-mile buffer around all proposed Project alternatives. The visual resource
8 impacts analysis included an assessment of the landscape changes that would result from the construction
9 and operation and maintenance of the proposed Project. The relative impacts of each alternative on the
10 characteristic landscape was assessed by comparing visual contrasts that would result from changes to the
11 form, line, texture, and color of the existing environment directly resulting from the implementation of the
12 proposed Project. The analysis area was determined by a viewshed analysis in which potential viewing
13 would be possible.

14 ***Impact Indicators***

15 Visual contrast was the primary indicator determining the degree of impact from the implementation
16 of the proposed Project into the existing environment. Visual contrast was determined through a thorough
17 evaluation of scenic quality, sensitivity levels, and distance zones establishing the baseline conditions,
18 and adheres to the BLM VRM system (BLM 1986a). Impacts resulting from the introduction
19 of the proposed Project into the existing visual environment, that cannot be mitigated or reduced, are
20 measured in terms of high, moderate, and low:

- 21 • High Impacts—occur where the proposed Project and/or facilities associated with the proposed
22 Project (e.g., access roads, towers, ancillary facilities, and other structures) are dominant in the
23 visual landscape from sensitive viewing locations. The visual impacts measured in terms of form,
24 line, color, and texture would be incompatible with the existing high-quality, unique, or rare
25 natural landscape. Typically, these landscapes are categorized as Class A or Class B scenic
26 quality and high or moderate sensitivity level.
- 27 • Moderate Impacts—occur where the proposed Project or portions of the proposed Project are co-
28 dominant with existing landscape features and are visible from high to moderate sensitivity-level
29 viewpoints. Moderate impacts may occur in Class B or Class C designated scenic quality levels
30 where the implementation of the proposed Project features would change the inherent scenic
31 quality of the landscape in terms of form, line, color, and texture.
- 32 • Low Impacts—occur where the proposed Project or portions of the proposed Project are not
33 dominant or considerably noticeable from sensitive viewing locations, and minimal change to the
34 existing scenic landscape is detectible. Low impacts would occur in Class B or Class C
35 landscapes in areas of weak sensitivity. Examples of low visual impacts would be if the proposed
36 Project paralleled an existing transmission line or utility corridor where similar or more dominant
37 structures are currently built, and the form, line, color, and texture contrast would result in similar
38 views or modifications.

39 ***Significant Impacts***

40 For the purposes of this analysis, a significant impact on visual resources could result if any of the
41 following were to occur from construction or operation and maintenance of the proposed Project:

- 42 • Areas that would no longer meet, or be in conformance with established VRM objectives and
43 would require a plan amendment (see figures 3.10-14 and 3.10-18 for VRM class and segment
44 conformance).

- 1 • Introduction of a structure contrast within a landscape that is highly sensitive from a natural
2 resources or community perspective.
- 3 • Qualitative assessment of the degree of change in the landscape character from analysis
4 viewpoints over time resulting in the permanent degradation of scenic quality in established areas
5 of aesthetic importance.
- 6 • Miles of Project visibility in areas established as highly scenic (i.e., scenic roads, community or
7 historic areas).

8 **4.10.3 Impacts Analysis Results**

9 ***No Action Alternative***

10 Under the no action alternative, the BLM would not issue permission to Southline for the use of the
11 ROW; therefore, the New Build Section of the proposed Project would not be constructed across Federal
12 lands and Western would not rebuild its existing transmission lines as part of the Southline Project.
13 No Project-related impacts to visual resources would occur in the New Build Section and visual resource
14 conditions would remain unaffected by the proposed Project. Visual resources would continue to be
15 affected by current actions and activities in the analysis area. Even under the no action alternative,
16 Western still plans to upgrade the existing lines between the Apache and Saguaro substations, including
17 the upgrade of Western's transmission lines to 230-kV, within the next 10 years, in accordance with
18 Western's 10-year capital improvement plan (Western 2012a).

19 ***Impacts Common to All Action Alternatives***

20 This section presents the direct and indirect effects common to all action alternatives during construction
21 and operation and maintenance and maintenance of the proposed Project.

22 **CONSTRUCTION**

23 During construction, visual impacts would result from the introduction of construction vehicles,
24 equipment, and construction materials within staging areas, access roads, and within the transmission line
25 ROW. Disturbance resulting from construction would be temporary and largely short in duration, and
26 visible effects from active construction would cease subsequent to clean up and restoration of the
27 temporary staging areas and access roads.

28 Sensitive viewers would be affected by the temporary proposed Project construction impacts. However,
29 the transmission line structures would cause the major, long-term change to scenery, while construction of
30 the structures and facilities would be short-term and temporary. During construction, alteration of
31 topography, earthwork, vegetation clearing, short-term impacts from dust generation, and landform
32 modification would be noticeable and create visual contrast within the viewshed.

33 **OPERATION AND MAINTENANCE**

34 The towers, transmission lines, permanent access roads, substations, and maintenance facilities would
35 increase visual contrast during the entire duration of proposed Project operations. Visual impacts would
36 be most evident where cleared areas created scars, barren areas, or unnatural lines and contrast resulting
37 from clearing which would remain for the life of the proposed Project (although, as discussed in the
38 mitigation measures, some areas would be revegetated to reduce contrast resulting from landform and
39 vegetation modification). The most evident and long-term visual contrasts result from the addition of

1 transmission lines and facility structures within the landscape. These vertical structures (towers),
 2 conductors, lines, and access roads would produce long, linear contrast within the landscape.

3 **Route Group 1 – Afton Substation to Hidalgo Substation**

4 Visual contrast in route group 1 would directly result from introduction of transmission line structures and
 5 substations into the landscape, removal of vegetation to construct and maintain the transmission lines,
 6 construction of temporary and permanent access roads, temporary construction laydown yards, and any
 7 landform modifications necessary to prepare the ROW for construction. Table 4.10-1 provides a summary
 8 of scenic quality ratings and VRM Classes for route group 1.

9 **Table 4.10-1.** Route Group 1 Scenic Quality Ratings and VRM Class

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM lands only) (in miles)		
		A	B	C	II	III	IV
Subroute 1.1, Proponent Proposed							
P1	5.1	0.0	0.0	5.1	0.0	3.0	0.0
P2	102.0	0.0	6.0	96.0	0.0	29.9	2.5
P3	31.1	0.0	0.0	31.1	0.0	2.6	22.9
P4a	8.7	0.0	0.0	8.7	0.0	0.4	3.6
Subroute 1.2, Proponent Alternative							
S1	13.4	0.0	0.0	13.4	0.0	10.9	0.0
S2	11.1	0.0	0.8	10.3	0.0	9.8	0.0
S3	12.9	0.0	7.0	5.9	0.0	8.7	3.7
S4	10.6	0.0	0.6	10.0	0.0	0.0	10.5
S5	29.7	0.0	7.6	22.1	1.2*	4.8	6.1
S6	7.4	0.0	0.0	7.4	4.4*	0.0	0.0
S7	41.5	0.0	0.0	41.5	13.7*	1.7	5.2
S8	14.6	0.0	0.0	14.6	0.0	0.3	0.0

10

1 **Table 4.10-1.** Route Group 1 Scenic Quality Ratings and VRM Class (Continued)

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM lands only) (in miles)		
		A	B	C	II	III	IV
Route Group 1 Local Alternatives							
DN1	42.5	0.0	12.3	30.2	0.0	4.0	2.9
A	17.5	0.0	0.0	17.5	0.0	14.7	0.0
B	12.2	0.0	0.7	11.5	0.0	0.0	10.0
C	9.0	0.0	0.0	9.0	3.7*	0.0	0.0
D	22.8	0.0	5.2	17.6	1.8*	4.3	1.9

2 * Not compliant with VRM objectives.

3 **SUBROUTE 1.1 – PROPONENT PREFERRED**

4 **Scenic Quality**

5 Changes to scenic quality along subroute 1.1 would result where vegetation is removed for construction
6 access, substation expansion, and ROW clearing during the operation and maintenance of the
7 transmission line and substations. Additional changes to scenic quality would occur from the introduction
8 of new transmission structures, including monopole and lattice-type structures on the landscape.
9 The majority of subroute 1.1 crosses Class C scenery (140.9 miles or 96 percent), crossing areas of low,
10 rolling landscape, minimal vegetation, muted colors, and open desert. The area is not known for its
11 scenery; and impacts from those changes to scenic quality would be low. A portion of segment P2 of
12 subroute 1.1 crosses Class B scenery where impacts from those changes would be moderate. In addition,
13 segments P1, P2, and P4a would be adjacent to existing transmission corridors and the I-10, repeating the
14 basic visual elements of that existing infrastructure, further contributing to low visual contrasts. Although
15 segment P3 crosses Class C scenery, it would pass through relatively undeveloped land and would require
16 new or improved construction access resulting in moderate impacts (see figure 3.10-11 for scenic quality
17 ratings and subroute 1.1). Contrasts would be further reduced by implementing VRM-1 and VRM-2, as
18 described in Section 4.10.4, “Additional Mitigation Measures.”

19 **Key Observation Points**

20 ***Residential***

21 Residences located along subroute 1.1 are generally dispersed, except for higher concentrations in the
22 community of Deming (see figure 3.10-9 for location of KOPs and subroute 1.1). In the Deming area,
23 impacts to residential viewers are expected to be moderate. There would be unobstructed views of
24 segment P2 crossing gently rolling terrain with low shrub and grass cover from over 3 miles away.
25 New structures would be visible, but would repeat the basic visual elements of the existing transmission
26 structures (see appendix I: VCRS P2-05).

27 The southern half of segment P3 is considered to have moderate sensitivity because of its rural residential
28 character. Moderate impacts to dispersed residences along segment P3 are expected to occur. There are no
29 existing transmission structures, and viewers would have unobstructed views of the proposed Project

1 transmission structures crossing flat to rolling terrain within 0.5 mile (see appendix I: VCRS P3-01 and
2 P3-02).

3 **Recreation**

4 Subroute 1.1 comes in proximity to the Aden Hills OHV area, Aden Lava Flow WSA, West Potrillo
5 Mountains WSA, Florida Mountains WSA, Mount Riley WSA as well as access to the CDNST (see
6 figure 3.10-9 for location of KOPs and subroute 1.1). Because dispersed recreation viewers would have
7 views of segments of subroute 1.1 where it is adjacent to existing transmission facilities, low impacts
8 would occur. Along segments P1 and P2, low to moderate impacts are expected for recreation viewers
9 associated with the Aden Hills OHV area and Aden Lava Flow WSA, Mount Riley WSA, and the West
10 Potrillo Mountains WSA. The addition of new transmission structures would repeat the existing
11 horizontal patterns associated with current infrastructure visible across the landscape, and views would be
12 visible from 2 miles or more (see appendix I: VCRS P1-01 and P2-02).

13 Impacts would be moderate for dispersed recreation users associated with the Florida Mountains WSA.
14 Because segment P2 would be viewed across slightly rolling terrain with low shrub vegetation cover,
15 recreation viewers would have clear views of lattice structures and horizontal transmission lines (see
16 appendix I: VCRS P2-05).

17 It also crosses the CDNST (see figure 3.10-9 for location of KOPs and subroute 1.1). Where it crosses the
18 CDNST, impacts to viewers are expected to be low. The view is located along a portion of the CDNST
19 that parallels NM 90 approximately 0.25 mile northeast of the intersection with NM 70. Very few
20 residents or destinations are located along NM 90. There is no marked trailhead located here, and
21 landscape is characterized by large expanses of open space. Recreation users seeking a solitary experience
22 on the CDNST may use this portion of the trail. Low impacts are expected from Grandmother Mountain
23 and the CDNST. Views of segment P2 would repeat the basic patterns of existing transmission structures
24 (see appendix I: VCRS P2-07).

25 **Travel Routes**

26 High sensitivity travel routes along subroute 1.1 include I-10 and NM 549 (see figure 3.10-9 for location
27 of KOPs and subroute 1.1). Viewers traveling along the I-10 corridor, which has high viewer sensitivity
28 because it is a major travel corridor, would have clear views of segments P2 and P4a following the I-10
29 corridor. Low impacts are anticipated because the new transmission lines would follow existing
30 transmission lines, and views of transmission structures would be against the backdrop of surrounding
31 mountains for portions of these segments, which would further reduce contrast (see appendix I: VCRS
32 P2-03 and P2-04).

33 **Compliance**

34 A majority of subroute 1.1 where it crosses BLM land would pass through VRM Class III lands (35.9
35 miles). Of the remaining portion of subroute 1.1 across BLM lands, 28.9 miles would cross VRM Class
36 IV lands. The remaining length of subroute 1.1 crosses private or State lands and does not have BLM
37 VRM classification. Although there would be low to moderate impacts to visual resources, all segments
38 of subroute 1.1 would be in compliance with BLM VRM Class III and Class IV objectives.

1 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

2 **Scenic Quality**

3 Changes to scenic quality along subroute 1.2 would result where vegetation is removed for construction
4 access, temporary laydown areas, substations, and for ROW clearing for the operation and maintenance
5 of the transmission line. Direct impacts would also occur from the introduction of new transmission
6 structures, including monopole and lattice-type structures, on the landscape. Subroute 1.2 crosses Class B
7 (16 miles or 11.3 percent) and Class C scenery (125.2 miles or 85.8 percent) and impacts from these
8 changes would be low, moderate, and high. Subroute 1.2 would pass through the East Potrillo Mountain
9 SQRU (segment S2) and the West Potrillo Mountain SQRU (segment S3), which the BLM considers to
10 have high sensitivity. Subroute 1.2 would also pass through an area of moderate sensitivity between
11 Columbus and Hachita (segments S5, S6, and S7). Low to moderate impacts would occur where there is
12 some existing construction access and with the addition of new tall transmission structures alongside
13 existing developments. High impacts would occur along 7 miles of segment S1 where new transmission
14 structures and construction access are introduced into currently undeveloped areas (see figure 3.10-11 for
15 scenic quality ratings and subroute 1.2).

16 Subroute 1.2 would have higher levels of contrast because it would pass mostly through rural and
17 undeveloped landscapes with no existing transmission line corridors, as opposed to the subroute 1.1
18 segments, which would pass primarily along existing transmission line routes and in proximity to I-10,
19 a major freeway.

20 **Key Observation Points**

21 ***Residential***

22 Dispersed rural residences are located along portions of the subroute 1.2. There are concentrations of
23 residences in the communities of Lordsburg, Columbus, and Hachita (see figure 3.10-9 for location of
24 KOPs and subroute 1.2). In the Lordsburg area, impacts to residential viewers are expected to be
25 moderate. There would be views of segment S8 paralleling existing shorter utility lines. New transmission
26 structures would be clearly visible, would be taller than the existing infrastructure, and would be visible
27 against the sky (see appendix I: VCRS S8-02). In the Columbus area, impacts to residential viewers are
28 expected to be moderate. There would be unobstructed views of segment S5 crossing gently rolling
29 terrain with low shrub and grass cover. New structures would be visible, but would repeat some of the
30 basic visual elements of existing vertical structures/towers in the Columbus area (see appendix I: VCRS
31 S5-01). In the Hachita area, impacts to residential viewers are expected to be low to moderate. There
32 would be views of segment S7 interspersed with residential development, water towers, and existing
33 utility towers. New structures would be visible, but would repeat some of the basic visual elements of
34 existing development. Impacts would be moderate where new structures would be visible against the sky
35 and where vegetation is removed for a temporary construction laydown yard (see appendix I: VCRS S7-
36 02 and S7-03).

37 ***Recreation***

38 There are few recreation viewers associated with subroute 1.2. The subroute comes in proximity to
39 Pancho Villa State Park (1 to 2 miles from the alignment) and the CDNST (4 miles from the alignment)
40 (see figure 3.10-9 for location of KOPs and subroute 1.2). Segments S3 and S4 are located just south of
41 the West Potrillos WSA boundary. Although the WSA receives little visitation, there is access from NM 9
42 just north of Segments S3 and S4. Low to moderate impacts are expected for travelers along NM 9
43 accessing the WSA. Along segments S5 and S7, low to moderate impacts are expected for recreation
44 viewers associated with the Pancho Villa State Park and the CDNST. The addition of new transmission

1 structures would repeat the existing angular patterns visible across landscape and views would be from a
2 distance of less than 2 miles. Impacts would be moderate for dispersed recreation users along the CDNST,
3 where views of new structures occur in front of existing structures, and where structures are visible
4 against the sky (see appendix I: VCRS P1-01 and P2-02).

5 ***Travel Routes***

6 Low- to medium-concern sensitive viewing areas for subroute 1.2 include NM 9 (see figure 3.10-9 for
7 location of KOPs and subroute 1.2). Viewers traveling along NM 9 would have views of segments S3, S5,
8 S6, and S7. Moderate impacts would occur where new transmission structures are introduced into largely
9 undeveloped areas, resulting in increased contrast from more pronounced linear features and strong
10 geometric angles compared with existing roads and structures in the landscape (see appendix I: VCRS S3-
11 01, S5-01, and S6-01).

12 The I-10 corridor has high viewer sensitivity because it is a major travel corridor. Low impacts are
13 anticipated because the new transmission lines would follow existing transmission lines, and views of
14 transmission structures would be against the backdrop of surrounding mountains for portions of these
15 segments, which would reduce contrast (see appendix I: VCRS S8-01 and S8-02). I-10 follows an east-
16 west path located to the north of subroute 1.2 ranging from 8 to 30 miles from the alignment.

17 **Compliance**

18 A majority of subroute 1.2 where it crosses BLM land (36.1 miles) would pass through VRM Class III
19 lands. Of the remaining portion of subroute 1.2 across BLM lands, 25.5 mile would cross VRM Class IV
20 lands, and 19.6 miles would cross VRM Class II lands. The remaining length of subroute 1.2 crosses
21 private or State lands and does not have BLM VRM classifications. Segment S5 would cross 1.5 miles of
22 VRM II land in the Tres Hermanas Mountains SQRU, segment S6 would cross 4.4 miles of VRM Class II
23 lands, and segment S7 would cross 13.7 miles of VRM Class II lands. These portions of subroute 1.2
24 would not be compliant with VRM Class II where moderate visual contrasts would occur.

25 **LOCAL ALTERNATIVES**

26 There are five local alternatives available for route group 1: DN1, A, B, C, and D. Impacts to scenic
27 quality, KOPs, and BLM VRM compliance are described for each local alternative segment below.

28 **Local Alternative DN1**

29 ***Scenic Quality***

30 Impacts along segment DN1 are similar to those described for subroute 1.1, segment P2, low to moderate.
31 Segment DN1 crosses 12.3 miles of Class B scenery and 30.2 miles of Class C scenery, which is
32 characterized by low, rolling landscape, minimal vegetation, muted colors, and open desert (see figure
33 3.10-11 for scenic quality ratings and segment DN1).

34 ***Key Observation Points***

35 **Residential**

36 Impacts to dispersed rural residences are located along portions of segment DN1 would be similar to
37 those described for subroute 1.1, moderate. There are concentrations of residences in the communities of
38 Lordsburg, Columbus, and Hachita (see figure 3.10-9 for location of KOPs and segment DN1).

1 **Recreation**

2 There are few recreation resources known along segment DN1, and impacts to dispersed recreation
3 viewers would be similar to those described for subroute 1.1.

4 **Travel Routes**

5 Segment DN1 is not located along existing roadways and there would be no impacts to sensitive viewers
6 along travel routes.

7 **Compliance**

8 Segment DN1 would pass through 2.9 miles of VRM Class IV lands and 4.0 miles of VRM Class III
9 lands. The remaining length of DN1 crosses private or State lands and does not have BLM VRM
10 classification. Although there would be low to moderate impacts to visual resources, all segments of DN1
11 would be in compliance with BLM VRM Class III and Class IV objectives.

12 **Local Alternative A**

13 **Scenic Quality**

14 Impacts along local alternative segment A would be similar to those described for segment S2 in subroute
15 1.2, moderate, crossing 17.5 miles of Class C scenery lands with a low sensitivity level throughout its
16 extent (see figure 3.10-11 for scenic quality ratings and segment A).

17 **Key Observation Points**

18 **Residential**

19 Segment A would pass near few, if any, rural residences.

20 **Recreation**

21 There are few recreation resources known along segment A, and impacts to dispersed recreation viewers
22 would be similar to those described for segment S2 in subroute 1.2.

23 **Travel Routes**

24 Segment A would follow existing roads for its entire length along County Road A015 and NM 9. Viewers
25 would experience moderate impacts while traveling along those routes where new transmission structures
26 are introduced into largely undeveloped areas, resulting in increased contrast from more pronounced
27 linear features and strong geometric angles compared with existing roads and structures in the landscape.

28 **Compliance**

29 Local alternative segment A would result in lower levels of visual contrast than would segment S2.
30 Segment A would pass through 14.7 miles of VRM Class III lands. The remaining length of segment A
31 crosses private or State lands and does not have BLM VRM classification. Although there would be low
32 to moderate impacts to visual resources, segment A would be in compliance with BLM VRM Class III
33 objectives.

1 **Local Alternative B**

2 ***Scenic Quality***

3 Impacts along local alternative segment B would be similar to those described for segment S4 in subroute
4 1.2, moderate, crossing 0.7 mile of Class B scenery and 11.5 miles of Class C scenery lands with a low
5 sensitivity level (see figure 3.10-11 for scenic quality ratings and segment B).

6 ***Key Observation Points***

7 **Residential**

8 Segment B would pass no residential areas.

9 **Recreation**

10 There are few recreation resources known along segment B, and impacts to dispersed recreation viewers
11 would be similar to those described for segment S4 in subroute 1.2. Segment B is located along the West
12 Potrillos WSA boundary, and there would be greater visibility from the WSA of segment B over segment
13 S4.

14 **Travel Routes**

15 Segment B would follow NM 9. Viewers would experience moderate impacts while traveling along NM 9
16 where new transmission structures are introduced into largely undeveloped areas, resulting in increased
17 contrast from more pronounced linear features and strong geometric angles compared with existing roads
18 and structures in the landscape (see appendix I: VCRS B-01).

19 ***Compliance***

20 Segment B would pass through 10.0 miles of VRM Class IV lands. The remaining length of segment B
21 crosses private or State lands and does not have BLM VRM classification. Although there would be low
22 to moderate impacts to visual resources, segment B would be in compliance with BLM VRM Class IV
23 objectives.

24 **Local Alternative C**

25 ***Scenic Quality***

26 Impacts along local alternative segment C would be similar to those described for segment S6 in subroute
27 1.2, low to moderate, crossing 9 miles of Class C scenery lands with a low sensitivity level throughout its
28 extent (see figure 3.10-11 for scenic quality ratings and segment C).

29 ***Key Observation Points***

30 **Residential**

31 Segment C would pass near few, if any, rural residences.

32 **Recreation**

33 There are few recreation resources known along segment C, and impacts to dispersed recreation viewers
34 would be similar to those described for segment S6 in subroute 1.2.

1 **Travel Routes**

2 Segment C would follow NM 9 for its entire length. Viewers would experience low to moderate impacts
3 while traveling along NM 9 where new transmission structures are introduced into largely undeveloped areas,
4 resulting in increased contrast from more pronounced linear features and strong geometric angles compared
5 with existing roads and structures in the landscape. There would be fewer visual contrasts from new
6 construction access associated with segment C, since existing roads would be available (see appendix I:
7 VCRS C-01).

8 **Compliance**

9 Segment C would pass through 3.7 miles of VRM Class II lands. The remaining length of segment C
10 crosses private or State lands and does not have BLM VRM classification. Segment C would not be
11 compliant with VRM Class II where moderate visual contrasts would occur.

12 **Local Alternative D**

13 **Scenic Quality**

14 Impacts along local alternative segment D would be moderate to high, crossing 5.2 miles of Class B
15 scenery and 17.6 miles of Class C scenery lands with low to moderate sensitivity level throughout its
16 extent (see figure 3.10-11 for scenic quality ratings and segment D).

17 **Key Observation Points**

18 **Residential**

19 Segment D would pass near few rural residences.

20 **Recreation**

21 Segment D crosses perpendicular to the CDNST. There are few other recreation resources known along
22 segment D, and impacts to dispersed recreation viewers would be similar to those described for segment
23 S8 in subroute 1.2.

24 **Travel Routes**

25 Segment D would follow existing roads until approximately 1.6 miles south of I-10, where it would turn
26 due west, from which point it would not follow any established road or energy corridor. Moderate impacts
27 would occur to viewers traveling along those routes where new transmission structures are introduced into
28 largely undeveloped areas, resulting in increased contrast from more pronounced linear features and
29 strong geometric angles compared with existing roads and structures in the landscape (see appendix I:
30 VCRS D-01).

31 **Compliance**

32 Segment D would pass through 1.9 miles of VRM Class IV, 2.3 miles of VRM Class III lands, and 1.8
33 miles of BLM Class II lands. The remaining length of segment D crosses private or State lands and does
34 not have BLM VRM classification. The 1.8 miles of segment D that crosses VRM Class II lands would
35 not be compliant with VRM Class II objectives where a moderate visual contrast would occur. Although
36 there would be low to moderate impacts to visual resources, the remaining 4.2 miles of segment D would
37 be in compliance with BLM VRM Class III and IV objectives.

1 **Route Group 2 – Hidalgo Substation to Apache Substation**

2 Visual contrast in route group 2 would directly result from introduction of transmission line structures and
 3 substations into the landscape, removal of vegetation to construct and maintain the transmission lines,
 4 construction of temporary and permanent access roads, temporary construction laydown yards, and any
 5 landform modifications necessary to prepare the ROW for construction. Table 4.10-2 provides a summary
 6 of scenic quality ratings and VRM Classes for route group 2.

7 **Table 4.10-2.** Route Group 2 Scenic Quality Ratings and VRM Class

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM lands only) (in miles)		
		A	B	C	II	III	IV
Subroute 2.1, Proponent Preferred							
P4b	14.0	0.0	0.0	14.0	0.0	0.7	0.0
P4c	1.9	0.0	0.0	1.9	0.0	0.4	0.0
P5a	9.6	0.0	0.0	9.6	0.0	5.0	1.1
P5b	21.1	0.0	21.1	0.0	0.0	6.4	11.5
P6a	0.9	0.0	0.9	0.0	0.0	0.9	0.0
P6b	22.5	2.4	20.1	0.0	0.0	0.2	0.0
P6c	2.8	0.0	0.8	2.0	0.0	0.0	0.0
P7	22.3	0.9	0.0	21.2	0.0	0.0	2.3
P8	0.5	0.0	0.0	0.5	0.0	0.0	0.0
Subroute 2.2, Proponent Alternative							
E	31.8	0.0	22.4	10.4	0.0	14.6	4.1
F	25.3	0.0	24.4	0.9	0.0	3.2	0.0
Ga	25.7	0.0	0.0	25.5	0.0	0.0	0.0
Gb	1.0	0.0	0.0	1.0	0.0	0.0	0.0
Gc	7.4	0.0	0.0	7.4	0.0	0.0	0.0
I	2.3	0.0	0.8	1.5	0.0	0.0	0.0
J	2.3	0.0	0.0	2.3	0.0	0.0	0.0
Route Group 2 Local Alternatives							
LD1	35.4	0.0	21.9	14.2	0.0	19.4	0.0
LD2	9.6	0.0	0.0	9.6	3.1*	0.0	0.6
LD3a	27.9	0.0	0.0	27.9	0.5*	7.0	2.5
LD3b	1.9	0.0	0.0	1.9	0.0	0.0	1.2
LD4	60.6	0.0	42.3	19.4	0.0	0.0	37.1
LD4-Option 4	6.5	0.0	0.0	6.5	0.0	0.0	0.0
LD4-Option 5	12.2	0.0	9.1	3.1	0.0	0.0	0.0
WC1	14.8	0.0	0.0	14.8	0.0	0.0	0.0

8 * Not compliant with VRM objectives.

1 **SUBROUTE 2.1 – PROPONENT PREFERRED**

2 **Scenic Quality**

3 Changes to scenic quality along subroute 2.1 would result where vegetation is removed for construction
4 access, construction laydown yards, substation expansion, and ROW clearing during the operation and
5 maintenance of the transmission line and substations. Additional changes to scenic quality would occur
6 from the introduction of new transmission structures including monopole and lattice-type structures on
7 the landscape. There are 49.2 miles of subroute 2.1 that cross Class C scenery (52 percent of the
8 subroute), and 42.9 miles which cross Class B scenery (45 percent of the subroute). Impacts from those
9 changes to scenic quality in Class B and C would be low to moderate. A portion of segment P6b of
10 subroute 2.1 also crosses Class A scenery where impacts from those changes would be moderate
11 (see figure 3.10-11 for scenic quality ratings and subroute 2.1).

12 In addition, segments P5a, P5b, P6a, P6b, and P6c follow the existing El Paso Natural Gas Pipeline. P7
13 and P8 would be adjacent to existing transmission corridors, repeating the basic visual elements of that
14 existing infrastructure and further contributing to low visual contrasts. Although segment P6b crosses
15 Class A scenery, there would be a moderate visual contrast based on proximity of viewers to the
16 representative ROW.

17 **Key Observation Points**

18 ***Residential***

19 Residences located along subroute 2.1 are generally dispersed, except for higher concentrations in the
20 communities of San Simon and Bowie (see figure 3.10-9 for location of KOPs and subroute 2.1). In the
21 San Simon area, impacts to residential viewers are expected to be low. There would be distant views of
22 segment P5b crossing a level alkali flat over 2 miles away with the Peloncillo Mountain in the
23 background. New structures would be faintly visible, and introduce a new linear component on the
24 landscape (see appendix I: VCRS P5-01 and P5-02).

25 In the Bowie area, impacts to residential viewers are expected to be low to moderate. There would
26 prominent views of segment P6b crossing the valley floor with the western extent of the Peloncillo
27 Mountains in the background. There would be unobstructed views of new structures visible against the
28 sky, adding a strong linear and angular element to the landscape (see appendix I: VCRS P6-01 and
29 P6-02).

30 ***Recreation***

31 Subroute 2.1 comes in proximity to the Peloncillo Mountains, Dos Cabezas Wilderness, Fort Bowie, and
32 the Willcox Playa. There would be views of segment P4b crossing rolling terrain against a backdrop of
33 mountains. Although the structures would introduce a new vertical element to the landscape, they would
34 repeat the basic elements of existing linear disturbances present on the landscape (see appendix I: VCRS
35 P4-01 and P4-02).

36 Impacts to viewers from the Peloncillo Mountains are expected to be low. The view is located in a wash
37 southwest of Peloncillo Mountains. There would be faint views of structures associated with segment P5b
38 more than 2 miles away. The Chiricahua Mountains are visible in the distant background (see appendix I:
39 VCRS P5-02 and associated simulation in appendix K).

40 Impacts to viewers from the Dos Cabezas Mountains would be moderate. There would be unobstructed
41 views of segment P6c crossing rolling hills and leading into the steeper, jagged mountains. The structures

1 would introduce new regular vertical and horizontal linear components to the landscape (see appendix I:
2 VCRS P6-03 and associated simulation in appendix K).

3 There are several views of subroute 2.1 associated with the Willcox Playa. Because dispersed recreation
4 viewers would have views of portions of segment P7 where it is adjacent to existing transmission
5 facilities, impacts to viewers from the Willcox Playa are expected to be low. The addition of new
6 transmission structures would repeat the existing vertical and horizontal patterns associated with current
7 infrastructure visible across an open and flat landscape (see appendix I: VCRS P7-01, P7-02, and P7-03).

8 ***Travel Routes***

9 High sensitivity travel routes along subroute 2.1 include NM 70 (see figure 3.10-9 for location of KOPs
10 and subroute 2.1). From the intersection of Hook and Anchor Road and NM 70 (Duncan Highway), this
11 view is oriented north approximately 0.4 mile from segment P4b, crossing rolling terrain against a
12 backdrop of mountains. There would be views to the northwest of a temporary construction laydown yard
13 which would introduce short-term contrasts with the surrounding vegetation. Although the structures
14 would introduce a new vertical element to the landscape, they would repeat the basic elements of existing
15 linear disturbances present on the landscape (see appendix I: VCRS P4-02).

16 **Compliance**

17 Subroute 2.1 where it crosses BLM land would pass through 13.5 miles of VRM Class III lands and
18 14.9 miles of VRM Class IV lands (see table 4.10-2). The remaining length of subroute 2.1 crosses private
19 or State lands and does not have BLM VRM classification. Although there would be low to moderate
20 impacts to visual resources, all segments of subroute 2.1 crossing VRM Class III and IV lands would be
21 in compliance with BLM VRM Class III and IV objectives.

22 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

23 **Scenic Quality**

24 Changes to scenic quality along subroute 2.2 would result where vegetation is removed for construction
25 access, substation expansion, and ROW clearing during the operation and maintenance of the
26 transmission line and substations. Additional changes to scenic quality would occur from the introduction
27 of new transmission structures, including monopole and lattice-type structures on the landscape. There are
28 49.0 miles of subroute 2.2 which cross Class C scenery (51 percent of the subroute), and 47.6 miles which
29 cross Class B scenery (49 percent of the subroute). Impacts from those changes to scenic quality in Class
30 B and C would be low to moderate (see figure 3.10-11 for scenic quality ratings and subroute 2.2).

31 In addition, portions of subroute 2.2 follow a variety of existing transmission alignments, pipelines, and
32 highways, repeating some of the basic visual elements of that existing infrastructure and further reducing
33 visual contrasts.

34 **Key Observation Points**

35 ***Residential***

36 Residences located along subroute 2.2 are generally dispersed, except for higher concentrations in the
37 communities of San Simon, Bowie, and Cochise (see figure 3.10-9 for location of KOPs and subroute
38 2.2). In the San Simon and Bowie areas, impacts to residential viewers are expected to be low to
39 moderate. There would be views of segments E and F crossing a rolling terrain area from between 1 and 2

1 miles. New structures would be visible, and would introduce a new linear component on the landscape
2 (see appendix I: VCRS E-01, E-02, F-01 and associated simulation in appendix K, and F-02).

3 Impacts to viewers from the Cochise area are expected to be low to moderate, where there are somewhat
4 denser residential areas along the western edge of the Willcox Playa surrounded by agricultural lands.
5 The proposed transmission tower along segment Gc would result in moderate contrast to view; although
6 relatively large, it would be partially obscured by intervening structures and vegetation within Cochise,
7 and would appear as one of a few utility pole structures in the view (see appendix I: VCRS G-03 and
8 associated simulation in appendix K).

9 **Recreation**

10 Views of segments Ga and Gb of subroute 2.2 are associated with the Willcox Playa. Because dispersed
11 recreation viewers would have views of the segments where they are adjacent to existing transmission
12 facilities, impacts to viewers from the Willcox Playa are expected to be low. The addition of new
13 transmission structures would repeat the existing vertical and horizontal patterns associated with current
14 infrastructure visible across an open and flat landscape (see appendix I: VCRS G-01 and G-02).

15 **Compliance**

16 A majority of subroute 2.2 where it crosses BLM land would pass through VRM Class III lands (17.8
17 miles). Of the remaining portion of subroute 2.1 across BLM lands; 4.1 miles would cross VRM Class IV
18 lands (see table 4.10-2). The remaining length of subroute 2.2 crosses private or State lands and does not
19 have BLM VRM classification. Although there would be low to moderate impacts to visual resources, all
20 segments of subroute 2.2 crossing VRM Class III and IV lands would be in compliance with BLM VRM
21 Class objectives.

22 **LOCAL ALTERNATIVES**

23 There are eight local alternatives available for route group 2. These local alternatives include LD1, LD2,
24 LD3a, LD3b, LD4, LD4-Option 4, LD4-Option 5, and WC1. Impacts to scenic quality, KOPs, and BLM
25 VRM compliance are described for each local alternative segment below.

26 **Local Alternative LD1**

27 **Scenic Quality**

28 Impacts along segment LD1 are similar to those described for segment E of subroute 2.2 segment P2, and
29 would result where vegetation is removed for construction access, temporary construction laydown yards,
30 and ROW clearing during the operation and maintenance of the transmission line and substations.
31 Additional changes to scenic quality would occur from the introduction of new transmission structures,
32 including monopole and lattice-type structures on the landscape. There would be 21.9 miles of LD1
33 crossing Class B scenery, and 14.2 miles crossing Class C scenery (see figure 3.10-11 for scenic quality
34 ratings and LD1). Impacts would be low to moderate, crossing Class B and C scenery which is
35 characterized by low, rolling landscape, minimal vegetation, muted colors, and open desert.

36 **Key Observation Points**

37 **Residential**

38 LD1 would pass several small areas of concentrated rural residences, including San Simon, Steins Ghost
39 Town, and Road Forks. The remainder of LD1 is sparsely populated. Impacts to dispersed rural

1 residences located along portions of segment LD1 would be similar to those described for subroute 2.2,
2 moderate (see figure 3.10-9 for location of KOPs and LD1).

3 **Travel Routes**

4 LD1 crosses the I-10 Deming to Lordsburg, and I-10 Willcox to New Mexico SLRUs which are both
5 rated as high viewer sensitivity. The SLRUs are both high sensitivity because they are major travel
6 corridors for local residents and tourism with scenic areas visible from the Interstate. Impacts to dispersed
7 travelers along I-10 with views of portions of segment LD1 would be similar to those described for
8 subroute 2.2, moderate.

9 **Compliance**

10 Segment LD1 would pass through 19.4 miles of VRM Class III lands. The remaining length of LD1
11 crosses private or State lands and does not have BLM VRM classification. Although there would be low
12 to moderate impacts to visual resources, all segments of LD1 crossing VRM Class III lands would be in
13 compliance with BLM VRM Class objectives.

14 **Local Alternative LD2**

15 **Scenic Quality**

16 Impacts along segment LD2 are similar to those described for subroute 2.2, and would result where
17 vegetation is removed for construction access and ROW maintenance during the operation and
18 maintenance of the transmission line. Additional changes to scenic quality would occur from the
19 introduction of new transmission structures including monopole and lattice-type structures on the
20 landscape. All 9.6 miles of LD2 cross Class C scenery (see figure 3.10-11 for scenic quality ratings and
21 LD2). Impacts from those changes to scenic quality in class C would be low, crossing scenery which is
22 characterized by a broad, flat valley and the Lordsburg Playa RNA. There are no existing major
23 transmission lines near LD2.

24 **Key Observation Points**

25 No critical KOPs were identified for LD2. The area has no known populations, and representative views
26 of subroute 2.2 from I-10 are already available.

27 **Compliance**

28 Segment LD2 would pass through 3.1 miles of VRM Class II lands and 0.6 mile of VRM Class IV lands.
29 The remaining length of LD2 crosses private or State lands and does not have BLM VRM classification.
30 Although there would be low to moderate impacts to visual resources, LD2 would be in compliance with
31 BLM VRM Class IV objectives. Where 3.1 miles of LD2 cross VRM Class II lands, it would not be in
32 compliance with BLM VRM Class II objectives. This area of Class II is associated with the historic
33 Butterfield Trail and impacts to the trail are described in appendix F.

34 **Local Alternative LD3a**

35 **Scenic Quality**

36 Impacts along segment LD3a would result where vegetation is removed for construction access,
37 construction temporary laydown yards, and ROW maintenance during the operation of the transmission
38 line. Additional changes to scenic quality would occur from the introduction of new transmission
39 structures including monopole and lattice-type structures on the landscape. All 27.9 miles of LD3a cross

1 Class C scenery (see figure 3.10-11 for scenic quality ratings and LD3a). Impacts from those changes to
2 scenic quality in Class C would be low, crossing scenery which is characterized by a broad, flat valley
3 and the Lordsburg Playa RNA. LD3a follows an existing 345-kV transmission line for much of its length.

4 ***Key Observation Points***

5 No critical KOPs were identified for LD3a. The area has no known populations, and representative views
6 from I-10 are already available from consideration of subroute 2.2 (see appendix I: VCRS for P4-01 and
7 P4-02 as examples).

8 ***Compliance***

9 Segment LD3a would pass through 0.5 mile of VRM Class II lands, 7.0 miles of VRM Class III lands,
10 and 2.5 miles of VRM Class IV lands. The remaining length of LD3a crosses private or State lands and
11 does not have BLM VRM classification. Although there would be low to moderate impacts to visual
12 resources, LD3a would be in compliance with BLM VRM Class III and IV objectives. Where 0.5 miles of
13 LD3a cross VRM Class II lands, it would not be in compliance with BLM VRM Class II objectives. This
14 area of Class II is associated with the historic Butterfield Trail and impacts to the trail are described in
15 appendix F.

16 **Local Alternative LD3b**

17 ***Scenic Quality***

18 Impacts along segment LD 3b would result where vegetation is removed for construction access and
19 ROW maintenance during the operation and maintenance of the transmission line. Additional changes to
20 scenic quality would occur from the introduction of new transmission structures including monopoles, on
21 the landscape. All 1.9 miles of LD3b cross Class C scenery (see figure 3.10-11 for scenic quality ratings
22 and LD3b). Impacts from those changes to scenic quality in Class C would be low, crossing scenery
23 which is characterized by a broad, flat valley and the Lordsburg Playa RNA. LD3b also follows an
24 existing 345-kV transmission line for much of its length.

25 ***Key Observation Points***

26 No critical KOPs were identified for LD3b. The area has no known populations, and representative views
27 from I-10 are already available from consideration of subroute 2.2 (see appendix I: VCRS for P4-01 and
28 P4-02 as examples).

29 ***Compliance***

30 Segment LD3b would pass through 1.2 miles of VRM Class IV lands. Although there would be low to
31 moderate impacts to visual resources, LD3a would be in compliance with BLM VRM Class IV
32 objectives.

33 **Local Alternative LD4**

34 ***Scenic Quality***

35 Impacts along segment LD4 would result where vegetation is removed for construction access and ROW
36 maintenance during the operation and maintenance of the transmission line. Additional changes to scenic
37 quality would occur from the introduction of new transmission structures, including monopole and lattice-
38 type structures on the landscape. There would be 19.4 miles of LD4 crossing Class B scenery, and 42.3
39 miles crossing Class C scenery (see figure 3.10-11 for scenic quality ratings and LD4). Impacts from

1 those changes to scenic quality in Class B and C would be low to moderate, crossing scenery which is
2 characterized by flat desert valleys and playas surrounded by mountains (including the Willcox Playa),
3 and more scenic areas in Class B lands characterized by steep undulating ridgelines, low rounded hills,
4 and eroded rocky peaks. There are a number of existing transmission lines and other existing development
5 along the length of LD4.

6 ***Key Observation Points***

7 No critical KOPs were identified for LD4. Representative views from I-10 are already available from
8 consideration of subroute 2.2.

9 ***Compliance***

10 Segment LD4 would pass through 37.1 miles of VRM Class IV lands. The remaining length of LD4
11 crosses private or State lands and does not have BLM VRM classification. Although there would be low
12 to moderate impacts to visual resources, LD4 would be in compliance with VRM IV objectives.

13 **Local Alternative LD4-Option 4**

14 ***Scenic Quality***

15 Impacts along segment LD4-Option 4 would result where vegetation is removed for construction access
16 and ROW maintenance during the operation and maintenance of the transmission line. Additional changes
17 to scenic quality would occur from the introduction of new transmission structures, including monopole
18 and lattice-type structures on the landscape. All 6.5 miles of LD4-Option 4 would cross Class C scenery
19 (see figure 3.10-11 for scenic quality ratings and LD4-Option 4). Impacts from those changes to scenic
20 quality in Class C would be low to moderate, crossing scenery which is characterized by flat desert
21 valleys and playas surrounded by mountains, including the Willcox Playa. LD4-Option 4 follows an
22 existing 230-kV transmission line for much of its length.

23 ***Key Observation Points***

24 No critical KOPs were identified for LD4-Option 4. Representative views from I-10 are already available
25 from the consideration of subroute 2.2.

26 ***Compliance***

27 Segment LD4-Option 4 does not cross BLM lands and VRM compliance is not an issue.

28 **Local Alternative LD4-Option 5**

29 ***Scenic Quality***

30 Impacts along segment LD4-Option 5 would result where vegetation is removed for construction access
31 and ROW maintenance during the operation and maintenance of the transmission line. Additional changes
32 to scenic quality would occur from the introduction of new transmission structures, including monopole
33 and lattice-type structures on the landscape. There would be 9.1 miles of LD4-Option 5 crossing Class B
34 scenery, and 3.1 miles crossing Class C scenery (see figure 3.10-11 for scenic quality ratings and LD4-
35 Option 5). Impacts from those changes to scenic quality in Class B would be low to moderate, crossing
36 scenery which is characterized by steep undulating ridgelines, low rounded hills, and eroded rocky peaks.
37 Impacts from those changes to scenic quality in Class C would be low to moderate, crossing scenery
38 which is characterized by flat desert valleys and playas surrounded by mountains, including the Willcox
39 Playa.

1 **Key Observation Points**

2 No critical KOPs were identified for LD4-Option 5. Representative views from I-10 are already available
3 from consideration of subroute 2.2.

4 **Compliance**

5 Segment LD4-Option 5 does not cross BLM lands and VRM compliance is not an issue.

6 **Local Alternative WC1**

7 **Scenic Quality**

8 Impacts along segment WC1 would result where vegetation is removed for construction access and ROW
9 maintenance during the operation and maintenance of the transmission line. Additional changes to scenic
10 quality would occur from the introduction of new transmission structures including monopoles, on the
11 landscape. All 14.8 miles of WC1 cross Class C scenery (see figure 3.10-11 for scenic quality ratings and
12 LD3b). Impacts from those changes to scenic quality in Class C would be low, crossing scenery which is
13 characterized by the 191 corridor, development associated with the community of Willcox, and the flat
14 open expanse of the Willcox Playa. WC1 does not follow any existing transmission lines.

15 **Key Observation Points**

16 No critical KOPs were identified for WC1. The area has no known populations, and representative views
17 are already available from consideration of subroute 2.2 (see appendix I: VCRS for P7-01, P7-02, and
18 P7-03 as examples).

19 **Compliance**

20 Segment WC1 does not cross BLM lands and VRM compliance is not an issue.

21 **Route Group 3 – Apache Substation to Pantano Substation**

22 Visual contrast in route group 3 would directly result from the replacement of existing transmission line
23 structures with taller structures, substation expansion, removal of vegetation to construct and maintain the
24 transmission lines, temporary construction laydown yards, and any landform modifications necessary to
25 prepare the existing ROW for upgrading and construction. Because there is an existing access road system
26 in place for maintenance of the existing line, there is little need for additional temporary or permanent
27 access roads. Table 4.10-3 provides a summary of Scenic Quality Ratings and VRM Classes for route
28 group 3.

29 **Table 4.10-3.** Route Group 3 Scenic Quality Ratings and VRM Class

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM Lands Only) (in miles)		
		A	B	C	Class II	Class III	Class IV
Subroute 3.1, Proponent Preferred							
U1a	16.1	0.0	11.1	4.9	0.0	0.0	0.4
U1b	2.9	0.0	2.9	0.0	0.0	0.0	0.0

1 **Table 4.10-3.** Route Group 3 Scenic Quality Ratings and VRM Class (Continued)

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM Lands Only) (in miles)		
		A	B	C	Class II	Class III	Class IV
U2	15.8	0.0	15.8	0.0	0.0	0.0	0.0
U3a	32.7	0.0	32.7	0.0	0.0	0.0	0.0
Route Group 3 Local Alternative							
H	19.3	0.0	19.3	0.0	0.0	0.0	0.0

2 **SUBROUTE 3.1 – PROPONENT PREFERRED**

3 The Proponent Preferred action follows a 67.5-mile segment between the Apache and Pantano
 4 substations. The upgraded portion of the transmission line begins at the Apache Substation and would
 5 involve rebuilding Western’s existing 115-kV power line within the existing corridor. This segment
 6 crosses 0.5 mile of U.S. Forest Service land and 0.6 mile of BLM-administered lands, which do not have
 7 planning-level VRI and VRM classification. A site analysis was performed and scenic quality and
 8 sensitivity levels were derived and used to determine the visual impact of the introduction of the proposed
 9 Project on lands outside of BLM jurisdiction.

10 **Scenic Quality**

11 Subroute 3.1 is largely characterized by low levels of development and natural desert landscape, including
 12 desert scrub vegetation, bare rock to low vegetation cover, and a range of topography from low hills to
 13 visually dominant rock outcroppings and distant isolated mountain ranges. Impacts along subroute 3.1
 14 would result where vegetation is removed for construction access, temporary laydown areas, substation
 15 expansion, and for ROW clearing for the operation and maintenance and maintenance of the proposed
 16 Project. There would also be direct impacts to the existing landscape from the addition of new
 17 transmission upgrade structures. Subroute 3.1 crosses 62.5 miles (93 percent) of Class B scenery lands
 18 and 4.9 miles (7 percent) of Class C scenery land. Subroute 3.1 crosses Class B scenery lands between the
 19 Little Dragoon and Dragoon Mountains (running south of Texas Canyon) and into the San Pedro Valley
 20 agricultural and rural residential areas, and the northern corner of the Coronado National Forest. These
 21 lands are rated Class B for the mix of natural-appearing landscape, agricultural fields, and communities.
 22 Low to moderate impacts would occur where there is some existing construction access and with the
 23 addition of new transmission structures alongside existing H-frame transmission line.

24 Class C scenery lands are located on lands just west of the Apache Substation within Sulphur Springs
 25 Valley south of critical viewing areas associated with the Willcox Playa. The lands west of Apache
 26 Substation within the Sulphur Springs Valley within 4.9 miles of the 16-mile segment U1a are associated
 27 with Class C scenic quality, and impacts along this segment of subroute 3.1 are anticipated to be low
 28 where the Project parallels existing transmission lines (see figure 3.10-15 for scenic quality ratings and
 29 subroute 3.1). Contrasts from vegetation clearing would be further reduced by implementing VRM-1
 30 and VRM-2, described in section 4.10.4. In addition, contrasts from the addition of adjacent upgrade
 31 structures would be further reduced by the implementation of VRM-4 and VRM-5, described in
 32 section 4.10.4.

1 **Key Observation Points**

2 ***Residential***

3 Residences located along subroute 3.1 are generally dispersed, except for higher concentrations in the
4 community of Pomerene and the city of Benson (see figure 3.10-11 for location of KOPs and subroute
5 3.1). Subroute 3.1 passes through the south part of the community of Pomerene, 1.15 miles north of I-10.
6 This area consists of cropland with several pockets of single-family homes. Segment U2 would also cross
7 a residential area in Pomerene along Pomerene Road, the primary route from Pomerene to I-10. In the
8 Pomerene area, impacts to residential viewers are expected to be moderate. There would be unobstructed
9 views of segment U2 crossing gently rolling terrain with low shrub and grass cover from over 3 miles
10 away. Upgrade structures would be visible, but would repeat the basic visual elements of the existing
11 transmission structures (see appendix I: VCRS U2-02, U2-03).

12 West of Pomerene, segment U2 would cross the San Pedro Golf Course, one of two public courses within
13 the city of Benson. Segment U2 would then cross adjacent to central Benson by passing through a semi-
14 industrial corridor just north of I-10. West of Benson, this segment would pass through rural residential
15 and light industrial development just north of I-10 and through the community of Mescal, then would
16 cross Mescal 0.2 mile north of I-10 through a residential zone. Segment U2 would also cross the main
17 access road from the community to I-10. Upgrade structures would be visible, but would repeat the basic
18 visual elements of the existing transmission structures (see appendix I: VCRS U2-04).

19 Visual contrast rating worksheets were conducted at: KOP U2-01, located 3.5 miles from the Proponent
20 Preferred alignment on the western edge of residential development between U.S. 80 and I-10; KOP
21 U2-02, located along Dark Star Road near the site of future development and an existing ranch; and KOP
22 U2-03, near the Mescal area approximate to residences.

23 ***Recreation***

24 There are few designated recreational opportunities along subroute 3.1. Peaks in the Little Dragoon and
25 Dragoon Mountains, north and south of the proposed Project, do not have developed trails and are
26 infrequently visited, despite having unique views within the region. KOP U1-01 represents views from
27 just north of the Dragoon Mountains along subroute 3.1. Segment U1a would pass south of Texas
28 Canyon, a granite boulder zone that provides scenic views from I-10. Texas Canyon, a boulder-strewn,
29 uniquely scenic area, is a popular rest stop along one of the most scenic portions of I-10 in the region.
30 The addition of the upgrade transmission structures would repeat the existing horizontal patterns
31 associated with current infrastructure visible across landscape and views.

32 Impacts to viewers along Lizard Lane would be moderate. Replacement structures of segment U1a where
33 it crosses a sweeping valley floor along the Coronado National Forest would be more prominent than the
34 existing structures in the landscape and would introduce stronger horizontal line elements above the
35 existing lines (see appendix I: VCRS U1-01).

36 Impacts to viewers from the Benson Recreational Park of segment U2 on the opposite side of I-10 are
37 expected to be low to moderate. Replacement structures approximately 0.5 mile away would be more
38 prominent than the existing structures in the landscape, and would introduce stronger vertical linear
39 elements visible against the skyline (see appendix I: VCRS U2-01).

40 The lands immediately west of Apache Substation are located just south of the Willcox Playa. Sensitivity
41 in this area is considered high because of its proximity to the Willcox Playa, which is an important
42 ecotourism and viewing area for migrating birds including the sandhill crane. Subroute 3.1 is south of
43 critical viewing areas associated with the Willcox Playa (outside of critical viewing locations), and no

1 KOP was identified in this area because of the general lack of sensitive viewers including residences, and
2 recreators that would be impacted by the presence of a new transmission line. Visual impacts in this area
3 would be low to moderate in the immediate foreground, and low beyond 1 mile of the transmission line.

4 ***Travel Routes***

5 Segment U1a would cross the I-10 Willcox-to-Texas Canyon SLRU, which is rated as having high visual
6 sensitivity because it is noted to be a highly traveled corridor with a popular rest stop in the Texas Canyon
7 area. Segment U1a would cross I-10 as it enters the San Pedro River Valley and would cross through the
8 San Pedro Basin. Visual impacts in this area would be low to moderate in the immediate foreground and
9 low beyond 1 mile of the transmission line.

10 ***Compliance***

11 Segment U1a of subroute 3.1 would pass through 0.4 mile of VRM Class IV lands. The remaining length
12 of subroute 3.1 crosses private or State lands and does not have BLM VRM classification. Although there
13 would be low to moderate impacts to visual resources, the portion of subroute 3.1 (segment U1a) crossing
14 BLM VRM Class IV lands would be in compliance with VRM objectives. A portion of segment U3a that
15 crosses State lands lies directly north of a block of BLM VRM Class II land.

16 **LOCAL ALTERNATIVES**

17 There is one local alternative for route group 3—local alternative H.

18 **Scenic Quality**

19 Local alternative H crosses the San Pedro Valley SQRU between 2 and 3 miles north of segment U2.
20 Unlike segment U2, local alternative H would not replace an existing transmission line but would entail
21 construction of a new transmission line which parallels an existing H-frame transmission line. Local
22 alternative H would bypass the city of Benson and the communities of Pomerene and Mescal. It would
23 follow an existing H-frame transmission line for its entire length. Where the segment U1/U2 boundary
24 would exist at the eastern edge of the San Pedro Valley, local alternative H would head northwest along
25 the alignment of the existing H-frame transmission line, cross the north end of the valley west of Benson,
26 and extend south until it met a railroad line. Local alternative H would follow the railroad line west along
27 with the existing transmission line, then would drop south again to connect to where the segment U2/U3
28 boundary would be, east of Mescal. Lands crossed by local alternative H traverse the San Pedro River
29 basin and valley and are a mix of vacant desert landscape, crop and ranch lands, and rural residential (see
30 figure 3.10-15 for scenic quality ratings and segment H).

31 Local alternative H would pass through the same SQRUs and SLRUs (San Pedro Valley and San Pedro
32 Basin) as segment U2, and the site analysis revealed a scenic quality rating of B, sensitivity level rating of
33 moderate, and visual impact of moderate.

34 **Key Observation Points**

35 ***Residential***

36 Local alternative H would bypass the communities of Pomerene and Mescal, and the city of Benson.
37 Impacts to dispersed rural residences located along portions of local alternative H south of I-10 within
38 rural residential areas would be similar to those described for subroute 3.1, moderate (see appendix I:
39 VCRS H-02) (see figure 3.10-11 for location of KOPs and local alternative H).
40

1 **Recreation**

2 There are few recreation resources known along local alternative H. Visual contrast rating worksheets
3 were conducted for KOP H-02 located on North Mescal Road in proximity to the Butterfield Trail
4 crossing. Impacts to viewers would be low because the replacement structures would be visually similar
5 to existing landscape and would be viewed against a backdrop of distant mountains (see appendix I:
6 VCRS H-03).

7 **Travel Routes**

8 Local alternative H is not located along major roadways and there would be low impacts to sensitive
9 viewers along North Cascabel Road just east of the San Pedro River (see appendix I: VCRS H-01).

10 **Compliance**

11 Local alternative H does not cross BLM lands and VRM compliance is not an issue.

12 **Route Group 4 – Pantano Substation to Saguaro Substation**

13 Visual contrast in the Upgrade Section would result from introduction of taller transmission structures
14 into the landscape. Visual contrast to the Upgrade Section was determined to be low to moderate.
15 A summary of Scenic Quality Ratings by subroute and segment is provided in table 4.10-4. Route group 4
16 does not cross BLM lands, and there are no VRM Class Compliance issues.

17 **Table 4.10-4.** Route Group 4 Scenic Quality Ratings and VRM Class

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM Lands Only) (in miles)		
		A	B	C	II	III	IV
Subroute 4.1, Proponent Preferred							
U3b	0.5	0.0	0.5	0.0	0.0	0.0	0.0
U3c	1.0	0.0	0.0	1.0	0.0	0.0	0.0
U3d	3.4	0.0	0.0	3.4	0.0	0.0	0.0
U3e	0.9	0.0	0.0	0.9	0.0	0.0	0.0
U3f	0.7	0.0	0.0	0.7	0.0	0.0	0.0
U3g	0.9	0.0	0.0	0.9	0.0	0.0	0.0
U3h	1.1	0.0	0.0	1.1	0.0	0.0	0.0
U3i	18.2	0.0	0.0	18.2	0.0	0.0	0.0
U3j	0.9	0.0	0.0	0.9	0.0	0.0	0.0
U3k	16.7	0.0	0.0	16.7	0.0	0.0	0.0
U3l	1.6	0.0	0.0	1.6	0.0	0.0	0.0
U3m	0.6	0.0	0.0	0.6	0.0	0.0	0.0
U4	1.9	0.0	1.9	0.0	0.0	0.0	0.0

18

1 **Table 4.10-4.** Route Group 4 Scenic Quality Ratings and VRM Class (Continued)

Segment	Total Miles	Scenic Quality Rating (in miles)			VRM Class (BLM Lands Only) (in miles)		
		A	B	C	II	III	IV
Route Group 4							
Local Alternatives							
MA1	1.1	0.0	0.0	1.1	0.0	0.0	0.0
TH1a	1.4	0.0	1.4	0.0	0.0	0.0	0.0
TH1b	1.6	0.0	1.6	0.0	0.0	0.0	0.0
TH1c	0.3	0.0	0.3	0.0	0.0	0.0	0.0
TH1-Option	1.0	0.0	1.0	0.0	0.0	0.0	0.0
TH3-Option A	0.8	0.0	0.0	0.8	0.0	0.0	0.0
TH3-Option B	0.8	0.0	0.0	0.8	0.0	0.0	0.0
TH3-Option C	1.8	0.0	0.0	1.8	0.0	0.0	0.0
TH3a	2.7	0.0	0.0	2.7	0.0	0.0	0.0
TH3b	4.5	0.0	0.0	4.5	0.0	0.0	0.0

2 **SUBROUTE 4.1 – PROPONENT PREFERRED**

3 **Scenic Quality**

4 Changes to scenic quality along subroute 4.1 would result where vegetation is removed for construction
 5 access, construction laydown yards, substation expansion, and ROW clearing during the operation and
 6 maintenance of the transmission line and substations. Additional changes to scenic quality would occur
 7 from the introduction of upgraded transmission structures, including monopole and lattice-type structures
 8 along the existing transmission line. There are 2.4 miles of subroute 4.1 which cross Class B scenery
 9 (5 percent of the subroute), and 46.0 miles which cross Class C scenery (95 percent of the subroute).
 10 Impacts from those changes to scenic quality in Class B and C would be minor to moderate (see figure
 11 3.10-15 for scenic quality ratings and subroute 4.1).

12 In the San Pedro Valley scenic quality unit, segment U3a would cross a broad alluvial fan with large
 13 swaths of native vegetation (largely paloverde) and mixed cacti/Sonoran creosote-bursage communities.
 14 Developed areas are scattered throughout this area and become slightly more common westward toward
 15 Vail, Arizona.

16 Within the Vail scenic quality rating unit, which encompasses a large portion of segment U3a, the scenic
 17 quality was determined to be Class C, given the flat, common nature of desert landscape in the area and
 18 the increasingly dense human modification (e.g., residences, utility corridors, industrial areas, etc.).
 19 In addition, sensitivity levels were determined to be low to moderate, given that several concentrations of
 20 residential communities exist along the line. The visual impact in this unit is considered low because the
 21 proposed transmission line and facilities would replace a similar, existing transmission line along the
 22 same alignment, and the areas of sensitive natural features are located outside of 1 mile of the corridor.

1 In addition to residential areas, segment U3a would pass through or near sensitive areas, including
2 recreational areas and a historic landmark. The segment then passes within 1 mile of Cienega Creek
3 Natural Preserve, a perennial wetland system. The preserve is located north of the Proponent Preferred
4 alignment and is located outside of the analysis area. The preserve offers scenic views of a lush riparian
5 corridor within a desert setting and of many wildlife species. A permit is required to visit the preserve,
6 which is mainly accessed from the Davidson Canyon Trailhead along Marsh Canyon Road. The segment
7 would cross near Cienega Creek in the Davidson Canyon Wash area, an undeveloped area south of I-10.
8 Additionally, the 800-mile Arizona Trail passes through the Cienega Creek Natural Preserve along the
9 Gabe Zimmerman Trail.

10 The developed areas along segment U3a include residential subdivisions, isolated residences, mining
11 operations, office parks, manufacturing complexes, and the Pima County Fairgrounds. Residential areas
12 through which segment U3a would pass or near where segment U3a would pass include: relatively new
13 subdivisions in the Vail area, low-density subdivisions around Swan Road, older residential areas around
14 Country Club and Old Vail Connection Roads, a narrow band of residences north of Summit that are
15 adjacent to the SR 19 (the Tucson-Nogales Highway) corridor, and a densely populated subdivision east
16 of I-19 and north of Los Reales Road.

17 Segment U3a would cross over, or be located near, designated Pima County scenic routes. Segment U3a
18 would come within 300 feet of a portion of I-10 designated as a scenic highway by Pima County. It also
19 would cross Pima County Scenic Highways SR 83 and Old Sonoita Highway at their northern termini
20 near I-10. Segment U3a would cross Pima County scenic routes such as Wentworth Road 1 mile south of
21 I-10 and Houghton Road near the Pima County Fairgrounds. Segment U3a also would come within 0.2
22 mile of the beginning and end points of Marsh Station Road but would be separated from it by I-10.

23 The Anza Trail/Tucson SQRU encompasses the majority of subroute 4.1 as it traverses through southern
24 Tucson, the city of Tucson, and north toward Marana, Arizona. This segment is located along an existing
25 transmission line alignment flanked by varying degrees of dense urban development. Scenic quality along
26 this segment is considered to be Class C because of the degree of urban modification and the co-location
27 of the line within an existing utility corridor. Additionally, sensitivity along the segment is considered low
28 to moderate given the presence of existing modifications. Visual impact would be low along this segment.

29 Just north of Grant Road, subroute 4.1 diverges from the dense urban environment of Tucson into a more
30 industrial area to the north, and follows roughly adjacent and parallel to the Anza Trail. Scenery along the
31 Trail is characterized by pockets of urban recreational places, linear biking and pedestrian trails, and
32 access to adjacent communities. Additionally, a segment of the Butterfield Trail runs parallel to subroute
33 4.1, from 0.2 mile to 1 mile away to the east. Scenic quality along this segment is considered Class C
34 because of the substantial human modification and urban industrial activities, and sensitivity is considered
35 low to moderate given that the subroute follows an existing power line for the entirety of the segment.
36 Thus, visual impacts are considered low.

37 Approximately 5 miles to the southeast of the Marana Airpark, subroute 4.1 crosses open desert landscape
38 with undulating topography at the southern end, and desert valley as the segment runs northwest towards
39 the agricultural development that surrounds the Marana Airpark. Scenic quality in this area is determined
40 to be Class C as the lands within the immediate foreground and middleground are common desert valley
41 landscape, with agricultural and budding residential development within the Marana town limits.
42 Sensitivity in this area is also considered low to moderate as viewers are accustomed to views of the
43 existing transmission line in which the proposed line would replace. Visual impacts in this area would be
44 low given the common nature of the landscape and the lack of sensitivity viewers.

45 The Red Rock scenic quality unit encompasses the lands connecting Avra Valley, Marana, and Pinal
46 County to the terminus of the Proponent Preferred alternative at the Saguaro Substation. This area is

1 characterized by open desert landscape, agricultural development, and budding residential development.
2 Additionally, the Pinal Airpark is located approximately 2.5 miles southeast of the Saguaro Substation
3 and 2 miles east of the Proponent Preferred alignment. The scenic quality in this area is classified as Class
4 C because of the developed landscape, and the sensitivity level is considered low to moderate, because
5 viewers are accustomed to views of the existing transmission line, which the proposed Project would
6 replace.

7 **Key Observation Points**

8 ***Residential***

9 High concentrations of residential development occur along subroute 4.1 in the communities of Vail,
10 Marana, and in Tucson (see figure 3.10-10 for location of KOPs along subroute 4.1). In the Vail area,
11 impacts to residential viewers are expected to be low to moderate. Replacement structures would be taller
12 and more visible, but scenery would not vary from the current landscape. Impacts would be moderate
13 where taller replacement structures would be visible against the skyline (see appendix I: VCRS U3-03,
14 U3-04, and associated simulation in appendix K).

15 In the Summit area, impacts to residential viewers are expected to be low. Replacement structures would
16 be visible, but scenery would not vary from the current landscape (see appendix I: VCRS U3-06 and
17 associated simulation in appendix K).

18 Impacts to viewers from the fairgrounds west of Vail would be low. The upgrade structures would be
19 visually similar to multiple existing transmission lines spanning the view (see appendix I: VCRS U3-05
20 and associated simulation in appendix K).

21 Impacts to viewers from the San Xavier Mission just south of Tucson would be low. The upgrade
22 structures of segment U3a are more than 1.5 miles away on the opposite side of I-19, and would be
23 visually similar to the multiple existing transmission lines spanning the view and would be viewed against
24 the distant mountain forms (see appendix I: VCRS U3-07).

25 In the Tucson area, impacts to residential viewers are expected to be low to moderate. Subroute 4.1
26 through Tucson is dominated by existing transmission structures, linear paved highways and roads, sound
27 walls, and blocky signs. Replacement structures would be visible, but scenery would not vary from the
28 current landscape. There would be moderate impacts where taller replacement structures are visible
29 against the skyline (see appendix I: VCRS U3-09, U3-20, U3-21, and U3-24 and associated simulation in
30 appendix K).

31 ***Recreation***

32 Recreation use along subroute 4.1 takes place at Sentinel Peak, along the Anza Trail, the Butterfield Trail,
33 the Arizona Trail, at Saguaro National Park, and within pockets of urban recreational places, linear biking,
34 and pedestrian trails. There are also views of the proposed upgraded line from the El Rio Golf Course.

35 Impacts to viewers along the Santa Cruz River Bikeway East River Trail and Santa Cruz riverbed crossing
36 near Juhan Park would be low. The upgrade structures of segment U3b would introduce low vertical contrast
37 to the existing strong linear element of the landscape. The replacement structures of segment U3i would be
38 taller and visible against the skyline interspersed with several transmission lines, buildings, and
39 communication structures which currently dominate views from the trail (see VCRS U3-08 and U3-15).
40 Impacts to viewers along the Anza Trail south of Irvington Road would be moderate. Where segment U3c
41 crosses the Santa Cruz River channel, one new structure concrete base would be clearly visible from the trail.

- 1 The foundation where a pole would be located within the channel would need to be 25 feet tall, and would
2 introduce a large blocky, pale structure into the gravelly river channel. The taller monopole structures and
3 substantial concrete base where the line crosses the channel would be viewed against the skyline and the
4 backdrop of the channel alongside existing lattice structures and other human development extending
5 across the flat and open landscape of the Santa Cruz River channel (see appendix K: simulation NPS-02).
- 6 Impacts to viewers at the Kennedy Park Fiesta Area Outdoor Amphitheatre and Tucson Mountain Park
7 would be low. Replacement structures would be visible, but scenery would not vary from the current
8 landscape. There would be moderate impacts where taller replacement structures and horizontal
9 conductors are visible against the skyline (see appendix I: VCRS U3-10, U3-11 and their associated
10 simulations in appendix K).
- 11 Impacts to viewers from Sentinel Peak Observation Area would be low. The replacement structures and
12 line would be similar in form to the existing line, but would be taller. Although the structures would be
13 taller, the increased height would be barely distinguishable when viewed against the backdrop of the
14 valley floor and surrounding hills. Replacement structures would be visible, but scenery would not vary
15 from the current landscape. Short-term impacts to viewers from Sentinel Peak would occur as a result of
16 improved construction access needs, but these impacts would end once construction equipment is
17 removed and reclamation of temporary disturbance is complete. There would be moderate impacts where
18 taller replacement structures and horizontal conductors are visible against the skyline from KOP U3-13 on
19 Tumamoc Hill Road (see appendix I: VCRS U3-12, U3-13 and their associated simulation in
20 appendix K).
- 21 Impacts to viewers from Joaquin Murrieta Northwest Park would be moderate. The replacement
22 structures add prominent vertical and horizontal elements to foreground views from the park that would
23 be skylined against distant mountains (see appendix I: VCRS U3-14).
- 24 Impacts to viewers at the Silverbell Public golf course would be low. Replacement structures would be
25 visible, but would be similar to existing structures and horizontal conductors. The scenery would not vary
26 from the current landscape (see appendix I: VCRS U3-16 and VCRS U3-18 and their associated
27 simulations in appendix K).
- 28 Impacts to viewers from Silverbell Lake at Christopher Columbus Park would be low. The replacement
29 monopole structures add prominent vertical and horizontal elements to foreground views from the park
30 that would be skylined against distant mountains (see appendix I: VCRS U3-17 and its associated
31 simulation in appendix K; see also simulation AN-04).
- 32 Impacts to viewers traveling on West Picture Rocks Road both to and from Saguaro National Park would
33 be low. The replacement structures would be barely visible against the valley floor along an existing
34 developed corridor. They would be visually similar to the existing line, and would blend into the visual
35 disturbance of existing development in the area (see appendix I: VCRS U3-19). Impacts to hikers in
36 Saguaro National Park located northwest of Tucson would be low. The distance (over 1 mile), vegetation
37 screening along the use trails in the park, and extensive development along segment U3i contribute to the
38 replacement structures blending in to the surrounding development (see appendix K: simulation SA-01).
- 39 Impacts to potential views from the planned extension of paved recreation trail of the Anza Trail west of
40 Pinal Airpark near North Aguirre Road would be low. The existing H-frame structures are not visible
41 from this location. The taller replacement monopoles and conductors would be visible just above the
42 existing vegetation set against the distant mountains (see appendix K: simulation MA-03).
- 43

1 **Travel Routes**

2 High sensitivity travel routes along subroute 4.1 include I-10, Avra Valley Road out to the Marana
3 Airport, West Twin Peaks Road, and Picture Rocks Road. From North Silverbell Road, this view is
4 oriented south-southeast 150 feet from segment U3i, crossing rolling terrain against a backdrop of
5 mountains. Although the replacement monopole structures would introduce a new vertical element to
6 the landscape, and would be visible against the skyline, they would repeat the basic elements of existing
7 transmission lines present on the landscape (see appendix I: VCRS U3-18 and simulation MA-03 in
8 appendix K).

9 Impacts to viewers from the West Twin Peaks Road would be moderate. The replacement monopole
10 structures of segment U3i would be visible to the south, and would introduce a new taller vertical
11 element to the landscape visible against the mountainous horizon line (see appendix I: VCRS U3-22 and
12 its associated simulation in appendix K).

13 From West Silverbell Road (Historic Auto Route), the replacement monopole structures of segment U3k
14 would be visible to the south, and would introduce a taller vertical element to the landscape. Because the
15 replacement line would be similar to existing transmission lines visible on the landscape, impacts would
16 be low (see appendix I: VCRS U3-23 and its associated simulation in appendix K).

17 **Compliance**

18 Subroute 4.1 does not cross BLM lands and VRM compliance is not an issue.

19 **LOCAL ALTERNATIVES**

20 There are 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a,
21 TH3b, TH3-Option A, TH3-Option B, TH3-Option C. Local alternatives TH1a, TH1b, and TH1c, were
22 all derived as alternatives to the Proponent Preferred alignment for the purpose of avoiding the Tumamoc
23 Hill area, which is considered an important natural and cultural resource within the city and region. This
24 site is a nationally recognized historic site and also supports research, recreation, and educational
25 opportunities for the University of Arizona and the community. Though the Tumamoc Hill area has been
26 preserved and protected for decades, there is an existing H-frame transmission line that runs north on the
27 west side of the Tumamoc Hill and Sentinel Peak. The Proponent Preferred route would replace the
28 existing H-frame transmission line; however, several local alternative options were developed through
29 public and agency outreach to avoid further environmental and scenic impact to the Tumamoc Hill area
30 itself.

31 Local alternatives TH1a, TH1b, and TH1c provide a “picket fence” diverging from the Proponent
32 Preferred alternative at West Starr Pass Road (TH1a) heading west and north at South Greasewood Road
33 (TH1b) then east at West Speedway Boulevard (TH1c) before it connects again with the Proponent
34 Preferred alignment just west of the El Rio Golf Course and 0.14 mile north of West Speedway
35 Boulevard.

36 Local alternatives TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C were derived through
37 multiple discussions with a working group that included representatives of the public and agencies
38 concerned with locating a transmission line alternative through the Tumamoc Hill area. This local
39 alternative and options would be located roughly within the Santa Cruz River bed along the Anza Trail,
40 which follows the Santa Cruz River and provides pedestrian and bicycle paths through the heart of
41 Tucson.

1 **Local Alternative MA1**

2 ***Scenic Quality***

3 Local alternative MA1 would be a new, approximately 1.1-mile transmission line that would provide an
4 alternative route to segment U3j. Segment MA1 would be located approximately 4.5 miles west of I-10
5 on the western boundary of the Marana Regional Airport. This new segment would cross agricultural
6 fields between North Sandario Road and North Sanders Road, turn north along North Sanders Road, and
7 terminate before reaching West Avra Valley Road. The MA1 segment avoids future expansion of the
8 Marana Airpark. This local alternative is located within scenic quality Class C landscape and has a
9 sensitivity level of low to moderate, given the proximity to existing development and existing
10 transmission line. Visual impact would be low. A simulation was rendered from approximately 1 mile
11 northeast of the local alternative and is included with the visual contrast worksheet (see figure 3.10-15 for
12 scenic quality ratings and segment MA1).

13 ***Key Observation Points***

14 No critical KOPs were identified for MA1. Representative views of the area from the intersection of
15 Sanders Road and Avra Valley Road are already available from consideration of segment U3j of subroute
16 4.1. Although the replacement monopole structures would introduce a new vertical element to the
17 landscape, and would continue to be visible against the skyline, MA1 would cross farther away from the
18 observation point and would repeat the basic elements of existing transmission lines in the foreground of
19 the simulation (see appendix K: simulation MA-02).

20 ***Compliance***

21 Segment MA1 does not cross BLM lands and VRM compliance is not an issue.

22 **Local Alternative TH1a**

23 ***Scenic Quality***

24 The majority of this route follows existing arterial roads flanked by residential development. Along South
25 Greasewood Road, an existing 69-kV power line runs on the east side of the road. Several KOPs located
26 along this local alternative reveal that the addition of a power line would produce similar, but increased
27 contrast due to the height and structure type being larger, taller, and more noticeable than the existing
28 power line. In addition, viewer sensitivity is heightened in this area due to the community concern over
29 the Tumamoc Hill cultural and scenic resource. Scenic quality in this area is considered Class B given the
30 unique character of the Tumamoc Hill in the middle of a highly dense urban area. Additionally, viewer
31 sensitivity is considered moderate to high because of Tumamoc Hill, as well as the established nature of
32 the surrounding community. Homes in this area are historic and well maintained; residents are extremely
33 vigilant and concerned with changes to the composition of the neighborhood and natural landscape.
34 Visual impact is considered moderate to high in this area because of the increased scenic quality and
35 visual sensitivity associated with Tumamoc Hill. Visual impacts would be reduced by the removal of
36 existing line across Tumamoc Hill (see figure 3.10-15 for scenic quality ratings and TH1a).

37 ***Key Observation Points***

38 In the Tumamoc Hill area, impacts to residential viewers and views to the west from Sentinel Peak Road
39 are expected to be low to moderate. Impacts to viewers located along West Starr Pass Boulevard would be
40 moderate. New transmission structures and lines associated with TH1a would be clearly visible in the
41 foreground. The taller monopole structures would be viewed against the skyline and the backdrop of

1 Tumamoc Hill extending north and south across the open landscape of Tumamoc Hill and east up West
2 Starr Pass Boulevard (see appendix K: simulation TH1-3, TH1-S3, TH1-02).

3 **Compliance**

4 Segment TH1a does not cross BLM lands and VRM compliance is not an issue.

5 **Local Alternative TH1b**

6 **Scenic Quality**

7 The scenic quality of segment TH1b would be the same as that described for segment TH1a.

8 **Key Observation Points**

9 No critical KOPs were identified for TH1b. Representative views of the area from KOPs identified for
10 TH1a are already available. The new taller monopole structures would introduce a strong vertical element
11 to the landscape and would result in moderate impacts to viewers in the Tumamoc Hill area.

12 **Compliance**

13 Segment TH1b does not cross BLM lands and VRM compliance is not an issue.

14 **Local Alternative TH1c**

15 **Scenic Quality**

16 The scenic quality of segment TH1b would be the same as that described for segment TH1a.

17 **Key Observation Points**

18 No critical KOPs were identified for TH1c. Representative views of the area from KOPs identified for
19 TH1a are already available. The new taller monopole structures would introduce a strong vertical element
20 to the landscape and would result in moderate impacts to viewers in the Tumamoc Hill area.

21 **Compliance**

22 Segment TH1c does not cross BLM lands and VRM compliance is not an issue.

23 **Local Alternative TH1-Option**

24 **Scenic Quality**

25 The TH1-Option runs perpendicular from North Greasewood Road eastward to connect with the
26 Proponent Preferred alignment. This portion runs along West Anklam Road for 1 mile. This segment
27 would provide a closer access to the Proponent Preferred alternative but would similarly create a
28 boundary along the northwestern edge of Tumamoc Hill where currently no similar structures exist.
29 Scenic quality in this area is the same as that described for TH1a, TH1b, and TH1c, and is considered a
30 moderate to high visual impact (see figure 3.10-15 for scenic quality ratings and segment TH1-Option).

31 **Key Observation Points**

32 No critical KOPs were identified for TH1-Option. Representative views of the area from KOPs identified
33 for TH1a are already available.

1 **Compliance**

2 Segment TH1 option does not cross BLM lands and VRM compliance is not an issue.

3 **Local Alternative TH3a**

4 **Scenic Quality**

5 TH3a runs approximately 3 miles connecting at the southern end with the Proponent Preferred alignment
6 and running due north parallel to I-19 along the highway corridor. Scenic quality in this area would be
7 Class C and sensitivity would be low given the lack of highly sensitive viewers and being located parallel
8 to a major transportation corridor. Visual impact would be low for this segment of the local alternative
9 (see figure 3.10-15 for scenic quality ratings and segment TH3a).

10 **Key Observation Points**

11 No critical KOPs were identified for TH3a.

12 **Compliance**

13 Segment TH3a does not cross BLM lands and VRM compliance is not an issue.

14 **Local Alternative TH3b**

15 **Scenic Quality**

16 TH3b runs north from TH3a to connect at the northern point with the Proponent Preferred alignment.
17 TH3b is co-located along the Santa Cruz River route and parallel to the Anza Trail for the entirety of its
18 length. This local alternative also parallels existing transmission lines currently located within the river
19 bed. To the east, ranging from 0.5 mile to directly adjacent, is I-10, a major travel corridor. KOPs were
20 selected at varying distances from this local alternative and two simulations were rendered to illustrate
21 how the local alternative would impact the existing visual impact of the area. Scenic quality along this
22 segment of the local alternative is considered Class C and sensitivity is considered low to moderate,
23 resulting in a low visual impact given the proximity to existing transmission lines and congested
24 industrial, transportation, and commercial development (see figure 3.10-15 for scenic quality ratings and
25 segment TH3b).

26 **Key Observation Points**

27 There are superior views of TH3b to the east as it follows the Anza Trail through heavy development of
28 Tucson, paralleling existing transmission lines and roads. Impacts to viewers from the observation point
29 on Sentinel Hill would be low. Although new transmission structures and lines associated with TH3b
30 would be visible, they would blend in with the surrounding utilities and development. Where new
31 structures associated with TH3b would be located within the river channel, the foundation would need
32 to be 25 feet tall, and would introduce a large blocky, pale structure into the gravelly river channel.
33 The taller monopole structures and substantial concrete base where the line crosses the channel would
34 be viewed against the backdrop of the channel alongside existing lattice structures and other human
35 development extending across the flat and open landscape of the Santa Cruz River channel (see appendix
36 K: simulation TH3-S1).

37 **Compliance**

38 Segment TH3b does not cross BLM lands and VRM compliance is not an issue.

1 **Local Alternative TH3-Option A**

2 ***Scenic Quality***

3 TH3-Option A, located to the east of TH3-Option B, runs parallel through 1-mile-long, channelized
4 portion of the Santa Cruz River parallel to commercial development. A bike and pedestrian access way
5 located on the Anza Trail also would parallel the proposed local alternative option. Scenic quality in this
6 area is considered Class C because of its proximity to human-made development as well as being located
7 within a corridor with existing lattice tower transmission lines. Sensitivity in this area would be low to
8 moderate and the visual impact would be low given the degree of modification and the lack of highly
9 sensitive viewers in this area (see figure 3.10-15 for scenic quality ratings and segment TH3-Option A).

10 ***Key Observation Points***

11 Impacts to viewers along the Anza Trail south of Irvington Road would be moderate. Where TH3-Option
12 A crosses the Santa Cruz River channel, new structure concrete bases would be clearly visible from the
13 trail. Foundations would need to be 25 feet tall, and would introduce a large blocky, pale structure into the
14 gravelly river channel. The taller monopole structures and substantial concrete base where it is located
15 within the channel would be viewed against the skyline and the backdrop of the channel alongside
16 existing lattice structures and other human development following the open landscape of the Santa Cruz
17 River Channel (see appendix K: simulation NPS-02 subroute 4.1 for an example of the larger concrete
18 foundations that would be required).

19 ***Compliance***

20 Segment TH3-Option A does not cross BLM lands and VRM compliance is not an issue.

21 **Local Alternative TH3-Option B**

22 ***Scenic Quality***

23 From the southern end of the route, TH3-Option B is a spur that runs nearly 1 mile, bypassing a mix of
24 high-density residential development and commercial development through a green corridor where no
25 utility lines currently exist. Scenic quality in this area is considered Class C and sensitivity is considered
26 moderate, visual impact is considered moderate (see figure 3.10-15 for scenic quality ratings and segment
27 TH3-Option B).

28 ***Key Observation Points***

29 Impacts to viewers of TH3-Option B would be similar to those described for TH3-Option A.

30 ***Compliance***

31 Segment TH3-Option B does not cross BLM lands and VRM compliance is not an issue.

32 **Local Alternative TH3-Option C**

33 ***Scenic Quality***

34 TH3-Option C runs parallel to the Santa Cruz bikeway along the river route west of I-19 and would have
35 similar visual impacts as compared to TH3-Option B. Scenic quality in this area is considered Class C
36 and sensitivity and visual impact is considered low (see figure 3.10-15 for scenic quality ratings and
37 segment TH3-Option C).

1 **Key Observation Points**

2 Impacts to viewers of TH3-Option C would be similar to those described for TH3-Option A.

3 **Compliance**

4 Segment TH3-Option C does not cross BLM lands and VRM compliance is not an issue.

5 **Agency Preferred Alternative**

6 **NEW BUILD SECTION**

7 The Agency Preferred Alternative for the New Build Section would cross predominantly flat desert
8 valleys and playa surrounded by mountains the visual impact is considered low to moderate. The VRM
9 Class B designated lands in this area are characterized by steep and undulating ridgelines, low rounded
10 hills, and eroded rocky plains. However, there is low to moderate visual sensitivity given the existence of
11 other disturbance such as transmission lines and utility development along the length of the route. The
12 LD4-Option 5 portion of the Agency Preferred Alternative does not cross BLM-administered lands and is
13 not subject to VRM compliance, however, the introduction of a new transmission line within the existing
14 environment along this route would result in low to moderate visual impacts. Short-term visual impacts
15 resulting from construction, access, and ROW maintenance during the construction and operation of the
16 transmission line would include the removal of vegetation, the introduction of new transmission
17 structures on the landscape, and the development of access roads resulting in low to moderate visual
18 impacts. The Agency Preferred Alternative further avoids visual disruption to Lordsburg Playa, the
19 community of Bowie, and the BSETR. Development of the New Build Section Agency Preferred
20 Alternative route would reduce visual congestion resulting in minimized impact to sensitive views, and
21 would not require plan amendments for visual resources.

22 **UPGRADE SECTION**

23 The Agency Preferred Alternative for the Upgrade Section includes the re-routing of the proposed
24 transmission line to avoid the Tumamoc Hill area using TH1 and TH1a to connect with the Proponent
25 Preferred alternative (U3e) perpendicular on West Starr Pass Boulevard then north on North Greasewood
26 Road and east on West Anklam Road to reconnect with U3g. This configuration largely avoids visual
27 impacts to Tumamoc Hill and would be located on segments with existing utility development and
28 transmission lines. This area is outside of BLM-administered lands and is not subject to VRM
29 compliance. However, along Greasewood Road, an existing 69-kV power line runs on the east side of the
30 road, and the introduction of an additional power line would result in increased visual contrast due to the
31 height, scale, and structure type being taller and more noticeable than the existing power line. In this area,
32 viewer sensitivity is heightened due to community concern and relatively high density residential
33 development as compared to the rest of the Project. The introduction of the proposed structures in this
34 area is considered moderate to high because of the well-established residential community and the historic
35 nature of Tumamoc Hill. However, as compared to the other alternatives under consideration, visual
36 impacts would be reduced by constructing the power line within a corridor that is currently disturbed.

37 Local alternative MA1 of the Agency Preferred Alternative provides an alternative route to avoid the
38 western boundary of the Marana Regional Airport and would cross between North Sandario Road and
39 North Sanders Road, turn north along North Sanders Road and terminate before reaching West Avra
40 Valley Road. The purpose of this Agency Preferred Alternative segment is to avoid future expansion of
41 the airport. This segment is also located outside of BLM-administered land and visual impact from the
42 development of MA1 would be low because it avoids visually sensitive areas associated with the airport.
43 The Marana Airport is a destination for local aviation enthusiasts who currently view airplanes from the

1 Sky Rider Café (one of the most popular airport restaurants in Arizona), however, the airpark is slated for
2 future development and MA1 would avoid obstruction of future viewing locations at the airpark.

3 ***Additional Mitigation Measures***

- 4 • **VRM-1.** The alignment of new access roads or cross-country routes would follow the landform
5 contours where practicable to minimize ground disturbance and reduce visual scarring of the
6 landscape, providing the alignment does not affect other resource values.
- 7 • **VRM-2.** Clearing of trees in and adjacent to the ROW would be minimized to reduce visual
8 contrast to the extent practicable to satisfy conductor-clearance requirements. Trees and other
9 vegetation would be removed selectively to blend the edge of the ROW into adjacent vegetation
10 patterns, as practicable and appropriate.
- 11 • **VRM-3.** All new or improved access that would not be required for maintenance would be closed
12 or rehabilitated to make it less visually apparent.
- 13 • **VRM-4.** Tower design may be modified, or an alternative tower type may be selected to
14 minimize visual contrast if practical (BLM 2013o).
- 15 • **VRM-5.** Standard tower design would be modified to correspond with spacing of existing
16 transmission structures, where feasible and within the limits of standard tower design, to reduce
17 visual contrast (BLM 2013o).
- 18 • **VRM-6.** At highway, canyon, and trail crossings, towers would be placed at the maximum
19 feasible distance from the crossing within the limits of standard tower design to reduce visual
20 impacts.

21 Also, the “Amended Plan of Development for the Southline Transmission Project” (Southline 2012a)
22 includes the following PPMs:

- 23 • **PPM VIS-1: Revegetation in Areas Disturbed by Construction.** In order to restore disturbed areas
24 to an appearance that will blend back into the overall landscape, seeding and/or planting will be
25 conducted 1) at road cuts where new roads are required to access new or existing transmission
26 towers, and 2) in areas around new or rebuilt transmission structures that must be cleared during
27 the construction process.
- 28 • **PPM VIS-2: Use of Existing Access Roads and Road Modification.** To the extent feasible,
29 existing access roads will be used. Widening and grading of roads will be kept to the minimum
30 required for access by Project construction equipment.
- 31 • **PPM VIS-3: Dust Suppression.** During the construction period, dust suppression measures will be
32 used to minimize the creation of dust clouds potentially associated with the use of access roads.
- 33 • **PPM VIS-4: Use of Nonspecular Conductors.** The Project will incorporate nonspecular
34 conductors into the Project design to decrease reflectivity and visibility of Project features.

35 ***Residual Impacts***

36 The effectiveness of using and implementing established BMPs and mitigation measures would be limited
37 by the distance of the viewer and the presence of other sources of contrast; therefore, impacts would
38 generally be the same as the direct and indirect impacts described under each alternative. Regardless of
39 the alternative selected, certain views during the construction period would be altered by the presence of
40 construction vehicles, equipment, and the erection and operation and maintenance of towers and facilities
41 associated with the transmission line itself. Residual impacts to landscape features from the presence of
42 the proposed Project would be low to moderate. Where the proposed Project would not meet BLM VRM
43 objectives, there would be significant impacts.

1 **Unavoidable Adverse Impacts**

2 The visual impact resulting from the construction and operation and maintenance of the transmission line
3 within the landscape would be an unavoidable consequence.

4 **Short-term Uses versus Long-term Productivity**

5 Construction and operation and maintenance of the proposed Project would require short-term and long-
6 term use of land for placement of the structures, access roads, and ancillary facilities. Implementation of
7 the proposed Project under all action alternatives would create long-term and permanent disruptions of the
8 characteristic landscape from soil, vegetation, and topographic disturbances and would, in some cases,
9 change the landscape from vacant to a utility corridor. One of the intents of the Project was to parallel
10 existing linear development where possible to minimize the disruption of vacant landscapes.
11 The proponent’s preferred route follows existing linear developments for a majority of its length.
12 The proponent’s alternative crosses vacant landscape along segments S1, S2, S4, and S6. In addition,
13 local alternative A crosses vacant land. The Upgrade Section follows existing linear development its
14 entire length.

15 **Irreversible and Irretrievable Commitments of Resources**

16 The visual contrasts that would result from the construction and operation and maintenance of the
17 proposed Project would result in loss of a portion of the characteristic landscape within the Project
18 footprint for the lifetime of the proposed Project (presumed to be a minimum of 50 years). If, however, at
19 some future date all proposed Project-related facilities were removed, these visual characteristics—
20 including vegetation levels within the ROW—would return after a few years to approximately previous
21 levels. Thus, impacts to these resources are neither irreversible nor irretrievable.

22 **4.11 LAND USE, INCLUDING FARM AND RANGE**
23 **RESOURCES AND MILITARY OPERATIONS**

24 **4.11.1 Land Use Introduction**

25 This section describes the potential impacts to the land use baseline conditions (as described in section
26 3.11.1, the land use affected environment) associated with the construction and operation and
27 maintenance of the transmission line, substations, and ancillary facilities. Potential impacts to land use are
28 discussed in terms of land ownership, compliance with management of lands, land use authorizations and
29 ROWs (including lands and realty actions), and future or planned land uses. The potential impacts
30 described in this section are based on the land use data available in “Southline Transmission Project
31 Resource Report 7: Land Use” (CH2M Hill 2013k). The contents of that report are used herein without
32 specific reference.

33 **Methodology and Assumptions**

34 **ANALYSIS AREA**

35 The land use analysis area for the New Build Section is a 2-mile corridor around the action alternatives
36 (1-mile buffer on either side of the centerline). In addition, Project elements that are proposed outside the
37 2-mile corridor are included in the land use analysis area. The 2-mile corridor is used to identify land uses
38 and land use resources that could be directly impacted by surface disturbance and where construction

1 materials, equipment, and workers may be present. The land use analysis area for the Upgrade Section is a
2 500-foot corridor (250-foot buffer on either side of the centerline). The Upgrade Section would not
3 change the physical location of the existing Apache-Saguaro 115-kV transmission line by more than 100
4 feet after construction since one option is to build the upgraded line directly adjacent to the existing line
5 then remove the existing line.

6 Land use resources concerning farmlands and rangelands as well as military operations are discussed in
7 separate subsections (4.11.2 and 4.11.3, respectively) herein.

8 **IMPACT INDICATORS**

9 For the purposes of this analysis, an impact to land use could result if any of the following were to occur
10 from construction or operation and maintenance of the proposed Project:

- 11 • Potential conflicts with applicable land use plans, policies, goals or regulations (incompatible
12 land uses).
- 13 • Potential conflicts with existing multi-use or utility ROWs.
- 14 • Potential conflicts with existing land uses, specifically where the Project would create a direct
15 long-term impact:
 - 16 ◦ Physically conflict with existing residential, commercial, industrial, military, or agricultural
17 uses (i.e., displacement of homes, businesses, center-pivot irrigation agricultural fields).
 - 18 ◦ Indirect conflict with residential, commercial, or military uses.
- 19 • Potential conflicts with planned land uses, specifically residential subdivisions or other sensitive
20 land uses at the final plat approval stage.
- 21 • Potential conflicts with State or federally established, designated or reasonably foreseeable
22 planned land use areas (e.g., lands and realty actions, resource inventory determinations
23 [avoidance areas])recreation, wildlife management area, game management areas, waterfowl
24 production areas, scientific and natural areas, wilderness areas, ACECs, etc.).
- 25 • The potential for the Project to result in nuisance impacts.

26 The laws, regulations, and land management plans below were referenced to determine conflicting or
27 consistency determinations with the action alternatives. The following plans were found to intersect with
28 the analysis area.

29	• Mimbres Resource Management Plan	41	• County of Doña Ana Comprehensive
30	• Safford Resource Management Plan	42	Plan
31	• Phoenix Resource Management Plan	43	• Luna County
32	• Continental Divide National Scenic	44	• Grant County, New Mexico, 1978
33	Trail Comprehensive Plan	45	ordinance
34	• Coronado National Forest Plan	46	• Hidalgo County Comprehensive Plan
35	• Las Cienegas National Conservation	47	• Graham County Comprehensive Plan
36	Area Resource Management Plan	48	• Greenlee County Comprehensive Plan
37	• Juan Bautista de Anza National Historic	49	• County of Cochise Comprehensive Plan
38	Trail Comprehensive Management and	50	• Pima County Comprehensive Plan
39	Use Plan	51	Update
40	• Willcox Playa Wildlife Area		

1	• Pinal County Comprehensive Plan	8	• City of Lordsburg Comprehensive Plan Update
2	• Pima County Multi-Species Conservation Plan	9	
3		10	• City of Willcox General Plan
4	• Cienega Creek Natural Preserve Management Plan	11	• City of Benson General Development Plan
5		12	
6	• City of Deming Comprehensive Plan Update	13	• City of Tucson General Plan
7		14	• Marana General Plan

15 ***Impacts Analysis Results***

16 **NO ACTION ALTERNATIVE**

17 Under the no action alternative, the BLM would not issue a ROW grant to the Southline. Even under the
18 no action alternative, Western still plans to upgrade the existing lines between the Apache and Saguaro
19 substations within the next 10 years, per Western’s 10-year capital improvement plan (Western 2012a).
20 There would be no new impacts to land uses occurring within the analysis area. It is assumed that land
21 ownership, management of lands, land use authorizations and ROWs would continue as they are currently
22 managed. The demand for electricity, particularly renewable energy, would likely continue to grow in the
23 analysis area. The current capacity on the existing transmission lines would be exceeded by the demand,
24 and other transmission line developments would likely be sought to meet the current demand, including
25 renewable energy transmission.

26 Since the Project would not be constructed, there would not be a conflict with the Mimbres RMP VRM
27 Class II land classifications, and the Mimbres RMP would not require a plan amendment under the No
28 Action,

29 **IMPACTS COMMON TO ALL ACTION ALTERNATIVES**

30 **Construction, Operation, and Maintenance**

31 ***Land Ownership and Management of Lands***

32 The implementation of any of the action alternatives would not alter existing BLM (and all agency-
33 managed) land ownership. All staging areas would be returned to their existing condition in accordance
34 with BLM standards following construction. Standard BLM leases for ROW grants, in accordance with
35 Title V of the FLPMA, as amended (43 U.S.C. 1761–1771) would apply for all portions of BLM-
36 managed lands that would be included in the Project footprint, should the proposed Project be approved.
37 For non-BLM lands, such as private or New Mexico or Arizona State lands, the private lands
38 (approximately 23 percent of the proposed Project footprint) would be leased or purchased in fee under
39 applicable laws.

40 The landowners would be compensated at market value for the land that may be acquired for the proposed
41 Project, as discussed in chapter 2. Private land would likely stay in private ownership, but there may be
42 leasing or purchasing involved that would change the ownership of certain privately owned lands.
43 All land transactions would be subject to Federal, state, and local laws. In fee purchasing would only be
44 required for substation expansion. Though the construction disturbances for the proposed Project would
45 be far less than the overall permanent ROW acreage, for the purposes of land ownership and surface land
46 management, the entire Project ROW acreages are discussed.

1 Private land owners may experience minor, temporary nuisance impacts in residential areas where the
 2 temporary activities involved with construction (i.e., noise, dust, and heavy equipment) is typically
 3 incompatible with local zoning restrictions. However, all private lands would be intersected by the Project
 4 in existing ROWs, and the proposed Southline Project would only be located in areas that would be in
 5 compliance with local zoning restrictions subject to land use nuisance standards. The temporary impacts
 6 would be short-term and would cease once construction activities are completed at a particular segment.
 7 (Refer to chapter 2 for a listing of BMPs intended to reduce construction impacts.) No new access roads
 8 would be developed in the residential areas of the municipalities that occur within the analysis area.
 9 Further, the transmission lines proposed in these residential areas (particularly within route group 4)
 10 would be upgrades to existing facilities.

11 Decommissioning of the Project (i.e., after the life of the Project) would make the ROW available for
 12 other similar uses, or could be completely reclaimed and revert land uses to the existing conditions.

13 As described in chapter 3, the analysis area is located within Federal, State, and local planning areas.
 14 Table 4.11-1 outlines the plans that are applicable within the analysis area, land use goals and objectives
 15 therein, and consistency with those plans if any of the action alternatives is implemented.

16 **Table 4.11-1. Consistency of the Project Alternatives with Local Plans**

Plan	Goals/Objectives/Policy	Consistency Determination
Mimbres RMP	The Mimbres Resource Area grants ROWs, leases and permits to qualified individuals, businesses and governmental entities for the use of public land. New ROWs are issued within existing ROWs whenever possible. All ROW activities are subject to site-specific environmental analysis.	Not Consistent. There are existing VRM settings (VRM II) and an avoidance area where the proposed Project would be in conflict with the prescriptions of the Mimbres RMP. A plan amendment would be required to change the VRM designation if the segments of the Project in VRM Class II areas are approved in the ROD. Segments that would conflict with VRM II classifications include S5, S6, S7, Alternative C, Alternative D of route group 1 and LD2, and LD3a of route group 2. LD2 would also conflict with the Butterfield Trail avoidance area.
Safford RMP	Land Use Authorizations, ROWs, leases, and permits would be considered on a case-by-case basis, in accordance with the decisions of this RMP. Major ROWs, however, would be directed to designated corridors where possible.	Consistent. Existing VRM settings (VRM II) would not be intersected by the proposed Project. The proposed Project would be in conformance with the prescriptions of the Safford RMP. A plan amendment would not be required.
Phoenix RMP	Land use authorizations (ROWs, leases, permits, and easements) would continue to be issued on a case-by-case basis and in accordance with recommendations in this DEIS. ROWs would be issued to promote the maximum utilization of existing ROW routes, including joint use whenever possible.	Consistent. An EIS has been determined as the appropriate level of environmental review. Where feasible, the actions alternatives would occur within existing ROWs.

17

1 **Table 4.11-1. Consistency of the Project Alternatives with Local Plans (Continued)**

Plan	Goals/Objectives/Policy	Consistency Determination
Continental Divide National Scenic Trail Comprehensive Plan	The primary purpose of this plan is to provide management guidance for a continuous, appealing trail route, designed for the hiker and horseman, but compatible with other land uses. Trail segments in the Roaded Natural class pass through areas where the natural setting may have modifications that range from being easily noticed to strongly dominant to observers within the area. Trail segments in Rural or Urban class pass through areas where the natural setting is culturally modified to the point that it is dominant to the travel route observer. The setting may include pastoral, agricultural, intensively managed wildland resource landscapes or utility corridors. The urban settings may be dominated by structures with the natural elements playing an important but visually subordinate role.	Consistent. The action alternatives would cross the CDNST in areas that have been determined as having a sensitivity level rating unit as "Maintenance of Visual Quality has low Value," no critical habitat or unique biological features, and low potential for cultural resources.*
Coronado National Forest Plan	Existing utility and transportation corridors would continue to be used for those types of uses. Every attempt should be made to locate new utilities within those existing corridors that meet the visual quality objective. New corridors shall be located so that the visual quality objectives are met.	Consistent. The approximately 0.5-mile segment that would cross the Coronado National Forest would be located within an existing ROW.
Las Cienegas National Conservation Area RMP	All new major utilities crossing public lands would be routed through designated corridors.	Consistent. Portions of the action alternatives would occur along an existing ROW within the Las Cienegas Sonoita Valley Acquisition Planning District; though not on BLM lands.
Juan Bautista de Anza National Historic Trail Comprehensive Management and Use Plan	Management objectives for visitor experience emphasize promotion of public understanding, appreciation, and enjoyment of the Anza Trail and outdoor recreation.	Consistent. The Anza Trail occurs within the development area of Tucson, primarily along the channelized Santa Cruz River that parallels I-10 and existing transmission lines.*
Willcox Playa Wildlife Area	Management emphasis for the Willcox Playa Wildlife Area is to support the best wildlife habitat possible on the wildlife area for present and future generations. This emphasis includes keeping opportunities available for public hunting and other wildlife-oriented recreation	Consistent. Portions of the action alternatives would occur along an existing ROW; however, some seasonal restrictions may be required in accordance with AGFD hunting regulations but would not likely be implemented since the area is already occupied by development and therefore not actively hunted.
County of Doña Ana Comprehensive Plan	Maintain and protect residential areas from incompatible land uses.	Consistent. There are no residential areas in the vicinity of the action alternatives in Doña Ana County.
Luna County Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
Grant County Ordinance 1978-12-04-01	The Grant County Board of Commissioners is hereby empowered to adopt rules and regulations concerning the construction and maintenance of utilities and other facilities within Grant County road ROWs.	Consistent. Design and location of the action alternatives must comply with existing ROWs and would not occur within Grant County road ROWs.
Hidalgo County Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
Greenlee County Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
Graham County Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.

1 **Table 4.11-1. Consistency of the Project Alternatives with Local Plans (Continued)**

Plan	Goals/Objectives/Policy	Consistency Determination
County of Cochise Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
Pima County Comprehensive Plan	The Plan does not specifically address transmission of electricity, although electrical transmission requires a Conditional Use Permit under some zoning districts.	Consistent. Portions of the action alternatives would occur within an existing ROW within Pima County. A conditional use permit would be required for portions of the proposed Project and alternatives that would occur on County lands.
Pinal County Comprehensive Plan	Transmission lines for the distribution of electricity and power substations shall be permitted in any zoning district and not be subject to the minimum lot area requirement.	Consistent. Portions of the action alternatives would occur within an existing ROW within Pinal County.
Pima County Multi-Species Conservation Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
Cienega Creek Natural Preserve Management Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
City of Deming Comprehensive Plan	Transmission development is allowed in all zones.	Consistent. Portions of the action alternatives would occur within an existing ROW within Deming.
City of Lordsburg Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
City of Willcox Comprehensive Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
City of Benson General Development Plan	The plan acknowledges the city's presence along a transmission and transportation corridor. The transmission of electricity is allowed in all zoned areas of Benson.	Consistent. Portions of the action alternatives would occur within an existing ROW within Benson.
City of Tucson General Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.
Marana General Plan	No goals/objectives/policies pertaining to transmission line are identified.	Consistent.

2 * A National Trails Assessment in accordance with BLM Manual 6250 and 6280 is provided in Appendix F of this DEIS.

3 **Land Use Authorizations and Rights-of-way**

4 The primary land use change associated with the proposed Project is the development of currently natural
 5 or undeveloped land for a new and/or upgraded transmission line and ancillary facilities (i.e., substations,
 6 access roads).

7 If the proposed Project is authorized, the Project would have to conform to the terms and conditions of
 8 other previously issued BLM ROWs in the Project footprint (e.g., transportation ROWs and gas line
 9 ROWs), if applicable (e.g., other linear ROWs). There would be no impacts to BLM-designated utility
 10 corridors and other existing BLM ROWs (see chapter 3, table 3.11-9) since the Project would span all
 11 pipelines, and tower construction would avoid other facilities. The action alternatives, if authorized,
 12 would include new terms and conditions (applicable to those BLM-managed lands on which the proposed
 13 Project and alternatives would occur) that would be developed under Title V of the FLPMA, as amended
 14 (43 U.S.C. 1761–1771). Therefore, there would be conflicts to other existing BLM-designated utility
 15 corridors or existing BLM ROW authorizations. Existing, authorized adjacent or intersecting linear land
 16 use facilities (transmission and utility corridors) would not be impacted if any action alternative were
 17 implemented.

1 The action alternatives cross portions of various irrigation, drainage, pipes, and related facilities within
2 agricultural areas in both New Mexico and Arizona. Where necessary to construct transmission facilities
3 across canals or other conveyance systems, the action alternatives would be constructed to allow
4 conductors to span these facilities, resulting in low or minimal impacts to the canal or other conveyance
5 system. An encroachment permit would be required by the managing agency (e.g., Reclamation) to cross
6 these facilities in accordance with federal and local regulations. Similarly, the action alternatives would
7 cross numerous Federal, State, County, and local highways and railroads, electric transmission and
8 delivery lines, and gas and oil pipelines. The exact alignment and design configurations of these crossings
9 would be in accordance with applicable regulations and codes. Special construction protection measures
10 would be undertaken at road and other ROW crossings. For a listing of construction BMPs, refer to
11 Chapter 2, Section 2.4.6, "Typical Design Features."

12 Other authorized land uses, such as outdoor recreation and grazing, may experience minor displacement
13 during construction since these activities are dispersed and not concentrated within certain areas (refer to
14 sections 4.11.2 and 4.14). Recreation along the National Trails that would be crossed by the Project would
15 not be precluded since the transmission towers, substations, and access roads would not be constructed
16 upon the National Trails; the intersections with National Trails would be spanned by the lines.
17 The recreation setting along National Trails (an authorized land use) would not change since there are
18 existing transmission lines already in place; further discussion to the potential impacts to the recreation
19 setting along National Trails is discussed in section 4.14. Existing land uses surrounding the proposed
20 Project would not be precluded during the construction period. Access to all existing land uses would be
21 maintained, and the minor displacements experienced by outdoor recreation and grazing would cease
22 during operation/maintenance of the proposed Project, areas occupied by the transmission line towers,
23 substations, and access roads notwithstanding. These areas would be precluded from recreation and
24 grazing for the life of the Project.

25 Substations that are proposed outside the existing ROW would not include new construction; the activity
26 would be limited to expanding the existing substation. Thus, no new ROW requests are anticipated for the
27 substation-related activities. Similarly, some staging areas would be located outside of the ROW. These
28 staging areas would be located in areas that would not conflict with land ownership agreements, existing
29 land use authorizations, RMP-prescriptions, or future or planned land use.

30 ***Future or Planned Land Use***

31 Potential effects on future or planned land use are generally associated with Project construction rather
32 than operation because once the ROW grant has been made by BLM and construction is completed, no
33 further changes to future or planned land use patterns are expected. Similarly, county and municipal
34 planning already recognize the existing ROWs that the proposed Project would occupy, thus any future
35 planned uses would conform to these existing ROWs. No residential areas are planned within the analysis
36 area. No planned residential subdivisions or other sensitive land uses at the final plat approval stage
37 would be intersected by the proposed Project footprint. Thus, a land use conflict with future or planned
38 land uses is not identified under all alternatives.
39

ROUTE GROUP 1 – AFTON SUBSTATION TO HIDALGO SUBSTATION

Subroute 1.1 – Proponent Preferred

Construction

Land Ownership and Management of Lands

Some of the segments under route group 1 would cross areas identified in the Mimbres RMP as avoidance areas and VRM Class II. Please refer to Section 4.10, “Visual Resources,” for a discussion on VRM compliance.

Non-VRM-related Mimbres RMP ROW avoidance prescriptions that route group 1 (subroutes 1.1, 1.2, and local alternatives) would cross are provided below in table 4.11-2. As described in Section 3.11.1, “Land Use,” avoidance areas may allow for ROWs under special terms and conditions. The special terms and conditions have not yet been identified, but would be specified prior to a ROD. Further, each segment proposed under route group 1 that would intersect an avoidance area is located within or along existing ROWs.

The subroute would cross habitat areas for the bighorn. Bighorn sheep habitat areas are recognized as avoidance areas by the Mimbres RMP. Impacts to these habitats are not anticipated since the Project would be located along existing facilities that are already in place within these avoidance areas. Subroute 1.1 would pass near the Aden Hills OHV area and would also intersect with BLM disposal areas; this would be a negligible impact to land use. Disposal avoidance areas are not subject as exclusion areas for ROW. Impacts for operation and maintenance of this subroute would be the same as described above in “Impacts Common to all Action Alternatives.”

Table 4.11-2. Route Group 1 ROW Avoidance Areas

Segments	Suitable/Occupied Desert Bighorn Sheep Habitat Avoidance Areas (miles crossed)	Butterfield Trail Avoidance Areas (miles crossed)	CDNST Avoidance Areas (miles crossed)	Grassland Restoration Avoidance Area (miles crossed)	Areas Identified as Suitable for Disposal (miles crossed)
Subroute 1.1, Proponent Preferred					
P1	0	0	0	0	0
P2	0	0	0	0	12.7
P3	0	0	0	0	0
P4a	0	0	0.5	0	0
Subroute 1.2, Proponent Alternative					
S1	0	0	0	0	0
S2	0.9	0	0	0	0
S3	0	0	0	0	0
S4	0	0	0	0	0
S5	0	0	0	0	0
S6	0	0	0	1.0	0
S7	0	0	0	1.0	0
S8	0	0	0	0	0.3

1 **Table 4.11-2.** Route Group 1 ROW Avoidance Areas (Continued)

Segments	Suitable/Occupied Desert Bighorn Sheep Habitat Avoidance Areas (miles crossed)	Butterfield Trail Avoidance Areas (miles crossed)	CDNST Avoidance Areas (miles crossed)	Grassland Restoration Avoidance Area (miles crossed)	Areas Identified as Suitable for Disposal (miles crossed)
Route Group 1, Local Alternatives					
DN1	0	0	0	0	4.4
A	0	0	0	0	0
B	0	0	0	0	0
C	0	0	0	0	0
D					0
Total	0.9	0	0.5	2.0	17.4

2 Table 4.11-3 describes the total land ownership of each segment within route group 1.

3 **Table 4.11-3.** Route Group 1 Land Ownership

	Total Miles	Land Ownership							
		BLM	BIA	DOD	U.S. Forest Service	Reclamation	State	County	Private
Subroute 1.1, Proponent Preferred									
P1	5.1	3.0	0.0	0.0	0.0	0.0	1.9	0.0	0.2
P2	102.0	32.8	0.0	0.0	0.0	0.0	31.2	0.0	37.9
P3	31.1	25.4	0.0	0.0	0.0	0.0	1.4	0.0	4.2
P4a	8.7	4.1	0.0	0.0	0.0	0.0	3.6	0.0	1.0
Subroute 1.2, Proponent Alternative									
S1	13.4	10.9	0.0	0.0	0.0	0.0	2.5	0.0	0.0
S2	11.1	9.8	0.0	0.0	0.0	0.0	1.0	0.0	0.3
S3	12.9	12.3	0.0	0.0	0.0	0.0	0.5	0.0	0.0
S4	10.6	10.5	0.0	0.0	0.0	0.0	0.2	0.0	0.0
S5	29.7	12.1	0.0	0.0	0.0	0.0	3.7	0.0	13.9
S6	7.4	4.4	0.0	0.0	0.0	0.0	2.4	0.0	0.5
S7	41.5	22.2	0.0	0.0	0.0	0.0	10.4	0.0	8.9
S8	14.6	0.2	0.0	0.0	0.0	0.0	5.8	0.0	8.5
Route Group 1 Local Alternatives									
DN1	42.5	6.9	0.0	0.0	0.0	0.0	29.3	0.0	6.3
A	17.5	14.7	0.0	0.0	0.0	0.0	1.1	0.0	1.8
B	12.2	9.9	0.0	0.0	0.0	0.0	2.2	0.0	0.0
C	9.0	4.0	0.0	0.0	0.0	0.0	1.6	0.0	3.4
D	22.8	6.8	0.0	0.0	0.0	0.0	2.5	0.0	13.5

1 **Land Use Authorizations and Rights-of-way**

2 If the proposed Project is authorized, the Project would have to conform to the terms and conditions of
3 previously issued BLM ROWs in route group 1, if applicable (e.g., other linear ROWs). Valid existing
4 rights of other ROW holders would remain in place, which are administered by the BLM Las Cruces
5 District Office (refer to Appendix J, “BLM Land Use Authorizations”). There would be no impacts to
6 BLM-designated utility corridors and other existing BLM ROWs since the Project would span all
7 pipelines, fiber optic lines, canals, and other land use authorizations; and tower construction would avoid
8 other facilities. Construction activities would not impact existing land use authorizations or BLM ROWs
9 since all temporary disturbances (approximately 28.4 percent of the total subroute 1.1) within the Project
10 footprint would avoid existing land use authorizations and BLM ROWs (i.e., preexisting authorizations
11 would continue as permitted). Existing, authorized adjacent or intersecting linear land use facilities
12 (transmission and utility corridors) would not be impacted during construction.

13 **Future or Planned Land Use**

14 Future or planned land uses within subroute 1.1 include the Tri-County RMP. The Tri-County RMP will
15 designate land use prescriptions, potentially including utility corridors intended for ROW use, and land
16 use authorizations. The ROD for the Tri-County RMP has not been issued as of the time of writing of this
17 DEIS. Any future land use authorizations under the Tri-County Plan that may intersect with the proposed
18 Project would also need to acknowledge the Project authorized ROW, if granted by the BLM. The Tri-
19 County RMP will guide the land use of future activities. Since future or planned land uses within route
20 group 1 are still under development, (i.e., the Tri-County RMP) the impact of the proposed Project to
21 future or planned land uses would not conflict as the Project can be considered in the Tri-County RMP
22 effort. Thus, a land use conflict with future or planned BLM land uses within the New Build Section of
23 the analysis area is unknown until the Tri-County RMP is finalized.

24 Undeveloped State lands that would be physically occupied by towers or substation or located
25 immediately beneath the spans by route group 1 would no longer be available for some future use,
26 including sale or lease during both construction and operation and maintenance.

27 Subroute 1.1 would occur within a Section 368 designated energy corridor on 20.1 acres. The Afton
28 Substation expansion would occur on 7.8 acres of a Section 368 designated energy corridor.

29 ***Operation and Maintenance***

30 **Land Ownership and Management of Lands**

31 Impacts to the land ownership and the management of lands within route group 1 would be the same as
32 described under subroute 1.1, “Construction.” Operational surface disturbances include the physical
33 occupation of the transmission line tower structures and substations, and the use of the access roads
34 during maintenance activities (short-term, sporadic).

35 **Land Use Authorizations and Rights-of-Way**

36 During operation and maintenance, the proposed Project would have to conform to the terms and
37 conditions of previously issued BLM ROWs in route group 1, if applicable (e.g., other linear ROWs).
38 Valid existing rights of other ROW holders would remain in place, which are administered by the BLM
39 Las Cruces District Office (refer to Appendix J, “BLM Land Use Authorizations”). There would be no
40 impacts to BLM-designated utility corridors and other existing BLM ROWs since the Project would span
41 all pipelines, fiber optic lines, canals and other land use authorizations; and tower construction would
42 avoid other facilities. Operational activities of the transmission line, substations, and ancillary facilities

1 would not preclude existing land use authorizations or BLM ROWs since all permanent disturbances
2 (approximately 12.6 percent of the total subroute 1.1) within the Project footprint would avoid existing
3 land use authorizations and BLM ROWs. Existing, authorized adjacent or intersecting linear land use
4 facilities (transmission and utility corridors) would not be impacted during operation and maintenance.

5 **Subroute 1.2 – Proponent Alternative**

6 ***Construction***

7 **Land Ownership and Management of Lands**

8 Impacts to the land ownership and the management of lands within route group 1 would be the same as
9 described under subroute 1.1, construction.

10 **Land Use Authorizations and Rights-of-way**

11 Construction activities would not impact existing land use authorizations or BLM ROWs since all
12 temporary disturbances (approximately 28.4 percent of the total subroute 1.2) within the Project footprint
13 would avoid existing land use authorizations and BLM ROWs (i.e., preexisting authorizations would
14 continue as permitted). Refer to section 4.11.2 for discussions of impacts to grazing.

15 **Future or Planned Land Use**

16 Future or planned land uses within subroute 1.2 include the Tri-County RMP. The Tri-County RMP will
17 designate land use prescriptions, including ROWs and land use authorizations. The ROD for the Tri-
18 County RMP has not been issued as of the time of writing of this DEIS. Any future Tri-County land use
19 authorizations under that Plan that may intersect the Project footprint would also need to acknowledge the
20 Project authorized ROW, if granted by the BLM. The Tri-County RMP will guide the land use of future
21 activities. Since future or planned land uses within route group 1 are still under development (i.e., the Tri-
22 County RMP), the impact of the proposed Project to future or planned land uses would be minor. Thus, a
23 land use conflict with future or planned land uses is unknown until the Tri-County RMP is finalized.

24 ***Operation and Maintenance***

25 **Land Ownership and Management of Lands**

26 Impacts to the land ownership and the management of lands within subroute 1.2 would be the same as
27 described under subroute 1.1, “Construction,” except the distance, ROW acreage, and disturbance
28 estimates for subroute 1.2 would differ from subroute 1.1 (see table 4.11-1). Impacts to land use
29 authorizations, ROWs, and future or planned land use during construction would be the same as described
30 under construction.

31 **Local Alternatives**

32 There are five local alternatives available for route group 1: DN1, A, B, C, and D.

33 ***Construction***

34 **Land Ownership and Management of Lands**

35 Alternative C intersects with the grassland restoration area. Alternative D intersects with the CDNST and
36 Section 368 designated energy corridors. Since these avoidance areas are pre-existing and would include
37 existing utilities, impacts to these special designations from the proposed Project would be minor. Other

1 impacts to the land ownership and the management of lands within the local alternatives of route group 1
2 would be the same as described under subroute 1.1, “Construction.”

3 **Land Use Authorizations and Rights-of-Way**

4 Construction activities would not impact existing land use authorizations or BLM ROWs since all
5 temporary disturbances (approximately 28.6 percent of the total local alternatives) within the proposed
6 Project would avoid existing land use authorizations and BLM ROWs (i.e., preexisting authorizations
7 would continue as permitted). Future or planned land use in the local alternatives would be precluded by
8 the proposed Project, but could be located parallel to the proposed Project. Refer to section 4.11.2 for
9 discussions of impacts to grazing.

10 ***Operation and Maintenance***

11 **Land Ownership and Management of Lands**

12 Alternative C intersects with the grassland restoration area. Alternative D intersects with the CDNST and
13 Section 368 designated energy corridors. Other impacts to the land ownership and the management of
14 lands within the local alternatives of route group 1 would be the same as described under subroute 1.1,
15 “Construction.” Impacts to existing land use authorizations, ROWs, and future or planned land use during
16 construction would be the same as described under construction.

17 **ROUTE GROUP 2 – HIDALGO SUBSTATION TO APACHE SUBSTATION**

18 **Subroute 2.1 – Proponent Preferred**

19 ***Construction***

20 **Land Ownership and Management of Lands**

21 All segments the comprise route group 2 are proposed New Build Section segments. Though that overall
22 mileage, ROW acreage, and disturbance estimates, would be different, impacts to the land ownership and
23 the management of lands within route group 2 would be the same as described under subroute 1.1,
24 “Construction,” except as described below.

25 There would be no lands identified as suitable for disposal crossed by subroute 2.1. Some of the segments
26 under route group 2 would cross areas identified in existing RMPs as avoidance areas and VRM Class II
27 areas. Please refer to Section 4.10, “Visual Resources,” for a discussion on VRM compliance.

28 Non-VRM-related Mimbres RMP and Safford RMP ROW avoidance prescriptions that route group 2
29 (subroutes 2.1, 2.2, and local alternatives) would cross are provided below in table 4.11-4. As described in
30 Section 3.11.1, “Land Use,” avoidance areas may allow for ROWs under special terms and conditions.
31 Further, each segment proposed under route group 2 that would intersect an avoidance area is located
32 within or along existing ROWs.

33 Segment P6b would cross the Bowie Mining District; however, no mining facilities are present within the
34 proposed Project’s ROW and therefore the BLM’s ability to manage the lands that encompass the Bowie
35 Mining District would not be impacted.

1 **Table 4.11-4. Route Group 2 ROW Avoidance Areas**

Segments	Suitable/Occupied Desert Bighorn Sheep Habitat Avoidance Areas (miles crossed)	Butterfield Trail Avoidance Areas (miles crossed)	CDNST Avoidance Areas (miles crossed)	Grassland Restoration Avoidance Area (miles crossed)	Areas Identified as Suitable for Disposal (miles crossed)
Subroute 2.1, Proponent Preferred					
P5a	0	0	0	0	0
P4c	0	0	0	0	0
P5a	0	0	0	0	0
P5b	3.0	0	0	0	0
P6a	0	0	0	0	0
P6b	0	0	0	0	0
P6c	0	0	0	0	0
P7	0	0	0	0	0
P8	0	0	0	0	0
Subroute 2.2, Proponent Alternative					
D*	0	0	0.5	0	0
E	2.9	0	0	0	0
F	0	0	0	0	0
Ga	0	0	0	0	0
Gb	0	0	0	0	0
Gc	0	0	0	0	0
I	0	0	0	0	0
J	0	0	0	0	0
Route Group 2 Local Alternatives					
LD1	2.2	0	0	0	0
LD2	0	3.0	0	0	0
LD3a	0	0.5	0	0	0
LD3b	0.1	0	0	0	0
LD4	0	0	0	0	0
LD4-Option 4	0	0	0	0	0
LD4-Option 5	0	0	0	0	0
Total	8.2	3.5	0.5	0	0

2 * Alternative D would occur in both route group 1 and route group 2.

3 The affected land ownership of subroute 2.1 is described in table 4.11-5. Table 4.11-5 shows the land
4 ownership that each segment of subroute 2.1 would occupy.

1 **Table 4.11-5. Route Group 2 Land Ownership**

	Total Miles	Land Ownership							
		BLM	BIA	DOD	U.S. Forest Service	Reclamation	State	County	Private
Subroute 2.1, Proponent Preferred									
P4b	14.0	0.7	0.0	0.0	0.0	0.0	9.5	0.0	3.8
P4c	1.9	0.4	0.0	0.0	0.0	0.0	1.4	0.0	0.0
P5a	9.6	6.1	0.0	0.0	0.0	0.0	1.3	0.0	2.2
P5b	21.1	17.9	0.0	0.0	0.0	0.0	1.0	0.0	2.2
P6a	0.9	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0
P6b	22.5	0.2	0.0	0.0	0.0	0.0	12.6	0.0	9.7
P6c	2.8	0.0	0.0	0.0	0.0	0.0	2.8	0.0	0.0
P7	22.3	2.3	0.0	0.2	0.0	0.0	8.5	0.0	11.3
P8	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5
Subroute 2.2, Proponent Alternative									
E	31.8	18.8	0.0	0.0	0.0	0.0	4.2	0.0	8.8
F	25.3	3.1	0.0	0.0	0.0	0.0	15.1	0.0	7.1
Ga	25.7	0.0	0.0	0.0	0.0	0.0	13.4	0.0	12.4
Gb	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0
Gc	7.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.4
I	2.3	0.0	0.0	0.0	0.0	0.0	2.3	0.0	0.0
J	2.3	0.0	0.0	0.0	0.0	0.0	2.3	0.0	0.0
Route Group 2 Local Alternatives									
LD1	35.4	19.5	0.0	0.0	0.0	0.0	6.8	0.0	9.1
LD2	9.6	3.6	0.0	0.0	0.0	0.0	5.8	0.0	0.2
LD3a	27.9	11.3	0.0	0.0	0.0	0.0	13.3	0.0	3.4
LD3b	1.9	1.2	0.0	0.0	0.0	0.0	0.7	0.0	0.0
LD4	51.7	37.1	0.0	0.0	0.0	0.0	18.6	0.0	4.9
LD4-Option 4	6.5	19.5	0.0	0.0	0.0	0.0	6.8	0.0	9.1
LD4-Option 5	12.3	0.0	0.0	0.0	0.0	0.0	11.1	0.0	1.2
WC1	14.8	3.6	0.0	0.0	0.0	0.0	5.8	0.0	0.2

2 **Land Use Authorizations and Rights-of-Way**

3 If subroute 2.1 is authorized, the Project would have to conform to the terms and conditions of previously
 4 issued BLM ROWs in route group 2, if applicable (e.g., other linear ROWs). Valid existing rights of other

1 ROW holders would remain in place¹, which are administered by the BLM Las Cruces District Office in
2 New Mexico and Safford Field Office in Arizona. There would be no impacts to BLM-designated utility
3 corridors and other existing BLM ROWs since the Project would span all pipelines, and tower
4 construction would avoid other facilities. Construction activities would not impact existing land use
5 authorizations or BLM ROWs since all temporary disturbances (approximately 28.5 percent of the total
6 subroute 2.1) within the proposed Project would avoid existing land use authorizations and BLM ROWs
7 (i.e., preexisting authorizations would continue as permitted). Existing, authorized adjacent or intersecting
8 linear land use facilities (transmission and utility corridors) would not be impacted during construction
9 since all towers and disturbance would be located outside existing structures (i.e., the spans would cross
10 over the existing structures without impact). Refer to section 4.11.2 for impact discussions to grazing.

11 **Future or Planned Land Use**

12 All future or planned land uses in Cochise and Pima counties, Arizona, would be required to conform to
13 the terms and conditions of the proposed Project and alternatives where applicable, if a ROW is granted
14 by the BLM.

15 ***Operation and Maintenance***

16 **Land Ownership and Management of Lands**

17 Impacts to the land ownership and the management of lands within subroute 2.1 would be the same as
18 described under subroute 2.1, “Construction.” Impacts to existing land use authorizations, ROWs, and
19 future or planned land during construction would be the same as described under construction.

20 **Subroute 2.2 – Proponent Alternative**

21 ***Construction***

22 **Land Ownership and Management of Lands**

23 Impacts to the land ownership and the management of lands within route group 2 would be the same as
24 described under subroute 2.1, “Construction.” Impacts to land use authorizations, ROWs, and future or
25 planned land use during construction would be the same as described for subroute 2.1, except as described
26 below.

27 Alternative F would cross the Bowie Mining District; however, no mining facilities are present within the
28 proposed Project’s ROW and therefore the BLM’s ability to manage the lands that encompass the Bowie
29 Mining District would not be impacted.

30 ***Operation and Maintenance***

31 Impacts to land ownership and management of lands, existing land use authorizations, ROWs, and future
32 or planned land use during operation and maintenance would be the same as described for subroute 2.1,
33 “Construction.”

34 **Local Alternatives**

35 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
36 4, LD4-Option 5, and 2, and WC1.

¹ A list of existing and pending ROW holders is provided in Appendix J.

1 **Construction**

2 **Land Ownership and Management of Lands**

3 Impacts to the land ownership and the management of lands within route group 2 would be the same as
4 described under subroute 2.1, “Construction,” except as described below.

5 Segment LD2 would cross the Butterfield Trail avoidance area. The Butterfield Trail travels in an east-
6 west direction along this avoidance area, as would segment LD2. As specified in chapter 3, the Mimbres
7 RMP prescribes the following stipulation for the Butterfield Trail avoidance area:

- 8 • Facilities will not be located parallel to the CDNST or Butterfield Trail (BLM 1991).

9 As such, segment LD2 would be in direct conflict with the management of the BLM lands that surround
10 segment LD2 within the Butterfield Trail avoidance area. This would be an adverse, major, and long-term
11 impact to land use since the proposed Project directly conflicts with the Mimbres RMP. Further, there are
12 no existing transmission lines or pipelines along the proposed route for segment LD2.

13 **Land Use Authorizations and Rights-of-Way**

14 Construction activities would not impact existing land use authorizations or BLM ROWs since all
15 temporary disturbances (approximately 28.5 percent of the total route group 2 local alternatives) within
16 the proposed Project would avoid existing land use authorizations and BLM ROWs (i.e., preexisting
17 authorizations would continue as permitted).

18 **Future or Planned Land Uses**

19 Some future or planned land use in the local alternatives Project footprint would be precluded by the
20 proposed Project, but could be located parallel to the proposed Project. Many land uses would be
21 compatible (recreation, grazing, etc.). Refer to section 4.11.2 for discussions of impacts to grazing.

22 **Operation and Maintenance**

23 **Land Ownership and Management of Lands**

24 Impacts to land ownership and management of lands, existing land use authorizations, ROWs, and future
25 or planned land during operation and maintenance would be the same as described for subroute 2.1,
26 “Construction.”

27 **ROUTE GROUP 3 – APACHE SUBSTATION TO PANTANO SUBSTATION**

28 **Subroute 3.1 – Proponent Preferred**

29 **Construction**

30 **Land Ownership and Management of Lands**

31 All segments that form route group 3 are proposed Upgrade Section segments. Impacts to the land
32 ownership and the management of lands within route group 3 would be the same as described under
33 subroute 1.1, “Construction,” except there would be no avoidance areas that would occur within route
34 group 3.

35 The affected land ownership of subroute 3.1 is described below in table 4.11-6.

1 **Table 4.11-6. Route Group 3 Land Ownership**

	Total Miles	Land Ownership							
		BLM	BIA	DOD	U.S. Forest Service	Reclamation	State	County	Private
Subroute 3.1, Proponent Preferred									
U1a	16.1	0.4	0.0	0.0	0.5	0.0	8.8	0.0	6.4
U1b	2.9	0.0	0.0	0.0	0.0	0.0	2.9	0.0	0.0
U2	15.8	0.0	0.0	0.0	0.0	0.0	3.3	0.0	12.5
U3a	35.6	0.2	2.9	0.0	0.0	0.2	20.7	0.0	11.6
Route Group 3 Local Alternatives									
H	19.3	0.0	0.0	0.0	0.0	0.0	15.3	0.0	4.0

2 **Land Use Authorizations and Rights-of-Way**

3 If subroute 3.1 is authorized, the Project would be required to conform to the terms and conditions of
 4 previously issued BLM ROWs in the route 3 group, if applicable (e.g., other linear ROWs). Valid existing
 5 rights of other ROW holders would remain in place, which are administered by the Tucson and Safford
 6 Field Offices. There would be no impacts to BLM-designated utility corridors and other existing BLM
 7 ROWs since the Project would span all pipelines, and tower construction would avoid other facilities.
 8 Construction activities would not impact existing land use authorizations or BLM ROWs since all
 9 temporary disturbances (approximately 38.5 percent of the total subroute 3.1) within the proposed Project
 10 would avoid existing land use authorizations and BLM ROWs (i.e., preexisting authorizations would
 11 continue as permitted). Existing, authorized adjacent or intersecting linear land use facilities (transmission
 12 and utility corridors) would not be impacted during construction. Refer to section 4.11.2 for discussions
 13 of impacts to grazing.

14 **Future or Planned Land Use**

15 All future or planned land uses in Pima County, Arizona, would be required to conform to the terms and
 16 conditions of the proposed Project and alternatives where applicable, if a ROW is granted by the BLM.

17 **Operation and Maintenance**

18 Impacts to land ownership and management of lands, existing land use authorizations, ROWs, and future
 19 or planned land during operation and maintenance would be the same as described for subroute 3.1,
 20 “Construction.”

21 **Local Alternatives**

22 There is one local alternative for route group 3—local alternative H.
 23

1 **Construction**

2 **Land Ownership and Management of Lands**

3 Impacts to the land ownership and the management of lands within route group 3 would be the same as
 4 described under subroute 3.1, “Construction.” Impacts to land use authorizations, ROWs, and future or
 5 planned land use during construction of the local alternative for route group 3 would be the same as
 6 described for subroute 3.1, “Construction.”

7 **Operation and Maintenance**

8 Impacts to land ownership and management of lands, existing land use authorizations, ROWs, and future
 9 or planned land use during operation would be the same as described for subroute 3.1, “Construction.”

10 **ROUTE GROUP 4 – PANTANO SUBSTATION TO SAGUARO SUBSTATION**

11 **Subroute 4.1 – Proponent Preferred**

12 **Construction**

13 **Land Ownership and Management of Lands**

14 All segments that comprise route group 4 are proposed Upgrade Section segments. Impacts to the land
 15 ownership and the management of lands within route group 4 would be the same as described under
 16 subroute 1.1, “Construction,” except there would be no avoidance areas that occur within route group 4.
 17 The affected land ownership of subroute 4.1 is described below in table 4.11-7.

18 **Table 4.11-7. Route Group 4 Land Ownership**

	Total Miles	Land Ownership							
		BLM	BIA	DOD	U.S. Forest Service	Reclamation	State	County	Private
Subroute 4.1, Proponent Preferred									
U3b	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5
U3c	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0
U3d	3.4	0.0	0.0	0.0	0.0	0.0	0.0	0.4	3.0
U3e	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9
U3f	0.7	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.4
U3g	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9
U3h	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1
U3i	18.2	0.0	0.0	0.0	0.0	0.2	2.7	0.0	15.3
U3j	0.9	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0
U3k	16.7	0.0	0.0	0.0	0.0	0.0	10.8	0.0	5.9
U3l	1.6	0.0	0.0	0.0	0.0	0.0	1.1	0.0	0.4
U3m	0.6	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.4
U4	1.9	0.0	0.0	0.0	0.0	0.0	1.9	0.0	0.0

1 **Table 4.11-7. Route Group 4 Land Ownership (Continued)**

	Total Miles	Land Ownership							
		BLM	BIA	DOD	U.S. Forest Service	Reclamation	State	County	Private
Route Group 4 Local Alternatives									
MA1	1.1	0.0	0.0	0.0	0.0	0.0	1.1	0.0	0.0
TH1a	1.4	0.0	0.0	0.0	0.0	0.0	0.2	0.0	1.2
TH1b	1.6	0.0	0.0	0.0	0.0	0.0	0.0	0.1	1.4
TH1c	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3
TH1-Option	0.4	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0
TH3-Option A	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8
TH3-Option B	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8
TH3-Option C	1.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8
TH3a	2.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7
TH3b	4.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.5

2 **Land Use Authorizations and Rights-of-Way**

3 If subroute 4.1 is authorized, the Project would be required to conform to the terms and conditions of
 4 previously issued BLM ROWs in the route 4 group, if applicable (e.g., other linear ROWs). Valid existing
 5 rights of other ROW holders would remain in place, which are administered by the Tucson Field Office.
 6 There would be no impacts to BLM-designated utility corridors and other existing BLM ROWs since the
 7 Project would span all pipelines, and tower construction would avoid other facilities. Construction
 8 activities would not impact existing land use authorizations or BLM ROWs since all temporary
 9 disturbances (approximately 38.6 percent of the total subroute 4.1) within the Project footprint would
 10 avoid existing land use authorizations and BLM ROWs (i.e., preexisting authorizations would continue as
 11 permitted). Existing, authorized adjacent or intersecting linear land use facilities (transmission and utility
 12 corridors) would not be impacted during construction. Refer to section 4.11.2 for discussions of impacts
 13 to grazing.

14 **Future or Planned Land Use**

15 All future or planned land uses in Pima and Pinal counties, Arizona, would be required to conform to the
 16 terms and conditions of the proposed Project and alternatives where applicable, if a ROW is granted by
 17 the BLM.

18 **Operation and Maintenance**

19 Impacts to land ownership and management of lands, existing land use authorizations, ROWs, and future
 20 or planned land uses during operation and maintenance would be the same as described for subroute 4.1,
 21 “Construction.”

1 **Local Alternatives**

2 There are 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a,
3 TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

4 **Construction**

5 **Land Ownership and Management of Lands**

6 Impacts to the land ownership and the management of lands within route group 4 would be the same as
7 described under subroute 4.1, “Construction.” Impacts to land use authorizations, ROWs, and future or
8 planned land use during construction of the local alternative for route group 4 would be the same as
9 described for subroute 4.1, “Construction.”

10 **Land Use Authorizations and Rights-of-Way**

11 Impacts would be the same as described under subroute 4.1, “Construction,” except the following.
12 Reclamation administers the CAP that occurs within subroute 4.1. Specifically, local alternative MA1
13 would cross Reclamation-owned lands. No impacts to the land uses of these Reclamation-owned lands
14 would occur since there are existing facilities within the Project footprint, and these existing facilities
15 have been previously authorized by Reclamation.

16 **Operation and Maintenance**

17 Impacts to land ownership and management of lands, existing land use authorizations, ROWs, and future
18 or planned land uses during operation and maintenance would be the same as described for subroute 4.1,
19 “Construction.”

20 **AGENCY PREFERRED ALTERNATIVE**

21 The Agency Preferred Alternative would not conflict with existing land use authorizations, and would not
22 change any future or planned land use under route groups 1, 2, 3, and 4. The Agency Preferred
23 Alternative would cross land owned by the following: approximately 3 miles of BIA lands; 294 miles of
24 BLM lands; 0.2 mile of DOD lands; 0.5 mile of U.S. Forest Service lands; 0.4 mile of Reclamation lands;
25 141 miles of State lands; 0.4 mile of County lands; and 113 miles of private lands.

26 The Agency Preferred Alternative alignments included in route group 1 would not occur within ROW
27 avoidance areas, except for segment P2 (crosses 12.7 miles of areas identified for disposal) and P4a
28 (crosses 0.5 mile of CDNST avoidance area). As previously stated, ROW avoidance areas designated for
29 disposal are not subject as exclusion areas for ROW locations, therefore the 12.7 miles of segment P2 that
30 cross areas identified as suitable for disposal would be a negligible impact. The area where P4a would
31 cross the CDNST avoidance area includes existing transmission line ROWs, access roads, and is located
32 approximately 0.6 mile southeast of the existing Hidalgo Substation. The existing transmission lines,
33 access roads, and general developed character dictates how these lands are currently managed, and the
34 Agency Preferred Alternative would not require changes to how these lands area managed. Therefore,
35 impacts of construction and operation and maintenance would be minor, and compliance with the
36 management of these lands (i.e., CDNST avoidance areas) would not be changed. The management of the
37 CDNST corridor would remain the same in this area. Further, the location where P4a crosses the actual
38 CDNST is outside the CDNST avoidance area on New Mexico State land.

39 The Agency Preferred Alternative alignments included in route groups 2, 3, or 4 would not occur within
40 designated ROW avoidance areas. The management of lands included in the Agency Preferred

1 Alternative under route groups 2, 3, and 4 would experience minor, short-term impacts, as described
2 under “Impacts Common to All Action Alternatives.”

3 ***Additional Mitigation Measures***

4 No additional mitigation measures are suggested. Special terms and conditions may be provided per the
5 POD in the ROW grant.

6 ***Residual Impacts***

7 Because no additional mitigation measures are suggested, residual impacts to land use would be the same
8 as discussed under all action alternatives.

9 ***Unavoidable Adverse Impacts***

10 There would be no unavoidable adverse impacts to land ownership and management of lands, existing
11 land use authorizations, ROWs, and future or planned land uses.

12 ***Short-term Uses versus Long-term Productivity***

13 Short-term effects on land uses in the analysis area would result if a ROW were granted for the proposed
14 Project and the subsequent encumbrance of the lands involved for any other uses such as recreational use.
15 These short-term effects would only occur in areas where construction activities for the transmission
16 towers or ancillary facilities physically occupy the ROW. Long-term impacts to land use would be
17 expected for the areas in which the physical occupation of the transmission line towers, substations, and
18 access road would preclude recreational use and grazing activities; future removal of the transmission line
19 and ancillary facilities at the end of the life of the Project would not preclude land use from reverting to
20 previous uses or to be converted to new uses, as allowed under managing land use plans.

21 Impacts to recreational and range resources would result from construction activities and physical,
22 permanent occupancy of the transmission towers and ancillary facilities. Long-term losses in the
23 productivity of recreational and range resources would not be expected, since forage and recreational
24 opportunity would be restored with rehabilitation of the ROW at the end of the life of the Project.

25 ***Irreversible and Irrecoverable Commitments of Resources***

26 There would not be an irreversible commitment of land use resulting from the Project. Land use
27 allocations and encumbrances could be reversed if the proposed Project and elements were removed in
28 the future. There would be an irretrievable loss of BLM-managed lands open to recreational use within
29 the Project footprint if any of the action alternatives are implemented.

30 **4.11.2 Farmlands and Rangelands Introduction**

31 This section describes the impacts to farmlands and rangelands associated with the construction,
32 operation, and maintenance of the transmission line, substations, and ancillary facilities. Impacts are
33 discussed in terms of loss of acreage of prime or unique farmlands or those of statewide importance.
34 The analysis also considers those lands that could be farmed with adequate irrigation, or playas that
35 would be suitable for farming when facilitated by sufficient precipitation. For rangelands, impacts are
36 assessed based on loss of AUMs resulting from either temporary land use or permanently developed lands
37 no longer available in grazing leases.

1 **Methodology and Assumptions**

2 Impacts in this section were confined to the representative ROW defined below. The ROW was compared
3 with a GIS database to intersect unique and prime farmland, and farmland with irrigation potential to
4 calculate temporary disturbance (structure and laydown yards) of farmland acres and acres to be impacted
5 by permanent disturbance (access roads, substation expansion, and structure foundations). It is important
6 to note that the NRCS classifies farmlands based on the physical, chemical, climatological, and
7 sociological characteristics of the soils and land. The NRCS classifications do not imply that prime or
8 unique farmlands or farmlands of statewide or local importance are currently being actively farmed or
9 have ever been actively farmed. Therefore, it can be assumed that the calculation of acres of impacts to
10 farmlands based on NRCS classifications will represent a larger impact to farmlands than would actually
11 occur if the proposed transmission lines were constructed.

12 Due to the length of the proposed Project, the number of individual grazing leases was extensive.
13 Therefore, rather than list each lease, the total lease acreage that intersected each segment of the action
14 alternatives was used in the analysis. The total lease acreage was divided by the total AUMs set by the
15 leasing entity to obtain an approximate average acreage per AUM. That number was then divided into the
16 total temporary disturbance acres to calculate a short-term loss of AUMs. Permanent loss of AUMs was
17 calculated by dividing the total permanent disturbance acres by the average acreage per AUM.

18 Limited AUM data were available for rangeland in Arizona. Based on data received on State leases, an
19 average of one AUM per 17 acres was calculated and used for analysis on BLM lands, where AUM data
20 were absent (represented with a dash in tables below).

21 **ANALYSIS AREA**

22 **New Build Section**

23 The environmental consequences for farmlands and rangelands for the New Build Section are based on a
24 200-foot-wide representative ROW, located along the centerline of the 2-mile-wide analysis area.
25 The actual construction ROW would likely be configured to avoid certain environmental impacts, or for
26 other logistical reasons. Therefore farmland and rangeland resources impacted by the representative ROW
27 may or may not be impacted by the final construction ROW. However, use of the representative ROW
28 allows disclosure of the approximate magnitude of impacts associated with each route group and route
29 segment.

30 Environmental consequences for farmlands and rangelands may extend beyond the representative ROW
31 in order to incorporate the potential for indirect impacts.

32 **Upgrade Section**

33 The environmental consequences for farmlands and rangelands for the Upgrade Section are based on a
34 150-foot representative ROW, located along the centerline of the 500-foot-wide analysis area. Similar to
35 the New Build Section, indirect environmental effects may extend beyond the representative ROW into
36 adjacent areas.

37 **ANALYSIS ASSUMPTIONS**

38 Estimate of AUM loss is based on the stocking rates recommended by the leasing agencies and does not
39 reflect actual conditions. Due to the recent drought and related range decline, stocking rates may actually
40 be considerably lower than what has been recommended. The agencies occasionally conduct range
41 assessments so that rates can be adjusted. However, it is unclear how accurately the recommended rates

1 reflect the real ones. Therefore, it can be assumed that acreage per AUM is an underestimate, and that the
2 loss in AUMs in this analysis represents an overestimate.

3 A similar assumption applies to farmlands, since the dry conditions may eliminate or restrict irrigation
4 opportunities due to lack of water. Many farmers make decisions regarding whether to plant based on
5 what they assume will be an availability of irrigation water. With pending drought, many farmers may
6 have preferred to leave land fallow than to absorb the cost of raising crops. Consequently, farming
7 acreages could be overestimates.

8 To assess the significance of impacts, total acreage of farmlands of unique or statewide importance were
9 divided by the total acreage per subroute. This represents a very conservative approach since the final
10 design of the transmission line, substations, and laydown areas has not been determined, and that some
11 flexibility would be available to minimize impacts to such designated farmlands. This analysis focuses on
12 permanent disturbance only, assuming that during construction planning an effort would be made to
13 locate laydown areas to avoid these farmlands. At locations where laydown areas cannot avoid farmlands,
14 the proponent would receive approval from the landowner of the farmland to lease the land required for
15 the laydown area.

16 **IMPACT INDICATORS**

- 17 • Acres of impacts to existing NRCS prime farmlands or Farmlands of Statewide Importance
- 18 • Acres of impacts to grazing allotments on BLM, ASLD, and NMSLO lands and subsequent
19 potential reduction in AUMs

20 **SIGNIFICANT IMPACTS**

21 This analysis recognizes the complexity of calculating active farming acreages or grazing AUMs in any
22 particular year. For example, due to recent drought conditions, many areas may not currently be actively
23 farmed and on many grazing lands stocking rates have declined as range condition has deteriorated.
24 In addition, the AUMs are estimates based on past conditions and do not accurately reflect the present
25 stocking rates. Most of the leases that intersect the ROW are large, in the tens or even hundreds of
26 thousands of acres, and it would be extremely difficult to tease out the impact of a small loss in acreage
27 from the already devastating effect of drought on farming or grazing lands. Therefore, for the purposes of
28 this analysis, a statistically relevant measure of 10 percent loss of farmlands and rangelands was used if it
29 were determined to result from construction, operation, and maintenance of the action alternatives.
30 The following were considered significant impacts:

- 31 • Loss of greater than 10 percent of prime or unique farmlands;
- 32 • Loss of greater than 10 percent AUMs from local grazing leases.

33 ***Impacts Analysis Results***

34 **NO ACTION ALTERNATIVE**

35 Under the no action alternative, the BLM would not issue a ROW grant to the Southline. Even under the
36 no action alternative, Western still plans to upgrade the existing lines between the Apache and Saguaro
37 substations within the next 10 years, per Western's 10-year capital improvement plan (Western 2012a).
38 No farmland or rangeland would be removed from production and there would be no direct or indirect
39 effects.

1 **IMPACTS COMMON TO ALL ACTION ALTERNATIVES**

2 **Construction**

3 Construction of the transmission line would have direct effects on farmlands and rangelands by removing
4 land acreage from productivity. Indirect effects could occur if dust and particulate matter resulting from
5 the construction activities covered crops in a layer thick enough to impair photosynthesis and impede
6 plant growth.

7 **Operation and Maintenance**

8 Except under extraordinary circumstances, all operation and maintenance activities would occur within
9 the transmission line ROW and access roads. These activities would not directly or indirectly impact
10 adjacent farmlands or rangelands. EMFs generated by the flow of electricity from the transmission line
11 could potentially interfere with radio signals used in automated irrigation or fertilization systems located
12 in close proximity to the line. However, these systems generally operate at different frequencies than the
13 60-hertz range of the transmission line and existing transmission lines are not known to interfere with
14 these systems' radio signals at existing farmlands. In addition, the final siting of the transmission lines
15 would either avoid crossing active farmlands or maximize the distance between the transmission lines and
16 automated irrigation or fertilization systems. Therefore, EMFs from the proposed transmission lines are
17 unlikely to cause a direct impact to automated irrigation or fertilization systems located on farms adjacent
18 to the proposed transmission lines.

19 No direct effect would occur to farmlands and rangelands during the operation and maintenance phase of
20 the Project beyond the loss of lands resulting from Project construction. Because the direct and indirect
21 effects of operation and maintenance are the same for all action alternatives, no further discussion is
22 included under each route group.

23 ***Route Group 1 – Afton Substation to Hidalgo Substation***

24 **SUBROUTE 1.1 – PROPONENT PREFERRED**

25 **Construction**

26 Approximately 28 percent of the 3,567.5 acres of representative ROW in the Proponent Preferred
27 (subroute 1.1) consists of Farmland of Statewide Importance (table 4.11-8). The construction of the
28 transmission line would result in a direct effect by eliminating farmland from production. This represents
29 a reduction in the NRCS farmland classification acres resulting from the Proponent Preferred alternative,
30 but does not take into account avoidance of farmlands during completion of the final design or whether
31 active farmlands are present. Because the proponent would avoid existing active farmlands, direct impacts
32 to farmlands would not be considered significant.

33 Nearly 217 acres of rangeland in the ROW would be directly affected by the construction of the
34 transmission line under the Proponent Preferred (subroute 1.1). However, this acreage represents less than
35 0.001 percent of the total lease acreage intersecting the proposed route (table 4.11-9). Based on expected
36 stocking rates, the removal of the rangeland acres would result in a reduction of about 14 AUMs. This
37 reduction in stocking rates is not considered significant.
38

1 **Table 4.11-8.** Route Group 1 Summary of Acres of Impacted Farmlands

	Total ROW Acreage	Farmland of Statewide Importance	Farmland of Unique Importance	Prime Farmland If Irrigated	Prime Farmland If Meeting Other Conditions
Subroute 1.1, Proponent Preferred					
P1	125.1	0	0	0	0
P2	2,472.0	272.4	0	0	0
P3	753.3	753.3	0	0	0
P4a	217.1	0	0	0	0
Total	3,567.5	1,025.7	0		
Subroute 1.2, Proponent Alternative					
S1	325.3	0	0	0	0
S2	267.7	27.2	0	0	0
S3	314.0	8	0	0	0
S4	255.2	0	0	0	0
S5	720.1	104.3	0	0	0
S6	182.1	0	0	0	0
S7	1,007.0	262	0	0	0
S8	352.8	329	0	0	0
Total	3,424.2	730.5	0		
Route Group 1 Local Alternatives					
DN1	1,030.5	120	0	0	0
A	422.9	0	0	0	0
B	291.5	0	0	0	0
C	215.7	0	0	0	0
D	551.1	399.7	0	68.6	0

2 **Table 4.11-9.** Route Group 1 Summary of Acres of Impacted Rangelands

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
Subroute 1.1, Proponent Preferred						
P1	125.1	111,823.1	8,388	10.4	<0.001	0.8
P2	2,472.0	918,415.2	55,769	131.7	<0.001	8.0
P3	753.3	265,353.56	18,786	63.4	<0.001	4.5
P4a	217.1	155,185.1	12,871	11.1	<0.001	0.9

3

1 **Table 4.11-9.** Route Group 1 Summary of Acres of Impacted Rangelands (Continued)

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
Subroute 1.2, Proponent Alternative						
S1	325.3	223,327.4	17,006	21.9	<0.001	1.6
S2	267.7	256,205.7	13,394	22.4	<0.001	1.2
S3	314.0	147,578.4	13,197	8.4	<0.001	0.6
S4	255.2	131,857.8	14,682	21.4	<0.001	2.6
S5	720.1	260,206.8	31,826	28.9	<0.001	3.5
S6	182.1	100,680.0	16,278	13.6	<0.001	2.2
S7	1,007.0	374,121.0	53,025	52.1	<0.001	7.4
S8	352.8	135,186.4	1,135	29.8	<0.001	2.5
Route Group 1 Local Alternatives						
DN1	1,030.5	415,285.1	12,086	92.9	<0.001	2.7
A	422.9	256,205.7	13,394	17.8	<0.001	1.0
B	291.5	131,857.8	14,682	7.2	<0.001	0.6
C	215.7	201,360.0	32,556	6.1	<0.001	1.0
D	551.1	191,671.7	10,599	28.1	<0.001	1.5

2 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

3 **Construction**

4 Approximately 21 percent of the 3,432 acres of representative ROW in the Proponent Alternative
 5 (subroute 1.2) consists of Farmland of Statewide Importance. The construction of the transmission line
 6 would result in a direct effect by eliminating farmland from production, if it cannot be avoided.
 7 This represents a reduction in the NRCS farmland classification acres resulting from the Proponent
 8 Preferred alternative, but does not take into account avoidance of farmlands during completion of the final
 9 design or whether active farmlands are present. Because the proponent would avoid existing active
 10 farmlands, direct impacts to farmlands would not be considered significant.

11 Approximately 199 acres of rangeland in the ROW would be directly affected by the construction of the
 12 transmission line under the Proponent Alternative (subroute 1.2). However, this acreage represents less
 13 than 0.001 percent of the total lease acreage intersecting the proposed route. Based on expected stocking
 14 rates, the removal of the rangeland acres would result in a reduction of about 22 AUMs. This reduction in
 15 stocking rates is not considered significant.

16 **LOCAL ALTERNATIVES**

17 There are five local alternatives available for route group 1: DN1, A, B, C, and D.

1 **Construction**

2 Of the route group 1 local alternatives, only DN1 and D would have a direct effect on Farmland of
3 Statewide Importance. Local alternative DN1 would affect 12 percent and local alternative D would affect
4 72 percent. The construction of the transmission line would result in a direct effect by eliminating this
5 farmland from production, if it cannot be avoided. No indirect effects to farmlands are anticipated. This
6 represents a significant reduction in the farmland acreage resulting from these two alternatives, but does
7 not take into account avoidance of farmlands during completion of the final design.

8 None of the local alternatives considered would result in significant loss of rangeland acreage or AUMs.

9 ***Route Group 2 – Hidalgo Substation to Apache Substation***

10 **SUBROUTE 2.1 – PROPONENT PREFERRED**

11 **Construction**

12 Approximately 7 percent of the 2,309 acres of representative ROW in the Proponent Preferred (subroute
13 2.1) consists of Farmland of Statewide or Unique Importance (table 4.11-10). The construction of the
14 transmission line would result in a direct effect by eliminating farmland from production, if it cannot be
15 avoided. No indirect effects to farmlands are anticipated. This does not represent a significant reduction in
16 NRCS farmland classification acreage resulting from the Proponent Preferred. Additional efforts to avoid
17 farmlands would be available during completion of the final design.

18 Nearly 119 acres of rangeland in the ROW would be directly affected by the construction of the
19 transmission line under the Proponent Preferred (subroute 2.1). However, this acreage represents less than
20 0.001 percent of the total lease acreage intersecting the proposed route (table 4.11-11). Based on expected
21 stocking rates, the removal of the rangeland acres would result in a reduction of about 12 AUMs. This
22 reduction in stocking rates is not considered significant.

23 **Table 4.11-10.** Route Group 2 Summary of Acres of Impacted Farmlands

	Total Representative ROW Acreage	Farmland of Statewide Importance	Farmland of Unique Importance	Prime Farmland If Irrigated	Prime Farmland If Meeting Other Conditions
Subroute 2.1, Proponent Preferred					
P4b	335.8	32.3	0	0	34.9
P4c	44.9	19.0	0	0	10.6
P5a	233.5	67.4	0	0	5.3
P5b	510.9	5.6	32.7	0.9	4.1
P6a	21.3	0	0	0	21.3
P6b	545.1	0	0	176.0	53.1
P6c	68.3	0	0	0	0
P7	540.8	0	0	14.9	7.0
P8	9.0	0	0	8.2	0.8
Total	2,309.6	124.3	32.7		

24

1 **Table 4.11-10.** Route Group 2 Summary of Acres of Impacted Farmlands (Continued)

	Total Representative ROW Acreage	Farmland of Statewide Importance	Farmland of Unique Importance	Prime Farmland If Irrigated	Prime Farmland If Meeting Other Conditions
Subroute 2.2, Proponent Alternative					
E	766.6	58.3	78.7	27.3	69.5
F	611.1	0	0	139.6	12.9
Ga	622.4	0	0	200.4	146.6
Gb	25.9	0	0	0	25.9
Gc	179.6	0	0	20.9	142.2
I	55.4	0	0	0	0
J	55.6	0	0	0	0
Total	2,316.6	58.3	78.7		
Route Group 2 Local Alternatives					
LD1	857.5	131.8	114.4	48.9	30.6
LD2	233.2	155.6	0	21.1	0
LD3a	677.5	150.8	0	55.9	0
LD3b	46.6	10.1	0	2.3	0
LD4	1,253.1	1.2	0	89.2	43.6
LD4-Option 4	156.1	0	0	0	0
LD4-Option 5	296.8	0	0	0	0
WC1	359.1	3.6	0	75.2	19.4

2 **Table 4.11-11.** Route Group 2 Summary of Acres of Impacted Rangelands

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
Subroute 2.1, Proponent Preferred						
P4b	335.8	148,656.5	18,756	28.2	<0.001	3.5
P4c	44.9	168,516.8	14,448	3.9	<0.001	0.3
P5a	233.5	180,805.6	29,168	11.4	<0.001	1.9
P5b	510.9	41,815.8	19,280	21.5	0.001	3.6
P6a	21.3	53,042.1	–	0.7	<0.001	0.1
P6b	545.1	91,054.0	–	25.8	<0.001	1.5
P6c	68.3	0	–	3.2	0	0
P7	540.8	99,908.3	–	23.8	<0.001	1.4
P8	9.0	0	–	0.1	0	0

3

1 **Table 4.11-11. Route Group 2 Summary of Acres of Impacted Rangelands (Continued)**

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
Subroute 2.2, Proponent Alternative						
E	766.6	141,653.9	18,640	61.1	<0.001	7.9
F	611.1	53,042.1	–	32.9	<0.001	2.0
Ga	622.4	622.4	–	34.6	0.06	2.0
Gb	25.9	10,334.3	–	1.7	<0.001	0.1
Gc	179.6	7,899.7	–	7.1	<0.01	0.4
I	55.4	55.4	–	4.7	0.08	0.3
J	55.6	55.6	–	3.0	0.05	0.2
Route Group 2 Local Alternatives						
LD1	857.5	153,600.7	–	55.2	<0.001	3.2
LD2	233.2	386.1	–	20.2	0.05	1.2
LD3a	677.5	287,796.0	–	29.3	<0.001	1.7
LD3b	46.6	63.8	–	0.6	<0.001	<0.1
LD4	1,253.1	230,121.1	–	113.9	<0.001	6.7
LD4-Option 4	156.1	0	–	14.3	0	0.9
LD4-Option 5	296.8	0	–	22.2	0	1.3
WC1	359.1	0	–	28.3	0	1.7

2 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

3 **Construction**

4 Approximately 6 percent of the 2,316 acres of representative ROW in the Proponent Alternative (subroute
5 2.2) consists of Farmland of Statewide or Unique Importance. The construction of the transmission line
6 would result in a minor direct effect by eliminating farmland from production, if it cannot be avoided.
7 No indirect effects to farmlands are anticipated. This does not represent a significant reduction in the
8 NRCS farmland classification acreage resulting from the Proponent Alternative. Additional efforts to
9 avoid farmlands would be available during completion of the final design.

10 Approximately 145 acres of rangeland in the ROW would be directly affected by the construction of the
11 transmission line under the Proponent Alternative (subroute 2.2). However, this acreage represents less
12 than 0.001 percent of the total lease acreage intersecting the proposed route. Based on expected stocking
13 rates, the removal of the rangeland acres would result in a reduction of about 13 AUMs. This reduction in
14 stocking rates is not considered significant.

15 **LOCAL ALTERNATIVES**

16 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
17 4, LD4-Option 5, and WC1.

1 **Construction**

2 Four of the local alternatives—LD1, LD2, LD3a, and LD3b—would result in significant effects on
 3 Farmland of Statewide or Unique Importance. The construction of the transmission line would result in a
 4 direct effect by eliminating farmland from production, if it cannot be avoided. No indirect effects to
 5 farmlands are anticipated for either of the local alternatives.

6 None of the local alternatives considered would result in significant loss of acreage to rangeland or
 7 AUMs.

8 **Route Group 3 – Apache Substation to Pantano Substation**

9 **SUBROUTE 3.1 – PROPONENT PREFERRED**

10 **Construction**

11 No Farmlands of Statewide or Unique Importance occur in the 1,278 acres of representative ROW under
 12 the Proponent Preferred (subroute 3.1; table 4.11-12). Construction of the transmission line would not
 13 result in any direct effects to farmland. No indirect effects to farmlands are anticipated.

14 Approximately 97 acres of rangeland in the ROW would be directly affected by the construction of the
 15 transmission line under the Proponent Preferred (subroute 3.1). However, this acreage represents less than
 16 0.001 percent of the total lease acreage intersecting the proposed route (table 4.11-13). Based on expected
 17 stocking rates, the removal of the rangeland acres would result in a reduction of less than one AUM. This
 18 reduction in stocking rates is not considered significant.

19 **Table 4.11-12.** Route Group 3 Summary of Acres of Impacted Farmlands

	Total Representative ROW Acreage	Farmland of Statewide Importance	Farmland of Unique Importance	Prime Farmland If Irrigated	Prime Farmland If Meeting Other Conditions	Permanent Disturbance (percent of total subroute acreage)
Subroute 3.1, Proponent Preferred						
U1a	291.9	0	0	48.7	9.9	
U1b	53.0	0	0	0	0	
U2	287.0	0	0	0	15.8	
U3a	646.7	0	0	9.4	68.1	
Total	1,278.6	0	0			0
Route Group 3 Local Alternative						
H	350.2	0	0	0	12.6	0

20

1 **Table 4.11-13. Route Group 3 Summary of Acres of Impacted Rangelands**

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
Subroute 3.1, Proponent Preferred						
U1a	291.9	34,672.3	-	13.6	<0.001	0.8
U1b	53.0	0	-	2.5	0	0
U2	287.0	0	-	20.3	0	0
U3a	646.7	0	-	32.4	0	0
Route Group 3 Local Alternative						
H	350.2	0	-	28.4	0	0

2 **LOCAL ALTERNATIVES**

3 **Construction**

4 No Farmlands of Statewide or Unique Importance occur in the 350 acres of representative ROW for local
5 alternative H. This alternative would not result in the loss of any farmlands.

6 Approximately 28 acres of rangeland in the ROW would be directly affected by the construction of the
7 transmission line under alternative H. However, no grazing allotment acreage is included in the area
8 represented by alternative H, and therefore no loss of AUMs would occur as a result of construction under
9 this alternative.

10 ***Route Group 4 – Pantano Substation to Saguaro Substation***

11 **SUBROUTE 4.1 – PROPONENT PREFERRED**

12 **Construction**

13 Approximately 3 percent of the 874.8 acres of representative ROW in the Proponent Preferred (subroute
14 4.1) consists of Farmland of Statewide or Unique Importance (table 4.11-14). The construction of the
15 transmission line would result in a minor direct effect by eliminating farmland from production, if it
16 cannot be avoided. No indirect effects to farmlands are anticipated. This does not represent a significant
17 reduction in the NRCS farmland classification acreage resulting from the Proponent Preferred. Additional
18 efforts to avoid farmlands would be available during completion of the final design.

19 Nearly 37 acres of rangeland in the ROW would be directly affected by the construction of the
20 transmission line under the Proponent Preferred (subroute 4.1). However, no grazing allotment acreage is
21 included (table 4.11-15). Therefore, no reduction in stocking rates would occur as a result of the
22 Proponent Preferred.

23 No direct or indirect effects of rangelands are expected to occur during the Project operation.

1 **Table 4.11-14.** Route Group 4 Summary of Acres of Impacted Farmlands

	Total Representative ROW Acreage	Farmland of Statewide Importance	Farmland of Unique Importance	Prime Farmland If Irrigated	Prime Farmland If Meeting Other Conditions	Permanent Disturbance (percent of total subroute acreage)
Subroute 4.1, Proponent Preferred						
U3b	8.2	0	0	0	7.1	
U3c	17.5	0	0	0	0.6	
U3d	62.4	0	0	0	0	
U3e	16.1	0	0	0	0	
U3f	12.4	0	0	0	6.8	
U3g	16.2	0	0	0	15.1	
U3h	19.8	0	1.5	0	123.9	
U3i	331.1	0	9.5	70.7	0	
U3j	15.9	0	0	15.9	99.3	
U3k	303.6	0	14.1	148.8	0	
U3l	28.1	0	0	27.2	0	
U3m	8.9	0	0	8.8	0	
U4	34.7	0	0	0	13.8	
Total	874.9	0	25.1			3%
Route Group 4 Local Alternatives						
MA1	19.0	0	0	19.0	0	0
TH1a	25.7	0	0	0	0	0
TH1b	28.4	0	0	0	1.6	0
TH1c	4.8	0	0	0	4.8	0
TH1-Option	7.7	0	0	0	0	0
TH3-Option A	15.1	0	0	0	3.9	0
TH3-Option B	14.5	0	0	0	11.4	0
TH3-Option C	29.3	0	2.2	0	21.5	7%
TH3a	49.7	0	4.0	0	11.7	8%
TH3b	81.4	0	24.6	0	21.9	30%

2 **Table 4.11-15.** Route Group 4 Summary of Acres of Impacted Rangelands

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
Subroute 4.1, Proponent Preferred						
U3b	8.2	0	0	0.3	0	0
U3c	17.5	0	0	0.2	0	0

1 **Table 4.11-15.** Route Group 4 Summary of Acres of Impacted Rangelands (Continued)

	Total Representative ROW Acreage	Total Grazing Allotment Acres	Estimated AUMs	Acres Permanently Removed	Percent of Allotment Acreage Impacted	Reduction in AUMs
U3d	62.4	0	0	2.5	0	0
U3e	16.1	0	0	0.7	0	0
U3f	12.4	0	0	0.5	0	0
U3g	16.2	0	0	0.4	0	0
U3h	19.8	0	0	0.2	0	0
U3i	331.1	0	0	13.1	0	0
U3j	15.9	0	0	0.7	0	0
U3k	303.6	0	0	15.6	0	0
U3l	28.1	0	0	1.0	0	0
U3m	8.9	0	0	0.2	0	0
U4	34.7	0	0	1.6	0	0
Route Group 4 Local Alternatives						
MA1	19.0	0	0	0.3	0	0
TH1a	25.7	0	0	0.3	0	0
TH1b	28.4	0	0	0.6	0	0
TH1c	4.8	0	0	0.1	0	0
TH1-Option	17.0	0	0	0.2	0	0
TH3-Option A	15.1	0	0	0.9	0	0
TH3-Option B	14.5	0	0	0.6	0	0
TH3-Option C	29.3	0	0	2.6	0	0
TH3a	49.7	0	0	2.7	0	0
TH3b	81.4	0	0	3.3	0	0

2 **LOCAL ALTERNATIVES**

3 There are 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a,
4 TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

5 **Construction**

6 Only three of the local alternatives—TH3a, TH3b, and TH3-Option C—would result in minor direct
7 effects to Farmlands of Unique Importance. The construction of the transmission line would result in a
8 direct effect by eliminating farmland from production. This represents a reduction in the NRCS farmland
9 classification acres resulting from the Proponent Preferred alternative, but does not take into account
10 avoidance of farmlands during completion of the final design or whether active farmlands are present.
11 Because the proponent would avoid existing active farmlands, direct impacts to farmlands would not be
12 considered significant. No indirect effects to farmlands are anticipated.

13 Minimal acres of rangeland in the ROW would be directly affected by the construction of the
14 transmission line under any of these local alternatives. No grazing allotment acreage is included in the

1 areas represented by the alternatives, and therefore no loss of AUMs would occur as a result of
2 construction under any of these alternatives.

3 ***Agency Preferred Alternative***

4 Construction of the Agency Preferred Alternative would have direct effects on farmlands and rangelands
5 by removing land acreage from productivity. Approximately 1,178 acres of Farmland of Statewide
6 Importance would be impacted under the Agency Preferred Alternative. Approximately 25 acres of
7 Farmland of Unique Importance would be impacted under the Agency Preferred Alternative.
8 Approximately 493 acres of Prime Farmland (irrigated) and 291 acres of Prime Farmland (other) would
9 be impacted under the Agency Preferred Alternative. These totals would not exceed a 10% or greater loss
10 of prime or unique farmlands, and impacts would be the same as described under “Impacts Common to
11 All Action Alternatives.” The impacts would be short-term in duration, and except in extraordinary
12 circumstances, would cease during operation and maintenance since siting of the Agency Preferred
13 Alternative would allow for prime and unique farmlands to be spanned by transmission line.

14 Approximately 478 acres of existing BLM allotment acreages would be permanently removed from
15 existing grazing allotments under the Agency Preferred Alternative. This permanent removal would be
16 required since the footprints of the transmission line towers would preclude grazing. The impact to
17 rangeland would be minor since this reduction represents a less-than 0.001 percent reduction in total acres
18 for allotments within the analysis area, but would be a long-term impact that would persist throughout the
19 life of the proposed Project.

20 ***Additional Mitigation Measures***

21 Laydown areas and substation development would be located on previously disturbed land, where
22 possible, to reduce the impact to farm operations and production in active farmlands. If laydown areas
23 cannot avoid farmlands, the proponent would receive approval from the landowner of the farmland to
24 lease the land required for the laydown area. Temporary gates would be installed to prevent livestock
25 from escaping rangelands and accessing roadways. Fences and gates would be repaired or replaced to
26 their original, predisturbed condition, as required by the landowner or the BLM Authorized Officer if they
27 are damaged or destroyed by construction activities. Cattle guards would be installed at access points to
28 prevent livestock from exiting unsecured gates onto roadways.

29 ***Residual Impacts***

30 The additional mitigation measures suggested above, if implemented, should address residual impacts to
31 farmlands and rangelands. Residual impacts remaining would consist of loss of minimal acres of farm and
32 rangeland. This loss would not exceed 10 percent of the analysis area and would not be a significant
33 impact.

34 ***Unavoidable Adverse Impacts***

35 Loss of productive farmland and rangeland would occur as a result of the construction of the transmission
36 line and associated infrastructure, although the total acreage removed as a comparison to the total acres in
37 each use would be insignificant. These impacts would reduce the amount of agriculturally productive
38 acreage on existing farmlands, and result in small decreases in stocking rates on some grazing allotments.

1 **Short-term Uses versus Long-term Productivity**

2 Short-term effects on farmlands would result if laydown areas were located in active agricultural areas
3 with permission to lease the land from the landowner. Similar effects would occur in rangelands areas,
4 since these locations would need fencing to prohibit access from livestock during construction. However,
5 these impacts would be minimal because laydown areas would be largely or entirely selected to be located
6 on previously disturbed areas. As such, these areas would provide little or no forage, and would not
7 represent a reduction in forage. Any laydown areas that are not able to be located on previously disturbed
8 areas would revert back to productive agriculture or rangelands following termination of construction
9 activities.

10 The action alternatives would result in long-term losses of agricultural and rangeland productivity where
11 substations, roads, and other permanent disturbance would occur. Rehabilitation of the temporary
12 rangeland disturbances in the ROW would be completed, but due to low precipitation and semi-arid
13 conditions in the region, these areas may not be available in the short-term for livestock grazing. No long-
14 term loss of temporarily disturbed farmlands would be expected to occur since these lands are more easily
15 rehabilitated by planting and irrigation.

16 **Irreversible and Irretrievable Commitments of Resources**

17 There would be an irreversible loss of minimal acreage of productive farmland where impacts to this
18 resource cannot be avoided. Loss of some rangeland would also occur, but the reduction in grazing
19 acreage available would have an insignificant overall impact on stocking rates. The temporary disturbance
20 to farmlands and rangelands would not be considered an irretrievable loss.

21 **4.11.3 Military Operations Introduction**

22 This section describes the impacts to military uses associated with the construction and operation and
23 maintenance of the proposed transmission line, substations, and ancillary facilities. Impacts to military
24 uses are discussed in terms of direct impacts on DOD-owned land, leased land, or withdrawn Federal
25 land; military bases, bombing ranges, gunnery ranges (including EPGs), airports, and airspace; parachute
26 drop zones; and MTRs. The analysis indicates whether the proposed Project directly or indirectly results
27 in impacts to access to military owned, leased, or withdrawn (including EPGs) lands as a result of fencing
28 or other physical or legal barriers necessary for construction, operation, and maintenance of the proposed
29 Project (any of the action alternatives). The analysis indicates whether the proposed Project would
30 conflict with, or put limitations on, existing and/or future military activities and/or missions. The impacts
31 described in this section are based on information provided in “Southline Transmission Project Resource
32 Report 19: Military Operations” (CH2M Hill 2013m). The contents of that report are used herein without
33 specific reference.

34 **Methodology and Assumptions**

35 **ANALYSIS AREA**

36 The analysis area military operations for the both the New Build Section and Upgrade Section includes
37 any military operation, MTRs, and military installation that may intersect with the footprint for the action
38 alternatives. This includes a 1-mile buffer around the BSETR. The analysis area includes the proposed
39 Project footprint total acreage (approximately 0 to 2,000 acres, depending upon alternative) as well as the
40 intersection of the proposed Project with the 1.6 million-acre BSETR. The 1-mile buffer also accounts for
41 potential EMF impacts along transmission lines, which according to military staff from the BSETR is up

1 to 1 km on either side of a transmission line. This analysis area is used to identify military operations,
2 MTRs, and military installations that could be directly, indirectly, or cumulatively impacted by surface
3 disturbance, above-surface facilities (i.e., towers, spans) and where construction materials, equipment,
4 and workers may be present.

5 **ANALYSIS ASSUMPTIONS**

6 There are no specific analysis assumptions for military uses beyond the impact indicators and significance
7 criteria described below.

8 **IMPACT INDICATORS**

9 The impact indicator is the presence of any military operation, MTRs, and military installation within the
10 analysis area.

11 **SIGNIFICANT IMPACTS**

12 For the purposes of this analysis, a significant impact on military uses could result if any of the following
13 were to occur from construction, operation, or maintenance of the Project:

- 14 • Physically conflicts with existing military uses (i.e., displacement of MTRs, increased EMF or
15 displacement of parachute drop zones).
- 16 • Changes military air traffic patterns, including either an increase in traffic levels or a change in
17 location that results in safety risks.
- 18 • Directly or indirectly impacts access to military owned, leased, or withdrawn (including EPGs)
19 land as a result of fencing, or other physical or legal barriers necessary for construction,
20 operation, and maintenance of the proposed Project and alternatives.
- 21 • Conflicts with, or puts limitations on existing and/or future military activities and/or missions.

22 ***Impacts Analysis Results***

23 **NO ACTION ALTERNATIVE**

24 Under the no action alternative the BLM would not grant the ROW for the proposed Project. However,
25 under the no action alternative, Western still plans to upgrade the existing lines between the Apache and
26 Saguaro substations within the next 10 years, per Western's 10-year capital improvement plan (Western
27 2012a). There would be no new impacts on military uses from the no action alternative. Current military
28 operations would continue as they currently take place.

29 **IMPACTS COMMON TO ALL ACTION ALTERNATIVES**

30 **Construction**

31 Potential impacts from construction activities that would be common to all action alternatives would
32 include temporary ground disturbance in areas where the transmission line, substations, and ancillary
33 facilities intersect with military owned, leased, or withdrawn (including EPGs) land. The transmission
34 lines would be constructed on lands below MTR visual routes (VRs) or in areas where training is for
35 electronics and communications. The MTR VRs that would include construction only occur on portions
36 of the analysis area and do not affect the entire MTR VRs. Impacts on military uses from ground
37 disturbance would not be significant as all operations/training occurring in VRs is aerial in nature and the
38 BSETR is used for electronics and communications testing. Further, these impacts would be below the

1 AGL thresholds since the areas that may intersect MTR VRs include existing transmission line facilities
2 that are already below AGL thresholds, and the military operations have operated in conjunction with
3 these facilities previously.

4 The airspace included in some VRs would be impacted since construction of the towers and spans would
5 introduce a new/higher obstruction than previously existed. Where poles are replaced with higher height
6 single poles and increased power transmission, this could have an effect on operations on the approach
7 and departure end of the runway and helipads used in area of operations and could have an effect on the
8 drop zones. The increase height and power could have an effect on radio transmissions. This airspace may
9 be used by manned or unmanned vehicles. Since most of the construction is being performed on areas that
10 currently already occupy airspace, most of the impacted VRs are already avoided by the military.
11 However, construction activities (e.g., cellular phone and/or 2-way radio use) may have minor, short-term
12 impacts to BSETR activities.

13 Helicopters may be used during construction and maintenance activities. To avoid conflicts with military
14 airspace, the appropriate military scheduler(s) and the CBP representative(s) would be contacted to
15 schedule airspace usage for any construction and maintenance activity on lands that could be used for
16 military and/or CBP training or other flights.

17 **Operation and Maintenance**

18 Potential impacts from operation and maintenance that would be common to all action alternatives
19 include physical conflicts where Project facilities penetrate the floor (minimum flight elevation) of
20 restricted airspace. This could require changes to military air traffic patterns to increase the minimum
21 flight elevation(s) for low-level training in MTR VRs to avoid potential collisions with transmission lines.
22 Changes to military air traffic patterns would be a moderate impact, since flight operations would not
23 need to be relocated, but would need to be adjusted where an intersection of military operations with the
24 proposed Project or alternatives would occur. This moderate impact would require advanced planning and
25 coordination amongst the military operations command and planning documents/procedures.

26 Other impacts would include changes to the “zero point” level for electronics and communications testing
27 purposes on the BSETR, which would require Fort Huachuca to revise its radio frequency emitter
28 inventory for this area to account for the new design and operation of the line. Revisions to radio
29 frequency emitter inventories would be a moderate impact, since the inventories would not need to be
30 relocated, but would need to be adjusted where an intersection of military operations with the proposed
31 Project or alternatives would occur. This moderate impact would require advanced planning and
32 coordination amongst the military operations command and planning documents/procedures. It is
33 important to note that the existing transmission lines that are currently in operation within the analysis
34 area are already accounted for in the existing EMF calculations.

35 Access road construction may increase access for OHV and other users in areas where the Project
36 facilities occur on the BSETR. This could lead to increased levels of unauthorized use in areas that are
37 closed to OHV and other uses, however locked gates and fencing would preclude unauthorized OHV use
38 where prohibited. Refer to “Additional Mitigation Measures,” below.

39 The operational impacts to the Upgrade Section of the proposed Project and alternatives would be minor
40 since the existing facilities are already be accounted for during military operations. These moderate
41 impacts would require future military operations planning to account for the action alternatives (if the
42 Project ROW is granted), thus moderately increasing the limitations for future or planned military uses.

1 **Route Group 1 – Afton Substation to Hidalgo Substation**

2 **SUBROUTE 1.1 – PROPONENT PREFERRED**

3 **Construction**

4 Segment P2 of Subroute 1.1 would cross MTR VR-263 (table 4.11-16). Construction impacts would be as
 5 described above in “Impacts Common to All Action Alternatives.”

6 **Operation and Maintenance**

7 Segment P2 of Subroute 1.1 would cross MTR VR-263. At the crossing of VR-263 the minimum flight
 8 altitude is 100 feet AGL. Therefore, the optional structure height of 90 feet (as described in section 2.4.2)
 9 would be required at MTR VR-23 in order to prevent impacts to MTR-263. No other military installations
 10 or MTRs are present in subroute 1.1. Impacts for operation and maintenance of this subroute were
 11 described above in “Impacts Common to All Action Alternatives.”

12 **Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data**

	Total Miles	MTR VRs (miles)	MOAs (miles)	Willcox Playa DOD (miles)	BSETR (miles)
Subroute 1.1, Proponent Preferred					
P1	5.1	0	0	0	0
P2	102.0	0.1	0	0	0
P3	31.1	0	0	0	0
P4a	8.7	0	0	0	0
Subroute 1.2, Proponent Alternative					
S1	13.4	0	0	0	0
S2	11.1	0	0	0	0
S3	12.9	0	0	0	0
S4	10.6	0	0	0	0
S5	29.7	0	0	0	0
S6	7.4	0	0	0	0
S7	41.5	0.1	0	0	0
S8	14.6	0	0	0	0
Route Group 1 Local Alternatives					
DN1	42.5	0.1	0	0	0
A	17.5	0	0	0	0
B	12.2	0	0	0	0
C	9.0	0	0	0	0
D	22.8	0	0	0	0

1 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

2 **Construction**

3 MTR VR-263 would be crossed by segment S7 of Subroute 1.2. Construction impacts would be as
4 described above in “Impacts Common to All Action Alternatives.”

5 **Operation and Maintenance**

6 MTR VR-263 would be crossed by segment S7 of Subroute 1.2. At the intersection of subroute 1.2 and
7 MTR VR-263 the minimum flight altitude is 100 feet AGL. Therefore, the optional structure height of 90
8 feet (as described in section 2.4.2) would be required at MTR VR-263 in order to prevent impacts to MTR
9 VR-263. Unmitigated, segment S7 would result in moderate impacts to MRT VR-263 due to the potential
10 for airspace limitations at 100 feet AGL. No other military installations or MTRs are present within
11 subroute 1.2. The Tombstone MOA is located approximately 3 miles south of the subroute and would not
12 be impacted by subroute 1.2. Impacts for operation and maintenance of this subroute would be as
13 described above in “Impacts Common to All Action Alternatives.”

14 **LOCAL ALTERNATIVES**

15 There are five local alternatives available for route group 1: DN1, A, B, C, and D.

16 **Construction**

17 Local alternatives A, B, C, and D do not intersect with any military facilities or MTR VRs. Local
18 alternative DN1 would cross MTR VR-263. Construction impacts would be as described above in
19 “Impacts Common to All Action Alternatives.”

20 **Operation and Maintenance**

21 Local alternatives A, B, C, and D do not intersect with any military facilities or MTR VRs. Local
22 alternative DN1 would intersect with MTR VR-263. At the intersection of local alternative DN-1 and
23 MTR VR-263, the minimum flight altitude is 100 feet AGL. Therefore, the optional structure height of 90
24 feet (as described in section 2.4.2) would be required at MTR VR-263 in order to prevent impacts to
25 MTR-263. Unmitigated, DN-1 would result in moderate impacts to MRT VR-263 due to the potential for
26 airspace limitations at 100 feet AGL. Impacts for operation and maintenance of the local alternatives were
27 described above in “Impacts Common to All Action Alternatives.”

28 ***Route Group 2 – Hidalgo Substation to Apache Substation***

29 **SUBROUTE 2.1 – PROPONENT PREFERRED**

30 **Construction**

31 Segment P7 of Subroute 2.1 would cross the Willcox Playa, which is managed by the BSETR and is a
32 possible site for test operations as well as MTR VR-259 and VR-260 (table 4.11-17). Construction
33 impacts would be as described above in “Impacts Common to All Action Alternatives.”

34 **Operation and Maintenance**

35 Segment P7 of subroute 2.1 would cross the Willcox Playa, which is managed by the BSETR and is a
36 possible site for test operations. Segment P7 crosses DOD land for approximately 0.2 mile. This impact

1 would be minor since P7 follows an existing transmission line and the military is already avoiding this
 2 area due to the presence of the existing 230-kV transmission line. The Proponent Preferred subroute 2.1
 3 would lead to changes in the “zero point” level for electronics and communications testing purposes on
 4 the BSETR. Where subroute 2.1 intersects with MTR VR-259 and VR-260, the minimum flight altitudes
 5 are 700 feet AGL and 300 feet AGL, respectively, well above the proposed structure height of 90 to 170
 6 feet, as described in section 2.4.2. Impacts for operation and maintenance of this subroute were described
 7 above in “Impacts Common to All Action Alternatives.”

8 **Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data**

Segment	Total Miles	MTR VRs (miles)	MOAs (miles)	Willcox Playa DOD (miles)	BSETR (miles)
Subroute 2.1, Proponent Preferred					
P4b	14.0	0	0	0	0
P4c	1.9	0	0	0	0
P5a	9.6	0	0	0	0
P5b	21.1	0	0	0	0
P6a	0.9	0	0	0	0
P6b	22.5	0.1	0	0	0
P6c	2.8	0	0	0	0
P7	22.3	0.5	0	0.2	0
P8	0.5	0	0	0	0
Subroute 2.2, Proponent Alternative					
E	31.8	0	0	0	0
F	25.3	0*	0	0	0
Ga	25.7	0	0	0	0
Gb	1.0	0	0	0	0
Gc	7.4	0.1	0	0	0
I	2.3	0	0	0	0
J	2.3	0	0	0	0
Route Group 2 Local Alternatives					
LD1	35.4	0	0	0	0
LD2	9.6	0	0	0	0
LD3a	27.9	0.1	0	0	0
LD3b	1.9	0	0	0	0
LD4	51.7	0.1	19.2	0	0
LD4-Option 4	6.5	0	0	0	0
LD4-Option 5	12.3	0	0	0	0
WC1	14.8	0	0	0	0

9 * Value greater than zero but less than 0.1.

1 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

2 **Construction**

3 Temporary ground disturbance would occur during construction activities where segments F and Gc
4 would cross MTRs VR-259 and VR-260. These would result in minor impacts for subroute 2.2 as it
5 would occur below the MTRs, which are used for aerial training, electronics, and communications testing.
6 Additional construction impacts would be as described above in “Impacts Common to All Action
7 Alternatives.”

8 **Operation and Maintenance**

9 Segments F and GC of Subroute 2.2 would cross MTRs VR-259 and VR-260. Where VR-259 would
10 intersect with subroute 2.2 the minimum flight altitude is 700 feet AGL. Where VR-260 would intersect
11 the subroute the minimum flight elevation is 300 feet AGL. The impacts of these intersections would be
12 minor since as it would occur below the MTR’s AGL. Impacts for operation and maintenance of this
13 subroute were described above in “Impacts Common to All Action Alternatives.”

14 **LOCAL ALTERNATIVES**

15 There are eight local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
16 4, LD4-Option 5, and WC1.

17 **Construction**

18 Local alternatives LD3a and LD4 would intersect with MTR VR-1233. LD4 would also intersect with
19 VR-260 and the Morenci MOA. Construction impacts would be as described above in “Impacts Common
20 to All Action Alternatives.”

21 **Operation and Maintenance**

22 Local alternatives LD3a and LD4 would intersect with MTR VR-1233. LD4 would also intersect with
23 VR-260. The minimum flight elevation at these intersections is 300 feet AGL. LD4 would also cross the
24 Morenci MOA. The Morenci MOA occurs at an altitude between 1,500 feet AGL and 17,999 feet AMSL.
25 As Project activities would occur approximately 200 feet AGL, it is not anticipated that the MOA would
26 be impacted by LD4. Additional impacts for operation and maintenance of the local alternatives were
27 described above in “Impacts Common to All Action Alternatives.”

28 ***Route Group 3 – Apache Substation to Pantano Substation***

29 **SUBROUTE 3.1 – PROPONENT PREFERRED**

30 **Construction**

31 Temporary ground disturbance would occur during construction activities where the analysis area
32 (segments U1a, U1b, U2, and local alternative H), the Adams Tap Substation expansion, and
33 representative staging area 10 would cross the BSETR (table 4.11-18). The substation expansion would
34 occur on 5.6 acres and the representative staging area would occur on 19.8 acres of the BSETR. This
35 would not be a significant impact for subroute 3.1, since it would occur in the BSETR, which is used for
36 electronics and communications testing. Additional construction impacts would be as described above in
37 “Impacts Common to All Action Alternatives.”

1 **Table 4.11-18.** Route Group 3 Military Uses Resource Inventory Data

	Total Miles	MTR VRs (miles)	MOAs (miles)	Willcox Playa DOD (miles)	BSETR (miles)
Subroute 3.1, Proponent Preferred					
U1a	16.1	0	0	0	10.3
U1b	2.9	0	0	0	2.9
U2	15.8	0	0	0	10.0
U3a	35.6	0	0	0	0
Route Group 3 Local Alternative					
H	19.3	0	0	0	8.7

2 **Operation and Maintenance**

3 Segments U1a, U1b, and U2 of Subroute 3.1 would cross the BSETR. The upgrade of the existing
 4 Western 115-kV transmission line between Apache and Benson to a double-circuit 230-kV design,
 5 therefore, would require Fort Huachuca to revise its radio frequency emitter inventory for this area to
 6 account for the new design and operation of the line. An upgrade of the existing line would include a
 7 higher electronic emission, however any transmission line design would use best available technology to
 8 minimize EMF, therefore upgrading the existing line could actually reduce EMF from current emissions.
 9 Thus the impacts of the Agency Preferred Alternative to military uses in the BSETR would also be
 10 negligible. Finally, the BLM and Western are working with the DOD clearinghouse, BSETR, and EPG
 11 to develop mitigation (see “Additional Mitigation Measures” below).

12 The Adams Tap Substation expansion and representative staging area 10 would occur within portions of
 13 the BSETR. The substation expansion would occur on 5.6 acres and the representative staging area would
 14 occur on 19.8 acres of the ETR. This would not be a significant impact for subroute 3.1, since it would
 15 occur in the BSETR, which is used for electronics and communications testing. Subroute 3.1 (Proponent
 16 Preferred) lead to ground disturbance and changes in the “zero point” level for electronics and
 17 communications testing purposes on the ETR. Approximately 13 miles of segment U1 and U1b and
 18 approximately 9 miles of segment U2 of Subroute 3.1 would intersect the BSETR.

19 No other military facilities are located within the analysis area for subroute 3.1. Impacts for operation and
 20 maintenance of this subroute were described above in “Impacts Common to All Action Alternatives.”

21 **LOCAL ALTERNATIVES**

22 There is one local alternative for route group 3—local alternative H.

23 **Construction**

24 Temporary ground disturbance would occur during construction activities within the analysis area.
 25 Construction impacts would be as described above in “Impacts Common to All Action Alternatives.”

26 **Operation and Maintenance**

27 Local alternative H would cross the BSETR for a length of approximately 8 miles. The construction of
 28 local alternative H, instead of upgrading the existing Western line along I-10, would lead to changes in

1 the “zero point” level for electronics and communications testing purposes on the BSETR.
2 Implementation of local alternative H would shift the EMF impacts north away from I-10, into an area
3 used by EPG for electronic and communications testing.

4 No other military facilities are located within this local alternative. Impacts for operation and
5 maintenance of this local alternative were described above in “Impacts Common to All Action
6 Alternatives.”

7 **Route Group 4 – Pantano Substation to Saguaro Substation**

8 **SUBROUTE 4.1 – PROPONENT PREFERRED**

9 **Construction**

10 No military facilities are located within the analysis area in subroute 4.1 (table 4.11-19). Therefore, there
11 would be no construction-related impacts on military uses in subroute 4.1.

12 **Table 4.11-19.** Route Group 4 Military Uses Resource Inventory Data

Segment	Total Miles	MTR VRs (miles)	MOAs (miles)	Willcox Playa DOD (miles)	BSETR (miles)
Subroute 4.1, Proponent Preferred					
U3b	0.5	0	0	0	0
U3c	1.0	0	0	0	0
U3d	3.4	0	0	0	0
U3e	0.9	0	0	0	0
U3f	0.7	0	0	0	0
U3g	0.9	0	0	0	0
U3h	1.1	0	0	0	0
U3i	18.2	0	0	0	0
U3j	0.9	0	0	0	0
U3k	16.7	0	0	0	0
U3l	1.6	0	0	0	0
U3m	0.6	0	0	0	0
U4	1.9	0	0	0	0
Route Group 4 Local Alternatives					
MA1	1.1	0	0	0	0
TH1a	1.4	0	0	0	0
TH1b	1.6	0	0	0	0
TH1c	0.3	0	0	0	0
TH1-Option	1.0	0	0	0	0
TH3-Option A	0.8	0	0	0	0
TH3-Option B	0.8	0	0	0	0
TH3-Option C	1.8	0	0	0	0
TH3a	2.7	0	0	0	0
TH3b	4.5	0	0	0	0

1 **Operation and Maintenance**

2 No military facilities are located within the analysis area in subroute 4.1. Davis-Monthan Air Force Base
3 and Pinal Airpark are located 3.7 miles from the analysis area. Tucson International Airport and the
4 Silverbell Army Heliport are located approximately 2 miles and 1 mile, respectively, from the analysis
5 area. No impacts would occur at the Davis-Monthan Air Force Base or Tucson International Airport.
6 Minor impacts to military operations at Pinal Airpark and Silverbell Army Heliport are anticipated from
7 the Proponent Preferred, subroute 4.1 since the upgrades would introduce new tower heights and the
8 increased transmission capacity may interfere with radio transmissions. Specifically, higher height single
9 poles and increase power could have an effect on Pinal Airpark and Silver Bell Army Heliport's area of
10 operations on the approach and departure end of the runway and helipads to the North of Pinal Airpark
11 and Silver Bell Army Heliport's area of operations and could have an effect on the parachute drop zone
12 from the west. The increased height and power could have an effect on Pinal Airpark and Silver Bell
13 Army Heliport area of operation radio transmissions.

14 **LOCAL ALTERNATIVES**

15 There ten nine local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option,
16 TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

17 **Construction**

18 Local alternatives MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a, TH3b, TH3-Option A, TH3-Option B,
19 and TH3-Option C would not intersect with any areas of military uses. Therefore, they are not anticipated
20 to have any construction-related impact on military uses.

21 **Operation and Maintenance**

22 Local alternatives MA1, TH1a, TH1b, TH1c, TH1 Option, TH3a, TH3b, TH3-OptionA, TH3-OptionB,
23 and TH3-OptionC would not intersect with any areas of military uses. Therefore, they are not anticipated
24 to have any operational or maintenance-related impact on military uses.

25 ***Agency Preferred Alternative***

26 During construction as well as operation and maintenance, the Agency Preferred Alternative would result
27 in short-term and moderate impacts to military use of airspace along the Upgrade Section of the Agency
28 Preferred Alternative, due to taller tower heights and an increase in power flow. The increase height and
29 power could have an effect on radio transmissions for military uses.

30 The Agency Preferred Alternative was developed in coordination with the DOD clearinghouse, as well as
31 staff from BSETR and the EPG. The Agency Preferred Alternative was identified in order to minimize
32 impacts to military operations near Willcox Playa and to the BSETR. Though segment P7 would cross
33 DOD-owned land on the southeast portion of the Willcox Playa, this segment would be located along an
34 existing transmission line ROW, and would be the furthest away from the most sensitive military use
35 areas of the Willcox Playa and BSETR.

36 Similarly, though upgrade of the existing Western line (segments U1a, U1b, and U2 of the Agency
37 Preferred Alternative) crosses the BSETR, EMF from the existing line is already part of the baseline
38 calculations within BSETR. Further, no electronic testing is currently conducted in the area of the existing
39 Western 115-kV line because of the existing line, I-10 corridor, topography, and other interference
40 disturbances. An upgrade of the existing line would include a higher electronic emission, however any
41 transmission line design would use best available technology to minimize EMF, therefore upgrading the

1 existing line could actually reduce EMF from current emissions. Thus the impacts of the Agency
2 Preferred Alternative to military uses in the BSETR would also be negligible. Finally, the BLM and
3 Western are working with the DOD clearinghouse, BSETR, and EPG to develop mitigation (see
4 “Additional Mitigation Measures” below).

5 ***Additional Mitigation Measures***

6 The following additional mitigation measure relevant to military uses have been recommended by the
7 Arizona Air National Guard, 162nd Fighter Wing Airspace Manager.

- 8 • Lower the transmission lines in areas intersecting MTRs VR-259, VR-260, and VR-263 to
9 remove impacts to military training and airspace usage. Additionally, do not erect any structures
10 exceeding 200 feet in height.

11 The following additional mitigation measures relevant to military operations at BSETR have been
12 recommended by Fort Huachuca:

- 13 • The transmission line operator would work with BSETR to coordinate, and possibly limit,
14 interconnections to the proposed Southline Project to the extent allowed by FERC;
- 15 • Southline and Western would work with BSETR to identify micro-siting opportunities during
16 Project design. Utilize electromagnetic effects—reducing construction techniques and/or special
17 construction to ensure minimal electromagnetic effects;
- 18 • The transmission line operator would coordinate with BSETR during the design phase of the
19 proposed Project to limit EMI. The proposed Project would be constructed using the best
20 available construction techniques and technology (i.e., use of grounding, selective conductor type
21 and arrangement, and conductor surface gradients), to the extent feasible and reasonably
22 economical, in order to minimize EMI.
- 23 • The transmission line operator would coordinate with BSETR to allow for an updated measure of
24 the “floor value” of the proposed Project, once the proposed line is energized. Such cooperation
25 could include provision of real-time operating and load information to the BSETR to help
26 calibrate the floor value of EMI.
- 27 • The transmission line operator would coordinate with BSETR to develop reporting standards, for
28 potential inclusion in the transmission line maintenance and inspection program, to the extent
29 allowable by FERC. While normal inspection maintenance would take care of typical EMI issues,
30 specific incidents such as storm damage or vandalism would need to be responded to outside of
31 the normal maintenance cycle. If not detectable through transmission line monitoring, the
32 operator would need to hear from someone experiencing interference in order to respond.
- 33 • The transmission line operator would coordinate planned outages (curtailment of power line
34 operations for BSETR to implement testing) with BSETR to the extent feasible in order to meet
35 necessary contractual commitments, utility mandates, laws and regulations, and power system
36 requirements. The operator is very limited in the timing and duration of potential outages; outages
37 stress the rest of the system which can cause system failures.

38 ***Residual Impacts***

39 Residual impacts could include the loss of airspace along MTR VRs if mitigation to lower the
40 transmission lines in areas intersecting the VRs is not successful in lowering the lines below the minimum
41 flight elevations. Because flight operations would not be required to relocate, the residual loss of airspace
42 along MRT VRs would be a moderate impact.

1 ***Unavoidable Adverse Impacts***

2 The construction, operation and maintenance of the proposed Project would not cause unavoidable
3 adverse impacts on military uses.

4 ***Short-term Uses versus Long-term Productivity***

5 The construction, operation and maintenance of the proposed Project and action alternatives is unlikely to
6 cause short-term uses of the environment that would affect the long-term productivity of military uses.

7 ***Irreversible and Irrecoverable Commitments of Resources***

8 No irreversible or irretrievable commitment of military uses resources would occur as a result of the
9 action alternatives.

10 **4.12 SPECIAL DESIGNATIONS**

11 **4.12.1 Introduction**

12 This section describes the impacts to special designations associated with the construction and operation
13 and maintenance of the transmission line, substations, and ancillary facilities. Potential impacts to special
14 designations are discussed in terms of Project activities directly or indirectly altering, conflicting, or
15 requiring new management prescriptions for special designations. The impacts described in this section
16 are based on information provided in “Southline Transmission Project Resource Report 13: Special
17 Designations” (CH2M Hill 2013n). The contents of that report are used herein without specific reference.

18 **4.12.2 Methodology and Assumptions**

19 The analyses for special designations include an assessment of whether Project-related actions would
20 alter, conflict with, or require new management prescriptions and objectives, or otherwise physically or
21 administratively affect State or federally established, designated, or reasonably foreseeable planned
22 special use areas. All BLM special designations are intended to conserve, protect, enhance, and manage
23 public lands for the benefit and enjoyment of present and future generations.

24 ***Analysis Area***

25 As discussed in chapter 3, section 3.12, the special designation analysis area is the representative ROW
26 with a 1-mile buffer on each side of the centerline for route groups 1 and 2 and a 200-foot buffer on each
27 side of the existing 100-foot ROW for route groups 3 and 4.

28 ***Analysis Assumptions***

29 There are no specific analysis assumptions for special designations beyond the impact indicators and
30 significance criteria described below.

31 ***Impact Indicators***

- 32 • Whether the proposed Project would conflict with the goals, objectives, and resources a particular
33 special designation is intended to protect.

1 **Significant Impacts**

2 Effects on special designations would occur if construction and operation/maintenance of the Project
3 conflicts with the objectives of the special designation. The Project could have potential effects on natural
4 qualities, outstanding opportunities for solitude and primitive recreation, and values such as visual
5 resources and visibility from special designations.

6 For the purposes of this analysis, a significant impact on special designations would occur if:

- 7 • The proposed Project would conflict with the goals, objectives, and resources a particular special
8 designated area is intended to protect.

9 **4.12.3 Impacts Analysis Results**

10 **No Action Alternative**

11 Under the no action alternative, the BLM would not grant the ROW for the proposed Project. Analysis
12 area conditions would likely continue at current levels and trends. Even under the no action alternative,
13 Western still plans to upgrade the existing lines between the Apache and Saguaro substations within the
14 next 10 years, per Western’s 10-year capital improvement plan (Western 2012a). However, there would
15 be no impacts on special designations within the analysis area from the no action alternative since no
16 activities would conflict with the goals, objectives, and resources of special designations.

17 **Impacts Common to All Action Alternatives**

18 **CONSTRUCTION**

19 Potential impacts from construction activities that would be common to all action alternatives include
20 direct ground disturbance and temporary increases in ambient noise levels in areas where the transmission
21 line, substations, and ancillary facilities intersect with special designations. The only BLM special
22 designations that would be intersected by the proposed Project would be National Trails and/or Trails
23 Under Study for National Designation. Though other special designations may be included in the analysis
24 area, only National Trails would be intersected by the proposed Project. Increases in ambient noise levels,
25 the presence of equipment, and dust would be temporary and would decrease with the completion of
26 construction activities. Impacts to special designations during construction would be minor since the
27 activities would be short-term in nature, and would not occur within special designations; National Trails
28 being the exception (refer to appendix F for a detailed National Trails Assessment). Substation
29 expansions that may occur within County special designations would be constructed in areas that are
30 already in operation and have been previously disturbed.

31 **OPERATION AND MAINTENANCE**

32 Potential impacts common to all action alternatives could include indirect impacts to Wilderness, WSAs,
33 ACECs, and National Monuments, where Project facilities would be sited near these special designations.
34 Potential indirect impacts could include changes to the natural, historic, cultural, or visual character of
35 some special designations. Other impacts could include increased access to areas due to the presence of
36 access roads. This could lead to increased use of areas by OHV users, which could conflict with
37 management objectives for some special designations.

38 There would be no direct impacts on designated wilderness areas and WSAs, as no facilities would be
39 sited within wilderness area or WSA boundaries. Potential indirect impacts would include loss of

1 outstanding opportunities for solitude or primitive and unconfined recreation as a result of changes to the
 2 visual character of the surrounding lands; these impacts are anticipated to be minor since existing
 3 facilities (e.g., transmission lines, pipelines, roads) would also be visible.

4 Despite potential indirect impacts on wilderness areas and WSAs from changes in the visual character of
 5 the surrounding lands, the impacts to wilderness and/or WSAs would be minor. The New Mexico
 6 Wilderness Act of 1980, the Arizona Wilderness Act of 1984, and the Arizona Desert Wilderness Act of
 7 1990 all indicate that Congress did not intend for the designation of wilderness areas to lead to the
 8 creation of protective perimeters and buffer zones. The acts state, “The fact that nonwilderness activities
 9 or uses can be seen or heard from within the wilderness shall not, of itself, preclude such activities or uses
 10 up to the boundary of the wilderness area.” As such, while indirect visual or noise related impacts from
 11 the proposed Project could affect outstanding opportunities for solitude or primitive and unconfined
 12 recreation in wilderness areas or WSAs, these actions would not preclude the proposed Project or
 13 alternatives.

14 Potential impacts on trails would include direct impacts where facilities would be sited within the
 15 designated trail corridor. Potential indirect impacts could include changes to the visual character, historic,
 16 natural, or cultural qualities of the trail as well as temporary increases in ambient noise levels during
 17 maintenance activities. However, these impacts would be minor since all crossings of National Trails
 18 (including trails under study for national designation) would occur in areas that include existing
 19 transmission facilities.

20 Potential impacts on ACECs would not include direct impacts, as none of the proposed Project or
 21 alternatives would be sited within ACEC boundaries. Indirect impacts could include changes to the
 22 natural, historic, cultural, or visual character of the ACEC. These impacts would be minor since none of
 23 the disturbance would take place within the ACEC, and the proposed Project would be located along
 24 existing utilities in the areas where the Project would be adjacent to the ACECs.

25 For route groups 3 and 4, the magnitude of impacts would be reduced compared with those in route
 26 groups 1 and 2, as the existing line would be upgraded rather than a new build. Impacts to visual resource
 27 management areas are described in Sections 4.10 and 4.11.1, “Visual Resources” and “Land Use,”
 28 respectively.

29 ***Route Group 1 – Afton Substation to Hidalgo Substation***

30 Table 4.12-1 describes which segments within route group 1 would intersect special designations.
 31 Acreages are not additive and may overlap.

32 **Table 4.12-1.** Route Group 1 Special Designations Resource Inventory Data

Segment	Total Miles	Continental Divide Trail (miles)	Butterfield Trail (miles)
Subroute 1.1, Proponent Preferred			
P1	5.1	0	0
P2	102.0	0	0*
P3	31.1	0	0
P4a	8.7	0.1	0

33

1
2

Table 4.12-1. Route Group 1 Special Designations Resource Inventory Data
(Continued)

Segment	Total Miles	Continental Divide Trail (miles)	Butterfield Trail (miles)
Subroute 1.2, Proponent Alternative			
S1	13.4	0	0
S2	11.1	0	0
S3	12.9	0	0
S4	10.6	0	0
S5	29.7	0	0
S6	7.4	0	0
S7	41.5	0	0
S8	14.6	0	0*
Route Group 1, Local Alternatives			
DN1	42.5	0	0
A	17.5	0	0
B	12.2	0	0
C	9.0	0	0
D	22.8	0*	0

3

* Value greater than zero but less than 0.1.

4

SUBROUTE 1.1 – PROPONENT PREFERRED

5

Construction

6

Segments within subroute 1.1 would cross the Butterfield Trail and the CDNST. Segments within subroute 1.1 would pass within 1 mile of the Mount Riley/West Potrillo Mountains WSAs and the Aden Hills OHV area. Construction impacts would be as described above in “Impacts Common to All Action Alternatives.”

10

Operation and Maintenance

11

Indirect impacts on WSAs may occur where the proposed transmission line and other facilities are visible from WSAs. The proposed transmission line would pass within 5 miles of and would likely be visible from the southern and eastern portions of the Aden Lava Flow and Mount Riley/West Potrillo Mountains WSAs (refer to sections 3.10 and 4.10 for visual resources analysis).

15

As noted above, segments of subroute 1.1 would cross the Butterfield Trail and the CDNST. The crossing of the CDNST would occur approximately 7 miles northeast of Lordsburg. The 2009 comprehensive plan for the CDNST does not classify lands along the trail at the point of intersection. In addition, the BLM has not designated ROS classes or management prescriptions for the trail in the area of the intersection. The Mimbres RMP goals for the trail are to “manage to maintain scenic and primitive recreation values in accordance with the enabling legislation.”

20

1 Because of the physical and visual proximity to rural and/or developed areas, the location where the
2 CDNST would intersect the analysis area would be classified as rural and/or roaded natural. Both the
3 roaded natural and rural classifications assume that the natural setting may have strong modifications,
4 including those that are strongly dominant. The rural classification specifically anticipates the presence of
5 utility corridors. Thus, the impact to the CDNST would be negligible. The comprehensive plan for the
6 CDNST (CDNST Interagency Leadership Council 2009), Section 5, “Recreation Resource Management,”
7 indicates that in areas where the ROS classification would be roaded natural or rural, VRM Class III areas
8 would be the norm. Therefore, the proposed Project would be consistent with the existing management of
9 the CDNST in the analysis area and would result in minor, long-term impacts to the CDNST.

10 The Butterfield Trail does not yet have a management plan; however, the Mimbres RMP goals for the
11 trail are to “manage to protect and interpret historical values.” In the area where the subroute would cross
12 the Butterfield Trail, there are no existing management prescriptions or ROS classes designated. Further,
13 subroute 1.1 would intersect the Butterfield Trail on New Mexico state lands in areas that include
14 previous disturbance. Thus, the impact to the Butterfield Trail would be negligible. Therefore, the
15 proposed Project would be consistent with the existing management of that area. A National Trails
16 assessment, in accordance with BLM Manual 6280 is underway, and further analysis is provided in
17 appendix F of this DEIS.

18 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

19 **Construction**

20 Subroute 1.2 would cross the Butterfield Trail. Construction impacts would be as described above in
21 “Impacts Common to all Action Alternatives.”

22 **Operation and Maintenance**

23 Indirect impacts on WSAs may occur where subroute 1.2 and other facilities are visible from WSAs.
24 Segment S3 would be within 200 feet of and would be visible from portions of the Aden Lava Flow WSA
25 and the Mount Riley/West Potrillo Mountains WSAs. This would be an indirect, minor impact to the
26 WSAs, as discussed under “Impacts Common to all Action Alternatives.”

27 Segments of subroute 1.2 would cross the Butterfield Trail. The Butterfield Trail does not yet have a
28 management plan; however, the Mimbres RMP goals for the trail are to “manage to protect and interpret
29 historical values.” In the area where the subroute would cross the Butterfield Trail, there are no existing
30 management prescriptions or ROS classes designated. Further, subroute 2.1 would intersect the
31 Butterfield Trail on New Mexico state lands in areas that include previous disturbance. Thus, the impact
32 to the Butterfield Trail would be negligible. The proposed Project would be consistent with the existing
33 management of that area. Other impacts for operation/maintenance of this subroute would be as described
34 above in “Impacts Common to all Action Alternatives.”

35 **LOCAL ALTERNATIVES**

36 There are five local alternatives available for route group 1: DN1, A, B, C, and D.

37 **Construction**

38 Local alternatives A and B do not intersect with any special designations. However, alternative B does
39 cross within 200 feet of the Mount Riley/West Potrillo Mountains WSAs and would be visible from
40 portions of the WSAs. Construction impacts would be the same as described above in “Impacts Common
41 to all Action Alternatives.”

1 **Operation and Maintenance**

2 Local alternatives included in route group 1 would cross within 2 miles of the West Potrillo Mountains
3 WSA and would be visible from portions of the WSA. Impacts on the CDNST would be similar in nature
4 to those described above for subroute 1.1. Other impacts for operation/maintenance of the local
5 alternatives would be as described above in “Impacts Common to all Action Alternatives.”

6 **Route Group 2 – Hidalgo Substation to Apache Substation**

7 Table 4.12-2 describes which segments within route group 2 would intersect special designations.
8 Acreages are not additive and may overlap.

9 **Table 4.12-2. Route Group 2 Special Designations Resource Inventory Data**

	Total Miles	Butterfield Trail (miles)
Subroute 2.1, Proponent Preferred		
P4b	14.0	0
P4c	1.9	0*
P5a	9.6	0
P5b	21.1	0*
P6a	0.9	0
P6b	22.5	0
P6c	2.8	0
P7	22.3	0
P8	0.5	0
Subroute 2.2, Proponent Alternative		
E	31.8	0.1
F	25.3	0
Ga	25.7	0
Gb	1.0	0
Gc	7.4	0
I	2.3	0
J	2.3	0
Route Group 2 Local Alternatives		
LD1	35.4	0.1
LD2	9.6	0.2
LD3a	27.9	0*
LD3b	1.9	0
LD4	51.7	0
LD4-Option 4	6.5	0
LD4-Option 5	12.3	0
WC1	14.8	0

* Value greater than zero but less than 0.1.

10

1 **SUBROUTE 2.1 – PROPONENT PREFERRED**

2 **Construction**

3 Subroute 2.1 would cross the Butterfield Trail. Subroute 2.1 would pass within one mile of the Peloncillo
4 Mountains Wilderness Area. The proposed transmission line would be visible from portions of the
5 wilderness area. Construction impacts to these special designations would be the same as described above
6 in “Impacts Common to all Action Alternatives.”

7 **Operation and Maintenance**

8 Impacts for operation/maintenance of this Subroute would be the same as described above in “Impacts
9 Common to all Action Alternatives.”

10 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

11 **Construction**

12 Subroute 2.2 would cross the Butterfield Trail. It would also cross within 5 miles of the Peloncillo
13 Mountains Wilderness Area and would likely be visible from the wilderness area. Construction impacts
14 would be the same as described above in “Impacts Common to All Action Alternatives.”

15 **Operation and Maintenance**

16 Impacts for operation/maintenance of this subroute would be as described above in “Impacts Common to
17 All Action Alternatives.”

18 **LOCAL ALTERNATIVES**

19 There are seven local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
20 4, and WC1.

21 **Construction**

22 Local alternatives LD2, LD3a, LD3b, and LD4 would occur within 5 miles of the Peloncillo Mountains
23 Wilderness Area and would likely be visible from portions of the wilderness area. Local alternative
24 LD1 would intersect the, Butterfield Trail. LD2 and LD3a would also cross the Butterfield Trail.
25 Construction impacts would be the same as described above in “Impacts Common to all Action
26 Alternatives.”

27 **Operation and Maintenance**

28 Local alternatives LD2, LD3a, LD3b, and LD4 would occur within 5 miles of the Peloncillo Mountains
29 Wilderness Area and would likely be visible from portions of the wilderness area. Local alternative
30 LD1 would intersect the Butterfield Trail. LD2 and LD3a would also cross the Butterfield Trail. Impacts
31 on the Butterfield Trail would be similar to those described above for subroute 1.1. Impacts for
32 operation/maintenance of these local alternatives would be the same as described above in “Impacts
33 Common to All Action Alternatives.”

1 Route Group 3 – Apache Substation to Pantano Substation

2 Table 4.12-3 describes which segments within route group 3 would intersect special designations.
3 Acreages are not additive and may overlap.

4 **Table 4.12-3.** Route Group 3 Special Designations Resource Inventory Data

	Total Miles	Pima County Biological Core Management Areas (acres)	Pima County Important Riparian Areas (acres)	Pima County Multiple Use Management Areas (acres)	Las Cienegas NCA (acres)	Arizona National Scenic Trail (miles)	Butterfield Trail (miles)
Subroute 3.1, Proponent Preferred							
U1a	16.1	0	0	0	0	0	0.1
U1b	2.9	0	0	0	0	0	0
U2	15.8	16.2	0	0	0	0	0.3
U3a	35.6	298.9	15.2	41.8	91.0	0.1	0
Route Group 3 Local Alternative							
H	19.3	46.5	1.3	0	0	0	0.1

5 **SUBROUTE 3.1 – PROPONENT PREFERRED**

6 **Construction**

7 Subroute 3.1 would cross Pima County Biological Core Management Areas, Important Riparian Areas,
8 and Multiple Use Management Areas. The impacts to Pima County special designations would be
9 negligible since subroute 3.1 would occur in areas that already contain utilities, including existing
10 Western lines. Further, the transmission line would span the important Biological Core and Important
11 Riparian Areas and no towers would be constructed within the specially designated areas. The impact
12 would be negligible to the Multiple Use areas since transmission lines are an allowable use for this
13 designation, and existing Western lines are already in operation for all portions of subroute 3.1.

14 Subroute 3.1 would also cross the Las Cienegas NCA, the Butterfield Trail and Arizona National Scenic
15 Trail. All of these crossings would occur in areas that already contain transmission lines and facilities;
16 therefore the impact to special designations would be negligible since the management prescriptions for
17 these special designations were already in place and all proposed activities would be limited to this
18 existing ROW.

19 Subroute 3.1 would be constructed on approximately 9.0 acres of the Coronado National Forest. This area
20 of the Coronado National Forest currently includes an existing Western transmission line, as well as
21 existing access roads. There would be no impacts to special designations since no special designations are
22 found within the analysis area of the Coronado National Forest.

23 **Operation and Maintenance**

24 Subroute 3.1 would cross Pima County Biological Core Management Areas, Important Riparian Areas,
25 and Multiple Use Management Areas. Subroute 3.1 would also cross portions of the Las Cienegas NCA.

1 The impacts to these special designations would be negligible since these crossings would occur in areas
 2 that already contain transmission lines and facilities.

3 Subroute 3.1 would also cross the Butterfield Trail and the Arizona Trail. Impacts on the Butterfield Trail
 4 would be similar in nature to those described above for subroute 1.1; however, the scope of the impacts
 5 would be commensurately less since subroute 3.1 would upgrade an existing line in this area.
 6 The subroute would cross the Arizona Trail within 1 mile of I-10 and within 2 miles of Vail, Arizona.
 7 As subroute 3.1 would cross the trail along I-10 and near a developed area, there would be no change to
 8 the visual character of the trail at this location.

9 Operation and maintenance of subroute 3.1 on the Coronado National Forest would not impact special
 10 designations since none are located within the analysis area of the Coronado National Forest.

11 **LOCAL ALTERNATIVES**

12 There is one local alternative for route group 3: local alternative H.

13 **Construction**

14 Local alternative H would cross the Butterfield Trail and Pima County Biological Core Management
 15 Areas and Important Riparian Areas. The Butterfield Trail would be crossed by the local alternative on
 16 Arizona state land. Construction impacts would be the same as described above in “Impacts Common to
 17 All Action Alternatives.”

18 **Operation and maintenance**

19 Local alternative H would cross the Butterfield Trail and Pima County Biological Core Management
 20 Areas and Important Riparian Areas. Impacts for operation/maintenance of this local alternative would be
 21 the same as described above in “Impacts Common to All Action Alternatives.”

22 ***Route Group 4 – Pantano Substation to Saguaro Substation***

23 Table 4.12-4 describes which segments within route group 4 would intersect special designations.
 24 Acreages are not additive and may overlap.

25 **Table 4.12-4.** Route Group 4 Special Designations Resource Inventory Data

	Total Miles	Pima County Biological Core Management Areas (acres)	Pima County Important Riparian Areas (acres)	Pima County Multiple Use Management Areas (acres)	Pima County Agricultural Inholdings (acres)	Butterfield Trail (miles)	Juan Bautista De Anza National Historic Trail (miles)
Subroute 4.1, Proponent Preferred							
U3b	0.5	0	1.3	0*	0	0	0
U3c	1.0	0	1.7	1.9	0	0	0.1

26

1 **Table 4.12-4.** Route Group 4 Special Designations Resource Inventory Data (Continued)

	Total Miles	Pima County Biological Core Management Areas (acres)	Pima County Important Riparian Areas (acres)	Pima County Multiple Use Management Areas (acres)	Pima County Agricultural Inholdings (acres)	Butterfield Trail (miles)	Juan Bautista De Anza National Historic Trail (miles)
U3d	3.4	0	1.3	0.5	0	0	0
U3e	0.9	0	0	16.1	0	0	0
U3f	0.7	0	0	12.4	0	0	0
U3g	0.9	0	0	1.0	0	0	0
U3h	1.1	0	1.5	0.3	0	0*	0
U3i	18.2	18.8	89.1	52.3	0	0.1	0.1
U3j	0.9	0	0	0	0	0	0
U3k	16.7	0	0	154.2	30.2	0	0*
U3l	1.6	0	0	0	0	0.1	0
U3m	0.6	0	0	0	0	0	0
U4	1.9	0	0	0	30.2	0	0
Route Group 4 Local Alternatives							
MA1	1.1	0	0	0	0	0	0
TH1a	1.4	0	0	25.7	0	0	0
TH1b	1.6	0	0	0.6	0	0	0
TH1c	0.3	0	0	0	0	0	0
TH1-Option	0.4	0	0	7.7	0	0	0
TH3-Option A	0.8	0	5.3	3.4	0	0	0
TH3-Option B	0.8	0	1.2	1.3	0	0	0*
TH3-Option C	1.8	0	8.3	14.5	0	0	0
TH3a	2.7	0	7.1	0*	0	0	0
TH3b	4.5	0	0	0	0	0*	0.2

2 Table 4.12-5 describes which segments within route group 4 would include special designations in terms
3 of local and county parks. Acreages are not additive and may overlap.

4 **Table 4.12-5.** Route Group 4 Special Designations Resource Inventory Data for Local and County Parks

	Total Miles	Christopher Columbus Park (acres)	Santa Cruz River Park (acres)	Kennedy Park (acres)	Tucson Mountain Park (acres)	Joaquin Murrieta Park (acres)	Greasewood Park (acres)	Tumamoc Hill (acres)
Subroute 4.1, Proponent Preferred								
U3b	0.5	0	0	0	0	0	0	0
U3c	1.0	0	0	0	0	0	0	0

1 **Table 4.12-5.** Route Group 4 Special Designations Resource Inventory Data for Local and County Parks
 2 (Continued)

	Total Miles	Christopher Columbus Park (acres)	Santa Cruz River Park (acres)	Kennedy Park (acres)	Tucson Mountain Park (acres)	Joaquin Murrieta Park (acres)	Greasewood Park (acres)	Tumamoc Hill (acres)
U3d	3.4	0	0	7.8	8.0	0	0	0.1
U3e	0.9	0	0	0	0	0	0	14.3
U3f	0.7	0	0	0	0	0	0	0.4
U3g	0.9	0	0	0	0	0	0	0
U3h	1.1	0	0.6	0	0	5.0	0	0
U3i	18.2	20.9	1.6	0	0	0	0	0
U3j	0.9	0	0	0	0	0	0	0
U3k	16.7	0	0	0	0	0	0	0
U3l	1.6	0	0	0	0	0	0	0
U3m	0.6	0	0	0	0	0	0	0
U4	1.9	0	0	0	0	0	0	0
Route Group 4 Local Alternatives								
MA1	1.1	0	0	0	0	0	0	0
TH1a	1.4	0	0	0	0	0	0	21.7
TH1b	1.6	0	0	0	0	0	3.0	0
TH1c	0.3	0	0	0	0	0	0	0
TH1-Option	0.4	0	0	0	0	0	0	0
TH3-Option A	0.8	0	3.6	0	0	0	0	0
TH3-Option B	0.8	0	0.3	0	0	0	0	0
TH3-Option C	1.8	0	9.2	0	0	0	0	0
TH3a	2.7	0	0	0	0	0	0	0
TH3b	4.5	0	36.4	0	0	0	0	0

3

4 **SUBROUTE 4.1 – PROPONENT PREFERRED**

5 **Construction**

6 Subroute 4.1 would cross Pima County Biological Core Management Areas, Important Riparian Areas,
 7 Multiple Use Management Areas, and Agricultural Inholdings. The subroute would also cross the
 8 Butterfield Trail and Anza Trail. Impacts to these special designations would be the same as described
 9 under subroute 3.1, since existing Western lines are already in operation for all portions of subroute 4.1.

10 Representative staging area 13 would cross the Anza Trail for less than 0.1 mile. This area of the Anza
 11 Trail is highly disturbed, includes existing Western transmission lines and is located in an urban setting.
 12 It would also be located within Pima County Biological Core Management Areas for 0.8 acre and Pima
 13 County Important Riparian Areas for 19.5 acres. Representative staging area 11 would occur on 19.5
 14 acres of Pima County Biological Core Management Areas. Impacts from the staging areas would be

1 temporary and would be within an existing ROW that already includes a Western transmission line, as
2 well as access roads. Further, the areas would be reclaimed after the completion of construction activities,
3 thus resulting in a short-term, minor impact to these county special designations.

4 The Marana Substation expansion would occur on 14.5 acres of Pima County Multiple Use Management
5 Areas. The Pantano Substation expansion would occur on 25.0 acres of Pima County Biological Core
6 Management Areas and 0.5 acre of Pima County Important Riparian Areas.

7 Subroute 4.1 would also intersect with some local and county parks. The impacts to these city special
8 designations would be negligible since Subroute 4.1 would occur in areas that already contain utilities.
9 Further, the transmission line would span the parks as the existing Western existing lines between the
10 Apache and Saguaro substations currently do. It would cross Christopher Columbus Park, Santa Cruz
11 River Park, Kennedy Park, Joaquin Murrieta Park, and Tumamoc Hill. Construction impacts would be the
12 same as described above in “Impacts Common to All Action Alternatives.”

13 **Operation and Maintenance**

14 Subroute 4.1 would cross Pima County Biological Core Management Areas, Important Riparian Areas,
15 Multiple Use Management Areas, and Agricultural Inholdings. The subroute would also cross the
16 Butterfield Trail and the Anza Trail. Impacts to these special designations would be the same as described
17 under subroute 3.1.

18 Minor changes would occur to the visual character of the Butterfield Trail and Anza Trail in areas where
19 the subroute would intersect with the trail. However, these impacts would be minor as the trails in this
20 subroute would pass through the urbanized area in and around Tucson and work at the intersections would
21 involve upgrading an already existing transmission line.

22 Representative staging area 13 would cross the Anza Trail for less than 0.1 mile. It would also occur
23 within Pima County Biological Core Management Areas for 0.8 acre and Pima County Important
24 Riparian Areas for 19.5 acres. Representative staging area 11 would occur on 19.5 acres of Pima County
25 Biological Core Management Areas. Impacts from the staging areas would be temporary and the areas
26 would be reclaimed after the completion of construction activities.

27 The Marana Substation expansion would occur on 14.5 acres of Pima County Multiple Use Management
28 Areas. The Pantano Substation expansion would occur on 25.0 acres of Pima County Biological Core
29 Management Areas and 0.5 acre of Pima County Important Riparian Areas.

30 Subroute 4.1 would also intersect with some local and county parks. It would cross Christopher Columbus
31 Park, Santa Cruz River Park, Kennedy Park, Joaquin Murrieta Park, and Tumamoc Hill. Impacts from
32 operations and maintenance would be the same as described above in “Impacts Common to All Action
33 Alternatives.”

34 **LOCAL ALTERNATIVES**

35 There are ten local alternatives are available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option,
36 TH3a, TH3b, TH3-Option A, TH3-Option B, and TH3-Option C. These local alternatives represent
37 options that would enable the proposed Project to avoid Tumamoc Hill.

38 **Construction**

39 Local alternatives that would occur on lands managed by Pima County as Important Riparian Areas
40 would be TH3a, TH3-Option A, TH3-Option B, and TH3-Option C. Local alternatives that would occur

1 on lands managed by Pima County as Multiple Use Management Areas would be TH1a, TH1b, TH1-
2 Option, TH3a, TH3-Option A, TH3-Option B, and TH3-Option C. These impacts would be the same as
3 described under subroute 2.1

4 Local alternatives TH3b and TH3-Option B would cross the Anza Trail. TH3b would also cross the
5 Butterfield Trail. Impacts on the Butterfield and Anza Trail would be the same as described above for
6 subroute 4.1.

7 Local alternatives would occur in local and county parks. Local alternatives TH3b, TH3-Option A,
8 TH3-Option B, and TH3-Option C would occur in the Santa Cruz River Park. TH1b would occur in
9 Greasewood Park, and TH1a would cross Tumamoc Hill. Construction impacts would be the same as
10 described above in “Impacts Common to All Action Alternatives.”

11 **Operation and Maintenance**

12 Local alternatives that would occur on lands managed by Pima County as Important Riparian Areas
13 would be TH3a, TH3-Option A, TH3-Option B, and TH3-Option C. Local alternatives that would occur
14 on lands managed by Pima County as Multiple Use Management Areas would be TH1a, TH1b, TH1-
15 Option, TH3a, TH3-Option A, TH3-Option B, and TH3-Option C.

16 Local alternatives TH3b and TH3-Option B would cross the Anza Trail. TH3b would also cross the
17 Butterfield Trail. Impacts on the Butterfield and Anza Trail would be as described above for subroute 4.1.
18 RDEP nominated sites would be crossed by TH3a and TH3-Option C.

19 Local alternatives would occur in local and county parks. Local alternatives TH3b, TH3-Option A,
20 TH3-Option B, and TH3-Option C would occur in the Santa Cruz River Park. TH1b would occur in
21 Greasewood Park, and TH1a would cross Tumamoc Hill. Impacts from operations and maintenance
22 would be the same as described above in “Impacts Common to All Action Alternatives.”

23 **Agency Preferred Alternative**

24 The Agency Preferred Alternative would not conflict with the goals, objectives, or resources of special
25 designations. Short-term, minor impacts would occur at the intersections of segments P2, P4a, U1a, U2,
26 U3a, U3i, U3h, U3k, and U3l and National Trails during construction, as described under “Impacts
27 Common to All Action Alternatives.”

28 Short-term, indirect minor impacts to special designations would occur at the intersections of the Agency
29 Preferred Alternative segments in the Upgrade Section of the Project with National Trails, Aden Hills
30 OHV area, Bar V Ranch, Tucson Mountain Park, Tumamoc Hill, Joaquin Murrieta Park, Santa Cruz
31 River Park, and Christopher Columbus Park during construction, as described under “Impacts Common to
32 All Action Alternatives.” These impacts would be minor due to the presence of existing transmission line
33 ROWs at these intersections.

34 **Additional Mitigation Measures**

- 35 • No additional mitigation measures are proposed for special designations.

36 **Residual Impacts**

37 Residual impacts would include direct ground disturbance and temporary increases in ambient noise
38 levels in areas where the transmission line, substations, and ancillary facilities intersect with special
39 designations, which is limited to the following BLM special designations: CDNST, Butterfield Trail,

1 Arizona Trail, and the Anza Trail; county or city special designations would also be intersected but would
2 wholly be contained in areas that already include Western transmission lines. Increases in ambient noise
3 levels would be temporary and would decrease with the completion of construction activities. Other
4 impacts would include changes to the natural qualities, outstanding opportunities for solitude and
5 primitive recreation, and values such as visual resources and visibility from special designations. Because
6 proposed Project facilities that intersect with special designations would be located adjacent to existing
7 similar facilities, the residual impacts to special designations would be minor.

8 ***Unavoidable Adverse Impacts***

9 The construction and operation/maintenance of the proposed Project would cause minor unavoidable
10 adverse impacts on the city special designations as described in table 4.12-5 above.

11 ***Short-term Uses versus Long-term Productivity***

12 The construction and operation/maintenance of the proposed Project is unlikely to cause short-term uses
13 of the environment that would affect the long-term productivity of the BLM establishing future special
14 designations, since most of the proposed Southline transmission line has been routed to avoid sensitive
15 resources.

16 ***Irreversible and Irrecoverable Commitments of Resources***

17 No irreversible or irretrievable commitment of special designation resources would occur as a result of
18 the proposed Project.

19 **4.13 WILDERNESS CHARACTERISTICS**

20 **4.13.1 Introduction**

21 This section describes the impacts to BLM lands that may possess wilderness characteristics associated
22 with the construction and operation and maintenance of the transmission line, substations, and ancillary
23 facilities. Potential impacts to wilderness characteristics are discussed in terms of Project activities
24 directly or indirectly conflicting with one or more of the characteristics for which lands with wilderness
25 characteristics must possess (as provided in Section 2(c) of the Wilderness Act of 1964). As described in
26 section 3.13, there are lands possessing wilderness characteristics that would be intersected by the Project.

27 This DEIS describes WIUs based on the First Characteristic (size criteria) only. The initial set of WIUs
28 are those units of BLM land that are 5,000 acres or greater, not intersected by roads that are constructed,
29 maintained, regularly used, and not intersected by developed rights-of-way. The initial set of WIUs has
30 been identified using a GIS desktop analysis. WIUs based on the size criteria will be further refined
31 following a comprehensive road inventory of each unit². All potential roads and developed ROWs will be
32 identified using current aerial imagery, and will be evaluated by local BLM Field Office staff to
33 determine if additional field verification is needed.

34 The FEIS will describe WIUs based on the Second, Third, and Fourth Characteristics (naturalness,
35 outstanding opportunities for solitude or primitive, unconfined recreation, and supplemental values
36 criterion) of determining wilderness characteristics. This evaluation will be conducted by the local BLM

² Naturalness (2), outstanding opportunities for solitude or primitive, unconfined recreation (3) and other supplemental values (4) determinations are ongoing and will be provided in the FEIS.

1 Field Office staff for incorporation into the FEIS and will begin once the final set of units based on the
2 size criteria, and any prior wilderness characteristics inventory data is determined.

3 **4.13.2 Methodology and Assumptions**

4 Analysis of potential impacts to wilderness characteristics involves determining whether potential impacts
5 of the proposed Project would result in changes to any of the four tangible qualities of wilderness that
6 make up the description of lands managed to maintain wilderness characteristics, as discussed above in
7 section 3.13. BLM lands that possess or are managed to maintain wilderness characteristics are not
8 managed the same as Congressionally designated wilderness.

9 Effects are quantified where possible (i.e., acreages of surface disturbance under the action alternative).
10 In the absence of quantitative data, BLM local Field Office specialists' input and best professional
11 judgment was used. Impacts are sometimes described using a range of potential impacts or in qualitative
12 terms, if appropriate.

13 ***Analysis Area***

14 The wilderness characteristics analysis area is the Project ROW with a 1-mile buffer on each side of the
15 centerline for all four route groups. A 1-mile buffer on each side of the Project centerline represents a
16 reasonable distance for analyzing potential impacts to the four tangible qualities of a wilderness, and is
17 commensurate with other resources that share the value of wilderness characteristics such as recreation,
18 special designations, and visual resources.

19 ***Analysis Assumptions***

20 There are no specific analysis assumptions for wilderness characteristics beyond the impact indicators and
21 significance criteria described below. The impact indicators are described in the context of whether the
22 four tangible qualities that comprise wilderness characteristics would change if the ROW was granted:

23 ***Impact Indicators***

- 24 • Whether the proposed Project would reduce the size of identified and inventoried contiguous,
25 roadless WIUs greater than 5,000 acres;
- 26 • Whether the proposed Project would decrease natural ecological conditions³;
- 27 • Whether the proposed Project would decrease the opportunities for solitude or primitive,
28 unconfined recreation³; and
- 29 • Whether the proposed Project would affect supplemental values of wilderness characteristics
30 (i.e., ecological, geological, or other features of scientific, educational, scenic, or historic value)³.

31 ***Significant Impacts***

32 Effects on BLM lands possessing wilderness characteristics (WIUs) would occur if construction and
33 operation/maintenance of the Project reduces any of the four tangible qualities that comprise wilderness
34 characteristics.

³ Naturalness (2), outstanding opportunities for solitude or primitive, unconfined recreation (3) and other supplemental values (4) determinations are ongoing and will be provided in the FEIS.

1 Changes in wilderness characteristics could result from reductions in size, decreased naturalness, and/or
2 loss of outstanding opportunities for solitude or primitive and unconfined recreation. A reduction in size
3 that would result in the WIU becoming less than 5,000 acres would be a major, long-term impact.
4 A reduction in size that would not result in a WIU becoming less than 5,000 acres would be a moderate,
5 long-term impact.

6 **4.13.3 Impacts Analysis Results**

7 ***No Action Alternative***

8 Under the no action alternative, the BLM would not grant the ROW for the proposed Project. Wilderness
9 characteristics within the analysis area would likely continue at current levels and trends. Even under the
10 no action alternative, Western still plans to upgrade the existing lines between the Apache and Saguaro
11 substations within the next 10 years, per Western's 10-year capital improvement plan (Western 2012a).
12 However, there would be no impacts to wilderness characteristics within the analysis area from the no
13 action alternative, since no activities would occur that could impact one or more of the four wilderness
14 characteristics criteria.

15 ***Impacts Common to All Action Alternatives***

16 **CONSTRUCTION**

17 Potential impacts from construction activities that would be common to all action alternatives include
18 direct ground disturbance and temporary increases in ambient noise levels in areas where the transmission
19 line, substations, and ancillary facilities intersect with lands that possess wilderness characteristics.
20 Ground disturbance would not occur across the entire Project footprint. Approximately 23 percent of the
21 Project footprint would be disturbed throughout route groups 1 and 2. Approximately 28 percent of the
22 Project footprint would be disturbed throughout route groups 3 and 4. Within route groups 3 and 4, the
23 magnitude of impacts would be reduced, compared with those in route groups 1 and 2, as the existing line
24 would be upgraded rather than a new build. Nonetheless, the transmission line towers, staging areas, and
25 access roads would still be required along route groups 3 and 4; thus surface disturbance would still occur
26 in the Upgrade Section. Increases in ambient noise levels would be temporary and would decrease with
27 the completion of construction activities. This would be a short-term, minor impact to the opportunities
28 for solitude and primitive, unconfined recreation in the immediate area. Ground disturbance and
29 temporary increases in ambient noise levels would be a minor, short-term impact to the naturalness of the
30 immediate area.

31 For construction related to all alternatives, the Project would require staging areas along the ROW. These
32 are located on rugged terrain or road and utility crossings adjacent to the ROW to allow for additional
33 maneuvering in difficult areas. During construction, the extra work spaces and staging areas included in
34 the analysis area would affect the size, naturalness, opportunities for solitude or primitive and unconfined
35 recreation, and supplemental values (if any) of a given WIU.

36 The proposed Project would use existing public and private roads and would construct new roads to gain
37 access to the area during the construction period (short-term). Many of the existing access roads are
38 presently in a condition that could accommodate construction traffic without significant modification or
39 improvement. Some roads, however, are small, impassable, and are not currently suitable for construction
40 traffic. Additionally, in some areas access roads may not exist, requiring new construction. The Project
41 would improve unsuitable access roads through grading, filling, and/or widening. Following construction,
42 roads would be returned to their preconstruction condition, unless otherwise requested in writing by the
43 landowner or land-managing agency. It is not know specifically where all road improvements would be

1 required along any given road, and this information would not be available until after Southline’s
 2 construction contractor identifies which roads it prefers to use and how it prefers to use the roads.
 3 Therefore, for the purposes of this analysis, it is estimated that all access roads could need to be improved
 4 over their entire length.

5 Creation of new roads, maintenance of existing roads, and use of access roads for construction would
 6 decrease the size, affect naturalness, and limit opportunities for solitude and/or primitive and unconfined
 7 recreation in areas with wilderness characteristics. This would be a short-term, moderate impact by
 8 introducing the presence and noise of access roads and construction equipment within sight or sound of
 9 WIU visitors. Because Southline cannot identify which roads would be used during construction, the
 10 analysis cannot calculate the effects of the sight or sound of equipment on wilderness visitors in areas
 11 with wilderness characteristics. Instead, using the noise analysis presented in section 4.3 to determine the
 12 effects on naturalness, opportunities for solitude or primitive and unconfined recreation, it is assumed that
 13 visitors to areas with wilderness characteristics within 1 mile of a transmission line or access roads used
 14 for construction may be able to hear or see equipment during the construction period, and may experience
 15 changes to naturalness, outstanding opportunities for solitude, or primitive and unconfined recreation.

16 **OPERATION AND MAINTENANCE**

17 Following the completion of construction, the presence of the transmission lines and ancillary facilities
 18 would be a long-term impact to wilderness characteristics in areas where they did not previously exist.
 19 The permanent ROW with access roads to provide for inspection and maintenance of the transmission
 20 lines and ancillary facilities would be constructed. As described in chapter 2 of the EIS, ROW would be
 21 cleared of trees and large brush to allow for maintenance of the transmission line and related facilities, as
 22 mandated by Federal, state, and local law. Occasional maintenance trucks would also be used along the
 23 ROW. These would be long-term but minor impacts to the naturalness, outstanding opportunities for
 24 solitude, or primitive and unconfined recreation of the areas in a given WIU within 1 mile of the proposed
 25 Project as a result of changes in the visual character of the surrounding lands and periodic maintenance
 26 activities.

27 ***Route Group 1 – Afton Substation to Hidalgo Substation***

28 Table 4.13-1 describes which segments within route group 1 would intersect with WIUs. Acreages are not
 29 additive and may overlap. In addition, some segments may intersect more than one WIU.

30 **Table 4.13-1.** Route Group 1 Wilderness Characteristics Resource Inventory Data

Segment	Total Miles	WIU No.	WIU Name	WIU Size (acres)	Miles of Segment Intersection with WIUs
Subroute 1.1, Proponent Preferred					
P1	5.1	NM-LC-010	Black Mountain – Doña Ana	39,993	1.3
		NM-LC-011	Afton East	6,287	1.7
P2	102.0	-	-	-	-
P3	31.1	NM-LC-003			0.2
		NM-LC-004	Coyote Hill	11,972	3.8
		NM-LC-016	Eagle Nest	306,811	20.8
P4a	8.7	-	-	-	-

1 **Table 4.13-1.** Route Group 1 Wilderness Characteristics Resource Inventory Data (Continued)

Segment	Total Miles	WIU No.	WIU Name	WIU Size (acres)	Miles of Segment Intersection with WIUs
Subroute 1.2, Proponent Alternative					
S1	13.4	NM-LC-008	Rutter South 3	6,196	2.3
		NM-LC-009	Rutter South 1	6,017	0.02
		NM-LC-010	Black Mountain – Doña Ana	39,993	4.1
S2	11.1	NM-LC-005	South Doña Ana	55,790	5.2
		NM-LC-006	East Potrillo Mountains	25,182	2.7
		NM-LC-007	Rutter South 2	6,680	1.6
		NM-LC-008	Rutter South 3	6,196	0.0002
S3	12.9	-	-	-	-
S4*	10.6	NM-LC-003	Camel Mountain	11,532	6.9
S5	29.7	NM-LC-004	Coyote Hill	11,972	1.4
S6	7.4	NM-LC-015	Apache Hills-Hatchita Valley	229,889	3.0-
S7	41.5	NM-LC-001	Black Mountain –Grant	18,948	6.0
		NM-LC-015	Apache Hills-Hatchita Valley	229,889	12.7
S8	14.6	-	-	-	-
Route Group 1, Local Alternatives					
DN1	42.5	NM-LC-002	China Draw	9,813	2.1
A	17.5	NM-LC-005	South Doña Ana	55,790	5.8
		NM-LC-006	East Potrillo Mountains	25,182	1.4
		NM-LC-007	Rutter South 2	6,680	0.6
		NM-LC-008	Rutter South 3	6,196	0.5
B*	12.2	NM-LC-003	Camel Mountain	11,532	8.0
C	9.0	NM-LC-015	Apache Hills-Hatchita Valley	229,889	0.1
D [†]	22.8	NM-LC-013	Aberdeen Peak	17,529	2.3

2 *NM-LC-002, NM-LC-003, NM-LC-004, NM-LC-005, NM-LC-007, NM-LC-008, NM-LC-010 would be intersected by more than one segment.

3 [†] NM-LC-013 would intersect Alternative D in both route group 1 and route group 2.

4 **SUBROUTE 1.1 – PROPONENT PREFERRED**

5 **Construction**

6 Construction impacts are described in terms of impacts to size, naturalness, outstanding opportunities
 7 for solitude or primitive and unconfined recreation, and supplemental values. Granting a ROW for
 8 construction of a transmission line and ancillary facilities as well as construction or improvement of
 9 access roads would directly affect the size, and primitive/unconfined recreation of four wilderness
 10 inventory units. This construction would reduce the size and natural character of these areas. However,

1 the remaining portions of the WIUs would still be greater than 5,000 acres in size, retaining their natural
2 condition and outstanding opportunities for solitude or primitive and unconfined recreation.

3 One WIU, Afton East, would be reduced to less than 5,000 acres as result of construction of segment P1.
4 This would be a moderate, long-term impact since this WIU would no longer meet the first criteria of
5 wilderness characteristics. The Afton East WIU includes portions of citizen-proposed wilderness areas.
6 The impact to these citizen-proposed wilderness areas would also be moderate and long-term.

7 **Operation and Maintenance**

8 Impacts to size would be the same as described under construction.

9 Indirect impacts to WIUs may occur where the proposed transmission line towers, spans, and other
10 facilities are visible from the WIUs. Impacts to naturalness during operation and maintenance would
11 result from the presence of the transmission line and ancillary facilities, and vegetation clearing of the
12 ROW. Impacts include loss of vegetation, wildlife and wildlife habitat, and soil structure (including
13 erosion potential, compaction, loss of cryptobiotic crusts, and loss of playas) and visual resources
14 impacts.

15 Motorized travel along the ROW inspection, maintenance, and brush clearing of the permanent ROW in
16 or adjacent to a given WIU would result in sound that would degrade the setting needed to support
17 experiences of outstanding opportunities for solitude and primitive or unconfined recreation opportunities.
18 Sound generated during operation and maintenance would be expected to occur intermittently for the life
19 of the Project in a given WIU that would be intersected by subroute 1.1.

20 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

21 **Construction**

22 Short-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
23 same as described under subroute 1.1, except the acreages of the impacts would be different. The East
24 Potrillo Mountains WIU includes portions of citizen-proposed wilderness areas and would be intersected
25 by subroute 1.2. The impact to these citizen-proposed wilderness areas would also be moderate and long-
26 term.

27 Project construction would affect the natural characteristics of nine WIUs.

28 **Operation and maintenance**

29 Long-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
30 same as described under subroute 1.1, except the acreages of the impacts would be different.

31 **LOCAL ALTERNATIVES**

32 There are five local alternatives available for route group 1: DN-1, A, B, C, and D.

33 **Construction**

34 Short-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
35 same as described under subroute 1.1, except the acreages of the impacts would be different. The East
36 Potrillo Mountains WIU includes portions of citizen-proposed wilderness areas and would be intersected

1 by a route group 1 local alternative. The impact to these citizen-proposed wilderness areas would also be
2 moderate and long-term.

3 Project construction would affect the natural characteristics of eight WIUs.

4 **Operation and Maintenance**

5 Long-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
6 same as described under subroute 1.1, except the acreages of the impacts would be different.

7 ***Route Group 2 – Hidalgo Substation to Apache Substation***

8 Table 4.13-2 describes which segments within route group 2 would intersect with WIUs. Acreages are not
9 additive and may overlap.

10 **Table 4.13-2.** Route Group 2 Wilderness Characteristics Resource Inventory Data

	Total Miles	WIU No.	WIU Name	WIU Size (acres)	Miles of Segment Intersection with WIUs
Subroute 2.1, Proponent Preferred					
P4b	14.0				
P4c	1.9	-	-	-	-
P5a	9.6	NM-LC-012	Lordsburg Playa South	10,784	4.0
		NM-LC-014	Lordsburg Playa North	11,846	0.3
P5b	21.1	AZ-SF-001	Peloncillo Mountains South	34,153	5.1
P6a	0.9	AZ-SF-001	Peloncillo Mountains South	34,153	0.7
P6b	22.5	-	-	-	-
P6c	2.8	-	-	-	-
P7	22.3	-	-	-	-
P8	0.5	-	-	-	-
Subroute 2.2, Proponent Alternative					
E	31.8	NM-LC-012	Lordsburg Playa South	10,784	3.7
		AZ-SF-001	Peloncillo Mountains South	34,153	3.7
F	25.3	AZ-SF-001	Peloncillo Mountains South	34,153	2.1
Ga	25.7	-	-	-	-
Gb	1.0	-	-	-	-
Gc	7.4	-	-	-	-
I	2.3	-	-	-	-
J	2.3	-	-	-	-

11

1 **Table 4.13-2.** Route Group 2 Wilderness Characteristics Resource Inventory Data (Continued)

	Total Miles	WIU No.	WIU Name	WIU Size (acres)	Miles of Segment Intersection with WIUs
Route Group 2 Local Alternatives					
LD1	35.4	-	-	-	-
LD2	9.6	NM-LC-014	Lordsburg Playa North	11,846	3.6
LD3a	27.9	NM-LC-014	Lordsburg Playa North	11,846	0.1
LD3b	1.9	-	-	-	-
LD4	51.7	-	-	-	-
LD4-Option 4	6.5	-	-	-	-
LD4-Option 5	12.3	-	-	-	-
WC1	14.8	-	-	-	-

2 * NM-LC-012 and NM-LC-014 would intersect more than one segment.
 3 † NM-LC-013 would intersect Alternative D in both route group 1 and route group 2.

4 **SUBROUTE 2.1 – PROPONENT PREFERRED**

5 **Construction**

6 Short-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
 7 same as described under subroute 1.1, except the acreages of the impacts would be different.

8 Project construction of subroute 2.1 would affect the natural characteristics of three WIUs.

9 **Operation and Maintenance**

10 Long-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
 11 same as described under subroute 1.1, except the acreages of the impacts would be different.

12 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

13 **Construction**

14 Short-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
 15 same as described under subroute 1.1, except the acreages of the impacts would be different.

16 Project construction would affect the natural characteristics of one WIU, Lordsburg Playa North.

17 **Operation and Maintenance**

18 Long-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
 19 same as described under subroute 1.1, except the acreages of the impacts would be different.

20 **LOCAL ALTERNATIVES**

21 There are seven local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option
 22 4, and WC1.

1 **Construction**

2 Short-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
3 same as described under subroute 1.1, except the acreages of the impacts would be different.

4 **Operation and Maintenance**

5 Long-term impacts to size, naturalness, and solitude and primitive/unconfined recreation would be the
6 same as described under subroute 1.1, except the acreages of the impacts would be different.

7 ***Route Group 3 – Apache Substation to Pantano Substation and Route***
8 ***Group 4 – Pantano Substation to Saguaro Substation***

9 There would be no impacts to wilderness characteristics along the Upgrade Section in route groups 3 and
10 4 due to absence of WIUs.

11 ***Agency Preferred Alternative***

12 The Agency Preferred Alternative would result in moderate, long-term impacts to the wilderness
13 characteristics of the Afton East WIU since construction, operation, and maintenance of segment P1
14 would reduce the size of the Afton East WIU to less than 5,000 acres. In order for a parcel of land to be
15 considered for wilderness characteristics, it must be at least 5,000 acres in size. Segment P1 would
16 intersect areas of the Afton East WIU that also include citizen-proposed wilderness areas; the impact to
17 the citizen-proposed wilderness areas would also be a moderate, long-term impact.

18 Impacts to naturalness, opportunities for solitude or primitive, unconfined recreation, and supplemental
19 values would be the same as described under “Impacts Common to All Action Alternatives.”

20 ***Additional Mitigation Measures***

21 Mitigation measures provided in Section 3.2 “Air Quality,” Section 3.3 “Noise and Vibration,” Section
22 3.10 “Visual Resources,” and Section 3.14 “Recreation” would all service to mitigate any potential direct
23 or indirect impacts to lands possessing wilderness characteristics. The following mitigation measures may
24 lessen (or in some cases eliminate) the effects of transmission line construction and
25 operation/maintenance to wilderness characteristics:

- 26 • Explore opportunities to notify WIUs users prior to visiting the affected areas by publication of
27 the construction schedule in local media, posting the schedule at administering agency offices,
28 posting the schedule at trailheads or other recreation access points to WIUs, or other means of
29 reaching visitors. This notification process would alert wilderness users to the potential temporary
30 impacts of presence and sound of construction on opportunities for experiences of solitude and
31 primitive recreation settings, and allow visitors to decide if they want to reschedule their visit.
- 32 • Feather the edges of the shrubs and trees adjacent to the ROW when recontouring and
33 revegetating the construction ROW in vegetation communities with a large shrub or tree
34 component, to reduce the line or edge that would be apparent between the shrubs and trees and
35 the grass of the reclaimed ROW.

36 ***Residual Impacts***

37 Residual impacts would include direct ground disturbance and temporary increases in ambient noise
38 levels in areas where the transmission line, substations, and ancillary facilities intersect with lands with

1 wilderness characteristics. Increases in ambient noise levels would be temporary and would decrease with
2 the completion of construction activities. Other impacts would include changes to the natural qualities,
3 outstanding opportunities for solitude and primitive recreation, and supplemental values such as visual
4 resources and visibility. Because the Afton East WIU would be reduced to less than 5,000 acres as a result
5 of segment P1, the area would no longer meet criteria for wilderness characteristics and residual impacts
6 would be long term and moderate. Unavoidable Adverse Impacts

7 The construction and operation/maintenance of segment P1 of the proposed Project would result in the
8 unavoidable loss of the minimum 5,000 acre wilderness characteristic of the Afton East WIU. Short-term
9 Uses versus Long-term Productivity

10 The construction and operation of the proposed Project is unlikely to cause short-term uses of the
11 environment that would affect the long-term productivity of wilderness characteristics, since the Project
12 would be nearly 100 percent located along existing disturbed areas such as railroad beds, roadways, and
13 other utility ROWs.

14 ***Irreversible and Irrecoverable Commitments of Resources***

15 Irrecoverable commitment of wilderness characteristics would occur as a result of the proposed Project in
16 areas where the Project would result in WIUs becoming less than 5,000 acres. The Afton East WIU would
17 be irrecoverably lost since it would no longer be 5,000 or more acres. However, if the Project were to be
18 deconstructed and the area reclaimed, the area could be re-evaluated for wilderness characteristics and
19 identified as a potential WIU.

20 **4.14 RECREATION**

21 **4.14.1 Introduction**

22 This section describes the potential impacts to recreation resources associated with the construction and
23 operation and maintenance of the transmission line, substations, and ancillary facilities. Impacts to
24 recreation resources are discussed in terms of recreation opportunities and activities, recreation settings,
25 desired recreation experiences, and adjacent recreation areas. The impacts described in this section are
26 based on the analysis provided in “Southline Transmission Project Resource Report 10: Recreation”
27 (CH2M Hill 2013o). The contents of that report are used herein without specific reference.

28 **4.14.2 Methodology and Assumptions**

29 ***Analysis Area***

30 The analysis area for recreation resources is the same for the New Build Section and the Upgrade Section
31 and includes the proposed Project footprint. The analysis area for recreation resources does not include
32 a continuous, equidistant buffer as with other resources, since large areas of land likely have similar
33 existing recreation conditions and settings. Because the Project could affect adjacent areas where
34 recreation conditions and use could intensify and vary widely, some adjacent recreation areas are included
35 in the analysis area. Therefore, in addition to the proposed Project footprint, adjacent recreation areas that
36 could be directly or indirectly affected by the proposed Project are also included in the analysis area.

1 **Analysis Assumptions**

2 The analysis to determine potential impacts to recreation is based on existing recreation resource
3 management and data from the BLM Las Cruces District, BLM Safford and Tucson Field Offices, State,
4 County, and local recreation resource management. Spatial/GIS information was also used in this analysis
5 and includes designated recreation sites, special designations, transportation inventory, Coronado
6 National Forest ROS settings, historic and recreational trails, and known cultural sites. As outlined in
7 section 3.14, the changes (based on the proposed Project as described in chapter 2) to the resource
8 condition indicators provide the basis for assessing impacts to recreation resources. The impact analysis is
9 also based on review of existing literature and information provided by resource team experts in the
10 BLM, NPS, U.S. Forest Service, and other agencies.

11 **Impact Indicators**

12 Recreation Opportunities/Activities:

- 13 • Assess whether a change in (loss or creation of) recreational activities would result with
14 development of the proposed Project and improvement of access roads.
15 ◦ Specifically, assess whether the change would increase or decrease the qualities of the
16 hunting experience

17 Recreation Settings:

- 18 • Assess changes in the recreation setting (e.g., undeveloped or rural settings) of the analysis area
19 as a result of the Project. Specifically, assess whether changes in the settings that support existing
20 OHV, hiking, camping, target shooting, or hunting opportunities would increase or decrease
21 within the area of the proposed Project.

22 Desired Recreation Experiences:

- 23 • Assess the potential for diminished or loss of recreational values and quality
24 (e.g., remoteness, quiet, or solitude) in the analysis area/region.
25 • Assess potential changes in recreation (opportunities/activities, settings, and experiences) on
26 lands adjacent to the Project, if present.

27 **Significant Impacts**

28 For the purposes of this analysis, a significant impact on recreation resources could result if any of the
29 following were to occur from construction or operation and maintenance of the proposed Project:

- 30 • changes that alter existing recreation opportunities and activities to levels that would conflict with
31 existing management prescriptions;
32 • changes that alter existing recreation settings that have been prescribed by land managing
33 agencies;
34 • changes that alter the desired recreation experiences that local users currently seek; and
35 • changes that alter existing recreation opportunities and activities, recreation settings, and desired
36 recreation experiences of adjacent recreation areas.

4.14.3 Impacts Analysis Results

No Action Alternative

Under the no action alternative no ROW would be granted for the New Build Section and the transmission line, substation, and ancillary facilities would not be constructed. The BLM land on which the New Build Section is proposed would continue to be managed as it currently exists. Much of the Project footprint would be within existing ROWs, along existing disturbance. The land in the immediate vicinity of the Project footprint and alternatives would remain primarily developed desert land available for dispersed recreation, subject to existing closures or restrictions.

Current recreational use (recreation opportunities and activities, recreation settings, desired recreation experiences, and adjacent recreation areas) in the analysis area described in Section 3.14, "Recreation," would continue under the no action alternative. The Project footprint would be available to other uses that are consistent with land management plans.

Thus, there would be no changes that would alter existing recreation opportunities and activities, settings, desired experiences, or adjacent recreation areas in the New Build Section. Impacts to recreation resources would be negligible under the no action alternative. In regards to the Upgrade Section, even under the no action alternative, Western still plans to upgrade the existing lines between the Apache and Saguaro substations within the next 10 years, per Western's 10-year capital improvement plan (Western 2012a).

Impacts Common to All Action Alternatives

CONSTRUCTION

Recreation Opportunities/Activities

Construction of the proposed Project and alternative would not occur outside of the ROW, except for site-specific substations. Some substations would be expanded upon private land; all private land would likely be pursued with in-fee purchasing. Substation expansions would nonetheless be included in all analysis. Temporary staging areas associated with construction of the transmission line and/or substation construction would not be located within the recreation areas. Construction of the Project is not expected to permanently preclude the use of or access to any existing recreation opportunities or activities, but some short-term impacts to these resources would occur during the construction phases of the Project.

Recreation users that seek opportunities for solitude commonly seek areas where they would be less likely to see other humans. Development such as transmission lines may not affect opportunities for solitude if the users don't experience opportunities for interactions with other users. However, some users value a total absence of human development for their experiences of solitude.

Dispersed recreation activities such as hiking, camping, or equestrian use would be temporarily affected since the presence of construction noises, visual disturbances, or other humans could detract from these recreation opportunities and activities. These impacts would be localized and short-term. As described in chapter 2, table 2-7, Southline would post signage for all closures and would avoid temporary closures during heavy recreational use periods (e.g., holidays or special events).

Some unauthorized OHV use could occur during construction when workers are not present (such as on weekends or in between construction phases).

1 **Hunting**

2 Hunting opportunities (both big- and small-game) that could be displaced by the construction of the
3 transmission line, substations, and ancillary facilities would not represent a significant impact, since the
4 areas within GMUs that are outside of the proposed Project footprint would remain available for hunting,
5 subject to applicable laws and regulations. Further, the number of New Mexico and Arizona hunting
6 permits that are issued in individual GMUs would not change as a result of construction of the Project.
7 The availability to hunt in GMUs that are included within the Project footprint (see section 3.14) and the
8 number of hunting permits per GMU would not be affected by the Project since the ROW, if granted,
9 would represent less than 5 percent of the total GMU available. Further, hunter days would not change
10 under any alternative, since hunting could persist elsewhere in the GMU.

11 **Recreation Settings**

12 The Mimbres, Safford, and Phoenix RMPs specify that all BLM lands, unless otherwise designated and
13 subject to travel management rules, are open to recreational use.

14 Although BLM lands within the analysis area have not been classified with ROS settings, the overall
15 recreation setting of the Project footprint can be characterized as mostly roaded natural, with areas of
16 urban, rural, and semi-primitive motorized in site-specific areas. Motorized use in the Project footprint
17 would be limited to existing roads and ways, as specified in land management plans. Specially designated
18 areas and the recreational settings therein, while within the analysis area, would be outside the Project
19 footprint.

20 The removal of vegetation during construction of the proposed Project would have an indirect impact on
21 adjacent recreational users in the analysis area by altering the quality of the recreational setting. Similarly,
22 the construction of the transmission lines could have indirect impacts to the recreation settings in areas
23 that do not already include existing, similar structures due to the visual contrast these facilities could
24 introduce to the existing landscape. Although the sight of transmission line facilities would not affect
25 some recreational users (e.g., hunting or OHV driving), those seeking the features of a natural, non-
26 motorized setting in the analysis area would see the existing landscape change to an area characterized by
27 transmission line development as a substantial modification of the landscape (refer to Section 4.10,
28 “Visual Resources”).

29 **Desired Recreation Experiences**

30 The desired recreation experiences (as specified in the Mimbres, Safford, and Phoenix RMPs) would not
31 change under any alternative, since the ROW would only preclude recreational opportunities and
32 experiences temporarily during construction. The desired recreation experiences in areas outside the site-
33 specific areas where the physical occupancy of the transmission line tower, substation, or ancillary facility
34 would be located would not change. The individual impacts of transmission line towers, substations, and
35 ancillary facilities are discussed under each route group.

36 **Adjacent Recreation Areas**

37 The construction impacts to adjacent recreation areas would vary by alternative and are discussed under
38 each route group.

1 **OPERATION AND MAINTENANCE**

2 **Recreation Opportunities/Activities**

3 Recreation opportunities and activities would continue during operation and maintenance since operation
4 and maintenance would be temporary in terms of the amount of time activities would take place in a given
5 area and the amount of time that passes between operation and maintenance activities, which may be
6 many months to years in duration. Thus, since the potential for displacing recreation opportunity and
7 activities may occur, there would be impacts to recreation. These impacts would be minor. Further, unless
8 specifically closed to public access, all areas within the ROW (i.e., beneath spans) would be accessible for
9 recreational opportunity and activities.

10 Dispersed recreation would continue upon construction completion within the ROW in areas that are
11 outside of the footprints of the transmission line, substations, and ancillary facilities, subject to applicable
12 laws such as NMAC Title 19, Chapter 31, "Hunting and Fishing," Article 10.18, and ARS Title 17,
13 Chapter 3, "Game and Fish," Articles 17-301 and 17-309.

14 Intentional acts of destruction (e.g., using transmission line towers or facilities for target shooting) is
15 discussed in Section 4.19 of this DEIS.

16 Following construction activities, the presence of new access roads (as described in chapter 2) that would
17 be used for operation and maintenance of the proposed Project could permanently change the OHV use
18 patterns in the area, subject to Federal, State, and local OHV and traffic laws and regulations. New access
19 roads would be signed and would be closed to the public, but illegal OHV use would not be entirely
20 preventable on the new access roads. This would result in an increased chance for "wildcat" and user-
21 created route proliferation. An increase in "wildcat" and user-created trails would conflict with the
22 BLM's OHV-use strategies, creating management challenges and potentially increasing user
23 conflicts. The resultant impact from increased OHV use would be a moderate impact to recreation
24 opportunities/activities. Mitigation of locked gates and signage indicated road status would decrease
25 the magnitude of these impacts. However, illegal and/or unauthorized use of access roads would be
26 enforceable by BLM law enforcement, or other local jurisdiction law enforcement (e.g., County or State).

27 It should be noted that recreation opportunities/activities may only be permitted on public lands. Once the
28 ROW crosses into private land, the recreation opportunity/activity may no longer be permitted and thus,
29 private land boundaries may also form the boundaries for allowable recreation opportunities and
30 activities.

31 **Recreation Settings**

32 Impacts to recreation settings during operation and maintenance, common to all alternatives would be the
33 same as described under construction.

34 **Desired Recreation Experiences**

35 Impacts to desired recreation experiences during operation and maintenance, common to all alternatives
36 would be the same as described under construction.

37 **Adjacent Recreation Areas**

38 The operation and maintenance impacts to adjacent recreation areas would vary by alternative and are
39 discussed under each route group.

1 **Route Group 1 – Afton Substation to Hidalgo Substation**

2 **SUBROUTE 1.1 – PROPONENT PREFERRED**

3 **Construction**

4 ***Recreation Opportunities/Activities***

5 Construction activities in support of subroute 1.1 would not occur within any designated recreation sites
6 or areas. Segment P2 would pass just south of the Aden Hills OHV area and the presence of construction
7 activities would not be in conflict with the purposes of the Aden Hills OHV area. During construction,
8 access to the OHV area would be maintained. There could be temporary traffic delays as equipment
9 crosses access roads, but these delays would only last as long as it would take to move equipment across
10 the access roads and into the ROW and/or staging areas. The temporary impacts would be minor and
11 would cease once construction is completed.

12 Recreation access that does not depend on vehicles, OHV use, or access roads (e.g., hiking or equestrian-
13 based recreation) would not be impacted during construction. Similarly, dispersed recreation would only
14 be impacted within the ROW, due to safety concerns that would preclude dispersed recreation; however,
15 once construction activities are completed on subroute 1.1, the access to dispersed recreation would be
16 restored.

17 The construction of subroute 1.1 that would cross two national trails (segments P4a and P2) would be
18 in areas that would be comparable to a roaded-natural setting. Each of the national trail crossings of
19 Subroute 1.1 occurs along existing dirt roads and within 5 miles of I-10. Approximately 0.12 mile of the
20 Butterfield Trail and approximately 0.06 mile of the CDNST would be crossed by the Project within the
21 analysis area for Subroute 1.1. During construction, access to the Butterfield Trail and CDNST would be
22 maintained. There could be temporary delays as equipment crosses the trails, but these delays would only
23 last as long as it would take to move equipment across the trails and into the ROW and/or staging areas.
24 The temporary construction impacts to the Butterfield Trail and CDNST would be minor and would cease
25 once construction is completed.

26 Hunting in the immediate vicinity of subroute 1.1 would be temporarily impacted by construction,
27 as described above under “Impacts Common to All Action Alternatives.” Table 4.14-1 below provides the
28 acreages of each GMU that would be affected by the construction of the subroutes included in route group
29 1. The P2 segment that would occur in GMU 23 in New Mexico would have the greatest reduction of land
30 available for hunting during construction, at 1,101.1 acres. Since P2 is largely paralleling existing
31 facilities, nearly all existing hunting activities in this vicinity likely already occur outside of the ROW.
32 The reduction to land available for hunting within GMU 23 (totaling over 1 million acres) would
33 represent a less than 0.05 percent reduction, a negligible impact.

1 **Table 4.14-1.** Route Group 1 Game Management Unit (New Mexico) Inventory Data

	Total Miles	New Mexico GMU 21B (acres)	New Mexico GMU 23 (acres)	New Mexico GMU 24 (acres)	New Mexico GMU 25 (acres)	New Mexico GMU 26 (acres)	New Mexico GMU 27 (acres)
Subroute 1.1, Proponent Preferred							
P1	5.1	–	–	–	125.1	–	–
P2	102.0	462.5	1,101.1	130.44	778.0	–	–
P3	31.1	20.9	–	–	732.4	–	–
P4a	8.7	–	217.1	–	–	–	–
Subroute 1.2, Proponent Alternative							
S1	13.4	–	–	–	325.3	–	–
S2	11.1	–	–	–	267.7	–	–
S3	12.9	–	–	–	314.0	–	–
S4	10.6	–	–	–	255.2	–	–
S5	29.7	–	–	–	720.1	–	–
S6	7.4	–	–	–	182.1	–	–
S7	41.5	–	–	–	495.8	511.2	–
S8	14.6	–	171.0	–	–	181.9	–
Route Group 1 Local Alternatives							
DN1	42.5	21.3	741.1	268.0	–	–	–
A	17.5	–	–	–	422.9	–	–
B	12.2	–	–	–	291.5	–	–
C	9.0	–	–	–	215.7	–	–
D	22.8	–	–	–	–	506.8	44.4

2 **Recreation Settings**

3 The recreation setting within the subroute 1.1 ROW would be slightly modified during construction.
 4 Though subroute 1.1 is new construction, it has been designed to be located along similar, existing
 5 facilities (i.e., transmission lines, pipelines, and roads). Since the construction activities would not be
 6 introducing facilities that are not similarly present amongst the recreation settings, construction impacts
 7 would be minor and short-term, and limited to temporary delays at access roads and National Trails as
 8 equipment is moved into the ROW, but these delays would only last as long as it would take to move
 9 equipment across and into the ROW and/or staging areas.

10 **Desired Recreation Experiences**

11 Construction of subroute 1.1 would not change the desired recreation experiences. Subroute 1.1 occurs
 12 along existing facilities such as transmission lines, pipelines, and roads. Since access would be
 13 maintained to all public, existing, and legal roads (refer to Section 4.18, “Transportation”), any vehicular-
 14 based desired recreation experiences would continue during construction. Therefore, there would be no
 15 impacts to desired recreation experiences under subroute 1.1.

1 **Adjacent Recreation Areas**

2 There are no recreation areas adjacent to subroute 1.1.

3 **Operation and Maintenance**

4 ***Recreation Opportunities/Activities***

5 The overall permanent disturbance within the ROW of subroute 1.1 is approximately 8.2 percent, and
6 would be wholly within the ROW (20 acres to operate a new substation notwithstanding). Therefore,
7 recreation opportunities and activities would remain available in approximately 91.8 percent of the
8 subroute 1.1 ROW throughout operation and maintenance of the proposed Project, subject to existing
9 laws and closures. The operational impacts to recreation opportunities and activities would therefore be
10 commensurately less than described under subroute 1.1, construction.

11 ***Recreation Settings***

12 Impacts to the recreation settings of subroute 1.1 would be the same as described under construction.

13 ***Desired Recreation Experiences***

14 Impacts to desired recreation experiences within the subroute 1.1 ROW would be the same as described
15 under construction.

16 **Adjacent Recreation Areas**

17 There are no recreation areas adjacent to subroute 1.1.

18 **SUBROUTE 1.2 – PROPONENT ALTERNATIVE**

19 **Construction**

20 ***Recreation Opportunities/Activities***

21 Construction activities in support of subroute 1.2 would not occur within any designated recreation sites
22 or areas. Segment S3 would not cross into the WSAs located along route group 1, and follows an existing
23 road. Construction of segment S2 may preclude some flying opportunities for paragliding/parasailing,
24 which would be a moderate, long-term impact.

25 Hunting in the vicinity of subroute 1.2 would be temporarily displaced during construction, as described
26 above under “Impacts Common to All Action Alternatives.” The S7 segment that would be in GMUs 25
27 and 26 in New Mexico would have the greatest reduction of land available for hunting during
28 construction, at 495.8 and 511.2 acres, respectively. Since S7 is largely paralleling existing facilities,
29 nearly all existing hunting activities in this vicinity likely already occur outside of the ROW. The
30 reduction to land available for hunting within GMUs 25 and 26 (comprising over 2 million acres and 1.4
31 million acres, respectively) would represent a less than 0.02 percent reduction to GMU 25 and a less than
32 0.04 percent reduction to GMU 26, a negligible impact.

33 ***Recreation Settings***

34 Segments S1 and S2 of subroute 1.2, located east of the Aden Lava Flow WSA and Mount Riley/West
35 Potrillo Mountains WSAs, would be constructed on undeveloped land, resulting in a moderate change to
36 the recreation setting. There are no existing facilities that would be paralleled by segments S1 and S2.

1 The total temporary disturbance during construction of segment S1 and S2 would be approximately 28.4
2 percent and 28.6 percent of the ROW, respectively. However, none of S1 or S2 would occur within the
3 WSAs, and would not change the recreation settings within the WSAs.

4 Segments S3–S7 all occur along an existing State highway in New Mexico (NM 9) and construction
5 would not result in changes to the existing recreation setting.

6 ***Desired Recreation Experiences***

7 Construction of subroute 1.2 would not change the desired recreation experiences.

8 ***Adjacent Recreation Areas***

9 There are no recreation areas adjacent to subroute 1.2.

10 **Operation and Maintenance**

11 ***Recreation Opportunities/Activities***

12 The overall permanent disturbance within the ROW of subroute 1.2 is approximately 5.5 percent, and
13 would be wholly within the ROW (20 acres to operate a new substation notwithstanding). Therefore,
14 recreation opportunities and activities would remain available in approximately 94.5 percent of the
15 subroute 1.2 ROW throughout operation and maintenance of the proposed Project, subject to existing
16 laws and closures. The operational impacts to recreation opportunities and activities would therefore be
17 commensurately less than described under subroute 1.2, construction.

18 The new access roads along segments S1 and S2 could permanently change the OHV use patterns in the
19 area, subject to Federal, State, and local OHV and traffic laws and regulations. These impacts would be
20 the same as described under “Impacts Common to All Action Alternatives.”

21 ***Recreation Settings***

22 Impacts to the recreation settings of subroute 1.2 would be the same as described under construction.

23 ***Desired Recreation Experiences***

24 Impacts to desired recreation experiences within the subroute 1.2 ROW would be the same as described
25 under construction.

26 ***Adjacent Recreation Areas***

27 There are no recreation areas adjacent to subroute 1.2.

28 **LOCAL ALTERNATIVES**

29 There are five local alternatives available for route group 1. These local alternatives include DN1, A, B,
30 C, and D.

31 **Construction**

32 ***Recreation Opportunities/Activities***

33 Alternative B would not cross into the WSAs located along route group 1.

1 Hunting in the vicinity of the route group 1 local alternatives would be impacted by construction, as
2 described above under “Impacts Common to All Action Alternatives.” The alternative D segment that
3 would occur in GMUs 26 and 27 in New Mexico would have the greatest reduction of land available
4 for hunting during construction, at 506.8 and 44.4 acres, respectively. Since alternative D is largely
5 paralleling existing facilities, nearly all existing hunting activities in this vicinity likely already occur
6 outside of the ROW. The reduction to land available for hunting within GMUs 26 and 27 (comprising 1.4
7 million acres and 663,000 acres, respectively) would represent a less than 0.04 percent reduction to GMU
8 26 and a less than 0.01 percent reduction to GMU 27, a negligible impact.

9 ***Recreation Settings***

10 Local alternative DN1 of route group 1 would be constructed on undeveloped lands and the construction
11 impacts would be the same as described for segments S1 and S2 under subroute 1.2.

12 ***Desired Recreation Experiences***

13 Construction of route group 1 local alternatives would not change the desired recreation experiences.
14 In the vicinity where the local alternatives of route group 1 would cross the CDNST, existing roads and
15 disturbed areas are amongst the landscape, resulting in a desired recreation experience that would be
16 commensurate with the allowable uses surrounding the CDNST (see Appendix F, “National Scenic and
17 Historic Trails Assessment”).

18 ***Adjacent Recreation Areas***

19 There are no recreation areas adjacent to the route group 1 local alternatives.

20 **Operation and Maintenance**

21 ***Recreation Opportunities/Activities***

22 The overall permanent disturbance within the ROW of route group 1 local alternatives is approximately
23 4.7 percent, and would be wholly within the ROW. Therefore, recreation opportunities and activities
24 would remain available in approximately 95.3 percent of the route group 1 local alternatives ROW
25 throughout operation and maintenance of the proposed Project, subject to existing laws and closures.
26 The operational impacts to recreation opportunities and activities would therefore be commensurately less
27 than described under route group 1 local alternatives, construction.

28 The new access roads along segments S1 and S2 could permanently change the OHV use patterns in the
29 area, subject to Federal, State, and local OHV and traffic laws and regulations. These impacts would be
30 the same as described under “Impacts Common to All Action Alternatives.”

31 ***Recreation Settings***

32 Impacts to the recreation settings of route group 1 local alternatives would be the same as described under
33 construction.

34 ***Desired Recreation Experiences***

35 Impacts to desired recreation experiences within the route group 1 local alternatives ROW would be the
36 same as described under construction.
37

1 **Adjacent Recreation Areas**

2 There are no adjacent recreation areas to the route group 1 local alternatives.

3 **Route Group 2 – Hidalgo Substation to Apache Substation**

4 **SUBROUTE 2.1 – PROPONENT PREFERRED**

5 **Construction**

6 **Recreation Opportunities/Activities**

7 The recreation opportunities/ activities that currently exist within the subroute 2.1 analysis area would be
 8 impacted by construction in the same ways as described above under “Impacts Common to All Action
 9 Alternatives.” Construction activities in support of subroute 2.1 would not occur within any designated
 10 recreation sites or areas.

11 Subroute 2.1 would cross sections of the CDNST and Butterfield Trail. The impacts to the CDNST and
 12 Butterfield Trail would be the same as described under route group 1, subroute 1.1, except as described
 13 below.

14 Segment P5b would cross the Butterfield Trail in an area that includes existing pipelines and dirt roads.
 15 Segment P4c would cross the Butterfield Tail in an area that does not include existing transmission lines,
 16 pipelines, or roads. The construction of segment P4c would result in moderate impacts to the Butterfield
 17 Trail.

18 Bird-watching at Willcox Playa (specifically, the intersection of segment p7 with AGFD’s Willcox
 19 Wildlife Area) would be temporarily impacted during construction, as described above under “Impacts
 20 Common to All Action Alternatives.”

21 Hunting in the vicinity of subroute 2.1 would also be temporarily impacted during construction, as
 22 described above under “Impacts Common to All Action Alternatives.” Table 4.14-2 provides the acreages
 23 of each GMU that would be affected by the construction of the subroutes included in route group 2.
 24 The P6b segment that would occur in GMU 29 and 30A in Arizona would have the greatest reduction of
 25 land available for hunting during construction, at 186.3 and 358.8 acres, respectively. Since P6b is largely
 26 paralleling existing pipelines, existing hunting activities in this vicinity likely would occur within the
 27 ROW, but would be precluded if P6a were constructed. The reduction to land available for hunting within
 28 GMUs 29 and 30A (comprising 648,000 acres and 1.1 million acres, respectively) would represent a less
 29 than 0.03 percent reduction in lands available for hunting for both GMU 29 and 30, a negligible impact.

30 **Table 4.14-2.** Route Group 2 Game Management Unit (New Mexico and Arizona) Inventory Data

	Total Miles	New Mexico GMU 23 (acres)	New Mexico GMU 26 (acres)	New Mexico GMU 27 (acres)	Arizona GMU 28 (acres)	Arizona GMU 29 (acres)	Arizona GMU 30A (acres)	Arizona GMU 30B (acres)	Arizona GMU 31 (acres)	Arizona GMU 32 (acres)
Subroute 2.1, Proponent Preferred										
P4b	14.0	159.0	–	176.8	–	–	–	–	–	–
P4c	1.9	–	–	44.9	–	–	–	–	–	–
P5a	9.6	–	–	233.5	–	–	–	–	–	–

1 **Table 4.14-2.** Route Group 2 Game Management Unit (New Mexico and Arizona) Inventory Data
2 (Continued)

	Total Miles	New Mexico GMU 23 (acres)	New Mexico GMU 26 (acres)	New Mexico GMU 27 (acres)	Arizona GMU 28 (acres)	Arizona GMU 29 (acres)	Arizona GMU 30A (acres)	Arizona GMU 30B (acres)	Arizona GMU 31 (acres)	Arizona GMU 32 (acres)
P5b	21.1	–	–	106.6	404.4	–	–	–	–	–
P6a	0.9	–	–	–	18.6	2.7	–	–	–	–
P6b	22.5	–	–	–	–	186.3	358.8	–	–	–
P6c	2.8	–	–	–	–	–	68.3	–	–	–
P7	22.3	–	–	–	–	–	530.7	10.1	–	–
P8	0.5	–	–	–	–	–	–	9.0	–	–
Subroute 2.2, Proponent Alternative										
E	31.8	–	–	346.4	420.2	–	–	–	–	–
F	25.3	–	–	–	526.0	–	–	–	85.1	–
Ga	25.7	–	–	–	–	–	1.5	–	295.1	325.8
Gb	1.0	–	–	–	–	–	22.7	3.2	–	–
Gc	7.4	–	–	–	–	–	0.6	179.0	–	–
I	2.3	–	–	–	–	–	54.6	–	0.8	–
J	2.3	–	–	–	–	–	54.0	–	1.7	–
Route Group 2 Local Alternatives										
LD1	35.4	–	129.1	290.6	–	437.9	–	–	–	–
LD2	9.6	–	–	233.2	–	–	–	–	–	–
LD3a	27.9	214.6	–	462.8	–	–	–	–	–	–
LD3b	1.9	–	–	46.6	–	–	–	–	–	–
LD4	51.7	–	–	91.7	931.9	–	–	–	419.7	24.4
LD4–Option 4	6.5	–	–	–	–	–	26.9	–	129.2	–
LD4–Option 5	12.7	–	–	–	–	–	53.9	–	242.8	–
WC1	14.8	–	–	–	–	–	359.1	–	–	–

3 **Recreation Settings**

4 The overall recreation setting of subroute 2.1 would not be changed since subroute 2.1 has been designed
5 to follow existing transmission lines, pipelines, and roads. Further, much of subroute 2.1 would pass
6 through rural areas near the town of Lordsburg, New Mexico, and the agricultural fields of the San Simon
7 Valley, avoiding the primitive recreation settings that exist to north in the Peloncillo Mountains and to the
8 south in the Dos Cabezas Mountains.

9 Segment P5b would not be constructed within the designated Peloncillo Mountains Wilderness area.
10 Segment P5b would be located approximately 0.5 mile south of the Wilderness boundary, located along

1 existing pipelines, and would not detract from any of the characteristics for which the Wilderness was
2 designated by Congress (refer to Section 4.12, “Special Designations”).

3 ***Desired Recreation Experiences***

4 The impacts of construction of subroute 2.1 would not change the desired recreation experiences and
5 would be the same as described under route group 1, subroute 1.1.

6 ***Adjacent Recreation Areas***

7 There are no adjacent recreation areas to subroute 2.1.

8 **Operation and Maintenance**

9 ***Recreation Opportunities/Activities***

10 The overall permanent disturbance within the ROW of subroute 2.1 is approximately 8.4 percent, and
11 would be wholly within the ROW (20 acres to operate a new substation notwithstanding). Therefore,
12 recreation opportunities and activities would remain available in approximately 91.6 percent of the
13 subroute 2.1 ROW throughout operation and maintenance of the proposed Project, subject to existing
14 laws and closures. The operational impacts to recreation opportunities and activities would therefore be
15 commensurately less than described under subroute 2.1, construction. However, minor but long-term
16 impacts to bird-watching and hunting would be anticipated in the areas where subroute 2.1 crosses the
17 Willcox Wildlife Area. Though there is an existing line already in place in this area, the addition of the
18 proposed Southline Project may affect the sandhill crane, which is further discussed under Section 4.8.2,
19 “Wildlife.”

20 ***Recreation Settings***

21 Impacts to the recreation settings of subroute 2.1 would be the same as described under construction.

22 ***Desired Recreation Experiences***

23 Impacts to desired recreation experiences within the subroute 2.1 ROW would be the same as described
24 under construction.

25 ***Adjacent Recreation Areas***

26 There are no recreation areas adjacent to subroute 2.1.

27 **SUBROUTE 2.2 – PROPONENT ALTERNATIVE**

28 **Construction**

29 ***Recreation Opportunities/Activities***

30 Construction activities in support of subroute 2.2 would not occur within any designated recreation sites
31 or areas.

32 Hunting in the vicinity of subroute 2.2 would be impacted by construction, as described above under
33 “Impacts Common to All Action Alternatives.” The subroute 2.2 alternative E segment that would occur
34 in GMU 27 in New Mexico and GMU 28 in Arizona would have the greatest reduction of land available
35 for hunting during construction, at 346.4 and 420.2 acres, respectively. Alternative E would be

1 constructed primarily in areas that do not currently include existing transmission lines, pipelines, or roads.
2 The reduction to land available for hunting within GMU 27 in New Mexico and GMU 28 in Arizona
3 (comprising 663,000 and 1.4 million acres, respectively) would represent a less than 0.05 percent
4 reduction to GMU 27 in New Mexico and a less than 0.03 percent reduction to GMU 28 in Arizona,
5 a negligible impact.

6 ***Recreation Settings***

7 Segment E of subroute 2.2, would be constructed on undeveloped land from the Lordsburg Playa west to
8 the San Simon Creek, resulting in a moderate change to the recreation setting. There are no existing
9 facilities that would be paralleled by segment E. The total temporary disturbance during construction of
10 segment E would be 23.2 percent of the ROW.

11 ***Desired Recreation Experiences***

12 Construction of subroute 2.2 would not change the desired recreation experiences.

13 ***Adjacent Recreation Areas***

14 There are no adjacent recreation areas to subroute 2.2.

15 **Operation and Maintenance**

16 ***Recreation Opportunities/Activities***

17 The overall permanent disturbance within the ROW of subroute 2.2 is approximately 6.8 percent, and
18 would be wholly within the ROW (20 acres to operate a new substation notwithstanding). Therefore,
19 recreation opportunities and activities would remain available in approximately 93.2 percent of the
20 subroute 2.2 ROW throughout operation and maintenance of the proposed Project, subject to existing
21 laws and closures. The operational impacts to recreation opportunities and activities would therefore be
22 commensurately less than described under subroute 2.2, construction.

23 The new access roads along alternative E could permanently change the OHV use patterns in the area,
24 subject to Federal, State, and local OHV and traffic laws and regulations. These impacts would be the
25 same as described under “Impacts Common to All Action Alternatives.”

26 ***Recreation Settings***

27 Impacts to the recreation settings of subroute 2.2 would be the same as described under construction.

28 ***Desired Recreation Experiences***

29 Impacts to desired recreation experiences within the subroute 2.2 ROW would be the same as described
30 under construction.

31 ***Adjacent Recreation Areas***

32 There are no recreation areas adjacent to subroute 2.2.

33 **LOCAL ALTERNATIVES**

34 There are 8 local alternatives available for route group 2: LD1, LD2, LD3a, LD3b, LD4, LD4-Option 4,
35 LD4-Option 5, and WC1.

1 **Construction**

2 ***Recreation Opportunities/Activities***

3 The overall impacts to recreation opportunities and activities would be the same as described under
4 subroute 2.2, except as described below.

5 Hunting in the vicinity of the route group 2 local alternatives would be impacted by construction, as
6 described above under “Impacts Common to All Action Alternatives.” The LD4 segment that would
7 occur in GMU 27 in New Mexico and GMUs 28, 31, and 32 in Arizona would have the greatest reduction
8 of land available for hunting during construction, at 91.7, 931.9, 419.7, and 24.4 acres, respectively. LD4
9 would not parallel existing facilities for the majority of the segment. Therefore the reduction to land
10 available for hunting within GMU 27 in New Mexico and GMUs 28, 31, and 32 in Arizona (comprising
11 663,000, 1.4 million, 776,000, and 981,000 acres, respectively) would represent a less than 0.01 percent
12 reduction to GMU 27 in New Mexico, and a less than 0.06 percent, 0.05 percent, and 0.01 percent
13 reduction to GMUs 28, 31, and 32 in Arizona, respectively, a negligible impact.

14 ***Recreation Settings***

15 LD3a could have minor indirect impacts to the recreation setting of the Peloncillo Mountain WSA in
16 New Mexico, since the LD3a segment would not follow existing transmission lines, pipelines, or roads.
17 The impact would be minor since LD3a would be located approximately 0.25 mile to the east of the WSA
18 boundary, and the laws establishing WSAs specifically mandate that “The fact that nonwilderness
19 activities or uses can be seen or heard from within the wilderness shall not, of itself, preclude such
20 activities or uses up to the boundary of the wilderness area” (Public Law: New Mexico Wilderness Act
21 1980, Arizona Wilderness Act 1984, Arizona Desert Wilderness Act 1990).

22 LD1 would cross the Butterfield Trail in an area that is heavily disturbed with existing agricultural fields
23 and transmission lines, and would not change the existing recreation setting.

24 LD2 would cross the Butterfield Trail at the Lordsburg Playa. Since LD2 would be constructed in an area
25 that does not include existing transmission lines or pipelines, there would be a moderate impact to the
26 Butterfield Trail recreational setting. Similarly, LD3a would also cross the Butterfield Trail just west of
27 the Lordsburg Playa in an area that does not include existing transmission lines or pipelines.

28 Alternative E would cross the Butterfield Trail and would be constructed in an area that does not include
29 existing transmission lines or pipelines, resulting in a moderate impact to the Butterfield Trail recreational
30 setting (see Appendix F, “National Scenic and Historic Trails Assessment”).

31 ***Desired Recreation Experiences***

32 Construction of route group 2 local alternatives would not change the desired recreation experiences.
33 In the vicinity where the local alternatives of route group 2 would cross the Butterfield Trail, existing
34 roads and disturbed areas are amongst the landscape, resulting in a desired recreation experience that
35 would be commensurate with the allowable uses surrounding the Butterfield Trail.

36 ***Adjacent Recreation Areas***

37 The Hot Well Dunes Recreation SRMA is located approximately 0.5 mile north of the route group 2 local
38 alternative LD4. The primary recreation activities are camping and OHV driving, and the Hot Well Dunes
39 area is designated as “open” to vehicles, permitting cross-country travel. The recreation setting of Hot
40 Well Dunes SRMA would experience minor impacts to the existing recreation setting during construction
41 of LD4. Construction could result in the temporary access restrictions described under “Impacts Common

1 to All Action Alternatives,” but these delays would be temporary, minor impacts and would not persist
2 once construction is complete. The impact would be minor due to the general compatibility of OHV
3 driving and transmission line construction as not having an impact to the OHV driving experience.

4 **Operation and Maintenance**

5 ***Recreation Opportunities/Activities***

6 The overall permanent disturbance within the ROW of route group 2 local alternatives is approximately 7
7 percent, and would be wholly within the ROW. Therefore, recreation opportunities and activities would
8 remain available in approximately 93 percent of the route group 2 local alternatives ROW throughout
9 operation and maintenance of the proposed Project, subject to existing laws and closures. The operational
10 impacts to recreation opportunities and activities would therefore be commensurately less than described
11 under route group 2 local alternatives, construction.

12 ***Recreation Settings***

13 Impacts to the recreation settings of route group 2 local alternatives would be the same as described under
14 construction.

15 ***Desired Recreation Experiences***

16 Impacts to desired recreation experiences within the route group 2 local alternatives ROW would be the
17 same as described under construction.

18 ***Adjacent Recreation Areas***

19 Operation and maintenance activities to LD4 would not impact the Hot Well Dunes SRMA, and the
20 footprint of the transmission towers, substations, and ancillary facilities would be outside of the SRMA,
21 therefore not eliminating any BLM lands “open” to vehicles.

22 ***Route Group 3 – Apache Substation to Pantano Substation***

23 **SUBROUTE 3.1 – PROPONENT PREFERRED**

24 **Construction**

25 ***Recreation Opportunities/Activities***

26 Since subroute 3.1 is an upgrade to an existing line, there would be no changes to the existing recreation
27 and activities, except as described below.

28 Subroute 3.1 would cross sections of the Butterfield Trail. The impacts to the Butterfield Trail would be
29 the same as described under route group 1, subroute 1.1, except as described below under “Recreation
30 Settings.”

31 Hunting in the vicinity of subroute 3.1 would be temporarily impacted during construction, as described
32 above under “Impacts Common to All Action Alternatives.” Table 4.14-3 below provides the acreages of
33 each GMU that would be affected by the construction of the subroutes included in route group 3.
34 The U3a segment that would occur in GMUs 34B and 38M in Arizona would have the greatest reduction
35 of land available for hunting during construction, at 246.0 and 400.7 acres, respectively. Since U3a
36 parallels existing transmission lines and crosses I-10 multiple times, existing hunting activities in this
37 vicinity likely would not occur within the ROW since the existing facilities could already preclude

1 hunting. The reduction to land available for hunting within GMUs 34B and 38M in Arizona (comprising
 2 319,400 acres and 565,000 acres, respectively) would represent a less than 0.07 percent reduction in lands
 3 available for hunting for both GMU 29 and 30, a negligible impact. Further, much of GMU 38M occurs
 4 within the municipal limits of the greater Tucson area, precluding hunting anywhere within 0.25 mile of
 5 an occupied structure.

6 U3a would cross the Las Cienegas NCA Sonoita Valley Acquisition Planning District. Segment U3a
 7 follows an existing transmission line the entire distance that would cross the Sonoita Valley Acquisition
 8 Planning District. Therefore, there would be no impacts to the recreation opportunities and activities
 9 within the Sonoita Valley Acquisition Planning District. Similarly, U3a would cross through the Bar V
 10 Ranch, paralleling existing transmission lines. The recreation opportunities and activities in Bar V Ranch
 11 would not change during construction.

12 **Table 4.14-3.** Route Group 3 Game Management Unit (Arizona) Inventory Data

	Total Miles	Arizona GMU 30B (acres)	Arizona GMU 32 (acres)	Arizona GMU 33 (acres)	Arizona GMU 34B (acres)	Arizona GMU 38M (acres)
Subroute 3.1, Proponent Preferred						
U1a	16.1	291.9	–	–	–	–
U1b	2.9	2.9	50.1	–	–	–
U2	15.8	–	82.8	189.6	14.6	–
U3a	35.6	–	–	–	246.0	400.7
Route Group 3 Local Alternative						
H	19.3	–	120.8	223.0	6.3	–

13 **Recreation Settings**

14 Segment U1a would cross the Butterfield Trail in an area that includes existing transmission lines,
 15 pipelines, dirt roads, and rural residential homes. Segment U2 would cross the Butterfield Tail in an area
 16 that includes existing transmission lines and roads. The construction of segments U1a and U2 would
 17 result in negligible impacts to the recreation setting of the Butterfield Trail.⁴

18 Segment U1a would cross approximately 0.5 mile of semi-primitive motorized lands within the Coronado
 19 National Forest. U1a follows an existing transmission line the entire segment, and would not be in
 20 conflict with the semi-primitive motorized ROS setting that is designated under the 1988 Coronado
 21 National Forest Plan.

22 **Desired Recreation Experiences**

23 The impacts of construction of subroute 3.1 would not change the desired recreation experiences and
 24 would be the same as described under route group 1, subroute 1.1, except as described below.

25 The semi-primitive motorized ROS setting establishes desired recreation experiences of a mostly natural
 26 landscape not dominated by roads or structures. Construction of U1a would result in moderate impacts to

⁴ A National Trails assessment in accordance with BLM Manual 6250 (BLM 2012c) – National Scenic and Historic Trails Administration (Public) and BLM Manual 6280 (BLM 2012d) – Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (Public) is provided in Appendix F.

1 the desired recreation experience of the Coronado National Forest in a localized manner since the
2 construction of transmission towers and access roads would dominate the areas within the ROW,
3 detracting from a semi-primitive recreation experience. These impacts would be short-term and would
4 include moderate impacts from construction noise, potential fugitive dust, and the visible contrast to the
5 existing landscape. The impacts would be moderate due to the presence of the existing transmission line
6 that U1a would parallel.

7 ***Adjacent Recreation Areas***

8 There are no adjacent recreation areas to subroute 3.1.

9 **Operation and Maintenance**

10 ***Recreation Opportunities/Activities***

11 Hikers, birders, and other users would continue their activities as they existing prior to construction since
12 subroute 3.1 would be an upgrade to pre-existing facilities that already precluded some recreation
13 opportunity and activity. The overall permanent disturbance within the ROW of subroute 3.1 is
14 approximately 10.9 percent, and would be wholly within the ROW (there would be no substations located
15 outside of the ROW under subroute 3.1), a minor impact. Therefore, recreation opportunities and
16 activities would remain available in approximately 89.1 percent of the subroute 3.1 ROW throughout
17 operation and maintenance of the proposed Project, subject to existing laws and closures. The operational
18 impacts to recreation opportunities and activities would therefore be commensurately less than described
19 under subroute 3.1, construction.

20 ***Recreation Settings***

21 Impacts to the recreation settings of subroute 3.1 would be the same as described under construction.

22 ***Desired Recreation Experiences***

23 Impacts to desired recreation experiences within the subroute 3.1 ROW would be the same as described
24 under construction.

25 The operation and maintenance of U1a would have negligible effects to the desired recreation experience
26 of the Coronado National Forest, since U1a would be located parallel to an existing transmission line.

27 ***Adjacent Recreation Areas***

28 There are no recreation areas adjacent to subroute 3.1.

29 **LOCAL ALTERNATIVES**

30 There is one local alternative for route group 3–local alternative H.

31 **Construction**

32 ***Recreation Opportunities/Activities***

33 The construction of alternative H would not change the existing recreation opportunities or activities since
34 it would be an upgrade to an existing transmission line for the entire segment. The overall impacts to
35 recreation opportunities and activities would be the same as described under subroute 3.1, except as
36 described below.

1 Hunting in the vicinity of alternative H would result in minor impacts from construction, as described
2 above under “Impacts Common to All Action Alternatives.” The alternative H segment that would occur
3 in GMUs 32, 33, and 34B in Arizona would result in reductions of 120.8, 223.0, and 6.3 acres to lands
4 available for hunting, respectively. Alternative H would not parallel existing transmission lines for the
5 entire segment. Therefore the reduction to land available for hunting within GMUs 32, 33, and 34B in
6 Arizona (comprising 981,000, 661,000, and 319,000 acres, respectively) would represent a less than 0.01
7 percent reduction to GMU 32, a less than 0.03 percent reduction to GMU 33, and a less than 0.01 percent
8 reduction to GMU 34B in Arizona, a negligible impact.

9 ***Recreation Settings***

10 Alternative H would cross the Butterfield Trail in an area that includes an existing pipeline and dirt roads.
11 Therefore, the recreation setting would not change from existing conditions as a result of the construction
12 of alternative H.

13 ***Desired Recreation Experiences***

14 Construction of alternative H would not change the desired recreation experiences. In the vicinity where
15 alternative H would cross the Butterfield Trail, existing roads and disturbed areas are amongst the
16 landscape. Construction would result in a desired recreation experience that would be commensurate with
17 the allowable uses surrounding the Butterfield Trail.

18 ***Adjacent Recreation Areas***

19 There are no recreation areas adjacent to subroute 3.1.

20 **Operation and Maintenance**

21 ***Recreation Opportunities/Activities***

22 The overall permanent disturbance within the ROW of alternative H is 13.4 percent, and would be
23 wholly within the ROW. Therefore, recreation opportunities and activities would remain available in
24 approximately 86.6 percent of the alternative H ROW throughout operation and maintenance of the
25 proposed Project, subject to existing laws and closures. The operational impacts to recreation
26 opportunities and activities would therefore be commensurately less than described under alternative H,
27 construction.

28 ***Recreation Settings***

29 Impacts to the recreation settings within the route group 3 local alternatives ROW would be the same as
30 described under construction.

31 ***Desired Recreation Experiences***

32 Impacts to desired recreation experiences within the route group 3 local alternatives ROW would be the
33 same as described under construction.

34 ***Adjacent Recreation Areas***

35 There are no adjacent recreation areas to subroute 3.1.

1 **Route Group 4 – Pantano Substation to Saguaro Substation**

2 **SUBROUTE 4.1 – PROPONENT PREFERRED**

3 **Construction**

4 **Recreation Opportunities/Activities**

5 The recreation opportunities and activities in the area of subroute 4.1 are unique among the proposed
6 Project segments, in that subroute 4.1 would be located in rural areas in greater frequency than in
7 undeveloped areas. Subroute 4.1 would not be limited to rural areas and also includes undeveloped areas.

8 Hikers, birders, and other users would continue their activities as they existing prior to construction since
9 subroute 4.1 would be an upgrade to pre-existing facilities that already precluded some recreation
10 opportunity and activity. Multiple recreation areas, preserves, parks, and golf courses are present along
11 subroute 4.1 (refer to Section 3.14, “Recreation”). Since subroute 4.1 is an upgrade to an existing line,
12 there would be no changes to the existing recreation and activities except as described below.

13 Hunting in the vicinity of subroute 4.1 would be temporarily impacted during construction, as described
14 above under “Impacts Common to All Action Alternatives.” Table 4.14-4 provides the acreages of each
15 GMU that would be affected by the construction of the subroutes included in route group 4. The U3a
16 segment that would occur in GMUs 34B and 38M in Arizona would have the greatest reduction of land
17 available for hunting during construction, at 400.7 and 246.0 acres, respectively. Since U3a parallels
18 existing transmission lines and crosses I-10 multiple times, existing hunting activities in this vicinity
19 likely would not occur within the ROW since the existing facilities could already preclude hunting.
20 The reduction to land available for hunting within GMUs 34B and 38M in Arizona (composed of 319,400
21 acres and 565,000 acres, respectively) would represent a less than 0.07 percent reduction in lands
22 available for hunting for both GMU 34B and 38M, a negligible impact. Further, much of GMU 38M
23 occurs within the municipal limits of the greater Tucson area, precluding hunting anywhere within 0.25
24 mile of an occupied structure.

25 The Arizona Trail and the Anza Trail would be crossed by U3a under subroute 4.1. The recreation
26 opportunities and activities of the Arizona Trail and the Anza Trail would not change during construction
27 of subroute 4.1.

28 **Table 4.14-4. Route Group 4 Game Management Unit (Arizona) Inventory Data**

	Total Miles	Arizona GMU 37A (acres)	Arizona GMU 38M (acres)
Subroute 4.1, Proponent Preferred			
U3a	35.6	400.7	246.0
U3b	0.5	–	
U3c	1.0	–	
U3d	3.4	–	
U3e	0.9	–	
U3f	0.7	–	
U3g	0.9	–	
U3h	1.1	–	
U3i	18.2	6.1	325.0

1 **Table 4.14-4.** Route Group 4 Game Management Unit (Arizona) Inventory Data (Continued)

	Total Miles	Arizona GMU 37A (acres)	Arizona GMU 38M (acres)
U3j	0.9	15.9	–
U3k	16.7	303.6	–
U3l	1.6	28.1	–
U3m	0.6	8.9	–
U4	1.9	–	34.7
Route Group 4 Local Alternatives			
MA1	1.1	19.0	–
TH1a	1.4	–	25.7
TH1b	1.6	–	28.4
TH1c	0.3	–	4.8
TH1-Option	1.0	–	7.7
TH3-Option A	0.8	–	15.1
TH3-Option B	0.8	–	14.5
TH3-Option C	1.8	–	29.3
TH3a	2.7	–	49.7
TH3b	4.5	–	81.4

2 ***Recreation Settings***

3 Segment U3a would cross the Arizona Trail and the Anza Trail in areas that include existing transmission
 4 lines and dirt roads. The construction of segment U3a would result in negligible impacts to the recreation
 5 setting of the Arizona Trail and the Anza Trail (see Appendix F, “National Scenic and Historic Trails
 6 Assessment”).

7 ***Desired Recreation Experiences***

8 The impacts of construction of subroute 4.1 would not change the desired recreation experiences and
 9 would be the same as described under route group 1, subroute 1.1, except as described below.

10 ***Adjacent Recreation Areas***

11 Saguaro National Park is located approximately 0.5 mile west of segment U3i. The recreation
 12 opportunities and activities, recreation settings, and desired recreation experiences would not change if
 13 subroute 4.1 were constructed, since all construction activities would upgrade existing facilities and
 14 would not preclude the existing recreation conditions. Short-term access interruptions (as described under
 15 “Impacts Common to All Action Alternatives”) could occur but would be localized and minor.

16 IFNM is also located approximately 0.5 mile west of segment U3i near the town of Marana. The
 17 recreation opportunities and activities, recreation settings, and desired recreation experiences would not
 18 change if subroute 4.1 were constructed, since all construction activities would upgrade existing facilities
 19 and would not preclude the existing recreation conditions. Short-term access (as described under “Impacts
 20 Common to All Action Alternatives”) could occur but would be localized and minor.

1 **Operation and Maintenance**

2 ***Recreation Opportunities/Activities***

3 Impacts to the recreation opportunities and activities within the subroute 4.1 ROW would be the same as
4 described under construction.

5 ***Recreation Settings***

6 Impacts to the recreation settings of subroute 4.1 would be the same as described under construction.

7 ***Desired Recreation Experiences***

8 Impacts to desired recreation experiences within the subroute 4.1 ROW would be the same as described
9 under construction.

10 ***Adjacent Recreation Areas***

11 The impacts of operation and maintenance of subroute 4.1 to Saguaro National Park would be the same as
12 described under construction.

13 **LOCAL ALTERNATIVES**

14 There are 10 local alternatives available for route group 4: MA1, TH1a, TH1b, TH1c, TH1-Option, TH3a,
15 TH3b, TH3-Option A, TH3-Option B, and TH3-Option C.

16 **Construction**

17 ***Recreation Opportunities/Activities***

18 The construction of these local alternatives would not change the existing recreation opportunities or
19 activities since it would be an upgrade to an existing transmission line for the entire segment. The overall
20 impacts to recreation opportunities and activities would be the same as described under subroute 4.1,
21 except as described below.

22 Hunting is not legally permitted along the route group 4 local alternatives since all segments would be
23 within urban areas that occur within the city limits of Tucson.

24 ***Recreation Settings***

25 The recreation settings of the route group 4 local alternatives would not change since the proposed Project
26 would include upgrades to existing facilities.

27 ***Desired Recreation Experiences***

28 The desired recreation experiences of the route group 4 local alternatives would not change since the
29 proposed Project would include upgrades to existing facilities.

30 ***Adjacent Recreation Areas***

31 Impacts to adjacent recreation areas within the route group 4 local alternatives would be the same as
32 described under subroute 4.1, construction.

1 **Operation and Maintenance**

2 ***Recreation Opportunities/Activities***

3 The overall permanent disturbance within the ROW of route group 4 local alternatives is 2.2 percent, and
4 would be wholly within the ROW. Therefore, recreation opportunities and activities would remain
5 available in approximately 97.8 percent of the route group 4 local alternatives ROW throughout operation
6 and maintenance of the proposed Project, subject to existing laws and closures. The operational impacts
7 to recreation opportunities and activities would therefore be commensurately less than described under
8 route group 4 local alternatives, construction.

9 ***Recreation Settings***

10 Impacts to the recreation settings within the route group 4 local alternatives would be the same as
11 described under route group 4 local alternatives, construction.

12 ***Desired Recreation Experiences***

13 Impacts to desired recreation experiences within the route group 4 local alternatives ROW would be the
14 same as described under construction.

15 ***Adjacent Recreation Areas***

16 Impacts to adjacent recreation areas within the route group 4 local alternatives would be the same as
17 described under route group 4 local alternatives, construction.

18 ***Agency Preferred Alternative***

19 The Agency Preferred Alternative would not change the recreation opportunities/activities and impacts
20 would be the same as described under “Impacts Common to All Action Alternatives.”

21 The Agency Preferred Alternative segments included in route group 1 would result in negligible changes
22 to the recreation setting and desired recreation experiences during construction. The changes would be
23 negligible because all segments that comprise the Agency Preferred Alternative in route group 1 would
24 follow existing facilities, and thus the recreation setting and desired recreation experiences would already
25 include/anticipate the presence of transmission lines.

26 The Agency Preferred Alternative included in route group 2 would result in moderate changes to the
27 recreation setting and desired recreation experiences during construction, as well as operation and
28 maintenance. The changes would be moderate because segment LD4 would not follow existing facilities,
29 and thus the recreation setting and desired recreation experiences would change from the existing
30 conditions of undeveloped landscape to a developed landscape. This change to the recreation setting is not
31 anticipated to preclude any desired recreation experiences since recreational opportunity for all
32 recreational pursuits in the area would still be available everywhere within the analysis area for LD4
33 except the footprints of the transmission line towers.

34 Short-term, minor impacts to the existing recreation settings would occur in route groups 3 and 4 at the
35 intersections of the Agency Preferred Alternative segments with National Trails, Aden Hills OHV area,
36 Bar V Ranch, Tucson Mountain Park, Tumamoc Hill, Joaquin Murrieta Park, Santa Cruz River Park, and
37 Christopher Columbus Park during construction, as described under “Impacts Common to All Action
38 Alternatives.” These impacts would be minor due to the presence of existing transmission line ROWs at
39 these intersections, and would only occur during construction, when activities may change certain

1 recreation settings. These short-term changes to the recreation setting would result from the presence
2 construction equipment, increased noise, and fugitive dust.

3 ***Additional Mitigation Measures***

4 Construction could be limited to certain areas of the ROW during hunting seasons, in accordance with
5 NMDGF and AGFD hunting regulations.

6 If the Arizona National Scenic Trail must be temporarily closed during construction, an alternate route
7 should be provided during that time. The ASLD allows trail users to be within the 15-foot trail easement
8 without a State Land recreation permit. If it is necessary for trail users to leave the easement on a detour
9 during Project implementation, an exception should be obtained from the ASLD.

10 ***Residual Impacts***

11 No residual impacts to recreation resources are identified.

12 ***Unavoidable Adverse Impacts***

13 Dispersed recreation opportunities and activities would be lost permanently (for the life of the proposed
14 Project) in areas that would be physically occupied by the transmission line towers, substations, and
15 ancillary facilities. However, dispersed recreation would still occur in the immediate area surrounding the
16 tower, substation or ancillary facility. In addition, users may simply go around, or even through (if the
17 structure is steel lattice) the area that may be physically occupied by the Project. Thus, unavoidable
18 adverse impacts would be a negligible impact. The overall loss of BLM land available for dispersed
19 recreation would represent far less than 1 percent of the Las Cruces District and Safford FO, respectively.

20 ***Short-term Uses versus Long-term Productivity***

21 Construction and operation and maintenance of the proposed Project would result in use of land and other
22 resources for energy transmission and would preclude recreation in areas occupied by the transmission
23 line towers, substations, and ancillary facilities. Implementation of the Project would not eliminate
24 recreational access and activities in these areas in the long-term. The temporary and negligible impacts to
25 recreation are not anticipated to be long-term changes in hunting, hiking, and motorized vehicle use
26 patterns because construction of the proposed Project would not significantly decrease (or in the case of
27 new access roads, increase) the areas available for dispersed recreation. Implementation of the proposed
28 Project may create long-term disruptions of the visual quality due to the contrast that transmission
29 facilities create upon the existing landscape, but these impacts would not affect all users. There would be
30 no maintenance or enhancement of recreational resources, but all existing access to recreation areas
31 would be maintained during construction and operation and maintenance. However, due to the nature of
32 the Project occurring in areas that largely already experience these types of impacts (e.g., vehicle use
33 patterns, desired recreation setting) the impact is negligible since the proposed Project would not
34 eliminate recreation use.

35 ***Irreversible and Irretrievable Commitments of Resources***

36 There would not be an irreversible commitment to recreation resulting from the Project. Existing
37 recreation opportunities and activities, recreation settings, desired recreation experiences, and adjacent
38 recreation areas could be restored to existing conditions if the proposed Project and facilities were
39 removed in the future.

1 In addition, it could take years before the Project footprint is no longer visible, if it were restored to
2 existing conditions after the life of the Project. Even when vegetation is established during reclamation
3 efforts, the composition of plant species in the recovery area is often different than the original vegetation
4 community. Typically, grasses establish early on, whereas shrubs take much longer to reestablish.
5 The Project footprint could visibly persist for years beyond restoration.

6 **4.15 SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE**

7 **4.15.1 Introduction**

8 This section describes the impacts to socioeconomics and environmental justice communities associated
9 with the construction and operation and maintenance of the transmission line, substations, and ancillary
10 facilities. Impacts to socioeconomics are discussed in terms of effects on the economy, population,
11 housing, tax revenues, public services, property values, the tourism- and recreation-related economy, and
12 social impacts. The impacts described in this section are based on regional economic modeling
13 incorporating projected construction and operation and maintenance activities, prior experience and
14 analyses in other locations, and the other resource assessments provided in this DEIS.

15 **4.15.2 Methodology and Assumptions**

16 This section describes the analysis area for socioeconomics, key assumptions and methods, impact
17 indicators, and thresholds for determining significant impacts.

18 ***Analysis Area***

19 As discussed in chapter 3, section 3.15, the analysis area for socioeconomics is based on the counties the
20 Project alternatives traverse and where Project impacts are most likely to occur; these counties include
21 Doña Ana County, Grant County, Hidalgo County, and Luna County in New Mexico, and Cochise
22 County, Pima County, Pinal County, Graham County, and Greenlee County in Arizona. The New Build
23 Section of the Project would generally be located within the four counties in New Mexico and Cochise
24 County, Arizona. Under one New Build Section local alternative, the line would also cross Graham
25 County and Greenlee County in Arizona. The Upgrade Section of the Project would be located in Cochise
26 County, Pima County, and Pinal County in Arizona.

27 Given the large geographic area encompassing the proposed Project, and the limited availability of
28 economic data for geographic areas smaller than counties, the socioeconomic impact analysis generally
29 focuses on evaluating impacts for the two subareas within the overall analysis area—the New Build
30 Section and the Upgrade Section—as a whole.

31 The analysis area for environmental justice includes census tracts that fall within a 2-mile buffer of the
32 Project alternatives within the New Build Section of the Project and a 500-foot buffer within the Upgrade
33 Section of the Project. All of the census tracts within the analysis area for environmental justice were
34 analyzed for low-income and minority populations (see section 3.15).

1 **Analysis Assumptions**

2 **DEFINITIONS**

3 Direct socioeconomic impacts include effects that would be caused by the proposed Project and would
4 occur at the same time. Indirect impacts include effects that would also be caused by the proposed
5 Project, but would occur later in time or farther removed in distance. For socioeconomic resources, one
6 example of a potential indirect effect would include any “multiplier” effects on the economy resulting
7 from the recirculation of money spent by Southline for construction worker salaries or the purchase of
8 construction goods and services within the analysis area.

9 Short-term effects include effects that would occur during construction. Long-term effects include effects
10 that would continue to occur during operation and maintenance of the proposed Project.

11 **ECONOMIC AND FISCAL EFFECTS**

12 Economic effects from the proposed Project, and most fiscal effects, were estimated using IMPLAN
13 regional economic models. IMPLAN is an input/output modeling system originally developed for the
14 U.S. Forest Service and is widely used by both private-sector and public-sector economists for impact
15 analyses throughout the United States. The IMPLAN models incorporated 2010 data for the analysis area.

16 Construction of the proposed Project would produce three types of revenue streams that would stimulate
17 the local economy—procurement of locally sourced goods and materials, wages paid to local construction
18 workers, and the local expenditures of non-local construction workers during the period in which they are
19 located in the analysis area. Each of these revenue streams was incorporated in the IMPLAN analysis.

20 Even though the majority of the construction workforce would be temporary workers who would not
21 permanently reside in the analysis area, they would still contribute to the overall economic impacts of the
22 Project. Given that the non-local labor force would reside in the local community for the duration of the
23 Project, they would inevitably spend a portion of their income in the local economy. These local
24 expenditures would likely primarily include housing, food, and entertainment. For this analysis we have
25 assumed that 50 percent of the non-local labor force’s wages would be spent in the analysis area.
26 The 50 percent estimate is uncertain, but reflects both professional judgment and the assumptions
27 incorporated in previous IMPLAN studies involving large, transient labor forces. For example, a recent
28 economic impact study of the Marcellus Shale in Pennsylvania bounded local spending to 50 percent of
29 wages for transient workers (Marcellus Shale Education & Training Center 2011).

30 Although the IMPLAN model provides information on the tax revenues that would be produced by
31 construction or operation and maintenance activities, it does not account for the ongoing property tax
32 revenues that could accrue from the value of the constructed transmission line. For that purpose, several
33 assumptions were made: the “market value” of the completed line was assumed to be equivalent to the
34 full cost of construction, and the value of the line was assumed to be distributed across the analysis area
35 (by county) based on the proportion of the line that would be located in each county.

36 **POPULATION AND HOUSING EFFECTS**

37 The economic effects of the Project could also lead to impacts on the population levels in the analysis
38 area. Approximately 75 percent of the construction workforce is expected to consist of non-local
39 employees who will reside in the analysis area during the construction period (CH2M Hill 2013p). Given
40 the short-term and migratory nature of this Project, very few of these employees are expected to be
41 accompanied by their families. In other recent environmental impact studies for proposed transmission

1 lines, the proportion of non-local construction workers who would be accompanied by their families has
2 been projected to be essentially zero (BLM 2013a) or up to 10 percent (BLM 2013p). To ensure this
3 analysis does not inadvertently understate potential population-related impacts, the has analysis assumes
4 that 10 percent of the non-local construction workforce would be accompanied by a spouse and a school-
5 aged child.

6 The local economic opportunities that result from construction-related payroll and construction
7 expenditures for local goods and services could also lead to additional migration to the analysis area.
8 The IMPLAN model provides estimates of the number of indirect jobs that would be created due to these
9 expenditures. The extent to which these indirect jobs would be filled by existing residents in the analysis
10 area, versus people drawn to the area by these new employment opportunities, is unknown. For purposes
11 of estimating potential impacts on population, this analysis provides a range of potential population
12 effects from the alternatives. At the low end, the indirect jobs are assumed to be filled entirely by local
13 residents and estimates of population effects include only the direct Project construction workers and
14 families. At the high end, all indirect jobs are assumed to be filled by workers who migrate to the analysis
15 area. The composition of these workers' households is assumed to mirror the current average of 2.6
16 persons per household average within the analysis area (Census Bureau 2011).

17 Non-local workers, direct or indirect, will require housing in the analysis area. For purposes of
18 considering potential effects on housing conditions, the number of projected non-local workers is
19 compared to the estimated availability of rental housing, motel/hotel rooms, and RV sites within the
20 analysis area.

21 **SOCIAL EFFECTS**

22 Rapid development and the presence of large numbers of temporary workers in rural areas can lead to
23 impacts on social conditions. Sociologists and others have written extensively on social issues associated
24 with rapid development in rural areas since the 1980s. Analysts have focused on past energy development
25 campaigns in the western United States and impacts to the social well-being in host communities
26 (BLM 2012k).

27 Prior studies have found mixed results in terms of social effects from rapid development in rural areas.
28 Key areas of concern include the potential for changes in the “density of acquaintanceship;”⁵ declines in
29 local identity, solidarity, and trust in other community members; increased fear of crime; less control of
30 deviant behavior, reduced respect for law and order, and less effective socialization of youth; and
31 diminished community satisfaction and reduced attachment to the community. Whether these effects
32 occur, and the degree to which they occur, appears to vary based on both the nature of the resource
33 activity, the stage or phase of activity, and the characteristics of the affected communities (Montana
34 Board of Crime Control 2013).

35 Social effects cannot be directly quantified except by surveys of affected community members.
36 For purposes of this analysis, the rate of projected population change that could result from the proposed
37 Project, relative to the existing population size of potentially affected communities, is considered to
38 represent an indicator of the potential for adverse social effects.

39 **ENVIRONMENTAL JUSTICE EFFECTS**

40 Evaluation of environmental justice effects involves assessment of the potential for disproportionately
41 high and adverse effects on minority or low-income populations. Minority and low-income populations in

⁵ This may sometimes be expressed in statements like “we used to know everyone, now there are a lot of strangers in our community.”

1 proximity to the ROW for the proposed Project and the alternatives were identified in chapter 3, on the
2 basis of Census data at the Census tract level. Census tracts typically include 2,500 to 8,000 people and,
3 in rural areas, can be quite large in geographic area. For purposes of this assessment the population in
4 closest proximity to the ROW for the proposed Project and alternatives was assumed to have the same
5 characteristics (e.g., minority or low-income status) as the overall Census tract in which it is located.

6 ***Impact Indicators***

7 Impact indicators were developed for key socioeconomic and environmental justice attributes.
8 The attributes and impact indicators are:

- 9 • Regional economy – change in employment, labor earnings, and regional output
- 10 • Fiscal conditions – changes in local government tax revenues
- 11 • Demographic conditions – changes in total population
- 12 • Housing conditions – changes in demand for housing relative to available supply
- 13 • Social conditions – rate of population change, expressed as percent change per year
- 14 • Environmental justice – anticipated high and disproportionate adverse socioeconomic or
15 environmental effects on environmental justice communities relative to effects across the analysis
16 area as a whole

17 ***Significant Impacts***

18 For the purposes of this analysis, a significant impact on socioeconomics or environmental justice could
19 result if any of the following were to occur from construction or operation and maintenance of the
20 proposed Project:

- 21 • A short-term or long-term change (positive or negative) of 1 percent or more in employment,
22 labor earnings, or regional output compared to current conditions.
- 23 • A short-term or long-term change (positive or negative) of 1 percent or more in tax revenues
24 received by local governments
- 25 • A short-term change of 1 percent or more in the population residing in the analysis area or within
26 individual counties within the analysis area
- 27 • Short-term demand for accommodations during construction exceeding one-third of the estimated
28 available supply
- 29 • High and disproportionate adverse effects on environmental justice communities

30 **4.15.3 Impacts Analysis Results**

31 ***No Action Alternative***

32 Under the no action alternative, Southline would not construct and operate the new section of
33 transmission line in the New Build Section. Even under the no action alternative, Western still plans to
34 upgrade the existing lines between the Apache and Saguaro substations within the next 10 years, per
35 Western's 10-year capital improvement plan (Western 2012a). In the short term, there would be no
36 socioeconomic effects under the no action alternative.

1 In the long term, the no action alternative would not meet the purpose and need objectives of improving
2 reliability of the electrical grid in southern New Mexico and southern Arizona, increasing the ability of
3 the grid to meet demand growth in the region, or facilitating potential renewable generation development
4 in the region. Adequate and reliable electricity supply, like other key infrastructure, is an important
5 requirement for economic development. Absent alternative projects to upgrade electricity supplies in
6 southern New Mexico and southern Arizona, the no action alternative could result in significant long-term
7 adverse impacts on the economy, local utilities and residents in the analysis area.

8 ***Impacts Common to All Action Alternatives***

9 Each of the action alternatives would involve the construction and operation and maintenance of a new
10 transmission line and appurtenant facilities, including electrical substations, in the New Build Section,
11 and the upgrade and operation of similar existing facilities in the Upgrade Section.

12 During a projected construction period of approximately 24 months, Southline would hire a number of
13 local workers and bring in a larger number of non-local workers to complete the Project. They would also
14 spend money on materials and services for construction, with the majority of those expenditures going to
15 suppliers outside the analysis area.

16 Southline has developed and provided estimates of the required workforce—and anticipated expenditures
17 for labor, supplies, and materials—for the proposed Project. Comparable estimates of labor requirements
18 and costs are not available for the other action alternatives, but the magnitude of the workforce and
19 expenditures would likely be comparable to those anticipated for the proposed Project.

20 Overall, the action alternatives would facilitate future economic development and long-term job growth in
21 the region by improving reliability of the electrical grid and increasing the ability of the grid to meet the
22 demand of future growth.

23 **NEW BUILD SECTION**

24 **Economic Effects**

25 ***Construction***

26 Based on information provided by Southline, an average of 325 workers would be required to complete
27 the New Build Section over the 2-year construction period, at a projected cost of \$28.5 million per year.
28 Seventy-nine of these workers are expected to be hired from the local workforce at an annual cost of \$5.7
29 million. Southline would spend a projected average of \$117.85 during each of the 2 years for materials
30 and supplies, with approximately 5 percent (\$5.9 million per year) of these expenditures accruing to local
31 suppliers (CH2M Hill 2013p).

32 This information was incorporated into a regional IMPLAN economic model that included Doña Ana
33 County, Grant County, Hidalgo County, and Luna County in New Mexico, and Cochise County in
34 Arizona. As shown in table 4.15-1, construction of the proposed Project is projected to support
35 approximately 235 short-term jobs in the New Build Section. This total includes the projected 79 direct
36 jobs (local hires) associated with construction, as well as 156 indirect jobs that would be supported by
37 local purchases of supplies and materials for construction, household expenditures by the locally hired
38 workers, and local expenditures by non-local workers during the construction period. This employment
39 total does not count the estimated 246 non-local workers anticipated to be hired for construction.

1 **Table 4.15-1.** Projected Annual Employment Impact from Construction of New Build Section

Construction Expenditures	Direct Employment	Indirect Employment	Total Employment
Local materials	0	65	65
Local labor	79	30	109
Non-local labor	0	61	61
Total	79	156	235

2 In addition to the \$5.7 million in annual compensation anticipated to be paid to locally hired construction
3 workers, construction of the New Build Section is projected to indirectly produce an additional \$5.7
4 million in annual labor earnings during the 2-year construction period. This information is summarized in
5 table 4.15-2. The projected total labor earnings impact in the New Build Section of approximately \$11.4
6 million per year does not include the projected \$22.8 million per year expected to be paid to non-local
7 construction workers.

8 **Table 4.15-2.** Projected Annual Labor Earnings Impact from Construction of New Build Section

Construction Expenditures	Direct Labor Earnings	Indirect Labor Earnings	Total Labor Earnings
Local materials	\$0	\$2.7	\$2.7
Local labor	\$5.7	\$1.0	\$6.7
Non-local labor	\$0	\$2.0	\$2.0
Total	\$5.7	\$5.7	\$11.4

9 Note: Labor earnings reflect total compensation, including worker benefits, in millions of 2013 U.S. dollars.

10 Overall, construction of the New Build Section is projected to produce a short-term, annual increase in
11 regional output of \$24.8 million during the 2-year construction period. This total includes the projected
12 \$5.9 million increase in direct output due to the purchase of locally sourced construction goods and
13 materials, along with \$18.9 million in additional regional output due to recirculation of the wages paid to
14 construction workers. This information is summarized in table 4.15-3. As noted previously, non-local
15 workers were assumed to spend 50 percent of their disposable income within the analysis area during the
16 construction period.

17 **Table 4.15-3.** Projected Annual Impact on Regional Output from Construction of New Build Section

Construction Expenditures	Direct Output	Indirect Output	Total Output
Local materials	\$5.9	\$8.8	\$14.7
Local labor	\$0	\$3.3	\$3.3
Non-local labor	\$0	\$6.7	\$6.7
Total	\$5.9	\$18.9	\$24.8

18 Note: Output is in millions of 2013 U.S. dollars; numbers may not add up due to rounding.

1 **Operation and Maintenance**

2 In contrast to the large workforce and expenditures required for construction, ongoing operations and
3 maintenance would require few workers and have relatively little direct economic impact in the New
4 Build Section. Ground inspections of the transmission line facilities could require up to three crew
5 members and would be anticipated every 1 to 2 years. Insulator washing would occur no more than twice
6 per year and would require approximately 30 minutes per transmission structure. Vegetation removal
7 might be required in some locations on an annual basis. Repairs and replacements of transmission line
8 components would be performed as needed. Substations would be unmanned and controlled remotely.
9 Routine substation operations would require a monthly visit by a crew of one to two workers and a major
10 maintenance once per year requiring up to 15 personnel over a 1- to 3-week period. These types of
11 activities would have minimal effects on the local economy, and regional economic impacts from
12 operations have not been estimated (Southline 2013).

13 In contrast to the no action alternative, however, each of the action alternatives would meet the purpose
14 and need for the proposed Project in improving reliability of the electrical grid in southern New Mexico
15 and southern Arizona, increasing the ability of the grid to meet demand growth in the region, or
16 facilitating potential renewable generation development in the region. The long-term economic impacts
17 from these improvements have not been estimated, but could be significant.

18 **Tax Revenue Effects**

19 **Construction**

20 Construction-related economic activity would also generate additional tax revenues for local governments
21 in the New Build Section. The largest sources of new state and local revenues would be sales taxes⁶ and
22 property taxes. Based on the IMPLAN analysis of regional economic effects, construction of the proposed
23 Project would produce approximately \$462,000 per year in additional state and local sales taxes and
24 approximately \$219,000 per year in additional state and local property taxes.

25 In both Arizona and New Mexico, the state receives approximately two-thirds of all gross receipts tax
26 revenues, while approximately one-third of these revenues are distributed to local governments. Local
27 governments in the two states (including school districts) receive about 95 percent of the property tax
28 revenues and the states receive about 5 percent of these revenues. Based on these generalized proportions,
29 local governments in the New Build Section could expect to receive about \$150,000 per year in additional
30 sales tax revenues and about \$210,000 per year in additional property tax revenues during the 2-year
31 construction period. Comparison of these estimated local government tax revenues with the baseline tax
32 receipts shown in table 3.15-17 indicates construction-related sales and property taxes would represent an
33 increase of about 0.1 percent in total sales and property tax revenues for local governments in the New
34 Build Section.

35 **Operation and Maintenance**

36 Depending on the ultimate ownership of the proposed Project,⁷ the transmission line and appurtenant
37 facilities could produce more substantial property tax revenues for local governments once fully
38 constructed. Based on an estimated taxable value of approximately \$138 million for the New Build
39 Section, the transmission line could initially produce about \$4.2 million per year in property tax revenues
40 for local governments. This total would represent a 1.5 percent increase in total local government

⁶ Sales taxes are termed gross receipts taxes in New Mexico and Transaction Privilege taxes in Arizona.

⁷ Under private ownership, the transmission line and appurtenant facilities would likely be subject to State and local property taxes. To the extent that Western owns parts or all of the facilities, they may not be subject to property taxes.

1 property tax revenues in the New Build Section. Property tax revenues would decrease over time during
2 the period of operations due to depreciation in the value of the facilities.

3 **Population Effects**

4 **Construction**

5 Construction of the proposed Project is expected to require approximately 246 non-local workers who
6 would reside within the New Build Section during the 2-year construction period. Construction-related
7 economic activity is also anticipated to support approximately 156 indirect jobs in the area. Although no
8 more than 10 percent of the non-local construction workers are expected to be accompanied by their
9 families, migrants to the area to fill the indirect jobs resulting from local construction-related expenditures
10 might more closely resemble typical households within the area.

11 Table 4.15-4 depicts the potential short-term population effects associated with construction of the
12 proposed Project. If all of the indirect jobs are filled by existing residents of the area, the proposed Project
13 could result in a short-term increase in the population of the New Build Section of about 271 adults and
14 25 children. The maximum potential short-term population effect, if all of the indirect jobs were filled by
15 individuals moving to the area, would be about 583 adults and 119 children.

16 **Table 4.15-4.** Potential Population Effects from Construction of New Build Section

Source	Workers	Family Members		Potential Population Increase	
		Adults	Children	Adults	Children
Direct jobs	325				
Local hires	79				
Imported workers	246	25	25	271	25
Indirect jobs	156	156	94	312	94
Maximum potential population increase				583	119

17 These projected population effects would represent an increase of between 0.07 percent and 0.16 percent
18 in the total population of the New Build Section. However, the construction workforce would not be
19 evenly distributed across the area throughout the construction period. Instead, much of that workforce is
20 expected to move across the New Build Section as construction proceeds. In the sparsely populated
21 western portion of the New Build Section, the relative magnitude of the population increase could be
22 more substantial. In the most extreme example, if all of the non-local construction workers temporarily
23 reside in Hidalgo County, this workforce would represent about 5 percent of the total county population.
24 These localized effects, however, would occur for only a portion of the 2-year construction period.

25 **Operation and Maintenance**

26 As noted previously, ongoing operations and maintenance would require relatively few workers.
27 The proposed Project would have minimal long-term effects on the population of the New Build Section.

1 **Housing Effects**

2 ***Construction***

3 The non-local construction workers, any family members they bring with them, and any workers and
4 families who migrate to the area to fill indirect jobs resulting from construction would place additional
5 demands on rental housing and short-term accommodations in the analysis area. Based on the population
6 effects analysis described previously, between 246 and 402 rental or short-term housing units could be
7 required during construction in the New Build Section.

8 Although this projected housing requirement represents a small portion of the approximately 5,700 rental
9 housing units available in the New Build Section (see table 3.15-3), the available rental housing stock is
10 dominated by the large number of units available in the Las Cruces area (at the extreme eastern end of the
11 New Build Section) and in the southern portion of Cochise County—a considerable distance from the
12 proposed alignment. The biggest challenge in housing the temporary workforce within the New Build
13 Section is likely to occur when construction proceeds to the western portions of the New Build Section,
14 including Hidalgo County and northeastern Cochise County.

15 Table 3.15-3 shows that Hidalgo County has approximately 80 available rental housing units.
16 The number of rental units in northeastern Cochise County is not known, but is likely to also be small,
17 based on the sparse population in that area. As noted in chapter 3, there are approximately 400 to 500
18 hotel/motel units in Lordsburg (in Hidalgo County). Although hotel/motel accommodations in
19 northeastern Cochise County are much more limited, that area has a relatively large number of RV/mobile
20 home parks.

21 Overall, while it should be possible to accommodate the temporary construction workforce, the proposed
22 Project could lead to short-term shortages of housing and temporary accommodations in the western
23 portions of the New Build Section. It is possible that at least a portion of the construction workforce could
24 be housed in temporary “man camps.” Such camps can create issues and concerns for local governments
25 and residents if they are not carefully managed and monitored.

26 ***Operation and Maintenance***

27 The proposed Project would have minimal long-term effects on housing within the New Build Section.

28 **Effects on Public Services**

29 ***Construction***

30 In addition to the temporary increase in demand for housing just described, the non-local construction
31 workforce and any non-local workers and families who migrate to the area to fill indirect employment
32 opportunities, would also create additional short-term demands for public services such as police and fire
33 protection, education, and medical services. Much like the housing situation, these added demands are
34 unlikely to create substantial challenges in the eastern portion of the New Build Section, but could create
35 short-term challenges in the western portion of the proposed Project, where existing services are much
36 more limited.

37 ***Operation and Maintenance***

38 The proposed Project would have minimal long-term effects on most public services within the New
39 Build Section. However, to the extent the proposed Project improves reliability of the electrical grid in

1 southern New Mexico and southern Arizona, and increases the ability of the grid to meet demand growth
2 in the region, it could provide long-term improvements for the area in terms of electric utility service.

3 **Effects on Property Values**

4 ***Construction***

5 To construct the New Build Section of the proposed Project, a 200-foot-wide ROW along the 240-mile-
6 long route would be acquired. The new ROW would be obtained through a combination of grants and
7 easements negotiated with government and private landowners (Southline 2013). Landowners along the
8 ROW would be compensated for the disruption and the encumbrance of the required easement based on
9 market land and easement values. Note that private landowners would lease the use of their land for the
10 ROW, but would retain their ownership of the lands along the ROW.

11 ***Operation and Maintenance***

12 The concern that transmission lines may cause long-term decreases in property values has led to extensive
13 research on the subject. Studies have used both quantitative analyses of market data and survey methods
14 to investigate how land values are impacted. However, despite the large volume of available literature, the
15 conclusions are not clear or consistent. Instead the research indicates that the effects of transmission lines
16 on property values appear to differ depending on the situation.

17 Prior to the 1990s, research generally concluded that there were no negative impacts of transmission lines
18 on property values. However, more recent studies have indicated there may be property value effects,
19 though in most studies the decreases in land values are relatively small and seldom exceed 15 percent.
20 The impacts also generally decrease dramatically with distance from the transmission line (Colwell 1990;
21 Delaney and Timmons 1992; Hamilton and Schwann 1995). The properties most likely to be affected are
22 those that are directly adjacent to the transmission lines. One empirical study found that while the
23 adjacent properties experienced a 6.3 percent decrease in value, the properties that were in close
24 proximity but were not directly adjacent experienced only a 1 percent decrease in value (Hamilton and
25 Schwann 1995). One study, conducted in the Montreal area, found that properties located one or two lots
26 away from transmission lines actually increased in value due to the benefit of the open space created by
27 the transmission line ROW (Des Rosiers 2002). Negative impacts have also been found to diminish over
28 time as well as distance (Colwell 1990).

29 Other studies have found that it is primarily the visibility of the transmission lines that impacts property
30 values. A survey of experienced appraisers found that on average, transmission lines decreased property
31 values by 10.2 percent. Impacts attributed to the visibility of the infrastructure, particularly of the
32 permanent towers, did not noticeably dissipate over time (Delaney and Timmons 1992). Other studies
33 have found that the major cause of diminished property values was the encumbrance of the transmission
34 line easement placed on the land (Chalmers et al. 2009; Colwell 1990).

35 The majority of the existing literature has focused on urban residential properties in densely populated
36 northern regions. This, in conjunction with the inconsistent results, makes it difficult to directly apply the
37 findings to the largely rural setting for both the New Build and Upgrade Sections. However, there is
38 evidence that property values in less densely populated areas are less sensitive to transmission lines
39 (Chalmers 2012; Delaney and Timmons 1992). For agricultural lands in Montana, there was no evidence
40 of market impacts from transmission lines. When interviewed, property owners did express that the lines
41 were a nuisance, but did not impact their decision to purchase the property or how much they paid for it.
42 However, rural lands with recreation attributes may experience slightly diminished property values,
43 particularly when the recreation is related to the rural scenery. Rural residential properties also have the
44 propensity to be impacted by transmission lines. In tight housing markets there have not been noticeable

1 effects. However, when there are many suitable substitutes for housing, those closer to transmission lines
2 have taken longer to sell and have sold for comparatively less. The size of the rural property, both for
3 residential and non-residential uses, evidently plays a large role in determining the magnitude of the
4 impacts from transmission projects. Larger properties diffuse the impacts of the transmission line and
5 therefore minimize the effects compared to those on smaller properties (Chalmers 2012).

6 In summary, prior research suggests that properties immediately adjacent to transmission lines may suffer
7 a reduction in value due to the encumbrance the line places on the use of the land, the visual impact of the
8 line, or both. In more densely developed areas, reductions in immediately adjacent property values of
9 between 5 and 15 percent would be consistent with findings from previous studies. Homes located farther
10 away from the transmission line are unlikely to experience significant impacts to their values. The values
11 of larger properties in more sparsely populated rural areas are likely to be affected less than properties in
12 more densely populated areas. Impacts on property values may diminish over time.

13 As noted previously, property owners allowing the use of a portion of their property for the transmission
14 line ROW would be compensated by Southline for the encumbrance the line creates upon their land.

15 **Effects on Tourism and Recreation-related Economy**

16 ***Construction***

17 Based on the recreation impact analysis provided earlier in this chapter, existing recreation opportunities
18 and activities would not be permanently affected by construction of the action alternatives, though some
19 impacts to access could occur on a localized and short-term basis. Dispersed recreation activities, such as
20 hiking and equestrian activities, might also be temporarily affected in some locations for short periods of
21 time. These short-term, localized impacts are unlikely to result in a discernible impact to the tourism- and
22 recreation-related economy in the New Build Section.

23 As noted earlier in the housing discussion, a relatively large number of non-local construction workers
24 may use hotels/motels and RV/mobile home parks for temporary accommodations during the construction
25 period. In the western portions of the New Build Section, where such accommodations are in relatively
26 short supply, this workforce could occupy many of the available short-term accommodations during the
27 period of time that construction is focused in this area. Shortages of available hotel/motel rooms and RV
28 spaces could have an impact on the local tourism-related economy during this period.

29 ***Operation and Maintenance***

30 Ongoing operations and maintenance should have little or no long-term effect on the tourism- and
31 recreation-related economy in the New Build Section.

32 **Social Effects**

33 ***Construction***

34 As discussed earlier in this section, the presence of large, transient populations of short-term construction
35 workers can have impacts on social conditions in rural communities. Whether these effects occur, and the
36 magnitude of the effects, appears to partly depend on the size of the non-local construction workforce
37 relative to the size of the existing communities.

38 Overall, the projected non-local workforce is relatively small compared to the existing population in the
39 eastern portions of the New Build Section. As the workforce migrates to the western portions of the area,
40 there is the possibility of some short-term social impacts on communities such as Lordsburg, New

1 Mexico; Willcox, Arizona; and Benson, Arizona. Given the relatively short duration of the proposed
2 construction period, and the even shorter period of time in which activity could be concentrated in these
3 areas, any adverse social impacts would be relatively brief in duration.

4 ***Operation and Maintenance***

5 Ongoing operations and maintenance would have little or no effect on social conditions in the New Build
6 Section.

7 **UPGRADE SECTION**

8 **Economic Effects**

9 ***Construction***

10 Based on information provided by Southline, an average of 175 workers would be required to complete
11 the Upgrade Section at a projected cost of \$15.3 million per year over the 2-year construction period.
12 Forty-three of these workers are expected to be hired from the local workforce at an annual cost of \$3.1
13 million. Southline would spend a projected average of \$67.8 million during each of the 2 years for
14 materials and supplies, with approximately 5 percent (\$3.4 million per year) of these expenditures
15 accruing to local suppliers (CH2M Hill 2013p).

16 This information was incorporated into a regional IMPLAN economic model that included Cochise
17 County, Pima County, and Pinal County in Arizona. As shown in table 4.15-5, construction of the
18 proposed Project is projected to support approximately 138 short-term jobs in the Upgrade Section. This
19 total includes the projected 43 direct jobs (local hires) associated with construction, as well as 95 indirect
20 jobs that would be supported by local purchases of supplies and materials for construction, household
21 expenditures by the locally hired workers, and local expenditures by non-local workers during the
22 construction period. This employment total does not count the estimated 132 non-local workers
23 anticipated to be hired for construction.

24 **Table 4.15-5.** Projected Annual Employment Impact from Construction of Upgrade Section

Construction Expenditures	Direct Employment	Indirect Employment	Total Employment
Local materials	0	38	38
Local labor	43	19	62
Non-local labor	0	38	38
Total	43	95	138

25 In addition to the \$3.1 million in annual compensation anticipated to be paid to locally hired construction
26 workers, construction of the Upgrade Section is projected to indirectly produce an additional \$3.8 million
27 in annual labor earnings during the 2-year construction period. This information is summarized in table
28 4.15-6. The projected total labor earnings impact in the Upgrade Section of approximately \$6.9 million
29 per year does not include the projected \$12.2 million per year expected to be paid to non-local
30 construction workers.

1 **Table 4.15-6.** Projected Annual Labor Earnings Impact from Construction of Upgrade Section

Construction Expenditures	Direct Labor Earnings	Indirect Labor Earnings	Total Labor Earnings
Local materials	\$0	\$1.7	\$1.7
Local labor	\$3.1	\$0.7	\$3.7
Non-local labor	\$0	\$1.4	\$1.4
Total	\$3.1	\$3.8	\$6.8

2 Note: Labor earnings reflect total compensation, including worker benefits, in millions of 2013 U.S. dollars.

3 Overall, construction of the Upgrade Section is projected to produce a short-term, annual increase in
 4 regional output of \$15.4 million during the 2-year construction period. This total includes the projected
 5 \$3.4 million increase in direct output due to the purchase of locally sourced construction goods and
 6 materials, along with \$12.0 million in additional regional output due to recirculation of the wages paid to
 7 local and non-local construction workers (table 4.15-7). As noted previously, non-local workers were
 8 assumed to spend 50 percent of their disposable income within the analysis area during the construction
 9 period.

10 **Table 4.15-7.** Projected Annual Impact on Regional Output from Construction of Upgrade Section

Construction Expenditures	Direct Output	Indirect Output	Total Output
Local materials	\$3.4	\$5.5	\$8.9
Local labor	\$0	\$2.2	\$2.2
Non-local labor	\$0	\$4.3	\$4.3
Total	\$3.4	\$12.0	\$15.4

11 Note: Output is in millions of 2013 U.S. dollars.

12 **Operation and Maintenance**

13 As discussed previously for the New Build Section, ongoing operations and maintenance would require
 14 few workers and have relatively little direct economic impact in the Upgrade Section. By meeting the
 15 purpose and need for the proposed Project in improving reliability of the electrical grid in southern New
 16 Mexico and southern Arizona, increasing the ability of the grid to meet demand growth in the region, or
 17 facilitating potential renewable generation development in the region, each of the alternatives would offer
 18 longer-term economic benefits to the region. The economic impacts from these improvements have not
 19 been estimated, but could be significant.

20 **Tax Revenue Effects**

21 **Construction**

22 Construction-related economic activity would also generate additional tax revenues for local governments
 23 in the Upgrade Section. The largest sources of new state and local revenues would be sales taxes⁸ and
 24 property taxes. Based on the IMPLAN analysis of regional economic effects, construction of the proposed
 25 Project would produce approximately \$309,000 per year in additional state and local sales taxes, and
 26 approximately \$214,000 per year in additional state and local property taxes.

⁸ Sales taxes are termed Transaction Privilege taxes in Arizona.

1 In Arizona, the state receives approximately two-thirds of all gross receipts tax revenues, while
 2 approximately one-third of these revenues are distributed to local governments. Local governments
 3 (including school districts) receive about 95 percent of the property tax revenues and the state receives
 4 about 5 percent of these revenues. Based on these generalized proportions, local governments in the
 5 Upgrade Section could expect to receive about \$206,000 per year in additional sales tax revenues and
 6 about \$200,000 per year in additional property tax revenues during the 2-year construction period.
 7 Comparison of these estimated local government tax revenues with the baseline tax receipts shown in
 8 table 3.15-17 indicates construction-related sales and property taxes would represent an increase of about
 9 0.1 percent in total sales tax revenues, and less than 0.01 percent in property tax revenues for local
 10 governments in the Upgrade Section.

11 **Operation and Maintenance**

12 As noted previously in the discussion regarding the New Build Section, the transmission line and
 13 appurtenant facilities could produce more substantial property tax revenues for local governments once
 14 fully constructed. Based on an estimated increase in the taxable value of the transmission line in the
 15 Upgrade Section of approximately \$52 million, the transmission line could initially produce about \$4.3
 16 million per year in property tax revenues for local governments. This total would represent a 0.3 percent
 17 increase in total local government property tax revenues in the Upgrade Section. Property tax revenues
 18 would decrease over time during the period of operations due to depreciation in the value of the facilities.

19 **Population Effects**

20 **Construction**

21 Construction of the proposed Project is expected to require approximately 132 non-local workers who
 22 would reside within the Upgrade Section during the 2-year construction period. Construction-related
 23 economic activity is also anticipated to support approximately 95 indirect jobs in the area. Although no
 24 more than 10 percent of the non-local construction workers are expected to be accompanied by their
 25 families, migrants to the area who fill the indirect jobs resulting from local construction-related
 26 expenditures might more closely resemble typical households within the area.

27 Table 4.15-8 depicts the potential short-term population effects associated with construction of the
 28 proposed Project. If all of the indirect jobs are filled by existing residents of the area, the proposed Project
 29 could result in a short-term increase in the population of the Upgrade Section of about 145 adults and 13
 30 children. The maximum potential short-term population effect, if all of the indirect jobs were filled by
 31 individuals moving to the area, would be about 335 adults and 70 children.

32 **Table 4.15-8. Potential Population Effects from Construction of Upgrade Section**

Source	Workers	Family Members		Potential Population Increase	
		Adults	Children	Adults	Children
Direct jobs	175				
Local hires	43				
Imported workers	132	13	13	145	13
Indirect jobs	95	95	57	190	57
Maximum potential population increase				335	70

1 These projected population effects would represent an increase of between 0.01 percent and 0.04 percent
2 in the total population of the Upgrade Section. As the construction workforce moves across the Upgrade
3 Section during construction, the relative magnitude of the population increase in the more sparsely
4 populated eastern portion of the Upgrade Section (northern Cochise County) could be more substantial.
5 These localized effects, however, would occur for only a portion of the 2-year construction period.

6 ***Operation and Maintenance***

7 As noted previously, ongoing operations and maintenance would require relatively few workers.
8 The proposed Project would have minimal long-term effects on the population of the Upgrade Section.

9 **Housing Effects**

10 ***Construction***

11 Non-local construction workers, any workers who migrate to the area to fill indirect jobs resulting from
12 construction, and family members would place additional demands on rental housing and short-term
13 accommodations in the analysis area. Based on the population effects analysis described previously,
14 between 132 and 227 rental or short-term housing units could be required during construction in the
15 Upgrade Section.

16 This projected housing requirement represents a small portion of the approximately 24,500 rental housing
17 units available in the Upgrade Section (see table 3.15-4), the available rental housing stock is dominated
18 by the large number of units available in Pima County and Pinal County (at the western end of the
19 Upgrade Section). Most of the potentially available rental units in Cochise County would be located in the
20 southern portion of the county (in the larger communities such as Sierra Vista)—a considerable distance
21 from the proposed alignment. The biggest challenge in housing the temporary workforce within the
22 Upgrade Section is likely to occur when construction is focused in the eastern portions of the Upgrade
23 Section, in northeastern Cochise County.

24 The number of rental units in northeastern Cochise County is not known, but is likely to be small based
25 on the sparse population in that area. As noted in chapter 3, hotel/motel accommodations in northeastern
26 Cochise County are also very limited, but the area has a relatively large number of RV/mobile home
27 parks.

28 Overall, while it should be possible to accommodate the temporary construction workforce, the proposed
29 Project could lead to housing challenges in the eastern portion of the Upgrade Section. It is possible that
30 at least a portion of the construction workforce could be housed in temporary “man camps.” Such camps
31 can create issues and concerns for local governments and residents if they are not carefully managed and
32 monitored.

33 ***Operation and Maintenance***

34 The proposed Project would have minimal long-term effects on housing within the Upgrade Section.

35 **Effects on Public Services**

36 ***Construction***

37 In addition to the temporary increase in demand for housing just described, the non-local construction
38 workforce and any non-local workers and families who migrate to the area to fill indirect employment
39 opportunities, would also create additional short-term demands for public services such as police and fire
40 protection, education, and medical services. Much like the housing situation, these added demands are

1 unlikely to create substantial challenges in the western portion of the Upgrade Section, but could create
2 short-term challenges in the eastern portion of the proposed Project where existing services are much
3 more limited.

4 ***Operation and Maintenance***

5 The proposed Project would have minimal long-term effects on most public services within the Upgrade
6 Section. However, to the extent the proposed Project improves reliability of the electrical grid in southern
7 Arizona, and increases the ability of the grid to meet demand growth in the region, it could provide long-
8 term improvements for the area in terms of electric utility service.

9 **Effects on Property Values**

10 ***Construction***

11 Western already has a 100-foot-wide easement under its existing transmission line. Where room permits,
12 Western or Southline would obtain a new 150-foot easement 50 feet to one side of the centerline of the
13 existing easement, so as to have room to operate the existing line while constructing the new one. Once
14 completed, the old line would be removed. In the end, 75 feet of the existing ROW would be reoccupied,
15 75 feet of new ROW would be obtained, and 25 feet of old ROW would be abandoned. The additional
16 ROW required to construct and maintain the upgraded transmission line would be obtained through a
17 combination of grants and easements negotiated with government and private landowners (Southline
18 2013). Landowners along the ROW would be compensated for the disruption and the encumbrance of the
19 required easement based on market land and easement values.

20 ***Operation and Maintenance***

21 As discussed earlier for the New Build Section, there has been considerable research into the concern that
22 transmission lines may cause long-term decreases in property values. Recent studies have generally
23 concluded that immediately adjacent property values may be reduced by between 5 and 15 percent,
24 though effects on large landholdings in rural areas appear to be less than in more urbanized areas. Impacts
25 decrease quickly with distance and appear to diminish over time.

26 Compared to the New Build Section, portions of the Upgrade Section are located in more densely
27 developed urban areas, particularly in and near the City of Tucson. The upgraded transmission line would
28 largely follow alignments used by existing transmission lines, which would reduce the potential for
29 impact on property values. Nonetheless, property owners along the ROW would be affected by the
30 expanded easement required for the upgraded line and the increased size of the structures required for the
31 230-kV line. The new, double-circuit line would be supported by tubular steel structures, 100 to 140 feet
32 in height. Between 5 and 8 support structures (towers) will be required per mile, depending on the terrain
33 (Southline 2013).

34 **Effects on Tourism and Recreation-related Economy**

35 ***Construction***

36 Existing recreation opportunities and activities would not be permanently affected by construction of the
37 action alternatives, though some impacts to access could occur on a localized and short-term basis.
38 Dispersed recreation activities might also be temporarily affected in some locations for short periods of
39 time. These short-term, localized impacts are unlikely to result in a discernible impact to the tourism- and
40 recreation-related economy in the Upgrade Section.

1 A relatively large number of non-local construction workers may use hotels/motels and RV/mobile home
2 parks for temporary accommodations during the construction period. In the eastern portion of the
3 Upgrade Section, where such accommodations are in relatively short supply, this workforce could occupy
4 many of the available short-term accommodations during the period of time that construction is focused
5 in this area. Shortages of available hotel/motel rooms and RV spaces could have an impact on the local
6 tourism-related economy during this period.

7 ***Operation and Maintenance***

8 Ongoing operations and maintenance should have little or no long-term effect on the tourism- and
9 recreation-related economy in the Upgrade Section.

10 **Social Effects**

11 ***Construction***

12 The presence of large, transient populations of short-term construction workers can have impacts on
13 social conditions in rural communities. Whether these effects occur, and the magnitude of the effects,
14 appears to partly depend on the size of the non-local construction workforce relative to the size of the
15 existing communities.

16 Overall, the projected non-local workforce is relatively small compared to the existing population in the
17 western portions of the Upgrade Section. During the period of time that work is concentrated in the
18 eastern portions of the area, there is the possibility of some short-term social impacts on communities
19 such as Willcox and Benson, in northeastern Cochise County. Given the relatively short duration of the
20 proposed construction period, and the even shorter period of time in which activity could be concentrated
21 in these areas, any adverse social impacts would be relatively brief in duration.

22 ***Operation and Maintenance***

23 Ongoing operations and maintenance would have little or no effect on social conditions in the Upgrade
24 Section.

25 ***Alternative Impacts in New Build Section***

26 There are two major transmission route alternatives in the New Build Section, and several local
27 alternatives for portions of each of the major route alternatives.

28 **SUBROUTES 1.1 AND 2.1 – PROPONENT PREFERRED**

29 The Proponent Preferred alternative (subroutes 1.1 and 2.1) would follow the more northern, 242-mile-
30 long-route across the New Build Section. The route would proceed west-northwest from the Afton
31 Substation south of Las Cruces, New Mexico, reaching I-10 east of Deming in eastern Luna County.
32 The route would include a 31-mile-long spur, at this point, that would proceed directly south to a
33 substation in southern Luna County, just north of the international border with Mexico. The main route
34 would continue west, paralleling I-10, head north around Deming, and then diverge from the route
35 followed by the Interstate to head more directly west to the Lordsburg area in Hidalgo County. The route
36 would then bypass Lordsburg to the north and west, and continue in a westerly direction to the Willcox
37 area in northeastern Cochise County, Arizona. The route would bypass Willcox to the south and head
38 south and southeast to the Apache Substation, located south of I-10 between Willcox and Benson.

1 **Economic Effects**

2 ***Construction***

3 The estimated effects of construction on the regional economy in the New Build Section would be as
4 described previously under the impacts common to all action alternatives. Over the anticipated 2-year
5 construction period, construction-related expenditures would support an estimated 235 direct and indirect
6 jobs in the New Build Section, not counting the projected 246 non-local workers that would be hired for
7 the Project. Construction activity would produce an estimated \$11.4 million in annual labor earnings over
8 the 2-year period, again excluding the earnings of non-local workers. Annual regional economic output is
9 projected to increase by approximately \$24.8 million over the 2-year construction period due to the
10 construction activity. All of these estimates represent between a 0.1 percent and 0.2 percent increase
11 relative to current economic activity in the New Build Section. While these effects would not be
12 considered significant from a regional perspective, they could be significant for some communities in the
13 New Build Section during the construction period.

14 ***Operation and Maintenance***

15 As discussed under the impacts common to all action alternatives, ongoing operations and maintenance
16 activity for the proposed Project would include modest labor and expenditure requirements that would not
17 have a discernible effect on the regional economy. The additional electrical transmission capacity and
18 reliability that the proposed Project would provide could have a significant longer-term effect on the
19 economy relative to the no action alternative.

20 **Tax Revenue Effects**

21 ***Construction***

22 Effects of construction on local tax revenues would again be as described under the impacts common to
23 all action alternatives. Construction-related economic activity would produce an estimated \$462,000 per
24 year in state and local sales tax revenues and about \$219,000 in state and local property tax revenues. The
25 local shares of these tax revenues are estimated at approximately \$150,000 and \$210,000, respectively.
26 These additional tax revenues would not be considered significant from a regional perspective, but could
27 be significant for some communities in the New Build Section during the construction period.

28 ***Operation and Maintenance***

29 If the proposed transmission line is fully subject to state and local property taxes, completion of the
30 proposed Project could initially produce about \$4.2 million per year in new property tax revenues for
31 local governments in the New Build Section. This would represent about a 1.5 percent increase in local
32 property tax revenues relative to current conditions and would be a significant, positive socioeconomic
33 effect based on the impact indicators and criteria for significant effects described at the beginning of this
34 section. The property tax revenues would decline over time as the transmission line depreciates.

35 **Population Effects**

36 ***Construction***

37 As described under the impacts common to all action alternatives, construction of the proposed Project
38 could lead to a short-term increase in population in the New Build Section of between 296 and 702
39 people, including 25 to 119 children. While this potential population increase would be insignificant from

1 a regional perspective, construction could lead to a significant population increase in the western portion
2 of the New Build Section during the time when activity is focused in areas such as Hidalgo County.

3 ***Operation and Maintenance***

4 Ongoing operations and maintenance activities for the proposed Project would not have a measurable
5 impact on local or regional populations.

6 **Housing Effects**

7 ***Construction***

8 The estimated housing requirements for proposed Project construction workers, indirect workers, and
9 families in the New Build Section, described under the impacts common to all action alternatives, would
10 not be a significant concern from the standpoint of the region as a whole. Given the very limited numbers
11 of rental housing units available in the western portions of the New Build Section, non-local construction
12 workers (and any other indirect workers who migrate to the area) would likely have to rely on hotel/motel
13 accommodations and mobile/home RV parks in this area. The proposed Project could lead to significant,
14 temporary shortages of accommodations in the western portion of the New Build Section. Operation and
15 Maintenance

16 Ongoing operations and maintenance activities for the proposed Project would not have a measurable
17 impact on housing in the New Build Section.

18 **Effects on Public Services**

19 ***Construction***

20 Effects on public services from construction of the proposed Project would essentially mirror the effects
21 and potential concerns for housing described above. From a regional standpoint, these effects would not
22 be significant. However, construction in the western portions of the New Build Section could tax
23 available police, fire, and medical services in that area during the time period when activity is focused in
24 those locations.

25 ***Operation and Maintenance***

26 Ongoing operations and maintenance activities for the proposed Project would not have a discernible
27 impact on public services in the New Build Section.

28 **Effects on Property Values**

29 ***Construction***

30 As noted under the impacts common to all action alternatives, ROW needed would be acquired for the
31 proposed Project from public and private landowners. Approximately 68 miles of the 242-mile-long-route
32 in the New Build Section (28 percent) would be located on private lands. Landowners along the ROW
33 would be compensated for the disruption and the encumbrance of the required easement based on market
34 land and easement values.

35 ***Operation and Maintenance***

36 Once constructed, the transmission line and substations included in the proposed Project could have
37 ongoing effects on property values in very close proximity to these features. Existing research, described

1 under the impacts common to all action alternatives, is somewhat inconsistent regarding these effects, but
2 does indicate that larger parcels in rural areas (like most private landholdings along the proposed Project
3 in the New Build Section) are likely to experience modest impacts, if any.

4 **Effects on Tourism and Recreation-related Economy**

5 ***Construction***

6 The anticipated demand for hotel/motel rooms and RV park spaces in the Lordsburg area during
7 construction of western portions of the New Build Section under the Proponent Preferred alternative,
8 could create temporary shortages of available accommodations for tourists and other travelers in that area.
9 This could impact tourism-related businesses in that area, though many of those businesses (such as
10 motels and restaurants) would also benefit from expenditures by the construction workers.

11 ***Operation and Maintenance***

12 Ongoing operations and maintenance of the proposed Project should have little or no long-term effect on
13 the tourism- and recreation-related economy in the New Build Section.

14 **Social Effects**

15 ***Construction***

16 As discussed in the impacts common to all action alternatives, the presence of large, transient populations
17 of short-term construction workers can have impacts on social conditions in rural communities. Whether
18 these effects occur, and the magnitude of the effects, appears to partly depend on the size of the non-local
19 construction workforce relative to the size of the existing communities.

20 During the period of time that proposed Project construction work would be concentrated in the western
21 portions of the New Build Section, there is the possibility of some short-term social impacts on
22 communities such as Lordsburg. Given the relatively short duration of the proposed construction period,
23 and the even shorter period of time in which activity could be concentrated in this area, any adverse social
24 impacts would be relatively brief in duration.

25 ***Operation and Maintenance***

26 Ongoing operations and maintenance of the proposed Project would have little or no effect on social
27 conditions in the New Build Section.

28 **SUBROUTES 1.2 AND 2.2 – PROPONENT ALTERNATIVE**

29 The Proponent Alternative would follow a more southern, 237 mile-long-route across the New Build
30 Section. The route would proceed south-southwest from the Afton Substation to a point near the
31 international border in southwestern Doña Ana County. The route would then proceed west, along a
32 corridor about 5 to 10 miles north of the border, through southern Luna County before heading northwest
33 through southern Grant County to the Lordsburg area in Hidalgo County. Unlike the Proponent Preferred
34 alternative, the Proponent Alternative would bypass Lordsburg to the south. The Proponent Alternative
35 would then head west, along a route proximate to that used for the Proponent Preferred alternative, into
36 northeastern Cochise County in Arizona. The Proponent Alternative would bypass Willcox on the north
37 side. Like the Proponent Preferred alternative, the New Build Section of the Proponent Alternative would
38 terminate at the Apache Substation between Willcox and Benson.

1 **Economic Effects**

2 ***Construction***

3 The regional economic effects from constructing the Proponent Alternative would be similar to the effects
4 from construction of the proposed Project, described under impacts common to all action alternatives.
5 At a more detailed geographic level, construction of the Proponent Alternative might provide localized
6 economic benefits to the Village of Columbus, in the southern part of Luna County, and fewer economic
7 benefits to the City of Deming on I-10 between Las Cruces and Lordsburg.

8 ***Operation and Maintenance***

9 Ongoing operations and maintenance activity for the Proponent Alternative would include modest labor
10 and expenditure requirements that would not have a discernible effect on the regional economy.
11 The additional electrical transmission capacity and reliability that the Proponent Alternative would
12 provide could have a significant longer-term effect on the economy, relative to the no action alternative.

13 **Tax Revenue Effects**

14 ***Construction***

15 Construction of the Proponent Alternative would provide the same type and magnitude of new tax
16 revenues for local governments in the New Build Section as construction of proposed Project.

17 ***Operation and Maintenance***

18 The completed transmission line under the Proponent Alternative would also provide similar longer-term
19 property tax revenues to the proposed Project. The distribution of these revenues among the counties and
20 cities in the New Build Section would likely differ somewhat based on the different route.

21 **Population Effects**

22 ***Construction***

23 Construction of the Proponent Alternative would have similar short-term effects on the regional
24 population to the proposed Project—as more fully described under the impacts common to all action
25 alternatives. The more southern alignment under the Proponent Alternative could shift some of these
26 short-term population effects away from the City of Deming and onto the much smaller Village of
27 Columbus in the southern portion of Luna County.

28 ***Operation and Maintenance***

29 Ongoing operations and maintenance activities for the Proponent Alternative would not have a
30 measurable impact on local or regional populations.

31 **Housing Effects**

32 ***Construction***

33 Housing requirements for Proponent Alternative construction workers, indirect workers, and families in
34 the New Build Section would not be a significant concern for the region as a whole. Like the Proponent
35 Preferred alternative, the western portions of the New Build Section in Hidalgo County could be an area
36 of concern from a housing standpoint. The more southern alignment could also shift housing pressure

1 away from the relatively large community of Deming to the much smaller Village of Columbus. The
2 Proponent Alternative could lead to significant, temporary shortages of accommodations in both the
3 western portion of the New Build Section and in southern Luna County.

4 ***Operation and Maintenance***

5 Ongoing operations and maintenance activities for the proposed Project would not have a measurable
6 impact on housing in the New Build Section.

7 **Effects on Public Services**

8 ***Construction***

9 From a regional standpoint, the Proponent Alternative would not have significant impacts on public
10 services effects in the New Build Section. However, construction in the western portions of the New
11 Build Section and in southern Luna County could tax available police, fire, and medical services during
12 the time period when activity is focused in those locations.

13 ***Operation and Maintenance***

14 Ongoing operations and maintenance activities for the Proponent Alternative would not have a discernible
15 impact on public services in the New Build Section.

16 **Effects on Property Values**

17 ***Construction***

18 Approximately 69 miles of the 237-mile-long-route of the Proponent Alternative in the New Build
19 Section (29 percent) would be located on private lands. Landowners along the ROW would be
20 compensated for the disruption and the encumbrance of the required easement based on market land and
21 easement values.

22 ***Operation and Maintenance***

23 Like the proposed Project, the transmission line and substations included in the Proponent Alternative
24 could have ongoing effects on property values in very close proximity to these features. Given that most
25 of the private lands would consist of large-parcel, rural landholdings, any such impacts are likely to be
26 modest.

27 **Effects on Tourism and Recreation-related Economy**

28 ***Construction***

29 Similar to the Proponent Preferred alternative, the anticipated demand for hotel/motel rooms and RV park
30 spaces in the Lordsburg area during construction of western portions of the New Build Section under the
31 Proponent Alternative could create significant, temporary shortages of available accommodations for
32 tourists and other travelers. This could impact tourism-related businesses in that area, though many of
33 those businesses (such as motels and restaurants) would also benefit from expenditures by the
34 construction workers.

35

1 **Operation and Maintenance**

2 Ongoing operations and maintenance of the Proponent Alternative should have little or no long-term
3 effect on the tourism- and recreation-related economy in the New Build Section.

4 **Social Effects**

5 **Construction**

6 During the period of time that Proponent Alternative construction work would be concentrated in the
7 western portions of the New Build Section and in southern Luna County, there is the possibility of some
8 short-term social impacts on communities such as Lordsburg and Columbus. Given the relatively short
9 duration of the proposed construction period, and the even shorter period of time in which activity could
10 be concentrated in these areas, any adverse social impacts would be relatively brief in duration.

11 **Operation and Maintenance**

12 Ongoing operations and maintenance of the Proponent Alternative would have little or no effect on social
13 conditions in the New Build Section.

14 **LOCAL ALTERNATIVES**

15 There are 12 local alternatives available for route group 1 and route group 2, which together comprise the
16 New Build Section. Local alternatives between the eastern end of the transmission line at the Afton
17 Substation and the Lordsburg area include DN1 (for the Proponent Preferred alternative) and A, B, C, and
18 D (for the Proponent Alternative). Between the Lordsburg area and the western end of the New Build
19 Section between Willcox and Benson, local alternatives include LD1 (for the Proponent Alternative) and
20 LD2, LD3a, LD3b, LD4, LD4-Option 4, LD4-Option 5, and WC1 (for the Proponent Preferred
21 alternative).

22 The selection of any or all of the local alternatives in the New Build Section would not result in
23 economic, tax revenue, population, housing, public service, tourism, or social impacts that would
24 appreciably differ from the effects described under the impacts common to all action alternatives at the
25 regional level. At the local level, these local alternatives would affect different properties and individuals
26 than the corresponding route segments included in the Proponent Preferred alternative and the Proponent
27 Alternative.

28 Potential, localized socioeconomic differences associated with the local alternatives could include the
29 following:

- 30 • Alternative DN1 would co-locate a 43-mile-long section of the Proponent Preferred alternative
31 transmission line in Luna County (west of Deming) with the proposed SunZia Project. While co-
32 colocation means that fewer private property owners might be affected, it would also result in a
33 minimum combined 800-foot-wide ROW. This could result in greater disruption for the
34 properties along this section of the line, though only 6 of the 42 miles in this segment are
35 privately owned.
- 36 • Alternative LD4 would also co-locate a portion of the line with the proposed SunZia Project.
37 In this case, the affected area would be in southern Greenlee County and Graham County,
38 Arizona. LD4 would replace a section of the Proponent Preferred alternative located in
39 northeastern Cochise County, east of Willcox. Like DN1, LD4 would require a very wide ROW
40 for the two transmission lines, though none of the 52-mile length of this segment is privately
41 owned.

- 1 • Local alternatives LD1, LD2, LD3a, and LD3b were developed to avoid crossing the Lordsburg
2 Playa. Adoption of these alternatives could result in less impact on recreation and tourism than
3 the corresponding route segments under the Proponent Preferred alternative.

4 ***Alternative Impacts in Upgrade Section***

5 There is one major transmission route alternative in the New Build Section (the Proponent Preferred), and
6 several local alternatives for portions of that alternative.

7 **SUBROUTES 3.1 AND 4.1 – PROPONENT PREFERRED**

8 The Proponent Preferred alternative (subroutes 3.1 and 4.1) would use the ROW of the existing Western
9 115-kV line across the Upgrade Section. The route would proceed west-southwest across western Cochise
10 County, Arizona, into Pima County. The route would then turn more to the northwest, roughly paralleling
11 I-10 and intersect with I-19 south of Tucson. The route would cross I-19, then proceed north through the
12 southwestern portions of Tucson to intersect I-10 just northwest of downtown Tucson. The route would
13 finish by roughly paralleling I-10 to the northwest until it reaches the Saguaro Substation endpoint in
14 southern Pinal County, Arizona.

15 **Economic Effects**

16 ***Construction***

17 The estimated effects of the proposed Project construction on the regional economy in the Upgrade
18 Section would be as described previously under the impacts common to all action alternatives. Over the
19 anticipated 2-year construction period, construction-related expenditures would support an estimated 138
20 direct and indirect jobs in the Upgrade Section, not counting the projected 132 non-local workers that
21 would be hired for the Project. Construction activity would produce an estimated \$6.8 million in annual
22 labor earnings over the 2-year period, again excluding the earnings of non-local workers. Annual regional
23 economic output is projected to increase by approximately \$15.4 million over the 2-year construction
24 period due to the construction activity. All of these estimates represent less than a 0.1 percent increase
25 relative to current economic activity in the Upgrade Section and would not be significant from a regional
26 perspective. These short-term economic benefits could, however, be significant for some communities in
27 the Upgrade Section during the construction period.

28 ***Operation and Maintenance***

29 As discussed under the impacts common to all action alternatives, ongoing operations and maintenance
30 activity for the proposed Project would include modest labor and expenditure requirements that would not
31 have a discernible effect on the regional economy. The additional electrical transmission capacity and
32 reliability that the proposed Project would provide could have a significant longer-term effect on the
33 economy relative to the no action alternative.

34 **Tax Revenue Effects**

35 ***Construction***

36 Effects of the proposed Project construction on local tax revenues in the Upgrade Section would also be
37 as described under the impacts common to all action alternatives. Construction-related economic activity
38 would produce an estimated \$309,000 per year in state and local sales tax revenues and about \$214,000
39 in state and local property tax revenues. The local shares of these tax revenues are estimated at
40 approximately \$206,000 and \$200,000, respectively. These additional tax revenues would not be

1 considered significant from a regional perspective, but could be significant for some communities in the
2 Upgrade Section during the construction period.

3 ***Operation and Maintenance***

4 If the upgraded transmission line is fully subject to state and local property taxes, completion of the
5 proposed Project could initially produce about \$4.3 million per year in new property tax revenues for
6 local governments in the Upgrade Section. This would represent about a 0.3 percent increase in local
7 property tax revenues relative to current conditions, which would not be significant from a regional
8 perspective. The property tax revenues would decline over time as the transmission line is depreciated.

9 **Population Effects**

10 ***Construction***

11 As described under the impacts common to all action alternatives, construction of the proposed Project
12 could lead to a short-term increase in population in the Upgrade Section of between 158 and 405 people,
13 including 13 to 57 children. While this potential population increase would be insignificant from a
14 regional perspective, construction could lead to a significant temporary population increase in the eastern
15 portion of the Upgrade Section (northeastern Cochise County) during the time when activity is focused in
16 that area—particularly if construction on the Upgrade Section in this area occurs at the same time as
17 construction of the New Build Section.

18 ***Operation and Maintenance***

19 Ongoing operations and maintenance activities for the proposed Project would not have a measurable
20 impact on local or regional populations in the Upgrade Section.

21 **Housing Effects**

22 ***Construction***

23 The estimated housing requirements for proposed Project construction workers, indirect workers, and
24 families in the Upgrade Section, described under the impacts common to all action alternatives, would not
25 be a significant concern from the standpoint of the region as a whole. Given the very limited numbers of
26 rental housing units and motel rooms available in northeastern Cochise County, non-local construction
27 workers (and any other indirect workers who migrate to the area) would likely have to rely on RV parks
28 in this area. The proposed Project could lead to significant, temporary shortages of accommodations in
29 northeastern Cochise County which could be exacerbated if construction is also occurring at the same
30 time on the New Build Section in this area.

31 ***Operation and Maintenance***

32 Ongoing operations and maintenance activities for the proposed Project would not have a measurable
33 impact on housing in the Upgrade Section.

34 **Effects on Public Services**

35 ***Construction***

36 Effects on public services from construction of the proposed Project would essentially mirror the effects
37 and potential concerns for housing described above. From a regional standpoint, these effects would not

1 be significant. However, construction in northeastern Cochise County could tax available police, fire, and
2 medical services during the time period when activity is focused in this area.

3 ***Operation and Maintenance***

4 Ongoing operations and maintenance activities for the proposed Project would not have a discernible
5 impact on public services in the Upgrade Section.

6 **Effects on Property Values**

7 ***Construction***

8 The ROW needed for the proposed Project would be acquired from public and private landowners.
9 Approximately 60 miles of the 119-mile-long route in the Upgrade Section (51 percent) would be located
10 on private lands. As noted under the impacts common to all action alternatives, Western already has a
11 100-foot-wide easement under its existing transmission line. Where room permits, Western or Southline
12 would obtain a new 150-foot easement 50 feet to one side of the centerline of the existing easement, so as
13 to have room to operate the existing line while constructing the new one. Once completed, the old line
14 would be removed. In the end, 75 feet of the existing ROW would be reoccupied, 75 feet of new ROW
15 would be obtained, and 25 feet of old ROW would be abandoned. The additional ROW required to
16 construct and maintain the upgraded transmission line would be obtained through a combination of grants
17 and easements negotiated with government and private landowners (Southline 2013). Landowners along
18 the ROW would be compensated for the disruption and the encumbrance of the required easement based
19 on market land and easement values.

20 ***Operation and Maintenance***

21 Once constructed, the transmission line and substations included in the proposed Project could have
22 ongoing effects on property values in very close proximity to these features. Existing research, described
23 under the impacts common to all action alternatives, is somewhat inconsistent regarding these effects, but
24 appears to indicate that effects on values may be greater in denser, more urbanized areas than in rural
25 areas with larger parcels.

26 Impacts to property values are most likely to be of potential concern for the portions of the Proponent
27 Preferred route that cross through Tucson. However, because the Proponent Preferred alternative involves
28 upgrading an existing transmission line, any property value effects are likely to be less than could be
29 associated with development of a new transmission line in a new ROW in the same area. Nonetheless,
30 property owners along the ROW would be affected by the expanded easement required for the upgraded
31 line and the increased size of the structures required for the 230-kV line. The new, double-circuit line
32 would be supported by tubular steel structures, 100 to 140 feet in height. Between 5 and 8 support
33 structures (towers) will be required per mile, depending on the terrain (Southline 2013).

34 **Effects on Tourism and Recreation-related Economy**

35 ***Construction***

36 The anticipated demand for RV park spaces in northeastern Cochise County during construction of
37 eastern portions of the Upgrade Section under the Proponent Preferred alternative could temporarily limit
38 available accommodations for tourists and other travelers in that area. This could impact tourism-related
39 businesses in that area, though many of those businesses (such as motels and restaurants) would also
40 benefit from expenditures by the construction workers.
41

1 **Operation and Maintenance**

2 Ongoing operations and maintenance of the proposed Project should have little or no long-term effect on
3 the tourism and recreation-related economy in the Upgrade Section.

4 **Social Effects**

5 **Construction**

6 As discussed in the impacts common to all action alternatives, the presence of large, transient populations
7 of short-term construction workers can have impacts on social conditions in rural communities. Whether
8 these effects occur, and the magnitude of the effects, appears to partly depend on the size of the non-local
9 construction workforce relative to the size of the existing communities.

10 During the period of time that proposed Project construction work would be concentrated in the eastern
11 portion of the Upgrade Section (northeastern Cochise County), there is the possibility of some short-term
12 social impacts on communities such as Benson and Willcox. Given the relatively short duration of the
13 proposed construction period, and the even shorter period of time in which activity could be concentrated
14 in this area, any adverse social impacts would be relatively brief in duration.

15 **Operation and Maintenance**

16 Ongoing operations and maintenance of the proposed Project would have little or no effect on social
17 conditions in the Upgrade Section.

18 **LOCAL ALTERNATIVES**

19 Eleven local alternatives have been developed for the Upgrade Section. In the eastern portion of the
20 Upgrade Section, there is one local alternative (H), whereas 9 of the other 10 local alternatives (TH1a,
21 TH1b, TH1c, TH1-Option, TH3-Option A, TH3-Option B, TH3-Option C, TH3a and TH3b) would be
22 located in the Tucson area. Local alternative MA1 is near Marana, northwest of Tucson.

23 The selection of any or all of the local alternatives in the Upgrade Section would not result in economic,
24 tax revenue, population, housing, public service, tourism, or social impacts that would appreciably differ
25 from the effects described under the impacts common to all action alternatives at the regional level.
26 At the local level, these local alternatives would affect different properties and individuals than the
27 corresponding route segments included in the Proponent Preferred or Alternative routes.

28 Potential, localized socioeconomic differences associated with the local alternatives could include the
29 following:

- 30 • Alternative H would replace a 15- to 20-mile-long section of the Proponent Preferred alternative
31 through the Benson area in Cochise County. This local alternative was designed to avoid conflicts
32 with potential future residential development north of Benson and with the Benson Airport.
33 Relative to the Proponent Preferred alternative, this alternative could offer fewer land use
34 conflicts in the future and improved economic development opportunities in that area.
- 35 • The nine local alternatives in the Tucson area were all designed, at least in part, to replace the
36 portion of the existing Western line that crosses Tumamoc Hill in Tucson. Tumamoc Hill is a
37 prominent feature west of downtown Tucson, a popular area for hiking and other outdoor
38 activities, and an area with considerable cultural history. Tumamoc Hill is an important biological
39 corridor from an environmental and wildlife perspective and is the home of the University of
40 Arizona's Desert Laboratory. It is also a National Historic Landmark, listed on the NRHP, a

1 National Environmental Study Site, and an Arizona State Scientific and Educational Study Site.
2 It is reportedly also a sacred site for the Tohono O’odham Nation and is believed to encompass
3 archeological sites that have not been fully recorded. By replacing the existing line, these
4 alternatives would likely offer recreational, cultural and other benefits for Tucson area residents
5 and visitors (though relocating the line would then affect other landowners that do not currently
6 have a transmission line proximate to their properties).

- 7 • Alternative MA1 was designed to avoid an area of potential future expansion for the Marana
8 Regional Airport. This alternative could offer fewer conflicts with future land uses and improved
9 economic development opportunities in that area.

10 ***Environmental Justice***

11 The following discussion provides an assessment of the potential for disproportionately high and adverse
12 effects on low income or minority populations.

13 **ENVIRONMENTAL JUSTICE IMPACTS IN THE NEW BUILD SECTION**

14 As discussed in chapter 3, section 3.15, all of the Census tracts in the New Build Section that could be
15 crossed by any of the action alternatives can be defined as environmental justice communities because
16 they either have a proportion of minority residents that is greater than average for the state in which they
17 are located, they have a greater proportion of individuals or families that are living below the poverty
18 level, or both. Most of the potential adverse effects associated with construction and operation and
19 maintenance of the proposed transmission line and associated facilities would be localized in nature,
20 including noise and other types of disruption during construction, and visual and property value effects
21 during ongoing operation and maintenance. Potential adverse effects on local housing conditions and the
22 demand for public services during construction, discussed earlier in this section, would be somewhat
23 more dispersed.

24 Given these characteristics of the area and the proposed Project, low-income and minority populations in
25 the New Build Section would be disproportionately affected by the proposed Project. This would likely
26 be true, however, regardless of where the transmission line was located in the New Build Section given
27 the prevalence of low-income and minority populations throughout the area. The analysis of effects by
28 resource area provided in this chapter indicates that few, if any, of these effects would be “high.”
29 Construction effects would occur over a relatively short duration. Visual effects are expected to be low to
30 moderate and effects on property values, would be localized and primarily or entirely affect landowners
31 who would also receive compensation for easements on their properties.

32 Low-income and minority populations may also be positively affected by the benefits of the Project,
33 including the short-term economic stimulus from construction activities and expenditures, short-term and
34 longer-term increases in tax revenues, and added capacity and reduced congestion for electricity
35 transmission. Because these benefits are likely to be more geographically dispersed than the localized
36 adverse effects, however, it is uncertain whether or not low-income and minority populations would
37 receive disproportionate benefits from the proposed Project.

38 **ENVIRONMENTAL JUSTICE IMPACTS IN THE UPGRADE SECTION**

39 In the Upgrade Section, 26 of the 38 Census tracts that could be crossed by any of the action alternatives
40 can be defined as potential environmental justice communities. As in the New Build Section, potential
41 adverse effects associated with construction and operation/maintenance would be largely localized in
42 nature.

1 Given these characteristics of the area and the proposed Project, low-income and minority populations in
2 the Upgrade Section would likely be disproportionately affected by the proposed Project. As in the New
3 Build Section, few, if any, of these adverse effects would be “high” and, given the prevalence of low-
4 income and minority residents throughout the area, disproportionate impacts on these groups are likely
5 inevitable from any feasible transmission line alignment. As noted above for the New Build Section, low-
6 income and minority populations may also receive positive effects from the proposed Project.

7 ***Agency Preferred Alternative***

8 The socioeconomic impacts of the Agency Preferred Alternative are generally indistinguishable from
9 those resulting from the other action alternatives, including the Proponent Preferred alternative. Most
10 socioeconomic impacts, including temporary and permanent employment, changes in tax revenues and
11 requirements for housing and public services to meet demands of the construction workforce are not
12 sensitive to the precise line locations.

13 Localized impacts on properties and property owners in closest proximity to the proposed transmission
14 line would be similar, regardless of the specific line location, though different individual property owners
15 would be affected. Likewise, the environmental justice assessment is essentially the same for the
16 preferred alternative as for the other action alternatives.

17 ***Additional Mitigation Measures***

18 Based on the anticipated socioeconomic effects of construction and operation and maintenance of the
19 proposed Project, the following mitigation measures are recommended:

- 20 • Southline should maximize local hiring, to the extent feasible, during construction. Local hiring
21 could both maximize local economic benefits from the proposed Project, and help reduce
22 potential housing issues and new public service demands.
- 23 • Southline should develop plans for housing the temporary construction workforce during the
24 periods of time when construction will focus on the western portions of the New Build Section
25 (e.g., Hidalgo County) and the eastern portion of the Upgrade Section (e.g., northeastern Cochise
26 County). If the Proponent Alternative is selected, housing planning should also include southern
27 Luna County. The plan should be developed with input and review from local authorities in those
28 areas to both minimize potential impacts on housing and public services and inform the
29 communities of potential challenges associated with construction.

30 ***Residual Impacts***

31 Development of the proposed new transmission line in the New Build Section and improvements to the
32 existing line in the Upgrade Section that involve larger towers and facilities may have some residual
33 impacts on property values in close proximity to the line. While property owners directly affected by the
34 ROW would be compensated, closely proximate neighbors would not. Any impacts would be expected to
35 be modest, based on the existing literature, due to the predominantly low-density rural setting in the New
36 Build Section and the presence of an existing transmission line in the Upgrade Section.

37 ***Unavoidable Adverse Impacts***

38 Construction of the proposed Project would have unavoidable adverse short-term impacts on the
39 availability and cost of housing and the demand for some types of public services in the least populated
40 portions of the analysis area (e.g., law enforcement, fire, and emergency response). However, the

1 additional demand for public services would be offset by increases in local government revenues during
2 the construction period.

3 Low-income or minority populations (environmental justice populations) would likely experience
4 disproportionate adverse effects on a localized basis from construction and operation and maintenance of
5 the proposed Project. As discussed previously, these adverse effects are all expected to be low to
6 moderate, at most. Since all of the Census tracts in the New Build Section and approximately two-thirds
7 of the Census tracts in the Upgrade Section that could be crossed by any of the alternatives comprise
8 environmental justice populations, this appears to be an unavoidable adverse impact.

9 ***Short-term Uses versus Long-term Productivity***

10 The proposed Project does not involve trade-offs between short-term uses and long-term productivity
11 from a socioeconomic standpoint.

12 ***Irreversible and Irretrievable Commitments of Resources***

13 The Project would not result in irreversible or irretrievable commitments of socioeconomic resources.

14 **4.16 PUBLIC HEALTH AND SAFETY**

15 **4.16.1 Introduction**

16 This section describes the impacts to public health and safety that could be caused by the construction
17 and operation and maintenance of the transmission line, substations, and ancillary facilities, such as
18 electrocution risks and EMFs. This section also describes the impacts that the proposed Project could
19 have in connection with existing environmental hazards such as severe weather and fire hazards. For
20 analysis of impacts from hazardous materials, transportation conflicts, noise hazards, and potential
21 sabotage and terrorism hazards, see the “Hazardous Materials and Hazardous and Solid Waste,”
22 “Transportation,” “Noise and Vibration,” and “Intentional Acts of Destruction” sections of this DEIS,
23 respectively.

24 The impacts described in this section are based on the analysis provided in “Southline Transmission
25 Project Resource Report 6: Human Health and Safety” (CH2M Hill 2013q). The contents of that report
26 are used herein without specific reference.

27 **4.16.2 Methodology and Assumptions**

28 ***Occupational Safety***

29 The types of data and information collected include national statistics on injury rates for utility and
30 construction workers from the BLS (2012b). Data collected were evaluated to identify whether the
31 proposed Project could directly or indirectly affect national injury rates for utility and construction
32 workers and subsequently cause associated health and safety impacts.

33 ***Wind, Earthquake, Fire, and Other Severe Weather Hazards***

34 The types of data and information collected include national statistics on large blackouts and
35 transmission/generation failures due to extreme weather events, from published studies and extreme

1 weather data from the National Oceanic and Atmospheric Association. Data collected were evaluated to
2 identify whether the proposed Project could directly or indirectly be affected by extreme weather and
3 subsequently cause associated health and safety impacts.

4 ***Electromagnetic Hazards***

5 The ENVIRO program was used to model the EMFs that the New Build and Upgrade Sections would
6 create. The model produced lateral profiles of the EMF out to 1,000 feet on each side of the centerline.
7 These profiles were then plotted to produce the data and figures that are presented below. The analysis
8 results are compared to the recommended limits for EMF based on the ICNIRP guidelines, published in
9 1998. No EMF limit levels are established in Arizona or New Mexico. Technical details of the modeling
10 inputs, calculations, and scenarios used by the ENVIRO program for this proposed Project are provided in
11 “Southline Transmission Project Resource Report 6: Human Health and Safety” (CH2M Hill 2013q).

12 ***Analysis Area***

13 **NEW BUILD SECTION**

14 The analysis area for impacts regarding public health and safety within the proposed New Build Section is
15 based on a 200-foot-wide representative ROW, located along the centerline of the 2-mile-wide analysis
16 area. The actual construction ROW would likely be configured to avoid certain environmental impacts, or
17 for other logistical reasons. The representative ROW is used to identify natural and manmade hazards that
18 could be directly impacted by construction, operations, and maintenance of the proposed Project and the
19 action alternatives.

20 **UPGRADE SECTION**

21 The analysis area for impacts in the Upgrade Section is based on a 150-foot representative ROW, located
22 along the centerline of the 500-foot-wide analysis area.

23 ***Analysis Assumptions***

24 No assumptions are made for the analysis of impacts to occupational safety and impacts from severe
25 weather events.

26 **ELECTROMAGNETIC FIELDS**

27 The accuracy of the modeling is dependent on the accuracy of the input data (i.e., if the average phase
28 current is higher than what was modeled, then the resulting magnetic fields would also be higher).
29 The resulting EMF plots are within a few percent of the true value for the conditions modeled.
30 The electrical power flows entered into the ENVIRO program for this modeling are based on peak ratings
31 from load flow models and common ampacity rating methodology for that size of conductor. These
32 electrical power flows are likely much higher than the electrical power flows that would flow in the line
33 during most of the year; therefore, typical magnetic fields are expected to be much lower than those
34 modeled here.

35 ***Impact Indicators***

36 The following indicators were considered when analyzing potential impacts to public health and safety:

- 37 • Amounts and types of hazardous materials; number of workers and sensitive receptors within
38 analysis area.

- 1 • Number of predicted severe occupational accidents/deaths annually and over life of Project from
2 transmission line accidents, including electrocution. Number of predicted non-occupational
3 electrocutions annually from contact with transmission lines per mile of transmission line
4 (if possible).
- 5 • Severe weather, fire, and lightning strike statistics; transmission line failure rate per mile.
- 6 • Amounts and types of potentially fire-causing activities or equipment.

7 ***Significant Impacts***

8 For the purposes of this analysis, a significant impact on public health and safety could result if any of the
9 following were to occur from construction or operation and maintenance of the proposed Project:

- 10 • Construction, operation, and maintenance of the proposed transmission lines, substations, and
11 ancillary facilities would create an unsafe working environment that cannot be mitigated through
12 the use of BMPs and other required safety measures. Injuries or fatalities during construction
13 would be expected to be above the industry averages.
- 14 • Construction, operation, and maintenance of the proposed transmission lines, substations, and
15 ancillary facilities would increase the risk of fire.
- 16 • Severe weather events would cause frequent transmission failures.
- 17 • EMF generated by the proposed transmission lines, substations, and ancillary facilities would
18 expose the public to EMFs that are greater than guidelines proposed by the ICNIRP, the IEEE,
19 and the ACGIH.

20 **4.16.3 Impacts Analysis Results**

21 ***No Action Alternative***

22 Under the no action alternative, the proposed New Build Section would not be constructed; therefore,
23 there would not be an increased risk to occupational safety from the construction and
24 operation/maintenance of the transmission line, nor would there be an increased risk of fire from potential
25 fire-causing activities. Severe weather events would continue to potentially impact the existing
26 transmission infrastructure. The public would not benefit from an increase in reliability in electric service
27 that the proposed infrastructure would provide should a severe weather or other disruptive event occur
28 that causes a disruption in service from damage to the existing infrastructure. In regards to the Upgrade
29 Section, even under the no action alternative, Western still plans to upgrade the existing lines between the
30 Apache and Saguaro substations within the next 10 years, per Western's 10-year capital improvement
31 plan (Western 2012a).

32 ***Impacts Common to All Action Alternatives***

33 **CONSTRUCTION**

34 **Occupational Safety**

35 The New Build Section of the proposed Project would require construction of the transmission line and
36 associated facilities. Potential risks associated with construction activities include, but are not limited to,
37 electrocution, exposure to extreme weather, falling, exposure to hazardous materials, and injury from
38 equipment and materials. Site-specific risks such as difficult or remote terrain or highway crossings
39 would exist throughout the New Build Section. Construction requirements including workers and types of

1 equipment and materials are included in the POD for the proposed Project. Specific mitigation measures
2 and safety procedures are also included in the POD. The construction of the proposed Project is
3 temporary and would be confined to the footprint of the facilities, access roads, and staging areas.
4 Implementation of the proposed Project mitigation would help to limit the frequency and magnitude of
5 potential health and safety risks to construction workers. Construction safety requirements and mitigation
6 measures would meet the OSHA standards and site specific occupational safety measures (such as a
7 smoking ban in fire prone areas) would be developed as appropriate. Construction of the proposed
8 transmission line and associated facilities would not be expected to generate injury or fatality rates that
9 are higher than industry averages. The implementation of OSHA safety requirements through the use of
10 BMPs, mitigation measures, and other safety requirements would minimize the chance that an accident
11 could occur. Therefore, short-term impacts to occupational safety would be considered negligible.

12 **Severe Weather Hazards**

13 A severe weather event during construction such as high wind, excessive heat, or excessive cold could
14 pose a danger to construction workers during construction of the proposed transmission line and
15 associated facilities; however, this risk could be minimized by appropriate BMPs to stop, limit, or delay
16 construction until it is safe to continue with construction. Should a severe weather event occur during
17 construction, the impact would be temporary and limited to the construction site. The general public
18 would not be affected by this impact because the proposed transmission line would not be operating.

19 Potentially fire-causing activities (such as welding or the use of combustion engines) would occur during
20 construction of the proposed transmission line and associated facilities in areas known for extreme fire
21 danger during the dry season. The implementation of PPMs and mitigation measures would reduce the
22 potential for health and safety impacts that could result from fires associated with construction and/or
23 operation and maintenance of the proposed Project. Therefore, impacts from severe weather hazards and
24 potential fire-causing activities during construction would be considered negligible.

25 **Electromagnetic Fields**

26 EMFs during construction would not occur in the New Build Section because the proposed transmission
27 line and associated facilities that would be constructed would not be transmitting electricity. The existing
28 transmission infrastructure in the Upgrade Section does not pose a risk to the public for EMFs because the
29 EMFs are below proposed cautionary levels outside of the ROW. EMFs would potentially impact workers
30 constructing the proposed transmission line and associated facilities in the Upgrade Section, specifically
31 in areas within the ROW where EMF levels are above acceptable exposure guidelines. However, this
32 would not be likely to occur for two reasons: (1) to the extent possible, the proposed new transmission
33 facilities in the Upgrade Section would be constructed parallel to the existing transmission facilities and
34 out of the range of proposed cautionary levels of EMFs, and (2) in highly congested areas, such as
35 metropolitan Tucson, where it is impossible to construct parallel facilities within the ROW, the existing
36 transmission facilities would be turned off prior to deconstructing the existing facilities and reconstructing
37 the upgraded facilities. Therefore, impacts from electromagnetic fields would be considered negligible.

38 **OPERATION AND MAINTENANCE**

39 **Occupational Safety**

40 The number of workers that would be required for operation and maintenance of the proposed Project
41 would be much smaller than would be required for construction. All operations and maintenance staff
42 would be required to be fully trained to safely perform their duties in full compliance with OSHA and all
43 other safety requirements. Although more workers would be required to operate and maintain the

1 transmission lines, substations, and ancillary facilities, there would not be an increased risk to
2 occupational safety as a result of the construction of any of the action alternatives. Therefore, impacts to
3 occupational safety during operation and maintenance would be considered negligible.

4 **Severe Weather Hazards**

5 A severe weather event would have the potential to increase the risk to public health and safety by
6 causing downed transmission lines and increased potential for lightning strikes to occur at transmission
7 towers. In the New Build Section, the risk of downed transmission lines and increased lightning strikes
8 would be greater than in the Upgrade Section because these would be new risks in the New Build Section.
9 It is not anticipated that severe weather events would cause more frequent transmission failures than
10 currently occur, or increase the risk of more frequent transmission failures than currently exists.
11 The proposed transmission facilities would expand and improve transmission infrastructure in southern
12 New Mexico and Arizona, therefore improving distribution reliability during severe weather events
13 should such a disruptive event occur. Therefore, the proposed transmission line would have a long-term
14 beneficial impact by improving reliability of electricity transmission.

15 Potentially fire-causing activities would typically not occur during maintenance and operation of the
16 proposed transmission line and associated facilities. However, the construction of transmission towers
17 would increase the chance of lightning strikes because the towers would most likely be the tallest features
18 throughout most of the analysis area. Lightning strikes are among the most common causes of fire in the
19 arid Southwest and can also cause power outages. The construction of any of the action alternatives
20 would include the industry standard of lightning mitigation on the towers and other facilities, in order to
21 minimize the effects that a lightning strike could have. This includes grounding wires on the transmission
22 lines that divert the lightning charge to grounding rods that safely discharges the current to the ground.
23 The grounding system protects the transmission line from damage and reduces the chance of fire ignition.
24 It is not anticipated that the action alternatives would increase the risk of a fire occurring as a result of a
25 lightning strike to a transmission facility over levels that currently exist. Therefore, the potential impact
26 from lightning strikes would be considered negligible.

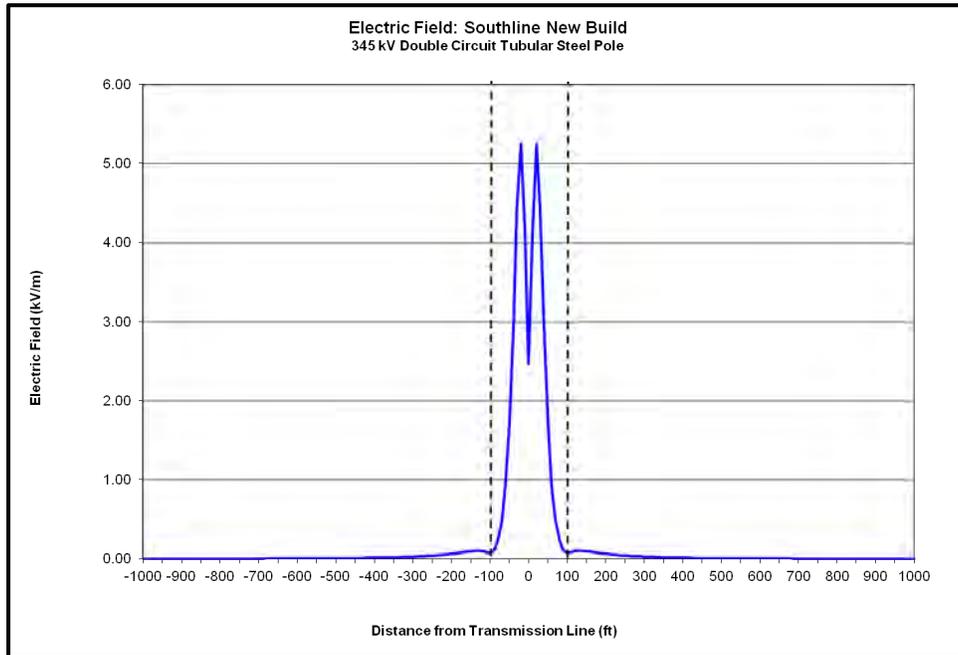
27 **Electromagnetic Fields**

28 New EMFs in the New Build Section would be introduced in sparsely populated areas where no other
29 transmission lines are currently located. In the Upgrade Section, the transmission lines would be built
30 parallel to existing lines within the ROW, or existing lines would be upgraded. As stated in chapter 3, the
31 EMFs currently created by the existing transmission infrastructure do not exceed EMF exposure
32 guidelines within the ROW. Subsequently, the existing transmission infrastructure is not impacting public
33 health and safety. The upgraded lines would generate higher EMF levels within the ROW. Therefore, the
34 risk of increased public exposure to electromagnetic fields would be considered negligible.

35 The ENVIRO program was used to model the EMFs that would occur as a result of implementation of
36 any of the action alternatives under various design and alignment scenarios that could occur from the
37 action alternatives. The ENVIRO model's findings predict that proposed public safety guidelines for
38 exposure to EMFs would be met at the ROW of the proposed transmission lines for all design and
39 alignment scenarios. The following figures are samples of the ENVIRO findings for scenarios applicable
40 to the New Build and Upgrade Sections.
41

1 Figures 4.16-1 and 4.16-2 show the electric field and magnetic field, respectively, that would be produced
2 by the proposed transmission lines in the New Build Section, should the transmission line be constructed
3 by itself (not parallel to other transmission infrastructure). The dotted lines in the figure represent the
4 ROW and demonstrate that EMFs e generated by this design would not exceed safety guidelines proposed
5 by the ICNIRP, the IEEE, and the ACGIH.

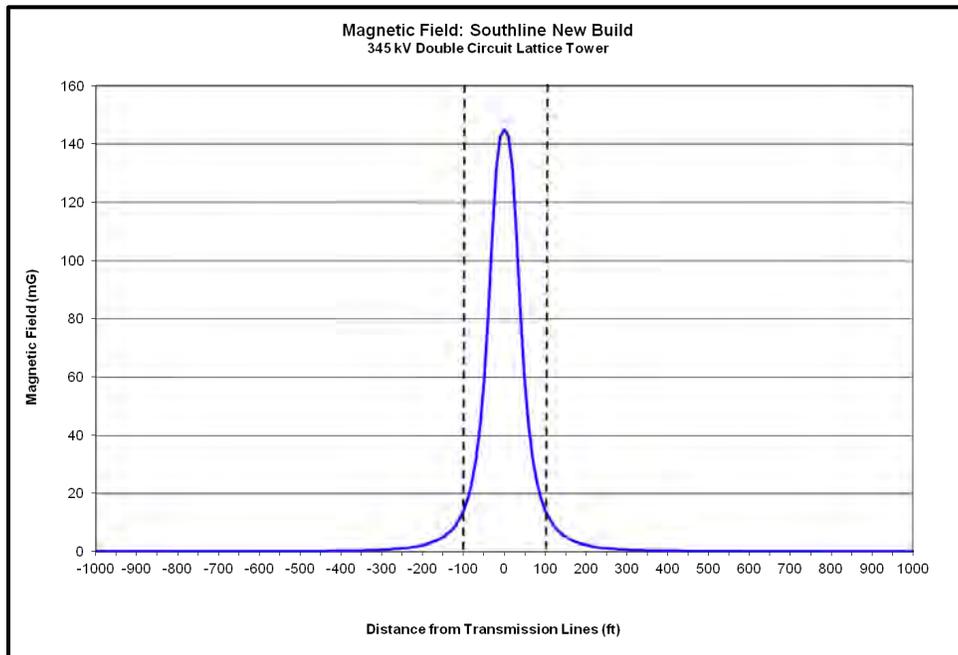
6 **Figure 4.16-1.** Electric field of New Build Section 345-kV double-circuit tubular
7 steel pole.



8

9
10

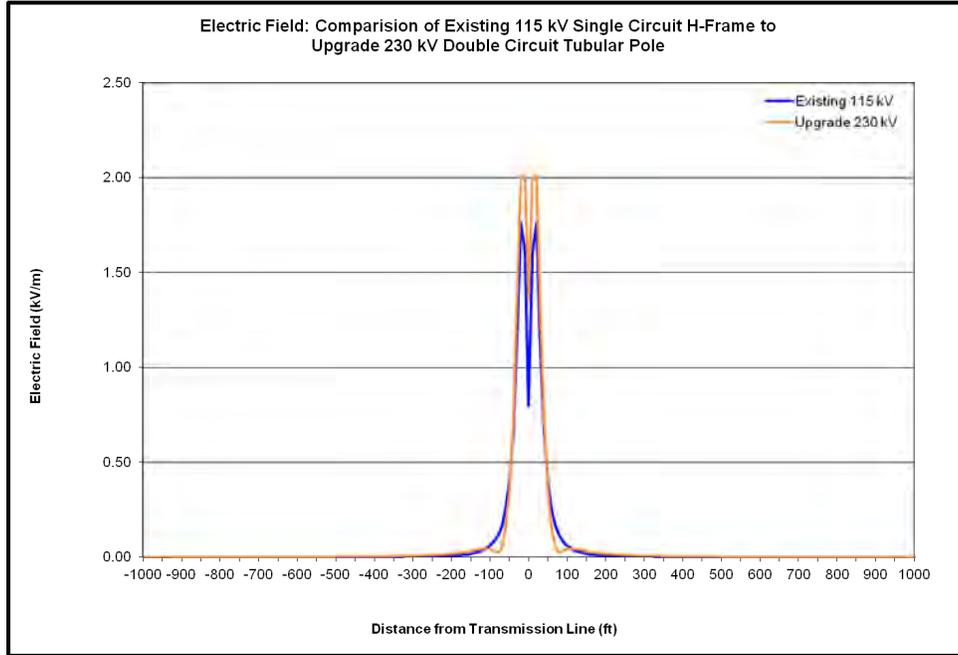
Figure 4.16-2. Magnetic field of New Build Section 345-kV double-circuit tubular steel pole.



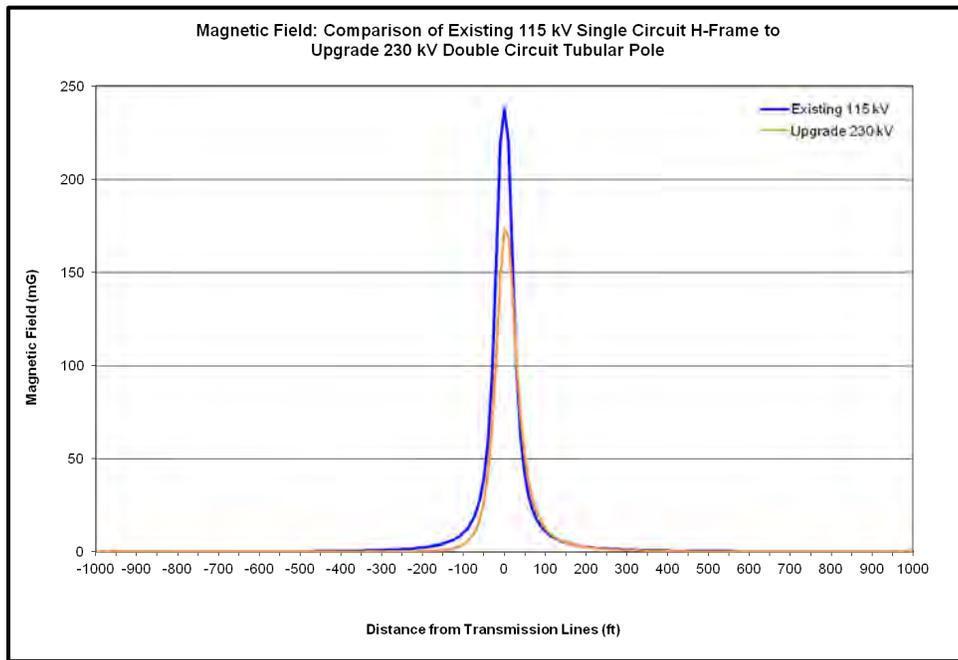
11

1 Figures 4.16-3 and 4.16-4 show the electric field and magnetic field, respectively, that would be produced
2 by the proposed transmission lines in the Upgrade Section, should the transmission line reconstruct the
3 existing transmission infrastructure. The ROW in this section is 100 feet wide. EMFs emitted by this
4 design would not exceed exposure guidelines proposed by the ICNIRP, the IEEE, and the ACGIH.

5 **Figure 4.16-3.** Electric field of Upgrade Section replacement of existing 115-kV
6 line with 230-kV line.



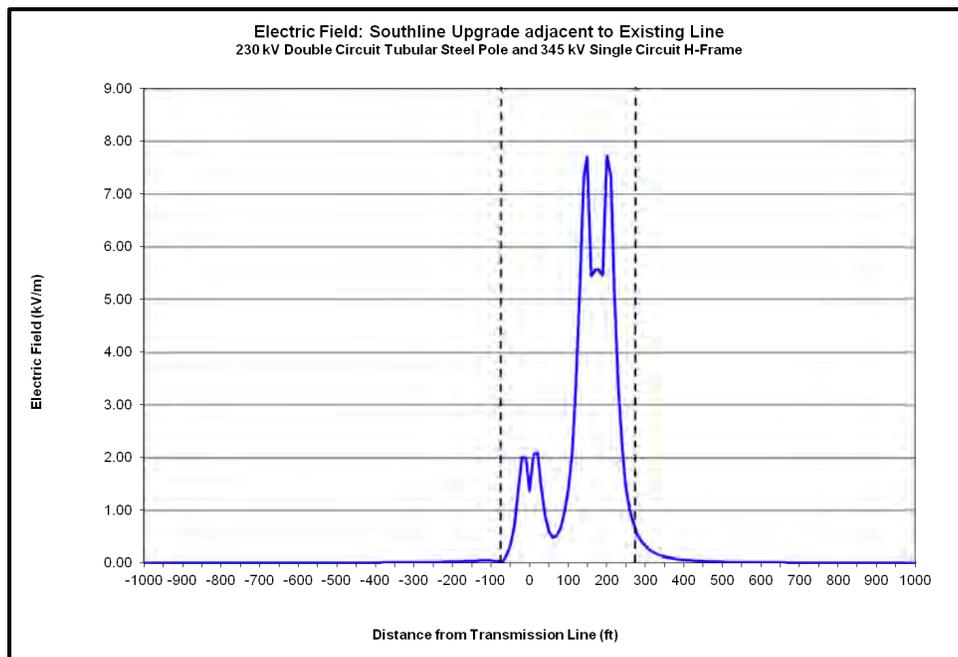
7
8 **Figure 4.16-4.** Magnetic field of Upgrade Section replacement of existing 115-kV
9 line with 230-kV line.



10

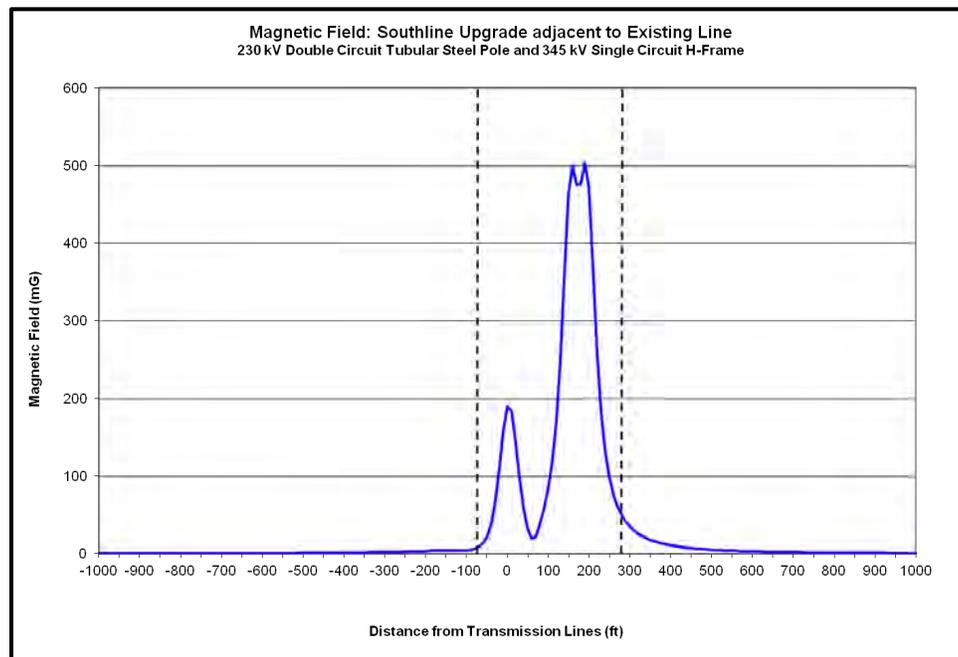
1 Figures 4.16-5 and 4.16-6 show the electric field and magnetic field, respectively, that would be produced
2 by the proposed transmission lines in the Upgrade Section should the transmission line be constructed
3 parallel to other existing transmission infrastructure. The dotted lines in the figure represent the ROW and
4 demonstrate that EMFs emitted by this design would not exceed safety guidelines proposed by the
5 ICNIRP, the IEEE, and the ACGIH.

6 **Figure 4.16-5.** Electric field of Upgrade Section 230-kV line parallel to existing
7 345-kV line.



8

9 **Figure 4.16-6.** Magnetic field of Upgrade Section 230-kV line parallel to existing
10 345-kV line.



11

1 ***Additional Mitigation Measures***

2 Implementation of the proposed Project would require that Southline comply with all applicable safety
3 and design regulations and BMPs set by the NERC, NESC, OSHA, and local permitting agencies as listed
4 in the POD. The POD would also include PPMs that are intended to avoid, minimize, or reduce impacts
5 to public health and safety. These PPMs include the presence of a safety representative at all times with
6 the construction crews, first aid kits stored in each construction vehicle, a worker trained in first aid
7 included in each work group during construction, and the development and implementation of a Health
8 and Safety Plan. The Health and Safety plan would communicate potential safety hazards during
9 construction, operation and maintenance activities and implement appropriate work practices prior to
10 construction that would minimize the chance that an accident could occur. These work practices include
11 spill prevention, emergency response measures, accident prevention, use of protective equipment, medical
12 care of injured employees, safety education, and fire protection.

13 ***Agency Preferred Alternative***

14 Impacts to public health and safety (occupational safety, severe weather hazards, and electromagnetic
15 fields) under the Preferred Alternative for both the New Build and Upgrade Sections would be similar to
16 the other action alternatives as described under “Impacts Common to All Action Alternatives.” Impacts to
17 occupational safety would be more likely to occur during the construction phase than during the
18 maintenance and operation phase. Potential risks associated with construction activities include, but are
19 not limited to, electrocution, exposure to extreme weather, falling, exposure to hazardous materials, and
20 injury from equipment and materials. The implementation of OSHA safety requirements through the use
21 of BMPs, mitigation measures, and other safety requirements would minimize the chance that an accident
22 could occur. Therefore, the Agency Preferred Alternative for both the New Build and Upgrade Sections
23 would have short-term, negligible impacts on occupational safety.

24 Impacts from severe weather hazards, including lightning, and potential fire-causing activities during
25 construction of the Agency Preferred Alternative would also be considered negligible after the application
26 of mitigation measures. Long-term beneficial impacts would occur after the Preferred Alternative is
27 constructed because the transmission facilities would expand transmission infrastructure in southern New
28 Mexico and Arizona and would improve reliability during severe weather events, should a disruptive
29 event occur.

30 The potential for increased public exposure to EMFs would occur under the preferred alternative for both
31 of the New Build and Upgrade Sections. In the New Build Section, transmission lines would be built in
32 areas where no current transmission lines exist and therefore create the potential for public exposure to
33 EMFs where they did not previously occur. In the Upgrade Section, the proposed transmission lines
34 would be built parallel to existing lines within the ROW, or existing lines would be upgraded. However,
35 EMF exposure guidelines would be met within the ROW for both the New Build Section and Upgrade
36 Section of the Agency Preferred Alternative. Therefore, the risk of increased public exposure to EMFs
37 would be considered negligible for the Agency Preferred Alternative and similar to the impacts of the
38 other action alternatives.

39 ***Residual Impacts***

40 The proposed Project would have both negative and beneficial long-term impacts to public health and
41 safety. Potential long-term negative impacts would occur as a result of increase of EMFs in areas where
42 they do not currently occur. However, with implementation of the mitigation measures, BMPs, and PPMs,
43 the impacts to public health and safety would be expected to be negligible. Implementation of the
44 proposed transmission infrastructure would also have a long-term beneficial impact to public health and

1 safety by improving the reliability of electricity transmission to areas that would be served by the
2 proposed infrastructure. In the Upgrade section, the new facilities would be constructed to modern design
3 standards including modern hardware and grounding systems. These new facilities would require less
4 frequent and less intensive maintenance work than the older facilities resulting in decreased potential for
5 occupational accidents to occur.

6 ***Unavoidable Adverse Impacts***

7 Unavoidable adverse impacts caused by the proposed Project include:

- 8 • Increased potential for occupational risks to occur.
- 9 • Increased potential for fire risks to occur.
- 10 • Increased potential for public exposure to EMFs.

11 As discussed above, the increased potential for these risks to occur would be minimal after the application
12 of all mitigation measures, BMPs, and PPMs.

13 ***Short-term Uses versus Long-term Productivity***

14 There would be no short-term uses versus long-term productivity conflicts to public health and safety as a
15 result of the implementation of the proposed Project or action alternatives.

16 ***Irreversible and Irretrievable Commitments of Resources***

17 All impacts described above would not be considered irreversible or irretrievable commitments of
18 resources because the impacts to public health and safety no longer exist should the proposed
19 transmission infrastructure be removed.

20 **4.17 HAZARDOUS MATERIALS AND HAZARDOUS AND** 21 **SOLID WASTE**

22 **4.17.1 Introduction**

23 Certain chemicals and materials that would be used during the construction, operation, and maintenance
24 of the Project are characterized as hazardous materials. Hazardous materials, wastes, and regulated,
25 nonhazardous solid wastes are governed by the laws, regulations, and policies discussed in chapter 3. This
26 section describes the potential impacts to human health and the environment from preexisting hazardous
27 materials that may be present along the Project footprint and from hazardous materials generated during
28 construction or operation and maintenance of the Project. For the purposes of this chapter, the term
29 hazardous materials includes petroleum products and other contaminants. Because the primary impact
30 from the use of hazardous materials during construction would be from potential leaks and spills and
31 potential contamination of surrounding soils, surface waters, and groundwater, potential impacts are
32 discussed in terms of which hazardous materials are or would be present, whether their presence creates
33 dangerous conditions, and how potential dangers would be mitigated. The extent to which the Project
34 could result in adverse conditions related to hazardous materials is addressed, and the potential effects are
35 evaluated. The impacts described in this section are based on data available in “Southline Transmission
36 Project Resource Report 5: Hazardous Materials and Waste” (CH2M Hill 2013r). The contents of that
37 report are used herein without specific reference.

4.17.2 Methodology and Assumptions

This section describes analysis area for determining the presence and effects of hazardous materials, how effects are measured, the assumptions used when evaluating the effects, and what criteria must be met for an impact to be considered significant.

Analysis Area

The analysis area for hazardous materials and solid waste for the New Build Section is a 2-mile corridor, 1 mile on either side of the centerline of alternatives carried forward, and any substations or access roads outside that corridor. As described in chapter 3, this satisfies the search distances specified in ASTM Standard E 1527-05 (ASTM 2005). The ASTM has determined that these search distances are appropriate distances in which to search for potential sources of contamination that could affect the analysis area. The analysis area for the Upgrade Section of the Project is a 500-foot corridor, which is 200 feet on either side of the centerline of the existing 100-foot corridor. The analysis area described here is sufficient to identify hazardous materials sites that could impact, or be directly impacted by, construction, or operation and maintenance of the Project.

Analysis Assumptions

The following factors were assumed when identifying hazardous materials sites that could impact or be directly impacted by the Project, hazardous materials potentially used or stored during construction and operation/maintenance of the Project, and the effects of those elements on human health and the environment. It should be noted that many of these elements are required by law, and the plans merely collect the requirements into a plan structure. The distinction is important, as legal requirements are mandatory and enforceable by regulatory agencies. They are also not mitigation, as they are legal requirements.

- A Project-specific hazardous materials and hazardous waste management program would be developed prior to construction. The program would outline proper hazardous materials use, storage, and transport requirements, as well as applicable handling procedures. The program would identify the types of hazardous materials to be used during the Project and the types of hazardous wastes that are expected to be generated. All debris generated during Project-related demolition of structures, buildings, asphalt, or concrete-paved surface areas would be managed in a manner that would minimize risks to workers, the public, and the environment. Waste materials determined to be hazardous waste would be recycled or disposed of at a permitted hazardous waste management facility. Used oil would be sent offsite for recycling, reuse, or proper disposal. Containers used to store hazardous would be properly labeled and maintained in good condition. Construction and operations and maintenance personnel would be provided with Project-specific training to safely manage hazardous materials and hazardous wastes. In addition to training, each work crew would have basic hazmat cleanup materials onsite for immediate use.
- New or expanded substation locations that involve the purchase or long-term leasing of land, purchased transmission line ROWs, and any other property to be acquired would be screened for environmental liabilities to determine the probability of contaminants of concern or other environmental impairment. An ASTM Standard E 1527-05 (or equivalent) Phase I Environmental Site Assessment would be conducted if necessary. Additional actions may include further assessment, characterization, remediation, or selection of alternative property.
- A soil management plan would be prepared to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. If backfill material to be used is derived from a site that is suspected to have

1 contamination, it would be sampled and determined to be free of regulated contaminants before it
2 is used to fill excavations.

- 3 • An SPCC Plan would be developed and implemented prior to construction of the Project, to
4 ensure safe handling, storage, and use of hazardous materials and to minimize, avoid, and/or
5 clean up unforeseen spills during construction and operation/maintenance.
- 6 • Service and refueling procedures would not be conducted within 500 feet of a seep, wash, or
7 other water body. All vehicles and equipment used would be maintained in good working order
8 and maintained to avoid fluid leaks.
- 9 • A SWPPP would also address such aspects as proper storage and spill containment for hazardous
10 materials, fuels, and lubricants used during construction.
- 11 • A number of BMPs are recommended to prevent hazardous materials from coming in contact
12 with the environment. BMPs would be detailed in the SWPPP and SPCC Plan. These plans would
13 detail BMPs such as retaining sediments on the construction site via soil erosion and sediment
14 control practices, and proper refueling and maintenance procedures for equipment.
- 15 • Applicants, contractors, and operators will adhere to the hazardous materials–related laws,
16 ordinances, regulations, and standards described in chapter 3.
- 17 • Existing hazardous waste sites and other locations pertinent to this analysis have been accurately
18 mapped.

19 ***Impact Indicators***

20 The following indicators were considered when analyzing the potential effects of hazardous materials:

- 21 • The presence of known hazardous materials sites within the analysis area and the type, nature,
22 status, and proximity to the Project of those sites.
- 23 • The presence, transportation, storage, use, and disposal of hazardous materials during
24 construction and operation/maintenance of the Project.

25 Although these indicators are by nature more qualitative than quantitative, they will be considered with
26 regard to the risk they would pose to human health or the environment during construction and
27 operation/maintenance of the Project.

28 ***Significant Impacts***

29 For the purposes of this analysis, a significant impact related to hazardous materials could result if any of
30 the following were to occur during construction or operation/maintenance of proposed Project:

- 31 • An activity regarding handling, transport, use, containment, or disposal of hazardous materials
32 that would violate any local, State, or Federal regulations or create a long-term risk to human
33 health or the environment.
- 34 • Improper storage or disposal of hazardous materials generated by the Project that would pose a
35 threat to human health or the environment in the Project vicinity.
- 36 • Spills or releases of hazardous materials at or above reportable quantities within the analysis area
37 that would pose a threat to public health and the environment in the Project vicinity.
- 38 • Impaired implementation of, or physical interference with, an adopted emergency hazardous
39 materials spills response plan or emergency evacuation plan.

- 1 • The presence of preexisting unmitigated hazardous materials within the analysis area that would
2 pose a threat to human health or the environment with respect to the Project.

3 **4.17.3 Impacts Analysis Results**

4 ***No Action Alternative***

5 Under the no action alternative, the BLM would not issue a ROW and impacts from hazardous materials
6 from construction and operation/maintenance of the Project would not occur. Current activities in the
7 area, such as livestock grazing, agriculture, and dispersed recreational use, would not result in the
8 generation, use, or disposal of large quantities of hazardous materials and hazardous and solid waste
9 within the Project footprint.

10 Even under the no action alternative, Western still plans to upgrade the existing lines between the Apache
11 and Saguaro substations within the next 10 years, per Western's 10-year capital improvement plan
12 (Western 2012a). While new hazardous materials sites in addition to those described in chapter 3 could be
13 discovered or created, or existing sites could be cleaned up, the status of existing hazardous materials sites
14 described in chapter 3 would likely remain unchanged. SF₆ and transformer oil would continue to be used
15 at existing substations, and quantities of those would likely increase for the upgrade of existing lines.
16 Much of the New Build Section is vacant land, and land in the immediate vicinity of the proposed Project
17 and alternatives would remain primarily undeveloped desert land under the no action alternative.

18 ***Impacts Common to All Action Alternatives***

19 Many of the potential impacts discussed in chapter 3 would universally apply to all action alternatives.
20 Potential impacts common to all alternatives are discussed below as they each relate to construction,
21 operation, and maintenance of the proposed Project.

22 The implementation of any of the action alternatives would result in the use of hazardous materials and
23 creation of solid waste during construction. The specific chemicals and materials, and their quantities,
24 have not yet been determined. Potential hazardous materials associated with construction activity could
25 include solvents, metals, petroleum products (fuels and lubricants, oils, gasoline, degreaser, etc.), plated
26 products, hazardous substances, paint, wood-treated products, and other products typically associated
27 with construction sites. Hazardous materials may also include pesticides (insecticides, fungicides,
28 herbicides, rodenticides, etc.) and other construction chemicals such as concrete products, sealants, and
29 wash water associated with these products. Solid wastes may include paper, wood, metal, and general
30 trash. With adherence to laws, ordinances, regulations, and standards and the implementation of the
31 proponent-committed environmental protection measures described in chapter 2 and in "Analysis
32 Assumptions" above, there would be no impacts from construction-related hazardous materials.

33 Transformers are filled with insulating mineral oil. PCBs are no longer used in transformers. Containment
34 structures are required to prevent equipment oil from getting into the ground or water bodies in the event
35 of a rupture or leak. An oil spill prevention preparedness plan would be developed for the Project in
36 conjunction with the operating utility as required. With adherence to laws, ordinances, regulations, and
37 standards and the implementation of the proponent-committed environmental protection measures
38 described in chapter 2 and in "Analysis Assumptions" above, there would be no impacts from the use of
39 oil-filled transformers.

40 SF₆ under pressure is used as an insulator in gas-insulated switches. Though it is nontoxic and largely
41 inert, it is considered to be an extremely potent greenhouse gas. Small amounts of SF₆ could leak over
42 time, resulting in emissions of this gas. Southline would follow BMPs to reduce the potential for

1 greenhouse gas emissions, including 1) ensuring that only knowledgeable personnel handle SF₆, and 2)
2 implementing SF₆ recovery and recycling. Because the gas is nontoxic and inert, and because BMPs
3 would be implemented, the potentially small amount of gas leaked over time would have no measurable
4 impact on human health or the environment.

5 A number of permitted facilities exist in the vicinity of the Project footprint. However, a permitted facility
6 does not imply contamination. None of the facilities listed as permitted were listed in databases indicating
7 contamination, and none are located within the ROW. Therefore, permitted facilities would not have an
8 effect on construction or operation and maintenance of any of the Project alternatives.

9 A number of USTs exist in the vicinity of the Project footprint, some of which are leaking or have leaked
10 in the past. However, none of these are located within the ROW, and because groundwater is generally
11 deep along the Project footprint (see Sections 3.7 and 4.7, “Water Resources”), the relatively shallow
12 excavations for tower footings are unlikely to intersect with any potential groundwater plumes. Therefore,
13 USTs would not have an effect on construction or operation and maintenance of any of the Project
14 alternatives.

15 The Project would not impair or impede implementation of, or physically interfere with, an adopted
16 emergency hazardous materials spill response plan or emergency evacuation plan. Towers would not be
17 located in roadways or block transportation routes. Therefore, no impacts to adopted emergency
18 hazardous materials spill response plans or emergency evacuation plans are anticipated.

19 With adherence to the laws, ordinances, regulations, and standards described in chapter 3, implementation
20 of the proponent-committed environmental protection measures described in chapter 2, and
21 implementation of safety-related plans and programs to ensure safe handling, storage, and use of
22 hazardous materials, none of the significant impacts described above would occur during construction and
23 operation/maintenance of the Project. No violations of local, State, or Federal regulations or long-term
24 risks to human health or the environment are anticipated from handling, transport, use, containment,
25 or disposal of hazardous materials during construction and operation/maintenance of the Project.
26 The mitigation measures described above would be implemented to prevent spills and leaks of hazardous
27 materials and provide for adequate containment and cleanup if spills and leaks do occur.

28 ***Route Group 1 – Afton Substation to Hidalgo Substation***

29 As described in chapter 3, publicly available databases were searched to gather information regarding
30 known sites of potential environmental concern within the analysis area. Sites of potential environmental
31 concern include permitted facilities and UST/LUST sites (both are discussed above in “Impacts Common
32 to All Action Alternatives”), and CERCLIS (or “Superfund”) sites. Segment P2 of the Proponent
33 Preferred alternative passes within 1 mile of the Peru Hill Mill (Site ID NMD097119986) and American
34 Smelting and Refining Deming Mill and Tailings (Site ID NMD980749220) CERCLIS sites. Segment D
35 of the route group 1 local alternatives passes within 1 mile of the Shakespeare Mining District (Site ID
36 NMD986684256) CERCLIS site. The Peru Hill Mill site is listed as fully remediated. The American
37 Smelting and Refining Deming Mill and Tailings site and the Shakespeare Mining District site have been
38 archived. This means the EPA has determined that the assessment has been completed and that no further
39 remedial action is planned at this time. Because neither of these sites overlaps the ROW and because of
40 their current status, no impacts to construction or operation and maintenance of the Project from these
41 sites would occur.

42 The Hachita Landfill is located near the town of Hachita, New Mexico, within the analysis area of
43 Segment S7 of the New Build Section of the Proponent Alternative. However, the landfill is located
44 outside the representative ROW. Limited information is available for this site. According to NMED, the

1 landfill is currently closed. No facility containing the term Hachita or located in Hachita is listed in the
2 CERCLIS database; therefore, it is unlikely that this is an actual CERCLIS site. It is also not mapped on
3 the NMED eGIS Mapper database. Because it is located outside the ROW and is not thought to be a
4 CERCLIS site, no impacts to construction or operation/maintenance of the Project are expected from this
5 facility.

6 ***Route Group 2 – Hidalgo Substation to Apache Substation***

7 It initially appeared that Segment P4b of the Proponent Preferred alternative passed within 1 mile of the
8 Fannie Hill Mine and Mill (Site ID NMD981147192) CERCLIS site. This site is listed as archived.
9 However, the coordinates of this site appear to be incorrect, and available information from the NMED
10 database states that this facility is located in Catron County, well north of the proposed Project. Based on
11 this additional information, this facility is not located within the analysis area or the ROW. Because this
12 site does not overlap the ROW, because of its current status, and because it is not thought to be located
13 within the analysis area, no impacts to construction or operation/maintenance of the Project are expected
14 from this facility.

15 ***Route Group 3 – Apache Substation to Pantano Substation***

16 A search of the publicly available data did not identify any hazardous materials sites, LUSTs, or any other
17 potential concerns related to hazardous materials in this route group. Therefore, no impacts are anticipated
18 from preexisting hazardous materials or the use of hazardous materials under any of the route group 3
19 action alternatives.

20 ***Route Group 4 – Pantano Substation to Saguaro Substation***

21 A search of the publicly available data did not identify any hazardous materials sites, LUSTs, or any other
22 potential concerns related to hazardous materials in this route group, except for the Silverbell Landfill
23 Water Quality Assurance Revolving Fund site (also known as the Silverbell Jail Annex Landfill).
24 The ADEQ Water Quality Assurance Revolving Fund program is also known as State Superfund.
25 The ROW of Segment U3i of the Proponent Preferred alternative overlaps the contamination plume of
26 this site.

27 Groundwater at the Silverbell Landfill site is contaminated with tetrachloroethene (PCE) and
28 trichloroethene (TCE), which exceed regulatory limits. Depth to groundwater at the site is approximately
29 145 feet bgs. The Arizona Department of Health Services completed a “Draft Baseline Human Health
30 Risk Assessment” for the site in November 1993. Even though no significant health risks were identified,
31 the risk assessment expressed concern for possible exposure routes for PCE and TCE through privately
32 owned wells (ADEQ 2012a, 2012b). Although the Project ROW crosses over the underground plume of
33 the Silverbell Landfill site, the groundwater is approximately 145 feet bgs, and the plume is deep enough
34 that transmission line foundations would not be affected. Therefore, no effects on the Project are
35 anticipated from the Silverbell Landfill site.

36 ***Agency Preferred Alternative***

37 With regards to hazardous materials and hazardous and solid waste, impacts under the Agency Preferred
38 Alternative would be as described under “Impacts Common to All Action Alternatives.” No impacts are
39 anticipated from preexisting hazardous materials or the use of hazardous materials under any of the
40 alternatives previously described. Therefore, no impacts are anticipated from preexisting hazardous
41 materials or the use of hazardous materials under the Agency Preferred Alternative.

1 ***Additional Mitigation Measures***

2 With adherence to laws, ordinances, regulations, and standards, implementation of the proponent-
3 committed environmental protection measures described in chapter 2, and implementation of safety-
4 related plans and programs to ensure safe handling, storage, and use of hazardous materials, no effects are
5 anticipated from preexisting hazardous materials or the use of hazardous materials under any of the action
6 alternatives. None of the significant impacts described above would occur during construction and
7 operation/maintenance of the Project. The mitigation measures described above would be implemented to
8 prevent spills and leaks of hazardous materials and provide for adequate containment and cleanup if spills
9 and leaks do occur. However, as with all projects that include excavation, if a petroleum hydrocarbon
10 odor or any suspicious odor or appearance of contaminated soil is detected during the course of
11 excavation or construction activities, excavation in that area would cease immediately until environmental
12 monitoring and mitigation are completed.

13 ***Residual Impacts***

14 With adherence to laws, ordinances, regulations, and standards, implementation of the proponent-
15 committed environmental protection measures described in chapter 2, and implementation of safety-related
16 plans and programs to ensure safe handling, storage, and use of hazardous materials, no residual impacts
17 are anticipated from preexisting hazardous materials or the use of hazardous materials under any of the
18 action alternatives. None of the significant impacts described above would occur during construction and
19 operation/maintenance of the Project. The mitigation measures described above are implemented to
20 prevent spills and leaks of hazardous materials and provide for adequate containment and cleanup if spills
21 and leaks do occur.

22 ***Unavoidable Adverse Impacts***

23 With adherence to laws, ordinances, regulations, and standards and the implementation of the proponent-
24 committed environmental protection measures described in chapter 2 and in “Analysis Assumptions”
25 above, no unavoidable adverse impacts are anticipated from preexisting hazardous materials or the use of
26 hazardous materials under any of the action alternatives. None of the significant impacts described above
27 would occur during construction and operation/maintenance of the Project. The mitigation measures
28 described above are implemented to prevent spills and leaks of hazardous materials and provide for
29 adequate containment and cleanup if spills and leaks do occur.

30 ***Short-term Uses versus Long-term Productivity***

31 With adherence to laws, ordinances, regulations, and standards and the implementation of the proponent-
32 committed environmental protection measures described in chapter 2 and in “Analysis Assumptions”
33 above, the productivity of the ROW would not be affected by the use of hazardous materials. The
34 mitigation measures described above are implemented to prevent spills and leaks of hazardous materials
35 and provide for adequate containment and cleanup if spills and leaks do occur.

36 ***Irreversible and Irretrievable Commitments of Resources***

37 With adherence to laws, ordinances, regulations, and standards and the implementation of the proponent-
38 committed environmental protection measures described in chapter 2 and in “Analysis Assumptions”
39 above, there would be no irreversible commitment of resources caused by the use of hazardous materials.
40 The mitigation measures described above are implemented to prevent spills and leaks of hazardous
41 materials and provide for adequate containment and cleanup if spills and leaks do occur.

4.18 TRANSPORTATION

4.18.1 Introduction

This section describes the impacts to transportation associated with the construction and operation and maintenance of the transmission line, substations, and ancillary facilities. Impacts to transportation are discussed in terms of changes in vehicular traffic on primary roads, changes in traffic and access to BLM roads and lands, consistency with Federal, State, and local transportation plans, and changes in air traffic patterns at airports. The impacts described in this section are based on the analysis in “Southline Transmission Project Resource Report 14: Transportation” (CH2M Hill 2013s). The contents of that report are used herein without specific reference.

4.18.2 Methodology and Assumptions

Traffic Impacts on Primary Roads

As defined in chapter 3, Interstates, U.S. highways, and State highways are considered primary roads. Impact analysis of traffic generated by the construction and operation and maintenance of the proposed Project and action alternatives uses the v/c ratio analysis to determine whether the primary roads level of service would change.

Impacts to BLM Roads and Access to BLM Roadless Areas

BLM Roadless Areas are a land designation not shared by State, or private land. Because “BLM Roadless Areas” are a BLM official land designation, this designation is analyzed in this DEIS. Analysis of access impacts to roadless state or private lands is not included in the analysis.

BLM road and lands information was collected from data provided by the BLM Safford and Las Cruces Field Offices. A GIS overlay of the collected BLM lands data with the proposed Project components was prepared to evaluate geographic location in relation to the proposed Project and alternatives.

To estimate the impacts on BLM lands by the proposed Project and alternatives, the proposed location of each segment relative to BLM lands was first designated as (1) through (the proposed Project would be located on BLM lands), (2) adjacent (the proposed Project would be located next to BLM lands) or (3) none (the proposed Project would not be on or adjacent to BLM lands). If two or more of these designations are applicable to one segment, the most invasive designation was assumed. Next, the percentage of new access roads that would be required for each segment was noted from the Terrain and Access table prepared by the Southline Engineering Team (Southline 2012b), and then compared with the invasiveness of the proposed transmission line location within each segment.

Consistency with Federal, State, and Local Transportation Plans

A review of Federal, State, and local transportation plans was conducted to identify potential inconsistencies between corridor planning and road widening projects and the proposed Project and the action alternatives.

1 ***Impacts to Airports, Flight Patterns, and Airport Plans***

2 The airport analysis methodology compares the proximity of the proposed Project and alternatives to
3 existing and planned airport facilities. These comparisons provide insight into the potential for impacts
4 that could dictate the requirement for an airspace obstruction analysis by the FAA.

5 ***Analysis Area***

6 **NEW BUILD SECTION**

7 The analysis area for transportation infrastructure resources within the proposed New Build Section is a
8 10-mile-wide corridor; that is, 5 miles to either side of the centerline of the alternatives carried forward.
9 The analysis area is used to identify existing and proposed transportation infrastructure that could be
10 directly impacted by ground disturbance during construction, delivery of construction equipment,
11 construction worker access, maintenance access, and potential conflicts with flight paths at airports.
12 A 10-mile-wide corridor is necessary in order to allow for some flexibility of Project routing and design,
13 and also to allow for errors or ambiguities in the recorded locations and boundaries of some resources.

14 **UPGRADE SECTION**

15 The analysis area for transportation infrastructure within the proposed Upgrade Section is the same as
16 identified above for the New Build Section.

17 ***Analysis Assumptions***

18 **TRAFFIC IMPACTS TO PRIMARY ROADS**

19 The methodology for traffic analysis assumes that high volume-to-capacity ratios at peak hours suggest
20 that the segment is experiencing a low level of service. For example, a higher v/c ratio on a particular
21 segment of a primary roadway suggests higher levels of traffic demand on the segment and a lower level
22 of service. Levels of service ratings run from a rating of A, for the highest or best level of service, to F,
23 the lowest or worst level of service. A v/c ratio above 0.90 indicates the demand nearly equals the design
24 capacity of the roadway, and a level of service rating of E or F can be assumed. In general, intermittent
25 temporary delays during peak traffic hours would be assumed to not increase the v/c ratio of a primary
26 roadway. Consistent long-term delays during peak traffic hours would be assumed to increase the v/c ratio
27 of a primary roadway.

28 **IMPACTS TO BLM ROADS AND ACCESS TO BLM ROADLESS AREAS**

29 The methodology for identifying impacts to BLM lands assumes that if the transmission line were to cross
30 through BLM lands and new access roads were required for construction, operation, and maintenance in
31 the same area, the potential would exist for the proposed Project and alternatives to open access to lands
32 previously inaccessible by roads. It is assumed that where a higher percentage of new access roads would
33 be required, an increase in access would occur on BLM lands previously inaccessible by roads.

34 **CONSISTENCY WITH FEDERAL, STATE, AND LOCAL TRANSPORTATION PLANS**

35 No assumptions are necessary for analyzing consistency with Federal, State, and local transportation
36 plans.

1 **IMPACTS TO AIRPORTS, FLIGHT PATTERNS, AND AIRPORT PLANS**

2 No assumptions are necessary for analyzing impacts to airports, flight patterns, and airport plans.

3 ***Impact Indicators***

4 **TRAFFIC IMPACTS TO PRIMARY ROADS**

5 Traffic from construction, operation, and maintenance of the proposed Project and action alternatives
6 would increase the primary roads' v/c ratio, and subsequently lower the roads' level of service.

7 **IMPACTS TO BLM ROADS AND ACCESS TO BLM ROADLESS AREAS**

8 Indicators for this impact would be the number of new access roads that would be required by the
9 proposed Project and action alternatives, and acres of BLM lands that are currently inaccessible by road
10 that would become accessible from the construction of new access roads.

11 **CONSISTENCY WITH FEDERAL, STATE, AND LOCAL TRANSPORTATION PLANS**

12 Indicators for this impact would be the number of transportation plans that are inconsistent with the
13 proposed Project and action alternatives. These plans are identified in section 3.18.

14 **IMPACTS TO AIRPORTS, FLIGHT PATTERNS, AND AIRPORT PLANS**

15 Indicators for this impact would be the number of existing and planned airports that are within the
16 analysis areas for the proposed Project and action alternatives.

17 ***Significant Impacts***

18 For the purposes of this analysis, a significant impact on transportation could result if any of the
19 following were to occur from construction or operation and maintenance of the proposed Project (see
20 below).

21 **TRAFFIC IMPACTS TO PRIMARY ROADS**

- 22 • The proposed Project and alternatives were to increase traffic that exceeds levels of service
23 established by a State Department of Transportation or a County transportation agency or
24 City/Town transportation department.
- 25 • The proposed Project and alternatives were to cause traffic delays on a primary transportation
26 corridor.
- 27 • The proposed Project and alternatives were to create road dust and/or severe road damage at
28 levels that create hazardous situations for motorists and pedestrians.
- 29 • The proposed Project and alternatives were to increase dust, noise, light, and litter pollution due
30 to construction activities (see Section 3.2, "Air Quality," and Section 3.3, "Noise and Vibration").

31 **CONSISTENCY WITH FEDERAL, STATE, AND LOCAL TRANSPORTATION PLANS**

- 32 • The proposed Project and alternatives would be inconsistent with regional, State, and local
33 transportation plans such as corridor planning, and road widening.

1 **IMPACTS TO BLM ROADS AND ACCESS TO BLM ROADLESS AREAS**

- 2 • The proposed Project and alternatives would increase opportunities for illegal access to
3 roads/areas currently closed to public access.
- 4 • The proposed Project and alternatives were to have impacts to the BLM roadway system
5 including improved access by the general public into remote or designated roadless or wilderness
6 areas.

7 **IMPACTS TO AIRPORTS, FLIGHT PATTERNS, AND AIRPORT PLANS**

- 8 • Change in air traffic patterns as a result of new transmission lines near airports. The unit to
9 measure change for airports includes alterations of flight paths and operations.
- 10 • Potential inconsistencies with Federal, regional, State, and local airport plans. The unit to
11 measure change is consistency with future airport plans.

12 **4.18.3 Impacts Analysis Results**

13 ***No Action Alternative***

14 There would be no impact to transportation under the no action alternative for the New Build Section.
15 Traffic volumes on primary roadways and BLM roads would continue to increase due to population
16 growth. Demand for access to BLM lands and other lands would be expected to increase due to
17 population growth as well. In regards to the Upgrade Section, even under the no action alternative,
18 Western still plans to upgrade the existing lines between the Apache and Saguaro substations within the
19 next 10 years, per Western's 10-year capital improvement plan (Western 2012a).

20 ***Impacts Common to All Action Alternatives***

21 The only measurable difference that the action alternatives would have on the impact indicators would be
22 the number of access roads that would be required for each alternative. The action alternatives would all
23 have common impacts on the other impact indicators: primary roads, Federal, State, and local
24 transportation plans, and impacts to airports and air traffic patterns. Although each alternative would
25 differ in the amount of new access roads that would be required, increasing access to BLM roadless areas
26 would also be the same for all action alternatives. These impacts are disclosed in this section, followed by
27 an analysis of alternative-specific impacts to BLM roads.

28 **TRAFFIC IMPACTS TO PRIMARY ROADS**

29 **Construction**

30 During the construction phase, traffic would be generated by the following activities: surveying, geotech
31 investigation, access road construction, foundation installation, laydown yard/receiving, structure hauling,
32 structure assembly, structure erection, wire stringing, restoration, and clean-up. There are seven to eight
33 primary roads within the New Build Section and seven primary roads within the Upgrade Section. Under
34 a maximum-case trip scenario (one crew shift each day, every worker drives alone on the same access
35 route, and all crew types work simultaneously), an estimated total of 192 additional personal vehicles
36 would be added to the primary roadway network before and after each shift. Deliveries would be spread
37 throughout the day and would not contribute to a noticeable volume increase on the roadway networks.
38 The cumulative additional volume would represent a volume increase of 1 percent or less on various
39 segments of I-10 in the New Build and Upgrade Sections. On other primary roads within the analysis

1 area, the addition of up to a maximum of 192 vehicles per shift change and intermittent deliveries would
2 not increase the v/c ratio for the primary roads, including the two primary roads in the Tucson
3 metropolitan area already experiencing a high v/c ratio. Construction traffic would not create consistent
4 long-term delays on the primary roadways. Therefore a temporary decrease in level of service for the
5 primary roads would not occur as a result of the construction activities.

6 Temporary short-term traffic delays during construction could occur at locations where transmission lines
7 cross roads or where improvements might be needed at local roads, intersections, and bridges to
8 accommodate overweight or oversize delivery vehicles. Because traffic generated by construction would
9 be short-term, deterioration of primary roads would not be anticipated. However, the design capacity of
10 the construction routes would need to be verified with the proper agencies prior to construction, to
11 determine if they would accommodate oversized vehicles and not deteriorate by bearing the weight of
12 oversize/overweight vehicles. As identified in the POD, if any existing roads were to be damaged by
13 construction activities and/or truck traffic they would be repaired.

14 **Operation and Maintenance**

15 After construction of any of the action alternatives, traffic generated by operation and maintenance
16 activities would be intermittent, only require a small number of vehicles, and deliveries would not
17 regularly occur. Operation and maintenance traffic would not increase v/c ratio on primary roads, and,
18 subsequently, would not decrease the level of service for any primary roads.

19 **IMPACTS TO BLM ROADLESS LANDS**

20 The proposed alignments within the New Build Section would cross the most amount of BLM land. GIS
21 roadway data indicate that there is an extensive network of existing rural roads and trails (that may or may
22 not be on BLM land) throughout the New Build Section. The alignments for each action alternative
23 appear to have roads or trails through them. Thus, with minimal potential to open access to land areas
24 where access is not currently available, no large expanses of land that are currently inaccessible would
25 become available if any of the action alternatives were to be built.

26 The BLM land area in the vicinity of the action alternatives would be minimal in the Upgrade Section
27 compared with the BLM land area in the more rural New Build Section. Two segments in the Upgrade
28 Section (U1a and U3a along the proposed route) run through BLM lands. However there is no potential to
29 open new access points to BLM lands in these segments, because they would not require new access
30 roads.

31 **CONSISTENCY WITH FEDERAL, STATE, AND LOCAL TRANSPORTATION PLANS**

32 Federal, State, and local transportation plans are identified in Section 3.18, "Transportation." The planned
33 roadway improvements by the ADOT and the NMDOT in the New Build and Upgrade Sections analysis
34 areas primarily involve widening and reconstructing existing roads and structures. The planned
35 improvements would not involve construction of new roads or relocation of existing roads (a northerly
36 extension of SR 90 has been discussed for some time, but is not currently a planned improvement
37 documented in the Statewide Transportation Improvement Program). Known road projects in the New
38 Build Section would not be a factor in deciding on the location of the transmission line or access routes.
39 The Upgrade Section would have two road projects that would require consideration during the design
40 process and coordination with ADOT: widening I-19 between SR 86 and San Xavier Road and
41 reconstructing North Silverbell Road to add travel lanes with curbs and a raised landscaped median.

1 **IMPACTS TO AIRPORTS, FLIGHT PATTERNS, AND AIRPORT PLANS**

2 The analysis areas for the action alternatives are within the influence area for some of the airports
3 identified in Section 3.18, “Transportation.” Given the location of the proposed Project, it appears likely
4 that the height of the proposed transmission structures (approximately 134 feet) would be below the
5 runway approach surface elevations for all airports in both the New Build and Upgrade Sections. This
6 height is below the 200-foot criterion and would meet or exceed the 100:1 or 50:1 slope criteria, which
7 are among the criteria that require submission of a proposal to the FAA for an evaluation. Therefore, a
8 change in flight patterns at airports within the analysis areas would be required as a result of
9 implementation of any of the action alternatives.

10 A review of Federal, regional, State, and local airport plans identified two airport improvement plans
11 within the New Build Section and four airport improvement plans within the Upgrade Section. Given the
12 distances of the alternative alignments to these airports, the proponent would be required to work with
13 airport staff during the permitting phase to ensure compliance with applicable zoning and airspace plan
14 regulations during the preliminary design process to avoid, minimize, and/or mitigate conflicts.

15 ***Alternative Specific Impacts to BLM Roads***

16 The proposed Project and alternatives would include new roads to accommodate construction and
17 operations- and maintenance-related activities in some of the segments. In other segments, existing public
18 and private roads would be used to access the construction and representative staging areas. The five
19 types of new access roads that would be required are defined as follows:

- 20 • **Access Type A** – Access from adequate private roads. This type of access would be used when
21 there is no existing road adjacent and parallel to the alignment, but where there is a patchwork of
22 existing roads in the area that could be used to get close to the structure locations. Grading
23 between the existing roads and each structure location would only be conducted where necessary
24 and depending upon site conditions. Grading and other improvements may not be necessary
25 depending on site conditions.
- 26 • **Access Type B** – Parallel to maintained public roads. This type of access would be used when the
27 alignment roughly parallels a nearby public road that is either paved or has gravel surfacing. Spur
28 roads would be graded between the existing roads and each structure location. Except in rare
29 cases, the existing roads would not be upgraded.
- 30 • **Access Type C** – Parallel to existing utility roads. This type of access would be used when the
31 alignment roughly parallels an existing utility that already has an existing access road. Spur roads
32 would be graded between the existing utility roads and each structure location. Generally, the
33 existing utility roads would be improved. At a minimum, it is anticipated a road grader would be
34 used to ensure a smooth surface for construction activities. Roads with a travel surface width less
35 than 12 feet would be widened to approximately 12 feet. Typically, the overall disturbance would
36 be limited to 16 feet (approximately 2 feet on either side of the road surface).
- 37 • **Access Type D** – Needs new down-line primary access. This type of access would only be used
38 when access types A–C are not feasible. It would consist of a 16-foot-wide road (12-foot travel
39 surface plus 2 feet on either side for berms/ditches). As much as possible, new access would be
40 entirely within the ROW. Typically, new down-line access would be used if any parallel roads are
41 more than 700 feet from the alignment. This access type would normally be used for alignments
42 that parallel interstate highways and railroads because the owners of those facilities generally
43 place restrictions on the use of their facilities that do not allow for the addition of spur roads.
- 44 • **Access Type E** – Spur Roads–improved and unimproved access. Spur roads would be used at
45 select access points for permanent access to the proposed ROW where existing or new roads are

1 not adequate. Spur roads would be a combination of improved (bladed) and unimproved (two-
 2 track) roads, with an average of one new spur road per mile. Where spur roads would be
 3 improved, the roads would be bladed and 10 to 12 feet wide. Spur roads would not be improved
 4 in areas with flat terrain and within grassland, desertscrub, sand scrub, and sand dune vegetation
 5 communities. Unimproved spur (two-track) roads would be used to crush vegetation by driving,
 6 but not crop or blade. This would avoid removal of root mass and organics in the soil (no surface
 7 soil is removed). The purpose of unimproved spur roads would be to preserve the maximum
 8 amount of native vegetation and minimize overall disturbance.

9 The mileage proposed for each of the four primary types of access roads is identified in table 4.18-1.

10 **Table 4.18-1.** Miles of Proposed New Access Roads on BLM Lands by Type of Access Road

Subroute	Access Road Type on BLM lands (miles)				
	A	B	C	D	E
New Build Route					
Group 1: Afton Substation to Hidalgo Substation					
Subroute 1.1					
P1	0.0	0.0	0.0	5.1	0.0
P2	4.9	0.0	98.1	0.0	26.3
P3	0.0	0.0	0.0	31.1	0.0
P4a	0.0	0.0	8.8	0.0	1.9
Total	4.9	0.0	106.9	36.2	28.2
Subroute 1.2					
S1	0.0	0.0	4.3	9.1	0.6
S2	0.0	0.0	0.0	11.0	0.0
S3	0.0	12.9	0.0	0.0	4.9
S4	0.0	0.0	0.0	10.5	0.0
S5	3.7	13.9	5.3	7.4	4.9
S6	1.0	0.0	0.0	6.4	0.3
S7	0.0	21.0	1.0	19.4	6.4
S8	0.0	0.0	0.0	14.6	0.0
Total	4.7	47.8	10.6	78.4	17.1
Route Group 1 Local Alternatives					
DN1	0.0	0.0	0.0	42.5	4.3
A	0.0	8.1	8.4	1.2	3.8
B	0.0	12.0	0.0	0.0	4.1
C	0.3	7.7	0.0	1.2	2.0
D	0.0	0.0	13.1	9.6	0.6

11

1 **Table 4.18-1.** Miles of Proposed New Access Roads on BLM Lands by Type of Access Road (Continued)

Subroute	Access Road Type on BLM lands (miles)				
	A	B	C	D	E
New Build Route					
Group 2: Hidalgo Substation to Apache Substation					
Subroute 2.1					
P4b	0.0	0.0	0.0	13.8	0.0
P4c	0.0	0.0	0.0	1.9	0.0
P5a	0.0	0.0	9.6	0.0	1.6
P5b	0.0	0.0	21.2	0.0	2.7
P6a	0.0	0.0	0.7	0.0	0.1
P6b	0.0	0.0	20.8	2.3	2.7
P6c	0.0	0.0	2.8	0.0	0.4
P7	0.0	0.5	22.1	0.0	3.8
P8	0.5	0.0	0.0	0.0	0.0
Total	0.5	0.5	77.2	18.0	11.3
Subroute 2.2					
E	2.5	0.0	0.0	29.2	0.9
F	6.8	0.0	7.5	12.0	2.4
Ga	5.2	0.9	8.6	11.5	1.7
Gb	0.2	0.0	0.0	0.8	0.0
Gc	1.2	3.8	2.4	0.0	1.2
I	0.0	0.0	0.0	2.3	0.0
J	0.0	0.0	2.3	0.0	0.4
Total	15.9	4.7	20.8	55.8	6.6
Route Group 2					
Local Alternatives					
LD1	6.1	0.0	10.8	19.0	4.8
LD2	0.0	0.0	0.0	9.9	0.0
LD3a	0.0	8.5	17.3	2.8	4.4
LD3b	0.0	2.0	0.0	0.0	0.3
LD4	0.0	0.0	0.0	51.5	6.1
LD4-Option 4	0.0	0.0	0.0	6.5	0.7
LD4-Option 5	0.0	0.0	9.9	0.0	1.2
WC1	0.0	0.0	2.4	12.5	0.4

2

1 **Table 4.18-1.** Miles of Proposed New Access Roads on BLM Lands by Type of Access Road (Continued)

Subroute	Access Road Type on BLM lands (miles)				
	A	B	C	D	E
Upgrade Group 3: Apache Substation to Pantano Substation					
Subroute 3.1					
U1a	4.9	0.0	11.9	0.0	3.3
U1b	0.0	0.0	2.7	0.0	0.1
U2	1.5	0.0	21.0	0.0	1.6
U3a	0.8	0.0	36.2	0.0	3.9
Total	7.2	0.0	71.8	0.0	8.9
Route Group 3 Local Alternative					
H	0.0	0.0	23.1	1.0	6.5
Upgrade Route Group 4: Pantano Substation to Saguaro Substation					
Subroute Group 4.1					
U3b	0.2	0.0	0.2	0.0	0.1
U3c	0.7	0.0	0.0	0.0	0.1
U3d	3.1	0.0	1.8	0.0	0.8
U3e	0.0	0.0	0.9	0.0	0.0
U3f	0.0	0.0	0.7	0.0	0.0
U3g	0.9	0.0	0.3	0.0	0.1
U3h	0.9	0.0	0.0	0.0	0.1
U3i	7.4	0.0	12.8	0.0	1.4
U3j	1.6	0.0	0.0	0.0	0.5
U3k	3.3	0.0	15.1	0.0	1.8
U3l	0.6	0.0	0.4	0.2	0.2
U3m	0.4	0.0	0.0	0.0	0.1
U4	0.0	0.0	1.8	0.0	0.5
Total	19.1	0.0	34.0	0.2	5.7
Route Group 4 Local Alternatives					
MA1	1.0	0.0	0.0	0.0	0.2
TH1a	0.0	1.5	0.0	0.0	0.2
TH1b	0.2	1.7	0.0	0.0	0.4
TH1c	0.4	0.0	0.0	0.0	0.1
TH1-Option	0.0	0.9	0.0	0.0	0.1

2

1 **Table 4.18-1.** Miles of Proposed New Access Roads on BLM Lands by Type of Access Road (Continued)

Subroute	Access Road Type on BLM lands (miles)				
	A	B	C	D	E
TH3-Option A	1.8	0.0	0.0	0.0	0.6
TH3-Option B	0.4	0.4	0.4	0.0	0.2
TH3-Option C	0.0	0.0	1.1	0.0	0.3
TH3a	3.0	0.0	1.1	0.0	1.2
TH3b	2.7	0.6	1.6	0.0	1.3

2 The construction of access road types A, B, and C would not increase access to other roads or adjacent
 3 lands because these types of access roads would only improve existing roads or consist of short spur roads
 4 that dead-end at the transmission line. The construction of access road type D and E would have the
 5 potential to increase accessibility to other roads and adjacent lands, including BLM roads and lands,
 6 because this type of access road would be a new road, connect to other existing roads, and would be an
 7 addition to the existing network of roads.

8 In the New Build Section route group 1, subroute 1.2 (95.5 miles of access road types D and E) would
 9 have the highest potential to increase access to other BLM roads and adjacent BLM lands when compared
 10 to Subroute 1.1 (64.4 miles of access road types D and E). Of the New Build Section route group 1 local
 11 alternatives, the DN1 would have the highest potential to increase access to other BLM roads and
 12 adjacent BLM lands by constructing 46.8 miles of new roads (access road types D and E).

13 In the New Build Section route group 2, subroute 2.2 (62.4 miles of access road types D and E) would
 14 have the highest potential to increase access to other BLM roads and adjacent BLM lands when compared
 15 to Subroute 2.1 (29.3 miles of access road types D and E). Of the New Build Section route group 2 local
 16 alternatives, the LD4 would have the highest potential to increase access to other BLM roads and adjacent
 17 BLM lands by constructing 57.6 miles of new roads.

18 Because the alternatives in the Upgrade Section would use existing transmission line alignments, only a
 19 minimal number of miles of access road types D and E would be constructed. In Upgrade Section route
 20 group 3, 8.9 miles of access road type E would be constructed, and 7.5 miles of access road types D and E
 21 would be constructed under local alternative H (1 mile). In Upgrade Section route group 4, 5.9 miles of
 22 access road types D and E would be constructed. Local alternatives in the Upgrade Section route group 4
 23 would include the construction of up to 1.3 miles of access road type E under alternative TH3b.

24 As stated above, the construction of the new roads would increase the potential for the public to access
 25 existing BLM roads and adjacent BLM lands, including roads and lands that are not currently accessible
 26 by the public. However, GIS data and local maps show that the analysis areas for the New Build Section
 27 have an extensive network of existing rural roads and trails (that may or may not be on BLM land)
 28 throughout the New Build Section. Thus, with minimal potential to open access to land areas where it is
 29 not currently available, no large expanses of land that are currently inaccessible would become available
 30 if any of the action alternatives were to be built. The impact of increasing access to BLM roadless areas
 31 would be considered minor.

1 **Agency Preferred Alternative**

2 **NEW BUILD SECTION**

3 Under the Agency Preferred Alternative for the New Build Section, impacts to traffic on primary access
4 roads, consistency with Federal, State, and local transportation plans, and impacts to airports, flight
5 patterns, and airport plans would be the same as described under “Impacts Common to All Action
6 Alternatives.” In general, the Agency Preferred Alternative for the New Build Section would cross a
7 sparsely populated rural area. Traffic would be generated primarily during the construction, but also
8 minimally during the maintenance and operation phases. However, given the existing low level of traffic
9 on primary roadways within the New Build Section and the low level of anticipated traffic during
10 construction, only short-term minor impacts to traffic on primary roads would be anticipated. Continued
11 coordination with federal, state, and local transportation agencies would ensure the preferred alternative
12 would not impact transportation plans. Continued coordination with airports would ensure that the
13 preferred alternative would not interfere with flight paths or airport plans.

14 The Agency Preferred Alternative for the New Build Section would have impacts to BLM Roads and
15 Roadless Areas by increasing opportunities for illegal access to roads/areas currently closed to public
16 access. This impact would most likely occur from the construction of new access roads, Type D and Type
17 E. Under the preferred alternative, 39 miles of new access roads Type D would be constructed and 37.6
18 miles of new access roads Type E would be constructed in the New Build Section. However, GIS data
19 and local maps show that the analysis areas for the preferred alternative have an extensive network of
20 existing rural roads and trails (that may or may not be on BLM land) throughout the New Build Section.
21 Thus, with minimal potential to open access to land areas where it is not currently available, no large
22 expanses of land that are currently inaccessible would become available if any of the action alternatives
23 were to be built. The impact of increasing access to BLM roads and BLM roadless areas would be
24 considered minor and similar to the impacts of the other action alternatives.

25 **UPGRADE SECTION**

26 Under the Agency Preferred Alternative for the Upgrade Section, impacts to traffic on primary access
27 roads, consistency with Federal, State, and local transportation plans, and impacts to airports, flight
28 patterns, and airport plans would be the same as described under “Impacts Common to All Action
29 Alternatives.” In general, the preferred alternative for the Upgrade Section is in a sparsely populated rural
30 and natural setting, with the exception of the Tucson metropolitan area. Traffic would be generated during
31 the construction, maintenance, and operation phases, of which the relatively greatest level of traffic from
32 the preferred alternative would occur during the construction phase. However, given the low level of
33 anticipated traffic generated by the preferred alternative during construction and the mitigation measures
34 proposed to minimize impacts during peak traffic hours, only short-term minor impacts to traffic on
35 primary roads would be anticipated. Continued coordination with federal, state, and local transportation
36 agencies would ensure the preferred alternative would not impact transportation plans. Continued
37 coordination with airports would ensure that the preferred alternative would not interfere with flight paths
38 or airport plans.

39 The Agency Preferred Alternative for the Upgrade Section would have impacts to BLM Roads and
40 Roadless Areas by increasing opportunities for illegal access to roads/areas currently closed to public
41 access. This impact would most likely occur from the construction of new access roads, Type D and Type
42 E. Because the alternatives in the Upgrade Section would use existing transmission line alignments, only
43 a minimal number of miles of access road types D and E would be constructed. Under the preferred
44 alternative 0.2 mile of new access roads Type D would be constructed and 14.4 miles of new access roads
45 Type E would be constructed. However, GIS data and local maps show that the analysis areas for the

1 preferred alternative have an extensive network of existing rural and urban roads and trails (that may or
2 may not be on BLM land) throughout the Upgrade Section. Thus, with minimal potential to open access
3 to land areas where it is not currently available, no large expanses of land that are currently inaccessible
4 would become available if any of the action alternatives were to be built. The impact of increasing access
5 to BLM roads and BLM roadless areas would be considered minor and similar to the impacts of the other
6 action alternatives.

7 ***Additional Mitigation Measures***

8 **TRAFFIC IMPACTS TO PRIMARY ROADS**

9 In order to mitigate traffic impacts on primary roads, shift changes for construction crews would not
10 occur during the peak hours for the road during construction. Oversize or overweight vehicle movements
11 would be restricted to nighttime hours or those specified in permitting regulations in order to minimize
12 traffic disruptions.

13 **IMPACTS TO BLM ROADS AND ACCESS TO BLM ROADLESS AREAS**

14 In order to reduce public access to BLM roads and adjacent lands that are not currently accessible by the
15 public, the proponent would fence off or place restricted access signage at new access roads, where
16 appropriate.

17 **CONSISTENCY WITH FEDERAL, STATE, AND LOCAL TRANSPORTATION PLANS**

18 Throughout the permitting and design phase, the proponent would correspond with Federal, State, and
19 local transportation agencies in order to avoid Project inconsistencies with current and future
20 transportation plans.

21 **IMPACTS TO AIRPORTS, FLIGHT PATTERNS, AND AIRPORT PLANS**

22 Throughout the permitting and design phase, the proponent would correspond with Federal, State, and
23 local airports in order to ensure that the FAA criteria for structures near airports are met, and to avoid
24 Project inconsistencies with current and future airport plans.

25 ***Residual Impacts***

26 **TRAFFIC IMPACTS TO PRIMARY ROADS**

27 The mitigation measures proposed to reduce traffic impacts on primary roadways would minimize the
28 potential that traffic during construction would increase the v/c ratio on primary roads and reduce the
29 potential for traffic disturbances during construction of facilities and oversize and overweight vehicle
30 deliveries. Although these mitigation measures would be applied, temporary short-term minor traffic
31 disruptions (usually less than a few hours) would be likely to occur during construction.

32 **IMPACTS TO BLM ROADS AND ACCESS TO BLM ROADLESS AREAS**

33 Placing fencing and restrictive access signage on new access roads where they connect to BLM roads that
34 are currently inaccessible by the public would minimize the potential for the public to access these BLM
35 roads. These mitigation measures would also minimize the potential for BLM lands currently inaccessible
36 to public access to become accessible by the public.

1 **CONSISTENCY WITH FEDERAL, STATE, AND LOCAL TRANSPORTATION PLANS**

2 Correspondence with Federal, State, and local transportation agencies during the permitting and design
3 phases would avoid the proposed Project from becoming inconsistent with future transportation plans.

4 **IMPACTS TO AIRPORTS, FLIGHT PATTERNS, AND AIRPORT PLANS**

5 Correspondence with Federal, State, and local airports during the permitting and design phases would
6 avoid the proposed Project from requiring flight pattern changes at airports and becoming inconsistent
7 with future airport plans.

8 ***Unavoidable Adverse Impacts***

9 Implementation of the proposed Project would create temporary, short-term minor impacts to traffic on
10 primary roads during construction, as a result of construction traffic and oversize and overweight vehicle
11 deliveries.

12 Although mitigation measures would minimize the potential for the public to be able to access BLM
13 roads and lands that are currently inaccessible by the public, the construction of new access roads would
14 increase the potential for this to occur. Therefore, the increase in access to BLM roads and lands that are
15 currently inaccessible by the public would be considered minor.

16 ***Short-term Uses versus Long-term Productivity***

17 The proposed Project would generate short-term uses of existing transportation facilities by increasing
18 traffic on primary roads and causing temporary traffic disruptions during construction. However, these
19 short-term uses would not affect the long-term productivity of the primary roads.

20 ***Irreversible and Irretrievable Commitments of Resources***

21 The proposed Project would constitute a small irretrievable impact to traffic on primary roads during
22 construction; however, construction-related impacts to traffic on primary roads would cease following
23 construction.

24 The potential for the public to access BLM roads and lands that are currently not accessible to the public
25 by the construction of new access roads would constitute an irreversible impact to BLM roads and BLM
26 roadless areas.

27 **4.19 INTENTIONAL ACTS OF DESTRUCTION**

28 **4.19.1 Introduction**

29 This section describes the potential impacts that intentional acts of destruction on the transmission line,
30 substations, and ancillary facilities could have on public health and safety. Intentional destructive acts
31 include acts of sabotage, terrorism, vandalism, and theft, which sometimes occur during construction and
32 operation and maintenance of power facilities. Vandalism and thefts are the most common intentional
33 destructive act, especially theft of metal and other materials that can be sold when the price of
34 construction materials is high on the salvage market. It is important to note that acts of sabotage or
35 terrorism on electrical facilities are rare.

4.19.2 Methodology and Assumptions

It is not possible to predict with certainty whether the transmission line, substations, and ancillary facilities would be the target of an intentional act of destruction and what type of intentional act of destruction would occur. Whereas individual acts of vandalism and theft (i.e., metal theft from a substation) could most likely cause a localized temporary impact to the proponent, acts of sabotage and terrorism could most likely cause a larger and longer-term impact to the general public. This section analyzes the potential effects that an act of sabotage or terrorism would have on the adjacent areas of the electrical facilities and the potentially impaired critical services that would receive electricity from the action alternatives. Therefore, this analysis assumes that an intentional act of sabotage or terrorism would result in potential damage to adjacent areas and disruption of service to the public.

Analysis Area

NEW BUILD SECTION

Based on the height of the proposed transmission line support structures, the analysis area for intentional acts of destruction on the transmission lines and substations is 200 feet from the edge of the ROW corridor for the transmission lines. Critical facilities (e.g., hospitals, emergency response services) that would receive power from the proposed transmission lines are also analyzed.

UPGRADE SECTION

The analysis area for intentional acts of destruction within the Upgrade Section is the same as identified above for the New Build Section.

Analysis Assumptions

This analysis assumes that an intentional act of destruction from vandalism and theft would not pose a threat to public health and safety, and is therefore not analyzed. Acts of sabotage or terrorism could potentially damage areas adjacent to the transmission line, substations, and ancillary facilities and could potentially disrupt service to the public, including critical services such as emergency response, hospitals, communications, and water supply.

Impact Indicators

It is not possible to predict whether an intentional act of destruction would occur, what kind of intentional act of destruction would occur, or the magnitude of damage that an intentional act of destruction on the existing and proposed electrical infrastructure could have. Therefore, no impact indicators are appropriate for the analysis of intentional acts of destruction. Instead, the following analysis describes the potentially affected areas and critical services that could be directly and indirectly impacted by an act of sabotage or terrorism on the electrical facilities, should one occur.

Significant Impacts

For the purposes of this analysis, a significant impact from an act of sabotage or terrorism could result if any of the following were to occur during the construction or operation and maintenance of the proposed Project:

- Indirect damage to areas immediately adjacent to the transmission line, substations, and/or ancillary facilities where an act of sabotage or terrorism has occurred; and

- 1 • Disruption of service to the general public and critical services.

2 **4.19.3 Impacts Analysis Results**

3 ***No Action Alternative***

4 As described in chapter 3, acts of sabotage and terrorism on electrical facilities have been rare; however,
5 threats to the existing electricity infrastructure from sabotage and terrorism would continue to be a
6 possibility under the no action alternative. Because of the generally rural setting of the majority of the
7 analysis area for the New Build and Upgrade Sections, an act of sabotage or terrorism on existing
8 electricity infrastructure would have a negligible impact to adjacent land. However, urban areas adjacent
9 to electrical infrastructure in the Upgrade Section (i.e., Tucson) would continue to have a threat of being
10 impacted by an act of sabotage or terrorism.

11 With regard to the disruption of service to the general public and critical services, an act of sabotage or
12 terrorism on the existing electricity infrastructure could potentially have a greater chance of disrupting
13 power to the general public and critical services because the proposed Project would not be in place to
14 potentially provide an alternative source of electricity.

15 ***Impacts Common to All Action Alternatives***

16 An intentional act of destruction from sabotage or terrorism on the electrical infrastructure of all action
17 alternatives would have the same direct and indirect impacts on public health and safety. In general, the
18 electricity infrastructure proposed by all of the action alternatives could potentially be targets of an act of
19 sabotage or terrorism. However, the addition of transmission lines and associated facilities generally
20 strengthens the reliability of delivering electricity to the general public, because if one line is affected by
21 an intentional act of destruction or any other disruption, other lines would be available to continue the
22 delivery of electricity.

23 Lands immediately adjacent to the proposed transmission line, substations, and ancillary facilities could
24 be indirectly impacted by an act of sabotage or terrorism, should the unlikely event occur. In the rural
25 areas of the New Build Section and Upgrade Section analysis areas, the indirect effect on adjacent land
26 would be negligible because of the lack of development adjacent to the proposed routes. In urban areas
27 within the Upgrade Section of the analysis area, the indirect effect of an act of sabotage or terrorism
28 would be the same as the existing condition, because the proposed lines would follow existing
29 alignments. If an act of sabotage or terrorism occurred at facilities adjacent to urban areas, there would be
30 a greater chance that public health and safety would be indirectly impacted.

31 Should an act of sabotage or terrorism occur on the proposed transmission line, substations, and ancillary
32 facilities, public health and safety could be affected by a disruption of service. The general public and the
33 critical services identified in chapter 3 could be potentially directly impacted. However, the risk of this
34 happening is low, considering that acts of sabotage and terrorism on electricity infrastructure are rare.
35 Existing lines not affected by the act of sabotage or terrorism would be able to continue to deliver
36 electricity to the affected areas, and most critical services are required to have backup generators to
37 provide electricity when service through transmission lines is interrupted. Therefore, the unlikely impacts
38 of acts of sabotage or terrorism would be minor and would not be considered significant, as defined
39 above.

1 **Agency Preferred Alternative**

2 Under the Agency Preferred Alternatives, impacts from intentional acts of destruction would be
3 considered similar to the other action alternatives as described under “Impacts Common to All Action
4 Alternatives.” Predicting the occurrence of intentional acts of sabotage or terrorism or the potential
5 damage from these acts is not possible. By constructing and operating new transmission lines, saboteurs
6 and terrorists would have a new potential target to carry out their acts. Historically, acts of sabotage and
7 terrorism on transmission infrastructure have been rare and the effects of events that have occurred have
8 not had a significant impact to adjacent lands and public health and safety. Moreover, the addition of
9 transmission lines and associated facilities generally strengthens the reliability of delivering electricity to
10 the general public, because if one line is affected by an intentional act of destruction or any other
11 disruption, other lines would be available to continue the delivery of electricity. Therefore, the potential
12 impacts from the unlikely event of an act of terrorism or sabotage from the Agency Preferred Alternatives
13 would be considered minor and similar to the other action alternatives.

14 **Additional Mitigation Measures**

15 Final alignment of the proposed transmission lines would generally avoid locating the lines immediately
16 adjacent to development, including residential, commercial, and industrial areas. In urban areas in the
17 Upgrade Section where this is not possible, the transmission lines would be within existing utility ROW
18 and at the regulatory required distance from adjacent land uses. In addition to alignment, the transmission
19 line, substations, and ancillary facilities would employ the industry standards for security, including
20 fencing, warning signage, security cameras, and other means of restricting access. Several of the security
21 features for the substations are identified in the POD, such as fencing and security systems. Each
22 substation would be constructed with a 7-foot-tall chain-link perimeter fence with steel posts and 1 foot of
23 barbed wire installed at the top of the fence. Remotely monitored security systems would include fire
24 detection in the control building and infrared cameras within the fenced areas to provide visual
25 observation of disturbances at the fence line to the system operator. Lastly, utilities normally keep a
26 certain number of spare structure components on hand in order to respond to natural events such as ice
27 storms, high winds, tornadoes, etc. These maintenance spares can quickly be mobilized in response to a
28 destructive act.

29 **Residual Impacts**

30 Alignment of the transmission lines away from developed areas would reduce the potential indirect
31 impact that an act of sabotage or terrorism would have public health and safety by buffering the distance
32 between the lines and developed areas. Industry standard security measures would deter unauthorized
33 personnel from accessing the transmission line, substations, and ancillary facilities and carrying out an act
34 of sabotage or terrorism. However, no mitigation measure could wholly prevent an act of sabotage or
35 terrorism. Therefore, the risk of a potential act of sabotage or terrorism directly and/or indirectly
36 impacting land adjacent to the proposed Project facilities and disrupting electrical service to the general
37 public and critical services would not be fully mitigated.

38 **Unavoidable Adverse Impacts**

39 No unavoidable adverse impacts would occur as a result of an intentional act of destruction to the
40 proposed electricity infrastructure.

41 **Short-term Uses versus Long-term Productivity**

42 “Short-term uses versus long-term productivity” is not applicable to the analysis of impacts from intentional
43 acts of destruction, because intentional acts of destruction are not a natural or socioeconomic resource.

1 **Irreversible and Irrecoverable Commitments of Resources**

2 Analysis of irreversible and irretrievable commitments of resources is not applicable because intentional
3 acts of destruction are not a natural or socioeconomic resource.

4 **4.20 IMPACTS OF DRAFT RESOURCE MANAGEMENT**
5 **PLAN AMENDMENTS**

6 **4.20.1 Introduction**

7 Direct and indirect effects of the proposed Project have been described in the preceding sections.
8 This section describes the potential environmental impacts of potential land use plan amendments.
9 The proposed Project would cross federal lands managed by the BLM. Actions that occur on these lands,
10 including the granting of ROWs under Title V of FLPMA, are guided by decisions recorded in the
11 applicable RMP. The BLM has determined that the seven Project segments in New Mexico would not
12 conform to certain aspects of the Mimbres RMP. Approval of a Project-specific proposal that is
13 inconsistent with the existing land use plan requires that a land use plan amendment be completed (BLM
14 Land Use Planning Handbook H-1601-1 (BLM 2008a)).

15 The planning action is to consider amending one BLM land use management plan as a part of this DEIS.
16 This action is being considered under the BLM 1600 manual guidance (BLM Land Use Planning
17 Handbook H-1601-1), New Mexico and Arizona State BLM instruction memoranda, and the planning
18 regulations published as Title 43 CFR (including 1610.5-5, Amendments).

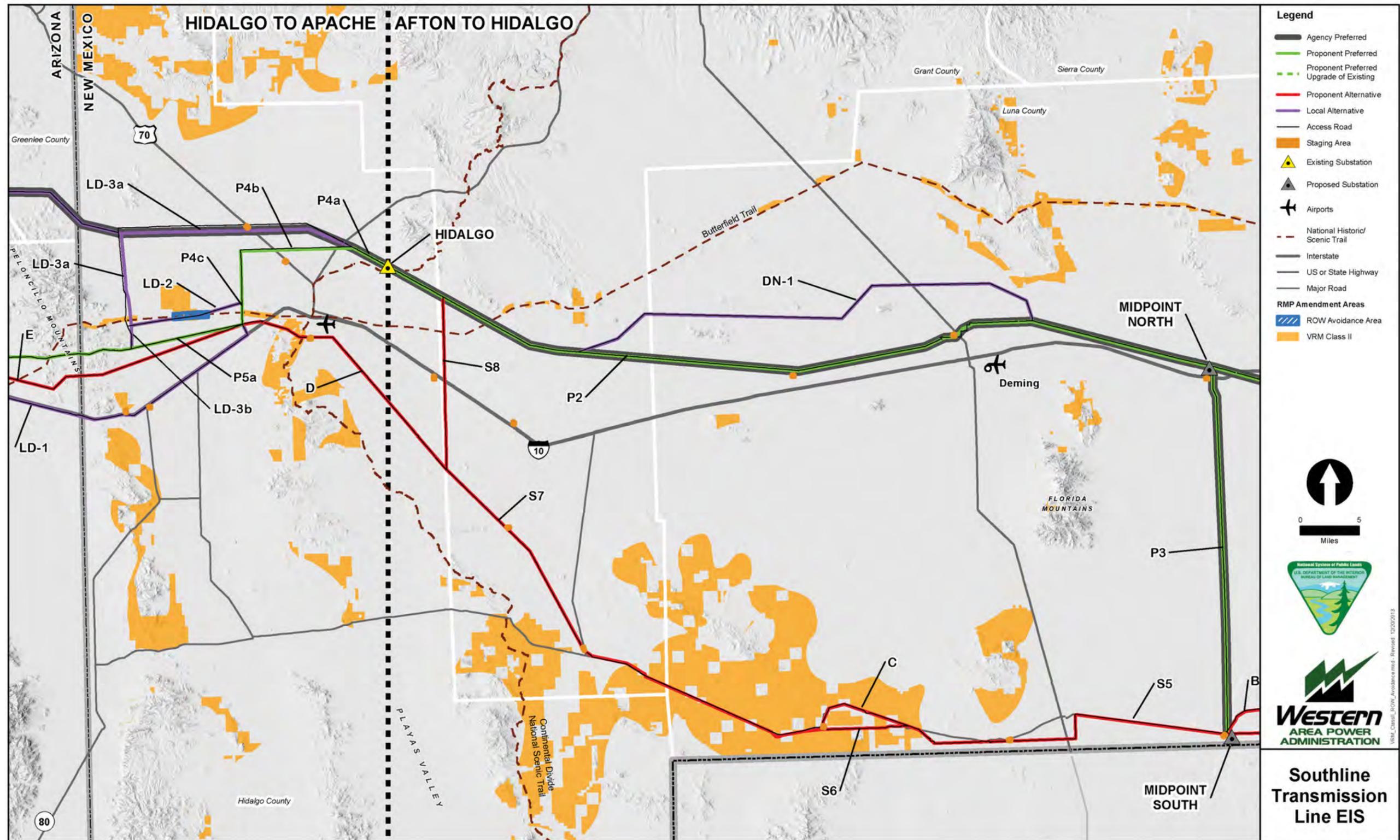
19 A report (Southline Transmission Proposal: Mimbres RMP Conformance Review (BLM 2013q)) was
20 compiled by the BLM Las Cruces District Office to document compliance with the Mimbres RMP (BLM
21 1991). From this analysis, needs for potential amendments were identified and analyzed based on
22 planning issues and criteria. As discussed in chapter 2, a plan amendment for the Mimbres RMP would be
23 required for the portion of the alternative route segment (local alternative LD2 near the Lordsburg Playa)
24 that parallels an avoidance area designated for the Butterfield Trail. A plan amendment would also be
25 required for the Mimbres RMP that would change the VRM Class II to VRM Class III or IV for seven
26 Project segments within the New Build Section that intersect VRM Class II lands (table 4.20-1, figure
27 4.20-1).

28 **Table 4.20-1. Draft RMP Amendment Areas**

Segments/Local Alternatives	Miles of Segments Crossing VRM Class II	Miles of Segments Crossing ROW Avoidance Area–Butterfield Trail
S5	1.2	0
S6	4.4	0
S7	13.7	0
C	3.7	0
D	1.8	0
LD2	3.1	9.1
LD3a	0.5	0

1

Figure 4.20-1. Areas of nonconformance in the Mimbres RMP.



2

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2

1 Four plan amendment alternatives have been identified for the Mimbres RMP. These options include
2 (1) the no action, (2) modifying VRM Class II to Class III, (3) modifying VRM Class II to Class IV, and
3 (4) allowing a ROW to parallel the Butterfield Trail in a ROW avoidance area.

- 4 • **No Action:** If no action is taken, then the ROW for the proposed Project would not be granted
5 and no amendment to the Mimbres RMP would be necessary.
- 6 • **Modify VRM Class II to Class III:** Under this plan amendment option, where the proposed
7 200-foot Project ROW crosses VRM Class II lands, the VRM class would be modified and
8 reclassified to VRM Class III.
- 9 • **Modify VRM Class II to Class IV:** Under this plan amendment option, where the proposed
10 200-foot Project ROW crosses VRM Class II lands, the VRM class would be modified and
11 reclassified to VRM Class IV.
- 12 • **Modify ROW Avoidance Area Stipulation:** Under this plan amendment option, where the
13 proposed 200-foot Project ROW would parallel the Butterfield Trail along local alternative LD2,
14 the ROW avoidance area would be modified. The special stipulations for ROWs in the Mimbres
15 RMP would be modified from “Facilities will not be located parallel to the Continental Divide
16 National Scenic Trail or Butterfield Trail” to “facilities will not be located parallel to the
17 Continental Divide National Scenic Trail or Butterfield Trail, except for a 9.1-mile-long linear
18 transmission ROW at the Lordsburg Playa.”

19 Amending Mimbres RMP to change a ROW avoidance area stipulation or change the VRM classification
20 would not involve any ground-disturbing activities, but would allow for ground-disturbing activities to
21 occur. Because the plan amendment modifications would be limited to the proposed Southline ROW,
22 direct and indirect impacts are therefore expected to be limited to those that would result from the
23 construction, operation, maintenance, and decommissioning activities from the proposed Southline
24 Project. Thus, impacts that may result from amending the plan would be limited to land use, special
25 designations, and visual resources. These impacts are discussed under the corresponding sections below.

26 Because amending the Mimbres RMP as described would not immediately involve ground disturbance or
27 development, this action would not directly or indirectly impact the remaining resources beyond the direct
28 and indirect impacts described in sections 4.2 through 4.19 (air quality; noise and vibration; geology and
29 mineral resources; soil resources; paleontological resources; water resources; biological resources
30 including vegetation and wildlife; cultural resources; farm and range resources; military operations;
31 wilderness characteristics; recreation; socioeconomics and environmental justice; public health and
32 safety; hazardous materials and hazardous and solid waste; transportation; or intentional acts of
33 destruction).

34 The Agency Preferred Alternative would not require an amendment to the Mimbres RMP.

35 **4.20.2 Land Use**

36 ***No Action***

37 Under the no action alternative, the BLM would not grant the ROW for the proposed Project and no plan
38 amendment would be required. Therefore there would be no impacts to land use from the no action
39 alternative for RMP amendments. Under the no action alternative, the BLM may update its RMP as part
40 of the normal land use planning process, which may include changes to current ROW avoidance areas.

1 **Modify Right-of-Way Avoidance Area Stipulation**

2 As noted previously, avoidance areas are to be avoided by major ROWs, but may be available for location
3 of major ROWs with the application of plan amendments, special stipulations, design features, and/or
4 mitigation measures.

5 Under this plan amendment alternative, where the proposed 200-foot Project ROW would parallel the
6 Butterfield Trail along local alternative LD2 for 9.1 miles, the stipulation for the ROW avoidance area
7 would be modified. The special stipulations for ROWs in the Mimbres RMP would be modified from
8 “Facilities will not be located parallel to the Continental Divide National Scenic Trail or Butterfield Trail”
9 to “facilities will not be located parallel to the Continental Divide National Scenic Trail or Butterfield
10 Trail, except for a 9.1-mile-long linear transmission ROW at the Lordsburg Playa.”

11 This would allow a 200-foot-wide by 9.1-mile-long segment (approximately 220 acres) of the proposed
12 Southline Project (local alternative LD2) to parallel the Butterfield Trail in the ROW avoidance area near
13 Lordsburg Playa. In terms of land use, this would have minor, long-term impact by amending the RMP.
14 The impact would be minor since land uses surrounding the 220 acres would not change, but would be
15 long-term since the change would persist throughout the life of the planning document and the proposed
16 Project.

17 **4.20.3 Special Designations**

18 **No Action**

19 Under the no action alternative, the BLM would not grant the ROW for the proposed Project and no plan
20 amendment would be required. Therefore there would be no impacts to special designations from the no
21 action alternative for RMP amendments. Under the no action alternative, the BLM may update its RMP as
22 part of the normal land use planning process, which may include changes to current special designations
23 classifications in the area.

24 **Modify Right-of-Way Avoidance Area Stipulation**

25 The Butterfield Trail is managed by the BLM as a special designation under the Mimbres RMP. Under
26 this plan amendment option, where the proposed 200-foot Project ROW would parallel the Butterfield
27 Trail along local alternative LD2 for 9.1 miles, the ROW avoidance area would be modified. The special
28 stipulations for ROWs in the Mimbres RMP would be modified from “Facilities will not be located
29 parallel to the Continental Divide National Scenic Trail or Butterfield Trail” to “facilities will not be
30 located parallel to the Continental Divide National Scenic Trail or Butterfield Trail, except for a 9.1-mile-
31 long linear transmission ROW at the Lordsburg Playa.”

32 As noted above in land use, implementation of this plan amendment alternative would allow a 200-foot
33 wide by 9.1-mile-long segment (approximately 220 acres) of the proposed Southline Project to parallel
34 the Butterfield Trail in the ROW avoidance area near Lordsburg Playa. Appendix F of this DEIS analyzes
35 the impacts of the proposed Project on trails, including the Butterfield Trail. The goals in the Mimbres
36 RMP outlined for the Butterfield Trail are to manage to protect and interpret historical values. An
37 amendment of the Mimbres RMP to modify the ROW stipulation as described above, would have a long-
38 term, moderate impact on special designations, specifically the Butterfield Trail. The impact would be
39 moderate since the recreational setting for approximately 220 acres of the Butterfield Trail corridor would
40 change, and the impact would be long-term since the change would persist throughout the life of the
41 planning document and the proposed Project.

4.20.4 Visual Resources

No Action

Under the no action alternative, the BLM would not grant the ROW for the proposed Project and no plan amendment would be required. Therefore there would be no impacts to visual resources from the no action alternative for RMP amendments. Under the no action alternative, the BLM may update its RMP as part of the normal land use planning process, which may include changes to current VRM classifications in the area.

Modify Visual Resource Management Class II to Class III

VRM Class III objectives are established in areas where the level of change to the existing character of the landscape should be moderate. Plan amendments to address conformance issues with VRM classification would only occur in association with the following segments. The remaining segments have been determined to be in conformance with applicable BLM land use plans or do not cross BLM-managed lands.

SUBROUTE 1.2 PROPONENT ALTERNATIVE

Under this alternative, segments S5, S6, and S7 cross VRM Class II BLM-managed lands. The proposed plan amendment would result in the reclassification of 468.5 acres of VRM Class II lands to VRM Class III lands. Impacts to scenic quality and viewer sensitivity from the selection of segments S5, S6, and S7 were determined to be moderate, and so would be in compliance with a VRM III classification. Because this amendment would only include the 200-foot-wide Project ROW along route segments S5, S6, and S7, the effects of the plan amendment on visual resources are expected to be the same as those described under the direct and indirect effects for segments S5, S6, and S7.

SUBROUTE 1.2 LOCAL ALTERNATIVES

Under this alternative, segments C and D cross VRM Class II BLM-managed lands. The proposed plan amendment would result in the reclassification of 130.6 acres of VRM Class II lands to VRM Class III lands. Impacts to scenic quality and viewer sensitivity from the selection of segments C and D were determined to be moderate, and so would be in compliance with a VRM III classification. Because this amendment would only include the 200-foot-wide Project ROW along route segments C and D, the effects of the plan amendment on visual resources are expected to be the same as those described under the direct and indirect effects for segments C and D.

ROUTE GROUP 2 LOCAL ALTERNATIVES

Under this alternative, segments LD2 and LD3a cross VRM Class II BLM-managed lands. The proposed plan amendment would result in the reclassification of 86.1 acres of VRM Class II lands to VRM Class III lands. These sections of VRM Class II were designated to follow the route of the Butterfield Trail historic trail where it crosses BLM land. Impacts to scenic quality and viewer sensitivity from the selection of segments LD2 and LD3A were determined to be low, and so would be in compliance with a VRM III classification. Because this amendment would only include the 200-foot-wide Project ROW along those two route segments, the effects of the plan amendment on visual resources are expected to be the same as those described under the direct and indirect effects for segments LD2 and LD3a. Similarly, the effect of the plan amendment to change VRM classes would not change the overall land use management of the Mimbres RMP, as described under the direct and indirect effects of land use resources.

1 **Modify Visual Resource Management Class II to Class IV**

2 VRM Class IV objectives are set for landscapes that BLM manages for uses that will result in substantial
3 landscape changes. Plan amendments to address conformance issues with VRM classification would only
4 occur in association with the following segments. The remaining segments have been determined to be in
5 conformance with applicable BLM land use plans, or do not cross BLM-managed lands.

6 **SUBROUTE 1.2 PROPONENT ALTERNATIVE**

7 Under this alternative, segments S5, S6, and S7 cross VRM Class II BLM-managed lands. The proposed
8 plan amendment would result in the reclassification of 468.5 acres of VRM Class II lands to VRM Class
9 IV lands. Because this amendment would only include the 200-foot-wide Project ROW along route
10 segments S5, S6, and S7, the effects of the plan amendment on visual resources are expected to be the
11 same as those described under the direct and indirect effects for segments S5, S6, and S7.

12 **SUBROUTE 1.2 LOCAL ALTERNATIVES**

13 Under this alternative, segments C and D cross VRM Class II BLM-managed lands. The proposed plan
14 amendment would result in the reclassification of 130.6 acres of VRM Class II lands to VRM Class IV
15 lands. Because this amendment would only include the 200-foot-wide Project ROW along route segments
16 C and D, the effects of the plan amendment on visual resources are expected to be the same as those
17 described under the direct and indirect effects for segments C and D.

18 **ROUTE GROUP 2 LOCAL ALTERNATIVES**

19 Under this alternative, segments LD2 and LD3a cross VRM Class II BLM-managed lands. The proposed
20 plan amendment would result in the reclassification of 86.1 acres of VRM Class II lands to VRM Class
21 IV lands. Because this amendment would only include the 200-foot-wide Project ROW along those two
22 route segments, the effects of the plan amendment on visual resources are expected to be the same as
23 those described under the direct and indirect effects for segments LD2 and LD3a.

24 **4.21 CUMULATIVE IMPACTS**

25 **4.21.1 Introduction**

26 This section addresses the cumulative effects of the proposed Project that would result when combined
27 with other past, present, and reasonably foreseeable actions. CEQ regulations for implementing NEPA
28 define cumulative impacts as “the impact on the environment which results from the incremental impact
29 of the action when added to other past, present, and reasonably foreseeable actions regardless of what
30 agency (federal or nonfederal) or person undertakes such other actions. Cumulative impacts can result
31 from individually minor but collectively significant actions taking place over a period of time”
32 (40 CFR 1508.7). Further, BLM’s NEPA Handbook states that the purpose of the cumulative effects
33 analysis is to ensure the decision makers consider the full range of the consequences of the Project and
34 alternatives, including the no action alternative (BLM 2008a).

35 The following sections discuss the analysis parameters including the geographic cumulative effects
36 analysis area (CEAA) and the timeframe for the analysis, the methodology and then the effects by
37 resource. The analysis of cumulative effects by resource considers the proposed Project’s contribution to
38 the environmental impacts of other past, present and future actions and whether the cumulative effects are
39 significant.

4.21.2 Analysis Parameters

Land uses described as “past” or “present” are considered in the baseline conditions in chapter 3 (see Section 3.11, “Land Use”). Past and present activities include agriculture, grazing, mining, residential, commercial and industrial development, linear transportation and utility corridors, parks and open space, and military installations.

The geographic CEAA may vary by resource (see section 4.21.4), however the following CEAA was used to identify past, present, and reasonably foreseeable future projects that may have a cumulative impact when considered with the proposed Southline Project. For the New Build Section of the proposed Project, the CEAA encompasses the geographic area between the Afton Substation near Las Cruces, New Mexico, and the existing Apache Substation near Willcox, Arizona. The New Build Section CEAA generally measures 40 miles north-south, all within the boundaries of New Mexico and Arizona (does not extend outside the United States). The Upgrade Section CEAA extends between the Apache Substation near Willcox to the existing Saguaro Substation north of Tucson, Arizona. The Upgrade Section CEAA is not as wide as the New Build Section CEAA because the cumulative effects of upgrading the existing line are generally expected to be more localized.

Table 4.21-1 summarizes the past, present, and future actions and uses considered in this assessment; see also figures 4.21-1 and 4.21-2 for a depiction of actions considered in this analysis. In general, projects that could result in similar cumulative effects include linear projects such as railroads, transmission lines, and pipelines. Forty-one projects have been identified that when combined with the proposed Southline Project may result in cumulative impacts. These projects span the entire extent of the proposed Southline Project and nearby region, and they range in proximity to the proposed Project.

In terms of timeframe, the cumulative effects analysis is considered over a 50-year time period—the estimated lifespan of the Project. Although the cumulative effects analysis is considered over a 50-year period, only those projects which are “reasonably foreseeable” are considered in the analysis. For the purpose of this analysis, “reasonably foreseeable” actions are considered where there is an existing decision (i.e., record of decision or issued permit), a commitment of resources or funding, a formal proposal (i.e., a permit request). Actions that are highly probable based on known opportunities or trends (i.e., residential development in urban areas) are also considered. Speculative future developments (i.e., enabling access to unknown renewable energy projects) are not considered.

4.21.3 Methodology

The following analyses consider (1) the CEAA for each resource, (2) a description of those past, present, and reasonably foreseeable actions that are similar in kind and effect as the proposed Project, or would have considerable impact to the environmental resources to which the proposed Project’s effects would cumulatively contribute, and (3) evaluate the potential effects of those actions and consider the significance of those cumulative effects.

Where data were available to do so, cumulative effects are quantified. Where reliable quantitative data could not be found, qualitative data were used to best assess the cumulative effects of the proposed Project.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis

Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
New Build Section, Past and Present Projects				
Existing distribution lines less than 230-kV*	381 miles	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico	Existing transmission distribution lines below 230 kV (69 and 115 kV): 381 miles	Existing distribution lines less than 230 kV are anticipated to continue their current operation for the life of the Project.
Existing transmission lines 230-kV and greater)*	303 miles	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico	Between 231 and 344 kV: 38 miles Between 345 and 499 kV: 265 miles Above 500 kV: none	Existing distribution lines greater than 230kV are anticipated to continue their current operation for the life of the Project.
Existing gas pipelines*	1,245 miles	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico	El Paso Natural Gas: 1,190 miles Las Cruces Municipal Gas: 16 miles Public Service Company of New Mexico: 14 miles Southwest Gas Corporation: 15 miles Unknown: 10 miles	All existing pipelines are anticipated to continue their current operation for the life of the Project.
Existing railroads*	428 miles	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico	Atchison Topeka Santa Fe: 11 miles Freepport McMoran Industrial Railroad: 26 miles Southern Pacific Company Railroad: 13 miles Southern Pacific Railroad: 97 miles Unidentified: 148 miles Abandoned Railroads: 134 miles	Unknown
New Build Section, Reasonably Foreseeable Future Projects				
Proposed Organ Mountains Desert Peaks National Monument*	54,800 acres	Doña Ana County, New Mexico	Approximately 54,800 acres of BLM lands in the mountains surrounding Las Cruces, New Mexico proposed for National Monument designation. Proximity: proposed Southline Project does not cross any area of the proposed Organ Mountains Desert Peaks National Monument. Segment S2 of the Proponent Alternative is the closest in proximity southeast of the East Potrillo Mountains.	Legislation introduced to the U.S. House of Representatives in March 2013. Consultation and development of a management plan will occur over the next 3 years.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis (Continued)

Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
Potential network upgrades	5 acres per substation	El Paso County, Texas and Doña Ana County, New Mexico	Upgrades within existing substations at Newman Substation southeast of Afon Substation and in Doña Ana Substation located on the northwest side of Las Cruces, New Mexico. Potential Network Upgrades would occur completely within existing substations fence lines. Existing access to the substations would be used for construction, operation, and maintenance of the Potential Network Upgrade project. Upgrades at Newman Substation would include converting the existing 345kV ring bus to a breaker-and-a-half arrangement and expanding to accommodate an additional 345/115kV transformer bank. Upgrades at Doña Ana Substation would include modifying the existing 115kV line in from Picacho Substation to include the addition of series line reactors.	Timing unknown
SunZia Transmission Line (agency preferred alternative, FEIS) ⁹	515 miles	Within Lincoln, Socorro, Sierra, Luna, Grant, Hidalgo, and/or Torrance counties in New Mexico, and Graham, Greenlee, Cochise, Pinal, and/or Pima counties in Arizona	Planned transmission project with up to 4,500 MW of new capacity with multiple substations, and two 500-kV transmission lines. Southline Local Alternatives DN1, LD4 were developed to collocate with the SunZia Transmission Line agency preferred alternative. Southline DN1 would parallel SunZia for 42.5 miles, and LD4 would parallel SunZia for 51.7 miles.	According to the SunZia EIS timeline (BLM 2013a), ROW is expected to be issued in 2013, with project construction taking place in 2014 and 2015, and operations beginning in 2016. Currently obtaining preconstruction licenses and permits. On June 14, 2013, the BLM released the SunZia EIS for public review and comment.
New Solar Ventures/Solar Torx*	Unknown	Luna County, New Mexico	Planned 300-MW photovoltaic solar power plant. Project would be less than 1 mile from subroute 1.1 in the New Build Section in Luna County, New Mexico.	Schedule not identified. In 2006, Solar Torx signed a lease with the State of New Mexico to hold land for use as the project site. The project was targeted to come on line in 2011, but does not currently appear to be under active development.
Sapphire Energy Algae Facility*	300 acres	Luna County, New Mexico	Partial 300-acre "green crude" demonstration farm with the capacity for 1.5 million gallons of biofuel. The facility would be located within the CEAA in the New Build Section of subroute 1.2 near the town of Columbus.	The first 100-acre segment was recently finished, and the entire project is scheduled to be complete by 2014. The other two pond segments, each of which is about 1 mile in length, will be constructed later in 2012 and in 2013.

⁹ The SunZia Transmission Line route considered in this analysis is based upon the June 14, 2013 FEIS/RMP Amendment. The future ROD may result in changes to the route when released.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis (Continued)

Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
Solar Reserve, LLC-1*	5,296 acres federal land	Hidalgo County, New Mexico	Planned 100-MW solar power plant	The project schedule is unknown.
Lordsburg Mesa, Iberdrola Renewables*	24,320 acres federal land	Doña Ana County, New Mexico	Planned 1,500-MW solar power plant, within 10.94 miles of the route group 2 local alternatives in the New Build Section.	An application was received by the BLM on March 25, 2008, for the use of 24,320 acres of Federal land for the project. The project does not appear to be under active development. The project schedule is unknown.
Lightning Dock Geothermal Power Plant Project*	Unknown	Lordsburg, Hidalgo County, New Mexico	Planned 10-MW geothermal project within 11 miles of the route group 2 local alternatives in the New Build Section.	Construction is anticipated in fall or winter 2012, with commercial startup expected in late 2014.
Planned Residential Development Projects New Mexico	Unknown	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico	Both the City of Deming and City of Lordsburg plan for amendments to their municipal zoning and planned-unit development ordinances are anticipated to expand their municipal boundaries to private and State lands in order to facilitate planned residential development.	Construction for new apartment complexes and detached single-family homes is underway, some to be completed in 2014. Planned residential development projects are anticipated to continue throughout the life of the project, as communities require extending boundaries through annexation.
Safford Solar Energy*	22,891 acres	San Simon, Graham County, Arizona	Planned 250-MW solar project adjacent to subroute 2.2 in the New Build Section	Identified as pending on list of BLM solar projects for Arizona. However, currently at a standstill due to the lack of a power transmission connection agreement.
Bowie Power Station*	Unknown	Cochise County, Arizona	Planned 1,000-MW natural gas-fired power station within 0.89 mile of subroute 2.2 in the New Build Section	To be constructed in two phases of up to 500 MW each. Each project phase is expected to require approximately 3-4 years to completion. Commercial operation is anticipated in 2016. Permits have been granted, including zoning and air permits and a CEC.
Bowie Power 345-kV Transmission Line	Unknown	Cochise and Graham counties, Arizona	Planned 345-kV generation tie-in between the proposed Bowie Power Plant and the proposed 345-kV Willow substation within 0.65 mile of route group 2 local alternatives.	Currently expected to begin commercial operation in 2016. An Interconnection Request with TEP, the Initial System Impact Study, and a System Impact Study Re-Study are all complete. TEP was expected to issue a Final Report by July 30, 2012, and the Facilities Study was scheduled to be updated by August 1, 2012.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis (Continued)

Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
Willow 345-kV Substation*	Unknown	Graham County, Arizona	Planned 345-kV substation with up to two 500/345-kV transformers to be located in Graham County, Arizona, approximately 7 miles from the route group 2 local alternatives.	Unknown at this time.
BrightSource Energy	14,100 acres	Hidalgo and Luna counties, New Mexico	Planned solar project Proximity to Project: unavailable	In 2008, BrightSource signed two 5-year option agreements to secure lands for the proposed solar facility, including 6,574 acres in Hidalgo County and 7,520 acres in Luna County. An option agreement was signed in 2011 that allows BrightSource 2 years to conduct studies and negotiate power purchase and interconnect agreements.
NextLight Renewable Power	7,301 acres	Luna, Hidalgo, and Valencia counties, New Mexico	Planned solar project Proximity to Project: unavailable	In 2008, NextLight signed three 5-year option agreements to secure 2,722 acres in Luna County, 3,714 acres in Hidalgo County, and 865 acres in Valencia County for the proposed solar facility. An option agreement was signed in 2011 that allows NextLight 2 years to conduct studies and negotiate power purchase and interconnect agreements.
High Plains Express Transmission Project	1,300 miles	Wyoming, Colorado, New Mexico, and Arizona	Planned 1,300-mile, four-state, 500-kV AC transmission line. Proximity to Project: not yet determined	The feasibility study is complete, with evaluation corridor engineering design and permitting currently ongoing. Commissioning is proposed between 2020 and 2025.
Upgrade Section, Past and Present Projects				
Existing distribution lines less than 230-kV*	394 miles	Cochise, Pima, and Pinal counties, Arizona	Existing transmission distribution lines below 230 kV (69 and 115kV): 394 miles	Existing distribution lines less than 230kV are anticipated to continue their current operation for the life of the project.
Existing transmission lines (230-kV and greater)*	200 miles	Cochise, Pima, and Pinal counties, Arizona	Between 230 and 344 kV: 105 miles Between 345 and 499 kV: 90 miles Above 500 kV: 5 miles	Existing distribution lines greater than 230kV are anticipated to continue their current operation for the life of the project.
Existing gas pipelines *	222 miles	Cochise, Pima, and Pinal counties, Arizona	El Paso Natural Gas: 209 miles Southwest Gas Corporation: 13 miles	Existing pipelines are anticipated to continue their current operation for the life of the project.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis (Continued)

Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
Existing railroads*	93 miles	Cochise, Pima, and Pinal counties, Arizona	P Railroad: 4 miles Southern Pacific Company Railroad: 32 miles Southern Pacific Railroad: 25 miles SP Railroad : 29 miles Unidentified : 2 miles	Unknown
Buffalo Soldier Electronic Testing Range (BSETR)*	1.6 million acres	Cochise, Pima, and Santa Cruz counties, Arizona.	A Fort Huachuca facility that is the principal Army Test Center for testing of command, control, communications, computer, and intelligence equipment and systems in real, virtual, and constructive environments. The facility spans several counties in southern Arizona and includes the Wilcox Dry Lake (Playa). Segments of the proposed Southline Project (subroute 3.1—segments U1a, U1b, and U2 requiring upgrade or local alternative H) cross the BSETR. Lengths of the crossings range from 2.9 miles to 10.3 miles.	Existing facility
Upgrade Section, Reasonably Foreseeable Future Projects				
Whetstone Ranch Solar Project*	1,600 acres	Cochise County, Arizona	Planned 80-MW solar farm, four stages of 20 MW each, located approximately 6.5 miles south of segment U2 of subroute 3.1.	The Benson Planning and Zoning Commission approved a conditional use permit in March 2012 for the proposed solar project. It is currently in the construction permitting stage.
Red Horse 2 Wind Farm	5,800 acres	Cochise County, Arizona	Proposed 51-MW wind farm located approximately 21 miles west of Wilcox, Arizona. Project would be located within the BSETR.	The Cochise County Planning and Zoning Commission approved a conditional use permit in 2013 for the proposed wind project. It is currently in the planning and permitting stage.
Rosemont Copper Mine*	4,285 acres	Pima County, Arizona	New open-pit copper mine and copper recovery facilities located more than 10 miles south of segment U3a of subroute 3.1.	Rosemont Copper Company submitted a proposal to extract locatable minerals such as copper, molybdenum, and silver from an approximate 955-acre open-pit mine. It is currently in the permitting process. The Arizona Corporation Commission approved an associated 13-mile transmission line. A construction schedule was not identified.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis (Continued)

Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
UA Tech Park Thermal Storage/Bell Independent Power Corporation*	200 acres	Pima County, Arizona	Planned 5-MW CSP project utilizing parabolic trough technology located approximately 1 mile from segment U4 of subroute 4.1 within the Upgrade Section.	Construction and operation schedule for the project is unclear at this time.
Sasabe Lateral Project*	60 miles	Pima County, Arizona	Approximately 60 miles of planned 36-inch-diameter, high-pressure pipeline and associated measurement facilities to be located approximately 8.8 miles west of segment U3d of subroute 4.1.	Project is in permitting stage with FERC; El Paso Natural Gas proposes to begin construction in January 2014 with an in-service date of September 2014.
Silverbell Road Improvements*	8 miles	Pinal County, Arizona	Planned road improvement project by the City of Tucson to widen and install a median to the existing road that would be intersected by segment U3i of subroute 4.1 within the Upgrade Section.	First segment – construction between 2012 and 2016. Second segment – construction between 2022 and 2026.
Fotowatio Renewable Ventures*	305 acres	Pima County, Arizona	Planned 25-MW solar photovoltaic energy facility located approximately 2 miles west of the proposed route in the Upgrade Section.	The facility was originally scheduled to be completed by April 2012, but is currently pending. A current completion date has not yet been identified.
Avra Valley Solar Project/NRG Solar*	300 acres	Pima County, Arizona	Planned 25-MW solar photovoltaic energy facility to be located approximately 3.6 miles west of segment U3j of subroute 4.1 within the Upgrade Section	NRG and First Solar have agreed to construct the project in 2012. Permitting appears to be complete. Anticipated groundbreaking, completion of construction, and operation in 2012.
Pinal Central to Tortolita 500-kV Transmission Line	40 miles	Pinal County, Arizona	Planned single-circuit 500-kV transmission line; 40 miles of new line between Pinal Central substation and Tortolita substation. The Proponent Preferred (subroute 4.1) interconnects at Tortolita substation	TEP filed a CEC application with ACC in April 2012 and public hearings were conducted in May 2012. Anticipated start of construction in 2012; in service in 2014.
Pinal Central Substation	200 acres	Pinal County, Arizona	Planned 500-kV substation to be located approximately 26.2 miles northwest of segment U3l of subroute 4.1.	Permitting of the Pinal Central Substation may be complete at this time; it will be developed as determined by resource need.
Electrical District 5 – Palo Verde Hub Project	109 miles	Maricopa and Pinal counties, Arizona	Planned 109-mile transmission line and the expansion of three existing substations to be located approximately 26.2 miles northwest of segment U3l of subroute 4.1.	Project approval was issued in August 2011; the project is planned to be constructed over a period of 24 to 30 months beginning in 2012, with a scheduled completion in 2015.

Table 4.21-1. List of Projects (Past, Present, and Reasonably Foreseeable Future) Considered in the Cumulative Impacts Analysis (Continued)

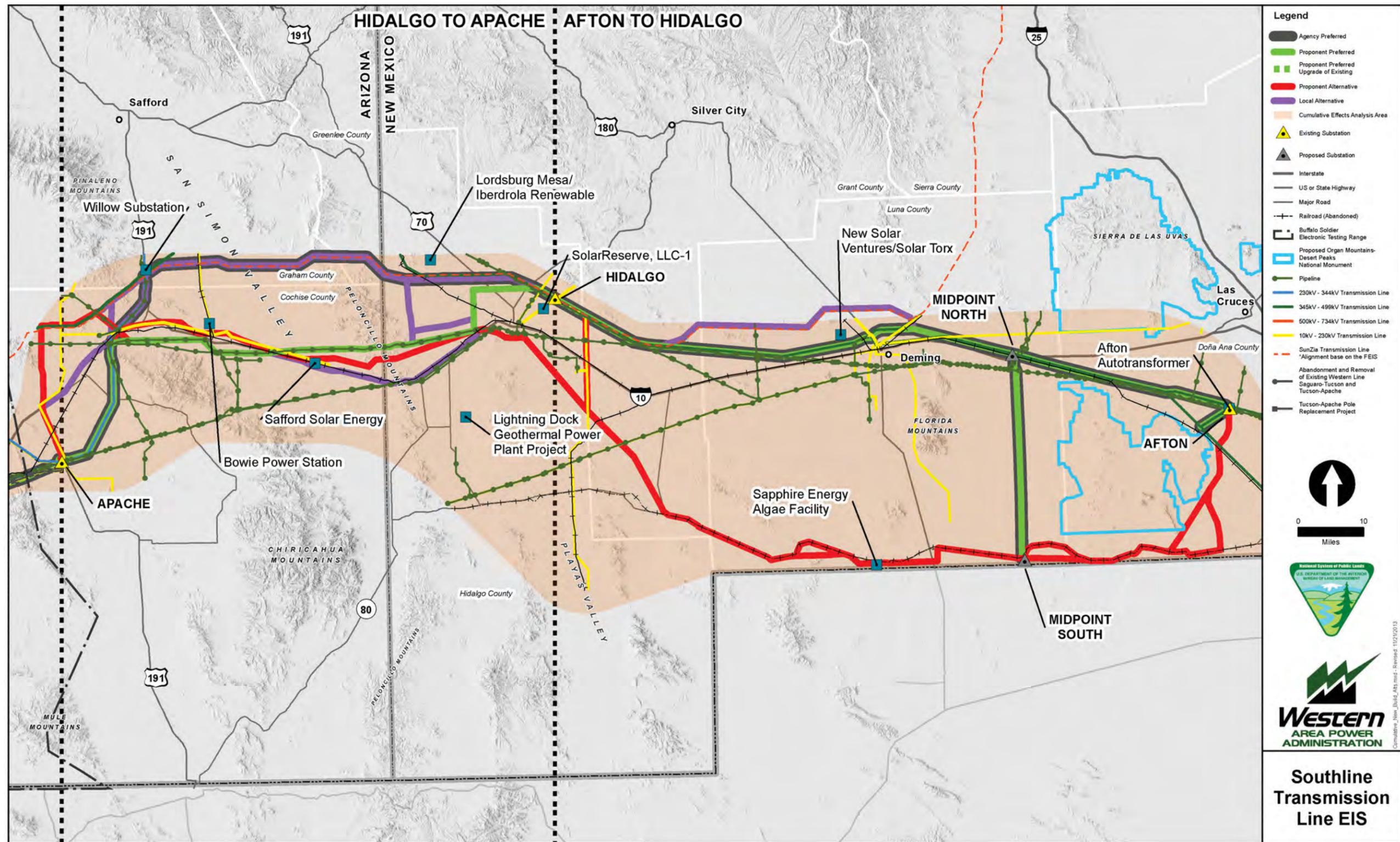
Project/Action Name	Project Size in the CEAA	Project/Action Location	Project/Action Description	Anticipated Project/Action Schedule
Vail-to-Valencia 115-kV to 137-kV Upgrade Transmission Line	45 miles	Pima and Santa Cruz counties, Arizona	138-kV link between TEP's Vail substation and UES' Valencia substation in Nogales. The Proponent Preferred (subroute 4.1) would interconnect to the Vail substation and run west and south to the Nogales substation, ranging from less than 200 feet near the Vail substation to approximately 45 miles at the Valencia substation in Nogales	The project is planned to be constructed over a period of 24 months beginning in 2012, with a scheduled completion in 2015.
Tucson-Apache Pole Replacement Project*	80 miles	Pima and Cochise counties, Arizona	Western is proposing to conduct pole replacement, access road improvements, and vegetation management along portions of their Tucson to Apache 115-kV transmission line. 149 wood H-frame structures have been selected for in-kind replacement and vegetation management is proposed near the San Pedro River in Benson, Arizona. All project-related access will be along existing access roads, however about 20 non-contiguous miles of access road will require improvement. The entire length of the Tucson-Apache Pole Replacement Project would be upgraded by the proposed Southline Project, if approved.	Work was proposed to begin in 2013 and would be completed in phases over a period of 2 years.
Abandonment and Removal of existing Western Line Saguaro-Tucson and Tucson-Apache *	120 miles	Cochise, Pima, and Pinal counties, Arizona	If the proposed Southline Project were to be approved the existing s transmission line in the Western ROW would be abandoned and removed once the new Southline transmission line is complete.	Upon completion of the proposed Southline Project.
Planned Residential Development Projects Arizona	Unknown	Cochise and Pima counties	The Cities of Willcox, Benson, Vail, Tucson, and Marana plan for amendments to their municipal zoning and planned-unit development ordinances are anticipated to expand their municipal boundaries to private and State lands in order to facilitate planned residential development.	Construction for new apartment complexes and detached single-family homes are ongoing, mostly on State and private lands. Planned residential development projects are anticipated to continue throughout the life of the project, as communities require extending their boundaries through annexation in order to facilitate planned residential development.
High Plains Express Transmission Project	1,300 miles	Wyoming, Colorado, New Mexico, and Arizona	Planned 1,300-mile, four-state, 500-kV AC transmission line. Proximity to Project: unavailable	The feasibility study is complete, with evaluation corridor engineering design and permitting currently ongoing. Commissioning is proposed between 2020 and 2025.

Source: CH2MHill Southline Transmission Project Resource Report 20: cumulative. April 10, 2013 (CH2MHill 2013t)

* Indicates the cumulative action is illustrated on figures 4.21-1 and 4.21-2

1

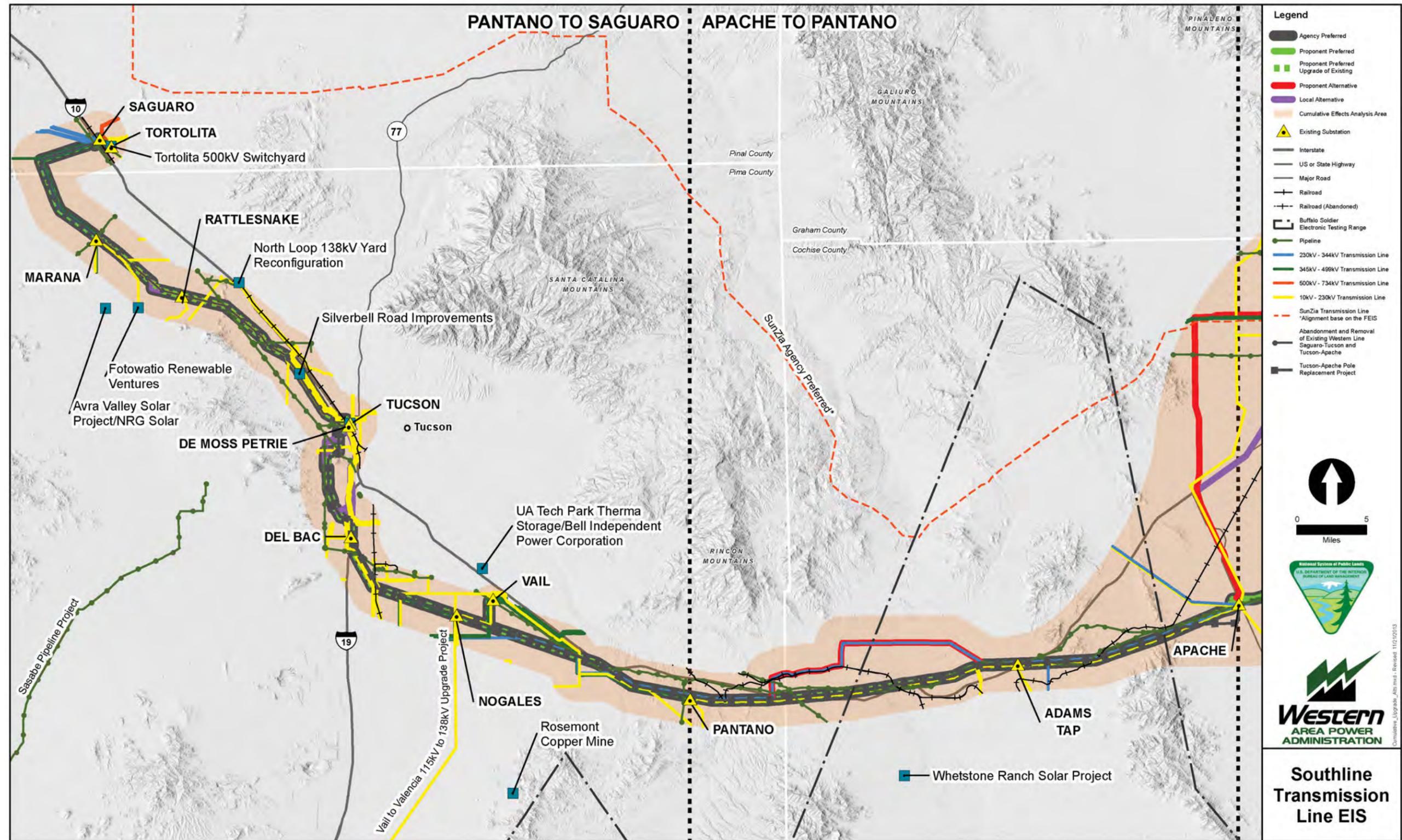
Figure 4.21-1. New Build Section cumulative effects analysis area.



2
3

1

Figure 4.21-2. Upgrade Section cumulative effects analysis area.



2

1 Like the direct and indirect effects described in sections 4.1–4.19, the cumulative effects of the proposed
 2 Project in combination with other past, present, and reasonably foreseeable future actions are also
 3 considered in the context of magnitude and significance. As described in section 4.1.3, use of the term
 4 *significant* when referring to resource impacts indicates that some threshold was exceeded for a particular
 5 impact indicator. The following categories of magnitude and duration are presented to define relative
 6 levels of effects and to provide a common language when describing effects (table 4.21-2).

7 **Table 4.21-2.** Standard Resource Impact Descriptions for Magnitude and Duration

Description Relative to Resource	
Magnitude	
No Impact	Would not produce obvious changes in baseline condition of the resource.
Minor/ Negligible	Impacts would occur, but resource would retain existing character and overall baseline conditions.
Moderate	Impacts would occur, but resource would partially retain existing character. Some baseline conditions would remain unchanged.
Major	Impacts would occur that would create a high degree of change within the existing resource character and overall condition of resource.
Duration	
Short term	During construction and up to 5 years (from when ground-disturbing activities begin, through reclamation when vegetation has been reestablished in construction areas).
Long term	More than 5 years, life of the Project.

8 **4.21.4 Cumulative Effects by Resource**

9 ***Air Quality and Climate Change***

10 The CEAA for the air quality and climate change effects is consistent with the 31-mile radius used to
 11 analyze proposed Project impacts and includes portions of Doña Ana, Grant, Hidalgo, and Luna counties
 12 in New Mexico, and Cochise, Greenlee, Graham, Pima, and Pinal counties in Arizona. This CEAA for
 13 analyzing potential cumulative impacts to air quality and climate change represents a reasonable region in
 14 which existing air quality, when assessed in combination with other cumulative actions, would be
 15 impacted if the proposed Project or action alternatives were implemented. The temporal scope of the
 16 cumulative effects analysis is for the life of the Project, which is 50 years. Cumulative actions discussed
 17 herein are based on the existing conditions of the air quality resources affected environment described in
 18 chapter 3 and the relevant projects presented in table 4.21-1.

19 **CONSTRUCTION**

20 As discussed in chapters 3 and 4, current and past air emission sources have impacted air quality in the
 21 analysis area to varying degrees. Current and past impacts to air quality are captured by the network of
 22 ambient air quality monitoring stations and emissions of pollutants are quantified annually state-wide in
 23 emission inventories. As discussed in chapter 3, the proposed Project would cross the Rillito PM₁₀
 24 nonattainment area and the Tucson CO maintenance area, both located in Pima County, Arizona. Several
 25 other nonattainment and maintenance areas are potentially located within the analysis area; however, with
 26 the exception of the Rillito PM₁₀ nonattainment area and the Tucson CO maintenance area, the boundaries
 27 of the proposed Project and/or alternatives would not be within any of the other nonattainment or
 28 maintenance areas identified in chapters 3 and 4.

1 As discussed in section 4.2, the Project would emit criteria pollutants, HAPs, and GHG emissions during
2 construction. During transmission line and substation construction activities, air pollutant emissions
3 would be generated from earthmoving, vehicle/equipment exhaust, vehicle travel on paved and unpaved
4 surfaces, and the construction and operation of concrete batch plants. Air quality impacts associated with
5 these activities are not expected to exceed any general conformity threshold levels or Federal, State, or
6 local ambient air quality standards, and would be temporary and localized in nature.

7 Several new major and PSD sources of air pollutants have been proposed within the air quality CEAA,
8 such as new or expanded power generation facilities (e.g., the 1,000-MW, natural gas-fired Bowie Power
9 Station), roadways, manufacturing facilities, and mines (e.g., Rosemont Copper Mine). These reasonably
10 foreseeable actions could cumulatively impact air quality, potentially resulting in further increases to
11 pollutant concentrations in non-attainment areas, further increases to concentrations of other air
12 pollutants, and/or exceedances of the NAAQS within the Project air quality analysis area. However, due
13 to the short-term, intermittent nature of Project construction activities, there would be little overlap
14 between Project construction activities and the activities of other proposed projects located within the air
15 quality CEAA. Additionally, all proposed projects would be regulated by the appropriate regulatory
16 authority (local, state, and/or federal), with emissions minimized thereby. Therefore, any cumulative
17 effects on air quality from construction activities for the proposed Project and construction emissions of
18 other proposed sources of air pollutants within the air quality CEAA would be expected to be minor and
19 short-term in nature.

20 **OPERATION AND MAINTENANCE**

21 During operation and maintenance of the transmission lines and substations, impacts would be
22 qualitatively similar to those described above for construction. However, impacts would be much lower
23 than construction-phase emissions and impacts. In contrast to proposed Project construction emissions,
24 emissions from the operation and maintenance of the proposed Project would likely overlap with future
25 development of air pollutant sources. Since the proposed Project potentially crosses two areas that have
26 been or are not in compliance with the NAAQS for PM₁₀ and CO (the Rillito PM₁₀ nonattainment area
27 and the Tucson CO maintenance area), the cumulative impact from past, present, and reasonably
28 foreseeable future air pollution emission sources could result in further degradation of these non-
29 attainment/maintenance areas. Therefore, the incremental contribution of the effects of the proposed
30 Project and action alternatives when added to the effect of other past, present, and reasonably foreseeable
31 future actions would result in a moderate and long-term cumulative effect. However, based on the small
32 amount of proposed Project operational emissions, the contribution of the Project to the cumulative air
33 quality in the CEAA would be negligible.

34 **GLOBAL CLIMATE CHANGE**

35 In terms of global climate change, anthropogenic activities have clearly increased the concentration of
36 CO₂ in the atmosphere.

37 Global temperatures are projected to continue to rise over this century; by how much and for how long
38 depends on a number of factors, including the amount of heat-trapping gas emissions and how sensitive
39 the climate is to those emissions. In the United States, average temperature has risen more than 2 °F over
40 the past 50 years and is projected to rise more in the future (U.S. Global Change 2009).

41 For the Southwest particularly, there has been and will likely continue to be an increase in mean annual
42 temperature. This will result in a more frequent drought cycle due to increased evapotranspiration.
43 The number of extremely hot days is also projected to rise during the first 100 years of the 21st century.

1 By the end of the century, parts of the Southwest are projected to face summer heat waves lasting 2 weeks
2 longer than those occurring in recent decades (IPCC 2007).

3 Projections of future precipitation generally indicate that northern areas will become wetter, and southern
4 areas, particularly in the West, will become drier. Precipitation is projected to drop by 5 percent by 2100
5 for much of Arizona and New Mexico. A 10 percent decline could be in store for the southern half of
6 Arizona based on these estimates (U.S. Forest Service 2010).

7 In the Southwest, winter precipitation has been reduced in the past two decades and the prediction is that
8 this trend will continue. This decrease in winter precipitation will likely result in reduced snowpack and
9 earlier snowmelt. There is less confidence in the potential changes to summer monsoonal rainfall patterns.
10 There is evidence that monsoonal rains have been occurring earlier in the season, although there is
11 considerable uncertainty in predicting this will continue.

12 The occurrence of abrupt changes in climate becomes increasingly likely as the human disturbance of the
13 climate system grows. Globally, many types of extreme weather events, such as heat waves and regional
14 droughts, have become more frequent and intense during the past 40 to 50 years (U.S. Global Change
15 2009). Ancient climate records suggest that in the United States, the Southwest may be at greatest risk for
16 this kind of change. This would include increased frequency of drought, as well as increased frequency of
17 heavy rains and flooding.

18 Construction (and, to a lesser extent, operation and maintenance) activities would result in GHG
19 emissions, as discussed and quantified in section 4.2, well below the CEQ threshold of 25,000 metric tons
20 of GHGs requiring a GHG emissions analysis of alternatives. As also described in section 4.2, a small
21 amount of SF₆ could potentially be emitted from circuit breakers during substation operations. On a CO₂e
22 basis the estimated amount of SF₆ emitted from all Project substations would be approximately 7,124
23 tonnes per year. This amount would be approximately the same under all action alternatives, and
24 represents approximately 0.004 percent of annual energy-related emissions in New Mexico and Arizona
25 combined (CCS 2005, 2006).

26 Therefore, the cumulative effect of climate change in the air quality CEAA would be major and long-
27 term; however, the contribution of the proposed Project and alternatives to this change would be
28 negligible, and, to the extent the proposed Project allows displacement of fossil fuel generation with
29 renewable energy sources, the proposed Project would have a beneficial contribution to anthropogenic
30 climate change.

31 **Noise**

32 In general, noise impacts would typically be localized, with noise levels associated with the construction
33 and especially operations of transmission lines returning to ambient conditions within a relatively short
34 distance. For this reason, cumulative impacts for noise would be limited to other projects in close
35 proximity to the proposed Project. The geographic analysis area for cumulative impacts to noise is the
36 CEAA described in section 4.21.2. The temporal scope is for the life of the Project, which is 50 years.

37 Existing noise conditions in and around the proposed Project and alternatives are discussed in section 3.3.
38 The majority of the area surrounding the proposed Project is desert open space, which typically sees
39 ambient noise levels in the range of 8 to 45 dBA. The Project would pass by one major city (Tucson) and
40 several small and medium-sized towns that would provide elevated noise levels. The proposed Project
41 would also pass or cross several highways, including two Interstate highways, as well as various large and
42 small airports, all of which typically have noise levels elevated above what might typically be seen in the
43 surrounding area.

1 As discussed in section 4.3, noise impacts from the construction of the proposed Project and alternatives
2 could be major, but short-term, temporary, and intermittent in nature. Maintenance activities associated
3 with substations and transmission lines would be similar in noise level to construction-related activities,
4 but would be anticipated to occur less frequently, include fewer individual noise point sources such as
5 pieces of equipment and vehicles, and would be of shorter duration. Corona noise from transmission line
6 and substation operation would be expected to be below regulatory thresholds. Therefore, impacts to
7 noise for operation and maintenance activities would be minor and long-term.

8 Construction noise from reasonably foreseeable actions in the analysis area that, when combined with the
9 proposed Project construction and operation and maintenance, may cumulatively impact noise include the
10 proposed SunZia Transmission Line Project, small (<100 MW) and large-scale (>100 MW) solar projects,
11 substation expansions, maintenance and upgrades to existing distribution and transmission lines (ranging
12 from less than 230 kV to greater than 500 kV lines), and the future expansion of the communities and
13 roadways (i.e., planned residential development) within the analysis area (e.g., Tucson) (see table 4.21-1).
14 The potential for effects of the proposed Project and alternatives to combine with the effects of reasonably
15 foreseeable actions within the CEAA is minimal. Several planned projects have potentially overlapping
16 construction schedules with the proposed Project and alternatives, which may cause localized noise
17 increases if both projects are under construction at the same time. However, cumulative noise impacts
18 from overlapping construction projects should be minimal and temporary.

19 ***Geology and Minerals***

20 The geographic analysis area for cumulative impacts to geology and mineral resources is the CEAA
21 described in section 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This
22 CEAA for analyzing potential cumulative impacts to geology and mineral resources represents a
23 reasonable region in which existing geological and mineral resources, when assessed in combination with
24 other cumulative actions, would be impacted if the proposed Project or action alternatives were
25 implemented. Cumulative actions discussed herein are based on the existing conditions of the geological
26 and mineral resources affected environment described in chapter 3 and the relevant projects presented in
27 table 4.21-1).

28 A number of proposed projects have been previously identified, which, when combined with the proposed
29 Project, may potentially result in cumulative impacts. Notwithstanding the proposed Rosemont Copper
30 Mine, any of these projects, if they overlap with mining districts, would further reduce the area available
31 for mining in those districts. However, because only some mining districts are active, because active
32 mining encompasses only a small fraction of those mining districts, and because the projects are likely to
33 cover only a fraction of the mining districts they cross (and assuming that active mines are avoided in a
34 similar fashion as this Project), there would be no obvious changes in the baseline conditions of local
35 geology or access to mineral resources. Therefore, there would be no cumulative impacts to geology and
36 mineral resources.

37 ***Soils***

38 The geographic analysis area for cumulative impacts to soil resources is the CEAA described in section
39 4.21.2. The temporal scope is for the life of the Project, which is 50 years. Cumulative actions discussed
40 herein are based on the existing conditions of the soil resources affected environment described in chapter
41 3 and the relevant projects presented in table 4.21-1.

1 **CONSTRUCTION**

2 The past uses in the CEAA have had a direct effect on the soils, as described in chapters 3 and 4.
3 The historic use of land through such activities such as mining and ranching and the associated roads,
4 solar projects, transmission lines, oil and gas development, and OHV use have all shaped the current state
5 of the soil resources. The impacts of present actions in the CEAA would be very similar to the past
6 actions. In general, construction activities from the proposed Project would contribute to the modification
7 of the soil resource. However, since the proposed Project is largely routed to follow existing ROWs and
8 disturbed areas, the construction activities are only anticipated to have minor, short-term impacts which
9 would be a result of the surface disturbance activities.

10 Reasonably foreseeable actions in the CEAA that, when combined with the proposed Project
11 construction, may have cumulative impacts to the soil resources including increased wind and water
12 erosion rates in areas where ground surface disturbance occurs. The foreseeable actions within the CEAA
13 include the proposed SunZia Transmission Line Project, small (<100 MW) and large-scale (>100 MW)
14 solar projects, substation construction and expansions, maintenance and upgrades to existing distribution
15 and transmission lines (ranging from less than 230 kV to greater than 500 kV lines), and the future
16 expansion of the communities and roadways (i.e., planned residential development) within the CEAA
17 (e.g., Tucson) (see table 4.21-1).

18 **OPERATION AND MAINTENANCE**

19 During operation and maintenance, the interaction of the actions within the CEAA and the proposed
20 Project, or action alternatives, would be a beneficial, minor, and short-term cumulative effect for the soil
21 resources. During this phase roads would be maintained resulting in less wind and water erosion of soils.
22 However when the operation and maintenance for the proposed Project is combined with future
23 development, a minor cumulative effect would occur. Since the majority of the proposed Project utilizes
24 existing ROWs and disturbed areas, this would result in a minor impact that would be long-term and for
25 the life of the proposed Project, which includes the loss of soil resources due to sites occupied by facilities
26 or unauthorized off-road vehicle use from construction on any of the cumulative projects identified with
27 inadequate access control. Further, operation and maintenance activities of the proposed Project would
28 result in minor cumulative effects, since the Project would already be constructed and standard operation
29 and maintenance activities would be so periodic as to not affect soil resources after they have recovered
30 from construction restoration. Decommissioning and reclamation can recover some of the soil
31 productivity, but is not 100 percent effective. The implementation of BMPs and reclamation on any of
32 these projects would minimize soil impacts; therefore, both the short- and long-term cumulative impacts
33 of the proposed Project would be negligible.

34 ***Cultural Resources***

35 The geographic analysis area for cumulative impacts to cultural resources is the CEAA described in
36 section 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This CEAA for
37 analyzing potential cumulative impacts to cultural resources represents a reasonable region in which
38 cultural resources with similar characteristics (as well as similar temporal and cultural affiliation) as those
39 within the Project ROW and, when assessed in combination with other cumulative actions, would be
40 impacted if the proposed Project were implemented. Cumulative actions discussed herein are based on the
41 existing conditions of the cultural resources affected environment described in chapter 3 and the relevant
42 projects presented in table 4.21-1. In addition, existing highways (i.e., I-10, U.S. 70, U.S. 191, and SR 80)
43 are considered for the cumulative impacts analysis for cultural resources.

1 **CONSTRUCTION**

2 Past construction in the CEAA has occurred in areas with important cultural resources along the New
3 Build and Upgrade Sections. The construction of existing pipelines, railroads, and highways would have
4 had the greatest effect on cultural resources through ground disturbance; transmission lines are more
5 flexible and can be designed to avoid resources, as well as have less ground disturbance. For example,
6 I-10 follows a similar alignment to the proposed Project in places and has a large “footprint” overall for
7 ground disturbance. However, for many of these past projects adverse effects to cultural resources would
8 have been mitigated under Section 106 of the NHPA, which would serve to reduce the adverse effects of
9 construction. Mitigation for most cultural resources would have involved data recovery which would
10 contribute to our knowledge of prehistoric and historic peoples. In the Tucson Basin especially, data
11 recovery projects conducted in compliance with Section 106 have greatly expanded our understanding of
12 early agriculture and other important developments.

13 Past construction of transmission lines has contributed to visual impacts to historic trails by altering the
14 setting of the trails. Several existing transmission lines cross or run near the Anza Trail corridor and the
15 Butterfield Trail which have impacted their setting. In addition, because the route followed by the
16 Butterfield Trail through southwestern New Mexico and Arizona is a logical travel and routing corridor,
17 several existing highways (e.g., I-10), pipelines, and railroads also run near or cross the trail and likely
18 have impacted any physical signs of the trail. Some of these projected were constructed prior to the
19 implementation of the NHPA, so adverse impacts may not have been mitigated, which contributes to
20 cumulative impacts.

21 Reasonable foreseeable actions, when combined with past actions and the proposed Project, that may
22 contribute to cumulative effects include the SunZia Transmission Line (515 miles), proposed energy
23 generation facilities including several small (<100 MW) and large (>100MW) solar facilities, residential
24 developments, road improvements, and upgrades and maintenance to existing transmission lines. Ground
25 disturbance associated with these projects would contribute to cumulative impacts if cultural resources are
26 present; however, these projects are subject to applicable State and Federal laws and regulations, and
27 adverse impacts would be reduced through mitigation in accordance with those State and Federal laws
28 and regulations. If data recovery is conducted as mitigation, these projects have the potential to contribute
29 to our knowledge of the past and may result in a moderate, long-term positive effect.

30 The construction phase of the proposed Project may contribute to cumulative impacts to cultural
31 resources, but most impacts would be avoided according to Southline’s POD. Direct impacts to cultural
32 resources from ground disturbance during construction range from minor to major through the route of
33 the proposed Project. The New Build Section ranges from moderate to major impacts; the Upgrade
34 Section ranges from minor to moderate. Although there is a potential for impacts from ground disturbance
35 to cultural resources from construction, as stated in section 4.9, adverse impacts to cultural resources
36 would be mitigated in accordance with all applicable regulations, guidelines, and Southline’s POD.
37 As stated in the POD, avoidance of resources during the final design stage would be the preferred form of
38 mitigation. Because avoidance would be the primary form of mitigation used, little to no direct
39 cumulative impacts are expected from the proposed Project. Additionally, the proposed Project is
40 primarily routed following existing ROWs and other disturbed areas, for which impacts to cultural
41 resources may have already been mitigated.

42 Some cumulative visual impacts to trails and historic properties for which setting is an important
43 characteristic are expected from the proposed Project. For example, in places where the proposed
44 transmission line would cross or run near the Butterfield Trail, the setting would be altered by the
45 presence of the structures and lines of the proposed Project.

1 **OPERATION**

2 The operation and maintenance of existing projects, the proposed Project, and reasonably foreseeable
3 projects would have minor, long-term impacts; however, is not expected to contribute to cumulative
4 effects to cultural resources. The operation of the proposed Project or other projects is not likely to result
5 in any additional ground disturbance. As discussed above, the presence of the transmission line would
6 impact the setting of some historic trails and historic properties, but the operation of the line would not
7 involve any further alterations to setting after construction is complete. Maintenance activities may
8 encounter unexpected cultural resources; however, maintenance activities would be subject to the
9 applicable State and Federal laws and regulations and adverse impacts to those resources would be
10 mitigated in accordance with those regulations.

11 ***Water Resources***

12 The geographic analysis area for cumulative impacts to water resources is the CEAA described in section
13 4.21.2. The temporal scope is for the life of the Project, which is 50 years. With respect to water
14 resources, impacts can be cumulative if they occur nearby in the same watershed or on the same water
15 body. This CEAA for analyzing potential cumulative impacts to water resources includes the immediate
16 drainage area associated with water bodies and floodplains that are also crossed by the proposed Project.
17 Drainage areas affected include the Mimbres, San Simon, and Willcox Playa subbasins in the New Build
18 Section of the CEAA and the Upper Santa Cruz and Lower Santa Cruz subbasins in the Upgrade Section
19 of the CEAA.

20 Cumulative actions are based on the existing conditions of the water resources affected environment
21 described in chapter 3 and the relevant projects presented in table 4.21-1. Future actions that could
22 contribute to cumulative effects to water resources include the proposed SunZia and High Plains Express
23 projects, five proposed energy projects (Sappharie, New Solar Ventures, Bright Source, NextLight, and
24 Safford Solar energy), the proposed UA Tech Park Thermal Storage, and proposed Silverbell Road
25 improvements. Other reasonably foreseeable projects would likely be mitigated by avoidance or
26 implementation of BMPs. The proposed Organ Mountains Desert Peaks National Monument is likely to
27 improve watershed conditions overall. Reasonably foreseeable actions that impact the drainage areas
28 would, in combination with impacts from the proposed Project, result in minor to negligible cumulative
29 impacts to water resources in the Mimbres, Willcox Playa, and Upper Santa Cruz subbasins, and minor to
30 moderate cumulative impacts to water resources in the San Simon Subbasin.

31 ***Biological Resources***

32 **VEGETATION**

33 The geographic analysis area for cumulative impacts (CEAA) to vegetation coincides with the study
34 corridor for the affected environment; for the New Build Section of the Project this includes 1 mile on
35 either side of the centerline of alternatives carried forward and any substation or access roads outside that
36 corridor; for the Upgrade Section of the Project this includes a 500-foot corridor (200 feet off of existing
37 100-foot corridor) of each alternative. In addition to this analysis area, projects that are adjacent to the
38 Southline CEAA and have the potential to cumulatively impact vegetation are also assessed (table
39 4.21-3). This analysis area is more restricted than the larger CEAA discussed in section 4.21.2 because
40 vegetation is relatively non-mobile (minus seed dispersal) and vegetation resources are more sensitive to
41 local impacts in the immediate proximity of vegetation rather than broader regional impacts. Broader-
42 scale potential impacts such as noxious weed dispersal and wildfire spread are addressed on a per-project
43 basis below, relative to the affected environment study corridors. The temporal scope is for the life of the
44 Project, which is 50 years. This CEAA for analyzing potential cumulative impacts to vegetation

1 represents a reasonable region in which existing vegetation, when assessed in combination with other
2 cumulative actions, would be impacted if the proposed Project were implemented. Cumulative actions
3 discussed herein are based on the existing conditions of the vegetation resources affected environment
4 described in chapter 3 and the relevant projects presented in table 4.21-1.

5 Of the 41 projects identified within the Southline CEAA, three proposed projects are identified that will
6 have portions located inside the analysis area selected for vegetation resources: the proposed SunZia
7 project, Sapphire Energy Algae Facility, and the Bowie Power 345 kV Transmission Line. Potential direct
8 cumulative impacts from these three projects are discussed below. In addition, 28 other projects are
9 within approximately 10 miles of the vegetation CEAA, including some existing transmission lines that
10 parallel routing for the proposed Southline Project and might generate indirect cumulative impacts such as
11 reductions in acreages of particular native plant communities in the region, shared watershed impacts, and
12 point sources for exotic invasive weeds and wildfire that might spread via wind across greater landscapes
13 to the CEAA. Potential cumulative impacts from those 28 projects are presented below.

14 Discrete portions of the proposed SunZia Transmission Line project are located within portions of the
15 CEAA. The BLM preferred alternative in the SunZia FEIS route is parallel and adjacent to portions of the
16 proposed Southline New Build Section from a point northeast of Deming, New Mexico, to a point west of
17 Willcox, Arizona. Local alternatives DN1 and LD4 were developed to collocate or parallel the proposed
18 SunZia project agency preferred alternative. Local alternative DN1 would parallel the proposed SunZia
19 project for 42.5 miles, and LD4 would parallel SunZia for 50 miles. The proposed SunZia route diverges
20 far away from the Upgrade Section. The proposed SunZia project would likely result in similar linear
21 disturbance to native vegetation as the proposed Southline Project and therefore contribute to cumulative
22 loss of native vegetation in the region of the New Build Section routes. Associated infrastructure for the
23 proposed SunZia project would also add to cumulative fragmentation of native plant communities, but
24 also along the same corridor as the proposed Southline project. In areas where the proposed SunZia
25 project are parallel, overall new disturbance to vegetation would be reduced since construction activities
26 for both projects would occur in the same areas. Seventeen SWReGAP vegetation community types along
27 with developed agricultural lands will be impacted by the proposed SunZia project, but the primary
28 vegetation types that would be cumulatively impacted are the widespread Apacherian-Chihuahuan
29 Piedmont Semi-Desert Grassland and Steppe, Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub,
30 and Chihuahuan Sandy Plains Semi-Desert Grassland, Chihuahuan Stabilized Coppice Dune and Sand
31 Flat Scrub vegetation types. No rare or sensitive vegetation types would be cumulatively impacted by the
32 proposed Southline and SunZia projects and given that the vegetation types that would be impacted are
33 common and widespread, cumulative impacts to vegetation communities would be minor. Special status
34 plant species that may be cumulatively impacted include dune pricklypear, Gregg night-blooming cereus,
35 Parish's alkali grass, Chihuahuan scurf pea, devilhorn hedgehog cactus, San Carlos wild-buckwheat,
36 slender needle corycactus, Wilcox pincushion cactus, varied fishhook cactus, button cactus, playa spider
37 plant, and needle-spined pineapple cactus. Noxious and other invasive exotic weeds are already present
38 along this route including African rue, starthistle, tamarisk, hoary cress, Russian thistle, filaree, and
39 mustards. Cumulative impacts from increased introduction and spread of noxious weeds and increased
40 potential for wildfire are likely to be minor because of the shared route corridors through the greater
41 landscapes.

42 The Sapphire Energy Algae Facility is a "green crude" demonstration farm and production project
43 consisting of a 300-acre algae farm with the capacity to produce 1.5 million gallons of biofuel annually.
44 The proposed algae facility is located inside the CEAA near the Proponent Alternative (New Build
45 Section, subroute 1.2), near the town of Columbus. The project footprint for the algae farm would result
46 in direct permanent disturbance to vegetation and therefore contribute to cumulative loss of native
47 vegetation in the region. The farm and pond segments would also add to cumulative fragmentation of
48 native plant communities. The Sapphire Energy Algae Facility is located along an abandoned railroad

1 line, in an area of existing agricultural disturbance. Much of the area to the west and north of the algae
2 facility is already developed as agricultural fields. Existing SWReGAP vegetation communities in that
3 area include about equal amounts of Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub, and
4 Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe, with smaller amounts of
5 Apacherian-Chihuahuan Mesquite Upland Scrub. Those three vegetation community types are common
6 and geographically widespread, and any specific cumulative impacts from the algae facility and proposed
7 Southline Project will be minor to those widespread vegetation types. Special status species that may be
8 present in the area include: dune pricklypear, Gregg night-blooming cereus, Parish's alkali grass, and the
9 Chihuahuan scurfpea. Since there already is considerable disturbance in the immediate area from
10 agricultural fields to the west, noxious and other exotic invasive weeds are likely present in the area, so
11 further increases in the spread of noxious weeds from the cumulative impacts of the algae facility and the
12 proposed Southline Project would be minor. Possible noxious weeds in the area include African rue and
13 starthistles, along with other exotic invasive weeds that are not classified as noxious, such as Russian
14 thistle, kochia, filaree, and mustards.

15 The Bowie Power 345-kV Transmission Line would connect the proposed Bowie Power Plant, a natural
16 gas-fired power plant planned for southeastern Arizona near the community of Bowie in Cochise County,
17 and the proposed 345-kV Willow Substation located within 0.65 mile of route group 2 local alternatives,
18 especially LD4. The primary SWReGAP vegetation community types that occur in the area are
19 Apacherian-Chihuahuan Mesquite Upland Scrub, Chihuahuan Creosotebush, Mixed Desert and Thorn
20 Scrub, Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe. These are widespread
21 vegetation types in the region. No rare or sensitive vegetation communities would be cumulatively
22 impacted by the proposed Southline Project and the Bowie Transmission Line and given that the
23 vegetation types that would be impacted are common and widespread, cumulative impacts to vegetation
24 communities would be minor. Agricultural development is considerable just east of this area in the
25 northwestern portion of the San Simon Valley. Special status plant species that may be affected include
26 Gregg night-blooming cereus, devilhorn hedgehog cactus, San Carlos wild-buckwheat, slender needle
27 corycactus, Wilcox pincushion cactus, varied fishhook cactus, button cactus, playa spider plant, and
28 needle-spined pineapple cactus. Cumulative impacts on special status species would be potentially greater
29 from both projects in the region. Noxious and other invasive exotic weeds including tamarisk, hoary
30 cress, Russian thistle, filaree, and mustards occur in the area. Cumulative impacts from the potential
31 introduction and spread of noxious weeds and increased potential for wildfire would be increased slightly
32 in the area due to the additive disturbances from both transmission lines, and such cumulative impacts
33 would be minor to moderate given the relatively small footprint of this proposed Project.

34 A network of existing transmission lines, natural gas pipelines, and railroads occurs throughout the
35 Southline CEAA that will contribute to cumulative impacts to vegetation. However, most of those are
36 located outside of the vegetation analysis area corridors, and as existing features will contribute minor
37 impacts, or are located far enough away from the proposed Southline Project as to be negligible. Various
38 other past, present, and future projects are located adjacent to the analysis area and may potentially impact
39 vegetation within the Southline CEAA. These projects and their potential cumulative impacts are
40 described in table 4.21-3.

41 In addition to identified projects, dispersed recreation, non-Project-related vehicle traffic, and other uses
42 also impact vegetation throughout the ROW and adjacent areas. Domestic livestock grazing, for example,
43 is a land use throughout the Project region, especially on BLM lands, that has historically impacted
44 vegetation communities, and is presently and for the foreseeable future, an ongoing land use that would
45 continue to affect vegetation. OHV activity often increases along ROW roads throughout a project region,
46 especially closed and restored or unimproved access roads. OHV activity may further impact vegetation
47 directly by crushing plants, and indirectly by creating soil disturbance and erosion, producing
48 environments favorable for the colonization of noxious weeds and other invasive exotic plant species.

1 OHV use may also cause increased wildfire threats. Any additional impacts are expected to be minimal if
 2 activities are restricted to existing road surfaces. Private landowners also have wide latitude to conduct
 3 activities on their properties that would impact vegetation communities. These activities are, however,
 4 difficult to predict in time or space and their impacts are therefore not quantifiable.

5 Table 4.21-3 lists the projects that fall outside of the CEAA for vegetation resources but due to their
 6 location adjacent to the proposed Southline Project have the potential to cumulatively impact vegetation.
 7 See text above for the three projects that fall within the analysis area.

8 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
New Build Section, Past and Present Projects			
Existing distribution lines less than 230-kV	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico. 381 miles of disturbance Variable distance from Southline ROW Existing distribution lines less than 230-kV are anticipated to continue their current operation for the life of the project.	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual transmission lines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.
Existing transmission lines (230-kV and greater)	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico. 303 miles of disturbance Variable distance from Southline ROW Existing distribution lines greater than 230-kV are anticipated to continue their current operation for the life of the project.	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual transmission lines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.
Existing Gas Pipelines	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico. 1,245 miles of disturbance Variable distance from Southline ROW All existing pipelines are anticipated to continue their current operation for the life of the project.	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual pipelines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.

9

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Existing Railroads	Doña Ana, Hidalgo, Luna, and Grant counties, New Mexico. 428 miles of disturbance Variable distance from Southline ROW	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual rail lines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.
New Build Section, Reasonably Foreseeable Future Projects			
Potential Network Upgrades	El Paso County, Texas and Doña Ana County, New Mexico Variable distance from Southline ROW Upgrades within existing substations at Newman Substation southeast of Afton Substation and in Doña Ana Substation located on the northwest side of Las Cruces, New Mexico. Potential Network Upgrades would occur completely within existing substations fence lines. Existing access to the substations would be used for construction, operation, and maintenance of the Potential Network Upgrade project.	Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub Apacherian-Chihuahuan Mesquite Upland Scrub	Not likely to contribute to cumulative disturbance because activities will be limited to existing footprints and access routes.
New Solar Ventures/Solar Torx	Planned 300-MW photovoltaic solar power plant. Project would be less than a mile from subroute 1.1 in the New Build Section in Luna County, New Mexico. No schedule identified. Not currently under active development.	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	If developed could potentially directly impact vegetation under project footprint. Disturbance acreage unknown. Is in an area with minimal existing disturbance; however vegetation community types are common and geographically widespread. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Significance of impacts unknown due to undetermined acreage.

2

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Solar Reserve, LLC-1	Planned 100-MW solar power plant. Project schedule unknown. Within 5 miles of Proponent Preferred Alternative and Proponent Alternative	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 5,296 acres of vegetation. Project is close to Lordsburg and within a mile of scattered residences so would impact an area of already preexisting disturbance. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Due to acreage of disturbance impacts to vegetation communities and potential special status species could be moderate and long-term (over the life of the project), however the community types are common and geographically widespread, and the project is located in an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Lordsburg Mesa, Iberdrola Renewables	Planned 1,500-MW solar power plant, within 10.94 miles of the route group 2 Local Alternatives in the New Build Section. Project schedule unknown.	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe Chihuahuan Stabilized Coppice Dune and Sand Flat Scrub North American Warm Desert Wash Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 24,320 acres of vegetation. Project is in an undisturbed area but less than a half mile from a road. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Due to acreage of disturbance, impacts to vegetation communities and potential special status species could be moderate and long-term (over the life of the project) however the community types are common and geographically widespread, and the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Planned Residential Development Projects New Mexico	Both the City of Deming and City of Lordsburg plan for amendments to their municipal zoning and planned-unit development ordinances are anticipated to expand their municipal boundaries to private and State lands in order to facilitate planned residential development. Variable distance from Southline ROW	Locations unknown. Impacts likely to various desert grassland scrub communities	Additional expansion of residential and commercial development into undisturbed land would further directly impact vegetation communities and contribute to cumulative loss of native species and impacts to special status species and noxious weeds. Since the location and extent of development is unknown, exact impacts cannot be assessed at this time.
Safford Solar Energy	Planned 250-MW solar project adjacent to subroute 2.2 in the New Build Section. Project currently at a standstill due to lack of power transmission connection agreement.	Apacherian-Chihuahuan Mesquite Upland Scrub Chihuahuan Mixed Salt Desert Scrub Developed, Medium - High Intensity	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 22,891 acres of vegetation. Is on the edge of a residential area of San Simon and within an area of existing disturbance. Is close to existing pipeline, transmission line routes and other rural development. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Due to acreage of disturbance, impacts to vegetation communities and potential special status species could be moderate and long-term (over the life of the project) however the community types are common and geographically widespread, and the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.

2

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Bowie Power Station	Planned 1,000-MW natural gas-fired power station within 0.89 mile of subroute 2.2 in the New Build Section	Agriculture Apacherian-Chihuahuan Mesquite Upland Scrub Chihuahuan Mixed Salt Desert Scrub	If developed could potentially directly impact vegetation under project footprint. Actual disturbance acreage is unknown. Is close to existing pipeline, transmission line routes and other urban development. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Significance of impacts unknown due to undetermined acreage.
New Build Section, Future Projects			
BrightSource Energy	Planned solar project including 6,574 acres in Hidalgo County and 7,520 acres in Luna County. Exact location unknown.	Variety of desert grassland and scrub communities	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 14,100 acres of vegetation. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Exact location of disturbance is unknown therefore significance of impacts to vegetation cannot be assessed at this time.
NextLight Renewable Power	Planned solar project including 2,722 acres in Luna County and 3,714 acres in Hidalgo County. Exact location unknown.	Variety of desert grassland and scrub communities	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 7,301 acres of vegetation. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Exact location of disturbance is unknown therefore significance of impacts to vegetation cannot be assessed at this time.
Upgrade Section, Past and Present Projects			
Existing distribution lines less than 230-kV	Cochise, Pima, and Pinal counties, Arizona 394 miles of disturbance Existing distribution lines less than 230-kV are anticipated to continue their current operation for the life of the project. Variable distance from Southline ROW	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual transmission lines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.
Existing transmission lines (230-kV and greater)	Cochise, Pima, and Pinal counties, Arizona 200 miles of disturbance Existing distribution lines greater than 230-kV are anticipated to continue their current operation for the life of the project. Variable distance from Southline ROW	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual transmission lines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Existing Gas Pipelines	Cochise, Pima, and Pinal counties, Arizona 222 miles of disturbance Existing pipelines are anticipated to continue their current operation for the life of the project. Variable distance from Southline ROW	Variety of desert grassland and scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual pipelines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.
Existing Railroads	Cochise, Pima, and Pinal counties, Arizona 93 miles of disturbance Variable distance from Southline ROW	Variety of desert grassland scrub communities	In collocated areas this project contributes to cumulative linear disturbance. Additional existing loss of vegetation, community fragmentation, introduction and spread of noxious species and potential loss of special status species. Significance of cumulative impacts varies depending on proximity of Southline to individual rail lines and potential for shared corridor impacts versus new additional impact acreages imposed by Southline. Generally, these cumulative impacts will be relatively insignificant given that Southline does not impact any particularly sensitive or small localized plant communities in this region.
Buffalo Soldier Electronic Testing Range (BSETR)	A Fort Huachuca facility that is the principal Army Test Center for testing of command, control, communications, computer, and intelligence equipment and systems in real, virtual, and constructive environments. 1.6 million acres of disturbance Segments of the proposed Southline Project (subroute 3.1—segments U1a, U1b, and U2 requiring upgrade or local alternative H) cross the BSETR. Variable distance from Southline ROW	Apacherian-Chihuahuan Piedmont Semi-Desert Grassland and Steppe Apacherian-Chihuahuan Mesquite Upland Scrub Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub Agriculture Developed, Medium - High Intensity Madrean Encinal Madrean Pine-Oak Forest and Woodland	The exact locations of vegetation disturbance related to BSETR operations are unknown so impact analysis cannot be completed at this time. Cumulative impacts of the Southline project within the BSETR however would contribute linear disturbance impacts to vegetation communities, increased fragmentation of native species, and impacts to special status species and noxious species. The dominant vegetation communities within the BSETR area and the Southline segments are common and geographically widespread therefore any cumulative impacts to vegetation communities resulting from construction and operation of the Southline project are expected to be negligible/minimal and short-term.

2

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Upgrade Section, Reasonably Foreseeable Future Projects			
UA Tech Park Thermal Storage/Bell Independent Power Corporation	Planned 5-MW CSP project utilizing parabolic trough technology located approximately 1 mile from segment U4 of subroute 4.1 within the Upgrade Section.	Sonoran Paloverde-Mixed Cacti Desert Scrub Developed, Open Space - Low Intensity Developed, Medium - High Intensity Sonora-Mojave Creosotebush-White Bursage Desert Scrub Sonoran Mid-Elevation Desert Scrub	If developed could potentially directly impact 200 acres of vegetation. The project is located in an area of heavy commercial/industrial disturbance. Would contribute to cumulative loss of vegetation communities across the region and potential impacts to special status species and noxious weeds. Impacts to vegetation communities and potential special status species could be long-term (over the life of the project) however the community types are common and geographically widespread, and the disturbance acreage relatively small; furthermore the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Silverbell Road Improvements	Planned road improvement project by the City of Tucson to widen and install a median to the existing road that would be intersected by segment U3i of subroute 4.1 within the Upgrade Section.	Sonoran Paloverde-Mixed Cacti Desert Scrub Developed, Open Space - Low Intensity	Would create 8 miles of linear disturbance in an already disturbed area of existing roadway and residential and industrial urban development. Would result in negligible cumulative loss of vegetation communities and special status species in the region. Impacts to vegetation communities and potential special status species could be long-term (over the life of the project) however the community types are common and geographically widespread, and the disturbance acreage relatively small; furthermore the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Fotowatio Renewable Ventures	Planned 25-MW solar photovoltaic energy facility located approximately 2 miles west of the proposed route in the Upgrade Section.	Sonoran Paloverde-Mixed Cacti Desert Scrub Agriculture Sonora-Mojave Creosotebush-White Bursage Desert Scrub North American Warm Desert Riparian Mesquite Bosque Developed, Open Space - Low Intensity Barren Lands, Non-specific	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 305 acres of vegetation. Project is in an area close to existing disturbance, residential industrial, and agricultural lands. Would result in negligible cumulative loss of vegetation communities and special status species in the region. Impacts to vegetation communities and potential special status species could be long-term (over the life of the project) however the community types are common and geographically widespread, and the disturbance acreage relatively small; furthermore the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Avra Valley Solar Project/NRG Solar	Planned 25-MW solar photovoltaic energy facility to be located approximately 3.6 miles west of segment U3j of subroute 4.1 within the Upgrade Section.	Sonoran Paloverde-Mixed Cacti Desert Scrub Agriculture Sonora-Mojave Creosotebush-White Bursage Desert Scrub North American Warm Desert Riparian Mesquite Bosque Developed, Open Space - Low Intensity Barren Lands, Non-specific	If developed could potentially directly impact vegetation under project footprint. Disturbance could remove 300 acres of vegetation. Project is in an area close to existing disturbance, residential, industrial, and agricultural lands. Would result in negligible cumulative loss of vegetation communities and special status species in the region. Impacts to vegetation communities and potential special status species could be long-term (over the life of the project) however the community types are common and geographically widespread, and the disturbance acreage relatively small; furthermore the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Pinal Central to Tortolita 500-kV Transmission Line	Planned single-circuit 500-kV transmission line; 40 miles of new line between Pinal Central substation and Tortolita substation. The Proponent Preferred (subroute 4.1) interconnects at Tortolita substation.	Sonoran Paloverde-Mixed Cacti Desert Scrub Agriculture Sonora-Mojave Creosotebush-White Bursage Desert Scrub North American Warm Desert Riparian Mesquite Bosque Developed, Open Space - Low Intensity Barren Lands, Non-specific	If developed could potentially result in 40 linear miles of disturbance. Project is collocated with existing transmission lines along some of its length. Would contribute to cumulative loss and fragmentation of vegetation communities across the region and impacts to special status species and noxious species. The vegetation communities impacted however are common and geographically widespread, and the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Vail-to-Valencia 115-kV to 137-kV Upgrade Transmission Line	38-kV link between Tucson Electric Power's Vail substation and UES' Valencia substation in Nogales. The Proponent Preferred (subroute 4.1) would interconnect to the Vail substation and run west and south to the Nogales substation, ranging from less than 200 feet near the Vail substation to approximately 45 miles at the Valencia substation in Nogales.	Sonoran Paloverde-Mixed Cacti Desert Scrub Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub Agriculture Sonora-Mojave Creosotebush-White Bursage Desert Scrub North American Warm Desert Riparian Mesquite Bosque Developed, Open Space - Low Intensity Barren Lands, Non-specific	If developed could potentially result in 45 linear miles of disturbance. Project is collocated with existing transmission lines along some of its length. Would contribute to cumulative loss and fragmentation of vegetation communities across the region and impacts to special status species and noxious species. The vegetation communities impacted however are common and geographically widespread, and the project is located close to an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Upgrade Section, Future Projects			
Tucson-Apache Pole Replacement Project	Western is proposing to conduct pole replacement, access road improvements, and vegetation management along portions of their Tucson to Apache 115-kV transmission line. 149 wood H-frame structures have been selected for in-kind replacement and vegetation management is proposed near the San Pedro River in Benson, Arizona. All project-related access will be along existing access roads, however about 20 non-contiguous miles of access road will require improvement.	Sonoran Paloverde-Mixed Cacti Desert Scrub Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub Agriculture Sonora-Mojave Creosotebush-White Bursage Desert Scrub North American Warm Desert Riparian Mesquite Bosque Developed, Open Space - Low Intensity Barren Lands, Non-specific	If implemented could potentially result in 80 linear miles of disturbance within a preexisting ROW. The greatest impacts would be related to upgrade of 20 miles of access roads. Would contribute to cumulative loss and fragmentation of vegetation communities across the region and impacts to special status species and noxious species. The vegetation communities impacted however are common and geographically widespread, and the project is located within an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.

2

1 **Table 4.21-3. Projects Outside the CEAA for Vegetation Resources (Continued)**

Project Name	Project Description	SWReGAP Vegetation Community Type	Cumulative Impacts
Abandonment and Removal of existing Western Line Saguaro-Tucson and Tucson-Apache	If the proposed Southline Project were to be approved the existing transmission line in the Western ROW would be abandoned and removed once the new Southline transmission line is complete.	Sonoran Paloverde-Mixed Cacti Desert Scrub Chihuahuan Creosotebush, Mixed Desert and Thorn Scrub Agriculture Sonora-Mojave Creosotebush-White Bursage Desert Scrub North American Warm Desert Riparian Mesquite Bosque Developed, Open Space - Low Intensity Barren Lands, Non-specific	If implemented could potentially result in 120 linear miles of disturbance within a preexisting ROW. Would contribute to cumulative loss and fragmentation of vegetation communities across the region and impacts to special status species and noxious species. The vegetation communities impacted however are common and geographically widespread, and the project is located within an area of existing disturbance and therefore cumulative impacts are unlikely to be significant.
Planned Residential Development Projects Arizona	The City of Willcox, Benson, Vail, Tucson, and Marana plan for amendments to their municipal zoning and planned-unit development ordinances are anticipated to expand their municipal boundaries to private and State lands in order to facilitate planned residential development.	Locations unknown. Impacts likely to various desert grassland scrub communities.	Additional expansion of residential and commercial development into undisturbed land would further directly impact vegetation communities and contribute to cumulative loss of native species and impacts to special status species and noxious weeds. Since the location and extent of development is unknown, exact impacts cannot be assessed at this time.

2 Cumulative effects as a result of past, present, and reasonably foreseeable future actions (including the
 3 proposed Project) would be long-term removal and degradation of natural vegetative communities.

4 Direct cumulative effects to vegetation resources would be additive and proportional to the amount of
 5 ground disturbance for each individual project, determined by the width of the construction zone for the
 6 linear projects vs. the width of the permanent ROW, the vegetative associations and special status species
 7 present, and the extent of permanent facilities associated with each project. In addition, the quality of the
 8 vegetation resource in neighboring areas would be indirectly impacted by surface disturbance, dust, wind
 9 dispersal of exotic invasive weed seeds and wildfire, and other off-site intrusions. A distinction can be
 10 made between the cumulative temporary loss of vegetation that is removed over the active life of project
 11 activities but can be reclaimed after project activities have been completed, and permanent loss of
 12 vegetation that remains indefinitely at the end of project activities and after the project sites are closed.
 13 Both direct and indirect, and temporary and permanent, cumulative impacts result from the existing and
 14 reasonably foreseeable projects identified. Projects that impact large acreages of landscape not already
 15 disturbed, such as solar array projects that will result in thousands of acres of new impacts, are likely to
 16 contribute to cumulative impacts more so than linear transmission or pipeline projects that may share
 17 already disturbed acreages or other indirect impacts with the proposed Southline Project.

18 **CONSTRUCTION**

19 Construction impacts are those impacts associated with initial ground disturbance or upgrade activities
 20 and access for construction vehicles.
 21

1 **Vegetation Communities**

2 Native vegetation communities predominate within the analysis area and the foreseeable future actions
3 identified within the analysis area. Many areas are already disturbed by agriculture, grazing, transmission
4 lines, pipelines, and a variety of roads. Domestic livestock grazing has historically changed the
5 composition of most plant communities throughout the region, and the impacts of livestock grazing
6 continue currently and for the foreseeable future. The impacts of domestic livestock grazing are
7 particularly evident at the plant community level, where changes in species composition result.
8 Historically, poorly managed livestock grazing changed many desert grassland areas of southern New
9 Mexico and southeastern Arizona to shrub-dominated areas with little and/or different perennial grass
10 species.

11 The majority of the vegetation communities are composed of native shrub and grassland with variable
12 recovery times after disturbance. Direct loss of vegetation cover through ground-disturbing construction
13 activities is expected, and infrastructure, including transmission lines, substations, access roads, etc.,
14 associated with the proposed Project, as well as other foreseeable projects within the analysis area, is
15 likely to cause fragmentation of the vegetation communities. Future developments in the region could
16 also contribute to overall habitat loss and fragmentation of vegetation communities and habitats, although
17 this is mitigated through locating actions within previously disturbed areas. Most proposed actions
18 usually avoid highly sensitive habitats in order to minimize impacts to vegetation communities that would
19 take long periods to recover or that comprise rare or sensitive plant species.

20 Indirect cumulative effects associated with the proposed Project and foreseeable future actions include
21 change in vegetation in disturbed areas from native to non-native (and potentially noxious) species. Each
22 additional ground disturbance in the area provides increased opportunity for introduction and invasion by
23 noxious weeds beyond the initial disturbance area.

24 **Special Status Species**

25 As discussed in Chapter 3, “Affected Environment,” multiple species of special status plants were
26 observed or predicted to occur within the analysis area, including a large number of FWS special status
27 species and BLM sensitive species. A cumulative, incremental loss of habitat would result for both
28 sensitive plant species and common plants which occur in the areas disturbed by one or more of the
29 identified projects in the cumulative effects analysis area. It is expected that both the proposed Project and
30 identified cumulative effects projects within or adjacent to the Southline analysis area and/or ROW would
31 obtain detailed information about the presence, if any, of special status species prior to construction, and
32 would take appropriate measures to avoid or minimize adverse effects on those species. The BLM is
33 likely to require that any foreseeable actions within or adjacent to the Southline analysis area and/or ROW
34 carry out similar surveys for special status species. If identified, special status species would be, wherever
35 possible, avoided on Federal lands that are subject to BLM ROW grant stipulations. Because of the high
36 density of projects in the region, however, and in some cases the approval of more than one project within
37 a single ROW, total avoidance of special status species may not be possible. As a result of overlap with
38 the Project, some foreseeable actions (the proposed SunZia project, Sapphire Energy Algae Facility,
39 Safford Solar Energy Center, and the Silverbell Road Improvements) might cumulatively impact some
40 special status species, depending on the coordination of BMPs across all projects. Ideally, all special
41 status species impacts would be avoided or mitigated.

42 Individual projects are required to implement measures to mitigate impacts to special status species,
43 which reduces the potential for both individual and cumulative impacts to vegetation. Because of the
44 implementation of Project-specific mitigation measures and requirements for restoration and remediation
45 on a Project-specific basis, cumulative effects associated with loss of vegetation are expected to be

1 minimized. The cumulative effects of the identified cumulative projects and uses on vegetation resources
2 would be short-term and minor, and therefore below the level of significance.

3 Other impacts to special status plant species include the direct and indirect effects of domestic livestock
4 grazing and OHV use. Livestock might directly trample or consume such plants, or indirectly alter the
5 habitats by increasing noxious weeds and other invasive exotic plant species, increasing plant to plant
6 competition for resources and increasing the potential for wildfire. OHVs also may crush individual
7 plants and alter habitats to favor noxious weeds and other invasive exotic plant species, and increase the
8 potential for wildfire.

9 **Noxious Weeds**

10 Ground disturbance–associated actions analyzed in the CEAA could also increase the potential for the
11 introduction and spread of noxious weeds. It is assumed the potential for establishment of invasive plants
12 would be a negative cumulative effect on reestablishment of native communities following construction.
13 The extent one or more invasive plant species could negatively affect reestablishment of native vegetation
14 is speculative; adherence of specific projects to control measures identified in invasive plant management
15 plans (or equivalent) and measures identified by the BLM would minimize the introduction and spread of
16 noxious weeds during and following construction. Domestic livestock grazing and OHV activities both
17 create soil and vegetation disturbance that favor noxious weeds and other invasive exotic plant species.
18 Adherence to PPMs for all cumulative actions in the analysis area that mitigate the introduction and
19 spread of noxious species, would result in only short-term and minor cumulative impacts to noxious
20 weeds.

21 **Operation and Maintenance**

22 Impacts associated with operation and maintenance include the continued existence of facilities on the
23 landscape, the associated maintenance activities, and the presence of access roads. The location of
24 multiple projects in the same ROW or analysis area minimizes impacts to vegetation, since multiple
25 projects can be served by the same access routes and the direct and indirect effects of disturbance are
26 contained within a smaller area.

27 ***Vegetation Communities***

28 Direct impacts associated with operation and maintenance of the proposed Project and other foreseeable
29 actions in and adjacent to the analysis area are primarily those that relate to fragmentation of plant
30 communities. Since large portions of the proposed Project are collocated with existing projects or areas of
31 planned disturbance, the overall cumulative impact is expected to be lessened and would result in only
32 short-term and minor impacts to vegetation communities.

33 ***Special Status Species***

34 Direct impacts associated with operation and maintenance of the proposed Project and other foreseeable
35 actions in and adjacent to the analysis area are primarily those that relate to fragmentation of vegetative
36 communities that contain special status plant species.

37 Individual projects are required to implement measures to mitigate impacts to special status species,
38 which reduces the potential for both individual and cumulative impacts to vegetation. Because of the
39 implementation of Project-specific mitigation measures and requirements for restoration and remediation
40 on a Project-specific basis, cumulative effects associated with loss of vegetation or fragmentation are
41 expected to be minimized. The overall cumulative effects of the identified cumulative projects and uses
42 on special status species would therefore be short-term and minor and below the level of significance.

1 **Noxious Weeds**

2 The operation/maintenance period would include maintenance activities that could contribute to the
3 ongoing spread of noxious weeds from outside of the analysis area and between the disturbance areas of
4 other foreseeable actions. Adherence of specific projects to control measures identified in invasive plant
5 management plans (or equivalent) and measures identified by the BLM would minimize the introduction
6 and spread of noxious weeds during Project operation and maintenance. The overall cumulative effects of
7 the identified cumulative projects and uses on noxious weed species would therefore be short-term and
8 minor and below the level of significance.

9 **Summary**

10 Development of the proposed Project, in conjunction with other foreseeable future projects, would
11 contribute to the ongoing fragmentation and loss of natural habitats in the Southwest. All Project subroute
12 alternatives, including the proposed Project, would have similar cumulative impacts. Cumulative impacts
13 would be reduced in most cases when linear utilities, including the proposed Project, are collocated. Other
14 types of future developments, particularly urban expansion and large-scale solar or wind energy
15 development which have significant disturbance footprints, are expected to contribute the greatest loss of
16 natural habitat in the region. Overall the past, present, and reasonably foreseeable future actions in the
17 proposed Southline Project footprint are expected to lead to short-term and only minor cumulative
18 impacts.

19 Cumulative disturbance to special status plant populations from multiple projects within the Project
20 footprint would be minimized through surveys and design and engineering to avoid individuals and
21 populations. BMPs and PPMs, including limited surface travel, erosion controls, invasive species
22 management, etc., would likely be required for all foreseeable transmission lines and other foreseeable
23 projects in order to minimize and prevent indirect impacts to these species. For those areas where
24 avoidance is difficult, loss of some sensitive plants is inevitable. The exact location and extent of this loss
25 cannot be ascertained until ROW locations have been determined.

26 **WILDLIFE CUMULATIVE IMPACTS**

27 The geographic analysis area for cumulative impacts on wildlife resources could extend to the entire
28 range of any wildlife species population that could be impacted by the proposed Project. The range of
29 some of the migratory bird species occurs from North America to South America. As the area of potential
30 cumulative impacts could cover such an enormous area, it is necessary to limit discussion of past, present,
31 and reasonably foreseeable future actions to a smaller area. For wildlife resources the CEAA described in
32 section 4.21.2 was utilized as the area of potential cumulative effects. The temporal scope is for the life of
33 the proposed Project, which would be 50 years. This CEAA represents a reasonable area in which past,
34 present, and reasonably foreseeable future projects when assessed in combination with the proposed
35 Project would impact wildlife resources and allow for meaningful impact analysis. Cumulative actions
36 discussed are based on the existing conditions of wildlife resources described in chapter 3 and the relevant
37 projects presented in table 4.21-1.

38 **Construction**

39 Past actions in the CEAA have had direct and indirect effects on wildlife resources. Historic livestock
40 grazing, proliferation of roadways and developments, electrical transmission lines, pipelines, energy
41 generation projects, water impoundment projects, groundwater pumping, mining, degradation of water
42 quality, conversion of land for agricultural uses, and the introduction and spread of non-native plant and
43 wildlife species have affected wildlife resources. The effects of these past actions include habitat loss,
44 fragmentation, and degradation; a decrease in the numbers and range of some species; increased

1 mortality; decreased reproductive success; and decreased genetic interchange between isolated
2 populations. Cumulative impacts vary depending on the species considered.

3 Historic grazing has in some areas led to habitat changes including the introduction and spread of non-
4 native plant species. The presence of non-native plant species has modified the historic fire regime,
5 especially in desert habitats. Fires in areas dominated by non-native species can be more frequent and
6 more intense and lead to long-term and permanent changes to wildlife habitat. This is especially important
7 in areas of desertscrub where the native vegetation is not adapted to fire and fires create a positive
8 feedback loop where non-native plant species burn more often and at a higher intensity than the native
9 plants. Post-fire, the non-native vegetation further increases in burned areas thereby leading to more
10 frequent and intense fires. This process can lead to the conversion of native habitats to non-native
11 grasslands and other vegetation types that do not support the same numbers or assemblages of wildlife
12 species as the native vegetation.

13 Roadways, development, pipelines, electrical transmission lines, mining, energy generation projects, and
14 conversion of land for agriculture have all contributed to wildlife habitat loss, fragmentation, and
15 degradation and have created barriers to species movement and genetic interchange for some species.

16 Groundwater pumping and water impoundments have modified and degraded large portions of the aquatic
17 and riparian habitats in the region. Water impoundment has changed the timing, frequency, and intensity
18 of floods which decreases native vegetation recruitment and favors non-native species establishment and
19 spread. Groundwater pumping has reduced or eliminated flows in many aquatic and riparian habitats
20 which led to the loss, fragmentation, and degradation of these habitats.

21 Other past actions that have contributed to the protection of wildlife and special status species and their
22 habitats have also occurred; these include the establishment of National Monuments, National Parks,
23 Wilderness Areas, National Conservation Areas, designation of critical habitat, and other preserves,
24 parks, and special management areas.

25 Impacts on wildlife and special status wildlife species from present actions would be similar to those
26 described for past actions in the CEAA. Ongoing actions including livestock grazing, roadways and
27 developments, electrical transmission lines, energy generation projects, mining projects, water
28 impoundments, groundwater pumping, and the introduction and spread of non-native plant and wildlife
29 species would contribute to impacts. Impacts from present actions would be similar to those described for
30 past actions.

31 In general, impacts on wildlife and special status species from construction of the proposed Project would
32 incrementally contribute to habitat loss, degradation, and fragmentation as well as increased mortality for
33 some species. Increased mortality during construction would be greatest for burrowing and non-mobile
34 species. As stated in Section 4.8.2 “Wildlife”, overall impacts from construction of the proposed Project
35 would be minor/negligible for some species and moderate for others. Habitat disturbance would be a
36 long-term impact with construction-related noise and potential for wildlife mortality from construction
37 equipment would be short-term. Species that utilize riparian and aquatic habitats would experience
38 minor/negligible short-term impacts from the proposed Project, since no ground disturbance would occur
39 in those areas. Species that utilize terrestrial habitats would experience moderate, adverse impact levels
40 from habitat loss and direct mortality.

41 Reasonably foreseeable and future projects in the CEAA when combined with the proposed Project
42 construction would have incremental, cumulative impacts to wildlife resources. Projects that would
43 contribute to cumulative impacts would include the proposed SunZia Transmission Line Project; other
44 electrical transmission projects; solar, wind, biofuel, and geothermal energy generation projects;
45 pipelines; substation construction and expansions; planned residential developments; Rosemont Copper

1 Mine; and the proposed Organ Mountains Desert Peaks National Monument (see table 4.21-1). With the
2 exception of the proposed Organ Mountains Desert Peaks National Monument, which would protect
3 wildlife resources on approximately 54,800 acres, the other reasonably foreseeable and future projects
4 would adversely impact wildlife resources.

5 Planned roadways, developments, pipelines, electrical transmission lines, mining, and energy generation
6 projects will all continue to contribute to wildlife habitat loss, fragmentation, and degradation and create
7 barriers to species movement and genetic interchange for some species.

8 Future projects, including the proposed SunZia project, would add an additional 789 miles of electrical
9 transmission lines plus additional lines for the High Plains Express Transmission Project. An additional
10 220 acres for substation expansions would be disturbed.

11 Within the CEAA, an additional 60 miles of pipelines would occur in the future. Approximately 4,285
12 acres of habitat would be impacted by the Rosemont Copper Mine. Residential developments would
13 impact an unknown number of acres.

14 Future energy generation projects for which approximate impacts were known total approximately 59,522
15 acres within the CEAA. Additional projects of unknown size would increase the number of acres
16 impacted.

17 The reasonably foreseeable and future projects above would contribute to impacts on wildlife resources.
18 These impacts would include habitat loss, degradation, and fragmentation; increased mortality for some
19 wildlife species; increased non-native plant introduction and spread; and increased noise/vibration levels
20 during construction activities. The magnitude of areas to be impacted is estimated in table 4.21-1 and
21 would be most intensive if the projects were to occur in previously undeveloped areas. As future
22 development occurs the CEAA would have reduced quality and quantity of wildlife resources. Habitat
23 would be lost to ground-disturbing activities and would be fragmented by additional linear features.
24 Co-location of facilities could reduce the overall habitat impacts in the CEAA.

25 Depending on the wildlife species, the interaction of the combined effects (past, present, and reasonably
26 foreseeable future actions) for construction of the proposed Project would generally result in major,
27 adverse cumulative impacts. Those species that are habitat generalists and are readily adaptable to human
28 activities could see beneficial cumulative effects. Those species with limited ranges, specialized habitats,
29 and especially species that utilize riparian and aquatic habitats could experience major, adverse, long-term
30 cumulative impacts.

31 During construction, the interaction of the proposed Project and other actions within the CEAA would be
32 a major, long-term cumulative effect on wildlife resources and wildlife habitat.

33 **Operation and Maintenance**

34 The cumulative impacts on wildlife resources from construction would be greatly reduced during the
35 operation and maintenance of the proposed Project. The cumulative effects of operation and maintenance
36 would be minor/negligible and long-term.

37 Ongoing operation of existing and future projects would continue to impact wildlife resources.
38 The presence of linear features such as roads and railways would continue to fragment habitat, provide
39 barriers to movement and genetic interchange. Wildlife species attempting to cross these linear features
40 would be subject to the potential for mortality from vehicle/train strikes. Migratory birds would continue
41 to be impacted by existing transmission lines due to birds striking lines or towers/poles.

1 Existing and future developments and energy generation projects would continue to fragment habitat and
2 provide barriers to wildlife species movement and genetic interchange. During operation the interaction of
3 the proposed Project and other actions within the CEAA would have a moderate, long-term impact on
4 wildlife resources.

5 **Summary**

6 Development of the proposed Project, in conjunction with other foreseeable future projects, would
7 contribute incrementally to ongoing wildlife habitat loss, degradation, and fragmentation; increased
8 mortality for some wildlife species; increased non-native plant introduction and spread; and increased
9 noise/vibration levels during construction activities. Impacts from each of the Project alternatives would
10 have similar cumulative impacts. Proponent-committed measures and additional mitigation measures
11 would avoid or minimize impacts to wildlife resources. Cumulative impacts would be reduced in cases
12 when linear facilities are collocated. Other future developments would add an additional 789 miles of
13 electrical transmission lines, 60 additional miles of pipelines, 220 acres of substation expansions, and
14 59,522 acres of disturbance for electrical generation projects. Future projects would also protect wildlife
15 habitat on 54,800 acres from the designation of the Organ Mountains Desert Peaks National Monument.

16 Cumulative impacts on wildlife resources would be minimized through surveys, design, and engineering
17 as well as mitigation measures. These measures would likely be required for most future projects. In areas
18 where avoidance or mitigation is difficult the loss of some individuals of wildlife species as well as
19 habitat would occur. Measures to minimize impacts would reduce impacts on wildlife resources.
20 However, the cumulative impact of the construction and operation of the proposed Project would be
21 moderate to major and long-term.

22 ***Paleontological Resources***

23 The geographic analysis area for cumulative impacts to paleontological resources is the CEAA described
24 in section 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This CEAA for
25 analyzing potential cumulative impacts to paleontological resources represents a reasonable region in
26 which the same or similar geological formations as those within the Project right-of-way, when assessed
27 in combination with other cumulative actions, would be impacted if the proposed Project were
28 implemented. Cumulative actions discussed herein are based on the existing conditions of the
29 paleontological resources affected environment described in chapter 3 and the relevant projects presented
30 in table 4.21-1.

31 Types of reasonably foreseeable future projects include transmission lines, an alternative energy
32 generation facility, natural gas power plants, a natural gas pipeline, substations, a copper mine, and road
33 improvements. Cumulative impacts to paleontological resources are only expected for projects or phases
34 of projects with ground disturbance where fossils are present. If no ground disturbance is expected or
35 fossils are present, there would be no direct cumulative effects. Mitigation measures appropriate to each
36 Project would reduce or minimize impacts to paleontological resources and therefore would also
37 minimize cumulative effects.

38 **CONSTRUCTION**

39 The past uses of the CEAA have had no direct or indirect effects on paleontological resources.
40 Construction activities associated with the past uses of the CEAA have not encountered any important
41 fossils and no known fossils localities have been recorded within the CEAA.

42 For the proposed Project, no cumulative effects on paleontological resources due to construction are
43 expected in the Upgrade Section because almost no formations with the potential to be fossiliferous are to

1 be impacted by the proposed Project. As discussed in chapter 3, the majority of geological formations in
2 the CEAA are of low or very low potential for paleontological resources (PFYC 1 or 2). In the CEAA for
3 the New Build Section, most of the geological formations are classified as very low to low potential
4 (PFYC 1 or 2) with some moderate or unknown (PFYC 3) and high (PFYC 4) potential. Moderate to
5 major direct impacts and minor indirect impacts to paleontological resources may occur during
6 construction of the proposed Project in the New Build Section if fossils are present in those geological
7 formations with the potential to be fossiliferous which are crossed by the proposed Project. Direct effects
8 may be negative, such as the loss of important fossils, or positive, such as the inadvertent discovery of
9 scientifically important fossils; indirect negative impacts would be due to loss of access to scientifically
10 important fossils if present during construction. However, negative effects will be mitigated according to
11 applicable regulations and the POD, so no cumulative effects are anticipated from construction of the
12 proposed Project.

13 Future development in Arizona within the CEAA is not expected to impact paleontological resources
14 because of the lack of potentially fossiliferous geological formations in the CEAA. In New Mexico, all
15 but one reasonably foreseeable project with a known location is planned for areas with very low potential
16 for paleontological resources (PFYC 1). The New Ventures/Solar Torx solar power plant, Solar Reserve,
17 LLC, Sapphire Energy Algae Facility, Lordsburg Mesa Iberdrola Renewables project, and the Lightning
18 Dock Geothermal Power Plant project are all located in areas with a PFYC of 1 and are not expected to
19 contribute to cumulative effects. The potential network upgrades and New Mexico residential projects are
20 also not expected to contribute to cumulative effects.

21 The proposed SunZia Transmission Line project would consist of two new 500-kV transmission lines
22 running from central New Mexico to central Arizona. In New Mexico, the proposed SunZia project would
23 cross some areas with high potential for paleontological resources (PFYC 4) and therefore could
24 contribute to cumulative effects if those geological formations are fossiliferous. Like the proposed
25 Project, if project construction results in adverse effects to paleontological resources, the adverse effects
26 would be mitigated and would not contribute to cumulative effects.

27 **OPERATION AND MAINTENANCE**

28 Operation and maintenance associated with past and present uses of the CEAA have had no direct or
29 indirect effects on paleontological resources because no known fossils localities have been recorded in the
30 CEAA. No direct or indirect impacts are expected from the operation and maintenance of the proposed
31 Project, as little ground disturbance is anticipated and areas with the potential for importance fossils can
32 be avoided. However, if maintenance could result in adverse effects to paleontological resources, adverse
33 effects would be mitigated, so no contribution to cumulative effects is expected. As with construction,
34 future projects in Arizona are not expected to contribute to cumulative effects to paleontological resources
35 because geological formations in the Arizona portion of the CEAA generally have a very low or low
36 potential for paleontological resources (PFYC 1 or 2). In New Mexico, only the proposed SunZia project
37 has the potential to affect paleontological resources but the operation and maintenance of the line is not
38 expected to contribute to cumulative effects for the same reasons the proposed Project is not expected to
39 contribute.

40 ***Visual Resources***

41 The geographic analysis area for cumulative impacts to visual resources is a 10-mile corridor centered on
42 the subroute or segment centerline, the same analysis area discussed in chapter 4. The temporal scope is
43 for the life of the Project, which is 50 years. Cumulative visual effects would result from the incremental
44 modification of scenic quality associated with the existing landscape as described in chapter 3 and
45 disruptions to sensitive viewer viewsheds and KOPs as a result of the construction, operation, and

1 maintenance of the Project in combination with other past, present, and reasonably foreseeable future
2 actions presented in table 4.21-1.

3 **NEW BUILD SECTION – ROUTE GROUPS 1 AND 2**

4 Past and present uses in the CEAA for visual resources have had a direct effect on the landscape and
5 sensitive viewers as described in chapters 3 and 4. Transmission lines and structures, gas pipelines,
6 residential and industrial developments, dirt surface roads and paved roads have all contributed to
7 changes to the existing scenic quality and landscape in the area. Reasonably foreseeable future
8 developments in the proposed Project vicinity also have the potential to result in cumulative effects on
9 visual resources. Reasonably foreseeable future actions that are likely to have direct cumulative effects to
10 visual resources along the 242.4 miles of route groups 1 and 2 of the New Build Section of the Project
11 include development of new transmission lines and substations, development of renewable energy
12 generation facilities, a natural gas energy generation facility, and new substation development. These
13 developments, when added to the direct effects of the proposed Project, would incrementally convert the
14 scenic quality of the natural landscapes into a more developed and industrialized landscape that would
15 adversely affect scenery, and sensitive viewers over time. Specific identified cumulative projects (see
16 table 4.21-1) that would alter landscape scenic quality and sensitive viewsheds within the analysis area
17 include the proposed SunZia project, Bowie Power 345-kV Transmission Line and substation, Bowie
18 Natural Gas Power Plant, Safford Solar Energy 250-MW photovoltaic solar power plant, Solar Reserve,
19 LLC-1 100-MW concentrating solar power/structure facility, and the Sapphire Energy Algae Facility.

20 Because the proposed SunZia project would be potentially constructed along a similar alignment and
21 timeline as the proposed Southline Project, they are likely to result in the greatest cumulative impact to
22 visual resources—in the long term from the introduction of transmission line structures and substation
23 expansions into the landscape; and in the short term from the removal of vegetation to construct and
24 maintain the transmission lines, construction of temporary and permanent access roads, construction of
25 temporary construction laydown yards, and any landform modifications necessary to prepare the ROW
26 for construction. Modification to the natural landscape would occur along the entire 242.4 miles of the
27 New Build Section proposed routes. Where applicable, implementation of BMPs and mitigation measures
28 included in the proposed Project and reasonably foreseeable projects would reduce or eliminate the
29 potential for incremental effects resulting from the proposed Project. In addition, because local alternative
30 DN1 parallels the proposed SunZia project preferred alignment, the same access and temporary
31 construction laydown yards may be used for that segment, further reducing the cumulative construction
32 impacts.

33 Solar energy projects typically require disturbance of large blocks of land, which would result in adverse
34 effects to existing, undeveloped landscapes as a result of vegetation removal and the introduction of
35 strong linear and geometrical shapes on the landscape. The impacts of the proposed Project when taken in
36 context with these other reasonably foreseeable future renewable energy developments would have a
37 cumulative effect on viewers from both recreation areas and travel routes in the analysis area.

38 The Tri-County RMP is a reasonably foreseeable future action and is expected to result in changes to the
39 VRM classification of BLM lands in Doña Ana County that are currently managed under the Mimbres
40 RMP. As a result of these potential changes, there are portions of the New Build Section that would not
41 be in conformance with VRM objectives under the current BLM preferred alternative for the Tri-County
42 RMP. Under the subroute 1.2 (the proponent's alternative); 0.6 mile of segment S2, 6.5 miles of segment
43 S3, and 0.6 mile of segment S4 would cross VRM Class II lands and would not conform to the Tri-
44 County RMP preferred alternative. Additionally, local alternative B would cross 0.7 mile of VRM class II
45 and would not conform to the Tri-County RMP preferred alternative.

1 Other past, present, and reasonably foreseeable future projects in the analysis area are minimal and
2 restricted primarily to incremental growth in residential and commercial areas associated with the cities of
3 Deming and Lordsburg. The level of overall development in the region, especially for residential and
4 commercial activities, has slowed significantly since about 2008. Residential, agricultural, and
5 transportation development within the cumulative effects analysis area is generally low and is anticipated
6 to remain so. Additionally, because the proposed Project and alternative alignments would be located
7 within new and existing transmission corridors, visual effects are likely to either be prominent enough or
8 isolated enough so that they would not substantially contribute to cumulative effects in concert with these
9 other developments.

10 **UPGRADE SECTION – ROUTE GROUPS 3 AND 4**

11 Reasonably foreseeable future developments in the vicinity of the Upgrade Section of the proposed
12 Project have the potential to result in cumulative effects on visual resources. Reasonably foreseeable
13 future actions that are likely have direct cumulative effects to visual resources along the 118.6 miles of
14 route groups 3 and 4 of the Upgrade Section of the proposed Project include development of new
15 transmission lines, development of renewable energy generation facilities, a natural gas pipeline, and
16 major road improvements. These developments, when added to the direct effects of the proposed Project,
17 would incrementally convert the scenic quality of the existing landscape into a more developed and
18 industrialized landscape that would adversely affect scenery, and sensitive viewers over time. Specific
19 identified cumulative projects that would alter landscape scenic quality and sensitive viewsheds within
20 the analysis area include the Pinal Central to Tortolita 500-kV Transmission Line, UniSource Energy
21 Services 115 kV to 138 kV Uprate, Whetstone Ranch 80-MW Solar Project, UA Tech Park
22 5-MW Thermal Storage/Concentrating Solar Project, Fotowatio 25-MW Photovoltaic Solar Project, the
23 Sasabe Lateral Project, and the Silverbell Road Improvements project.

24 Other past and present actions in the CEAA have converted larger portions of the Upgrade Section
25 analysis area to residential, commercial, and industrial development associated largely with the city of
26 Tucson and surrounding lands. Because the proposed Upgrade Section would be located along existing
27 transmission corridors, visual effects are likely to blend in with existing development and associated
28 visual impacts and not substantially contribute to cumulative effects in concert with these other
29 developments.

30 ***Land Use, Including Farm and Range Resources, and Military*** 31 ***Operations***

32 **LAND USE**

33 The geographic scope for the land use CEAA is the RMP planning area (Mimbres RMP, Safford, RMP,
34 and Phoenix RMP) that would be crossed by the proposed Project (i.e., the entire planning area,
35 regardless of land ownership). For lands other than BLM-managed lands (e.g., County, municipal, or U.S.
36 Forest Service land), the analysis area is the county, municipality, and Douglas Ranger District that would
37 be crossed by the proposed Project and alternatives. Planning areas, or the level at which land use
38 regulations, plans, or authorizations are in effect, is the rationale for designating the analysis area for land
39 use. The temporal scope for the analysis area is the life of the Project (50 years). The CEAA for analyzing
40 potential cumulative impacts to land use represents a reasonable region in which existing land uses, when
41 assessed in combination with other cumulative actions, would be impacted if the proposed Project were
42 implemented.

1 **Construction**

2 The past and present land uses in the CEAA have had a direct effect on the conversion of lands from one
3 use to another (i.e., undeveloped land that is converted to residential subdivision, or vice versa, a former
4 mining area that has been closed, rehabilitated and natural conditions reclaimed) and on the ability to
5 access certain areas, as described in chapters 3 and 4. How an agency manages their land depends upon
6 the purpose of the land (e.g., Federal land, state land, or private land). Land in the CEAA located outside
7 designated ROWs is largely undeveloped and is characterized by vacant desert, agricultural lands, and by
8 areas used for grazing, transportation corridors, utilities, recreation, and widely dispersed, low-density
9 residential development.

10 Reasonably foreseeable actions in the CEAA that, when combined with the proposed Project, may have
11 cumulative impacts include the Tri-County RMP, the proposed SunZia project, small (<100 MW) and
12 large-scale (>100 MW) solar projects, substation construction and expansions, and the future expansion
13 of the communities and roadways within the analysis area (e.g., Tucson). These projects would enable
14 future residential, commercial, or industrial development and would result in further changes to the types
15 of land uses similar to the proposed Project. However, the overall cumulative impact of these
16 developments is consistent with the long-term management planning tools such as the WWEC PEIS.

17 The WWEC PEIS designates energy corridors (i.e., oil, gas, and hydrogen pipelines; electricity
18 transmission; and electricity distribution) on Federal lands within 11 Western States, including New
19 Mexico and Arizona. One corridor identified in the WWEC PEIS is included in the analysis area, in New
20 Mexico near Lordsburg proceeding west into Arizona (81-213). The incremental impact of this corridor
21 designation, when combined with the construction of the proposed Project, would result in a minor
22 cumulative impact, since the WWEC PEIS designation has been identified to maximize targeted areas
23 suitable for ROW development.

24 Construction of the proposed Project would have moderate, short-term cumulative impacts to the
25 management of lands and future or planned land uses since the proposed Project would preclude non-
26 compatible future or planned land uses such as other transmission lines or pipelines from being located
27 within the same footprint as the proposed Southline Project. Similarly, construction of the proposed
28 Project may temporarily affect the management of lands (e.g., legal recreation users within the ROW may
29 be forced to recreate outside the ROW during construction yet remain within the planning area, despite
30 the local RMP permitting such uses), but would return to existing conditions following construction.

31 In general, an increase in reasonably foreseeable future developments in the CEAA would contribute to
32 the modification of the character of land use in the analysis area. As development occurs, the rural
33 environment would become increasingly more residential, commercial, and industrial. Linear ROW
34 projects such as the proposed Southline Project are sited to avoid impacting sensitive resources to the
35 greatest extent practicable. As more reasonably foreseeable actions are constructed, the possible paths that
36 can be taken to avoid sensitive resources can become limited. Construction of the proposed Project would
37 preclude other future transmission lines from being located within the same ROW footprint.

38 Avoidance areas proposed in the Tri-County RMP for aplomado falcon would be cumulatively impacted
39 by the preferred alternative when combined with other reasonably foreseeable projects such as the
40 proposed SunZia and solar projects. For the New Build Section, construction of the proposed Project
41 would convert the total ROW existing land use from predominantly undeveloped desert land into a utility
42 corridor. For the Upgrade Section, construction of the proposed Project would not convert the total ROW
43 since the transmission line is already in place. Opportunities for recreation land uses (recreation on public,
44 county, or city land) may have access to increased opportunities available as a result of the proposed
45 Project and new access roads. Other future developments (as described in the preceding 3 paragraphs) that

1 involve access road construction would also likely be closed to the public except where authorized, and
2 when combined with this project would not affect land use since these roads would not affect land
3 ownership, land management, land use authorizations, or ROWs for future or planned land uses.

4 **Operation**

5 During operation of the proposed Project, if populations of communities (particularly in urban areas)
6 increase as a result of community developments, the recreational use of public land within the CEAA
7 could increase. In addition, the quality of the recreational settings on public lands adjacent to urban areas
8 could be degraded by the loss of undeveloped landscape character and visual intrusion on the landscape.
9 However, existing land uses would only be precluded in site-specific areas where a transmission tower or
10 ancillary facility physically occupies the land; the remaining land within the ROW would not preclude
11 existing land uses. Therefore, the cumulative impacts of past, present, and reasonably foreseeable projects
12 to land use would be minor in the rural portions of the analysis area, but would be moderate in the more
13 urbanized portions. However, the proposed Project would contribute negligibly to this overall cumulative
14 effect.

15 **FARMLANDS AND RANGELANDS**

16 The geographic analysis area for cumulative impacts to public farmlands and rangelands is the CEAA
17 described in section 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This
18 CEAA for analyzing potential cumulative impacts to farmlands and rangelands represents a reasonable
19 region in which acres of Farmland of Statewide or Local Importance and acres of grazing allotments
20 when assessed in combination with other cumulative actions, would be impacted if the proposed Project
21 were implemented. Cumulative actions discussed herein are based on the existing conditions of the
22 recreation resources affected environment described in chapter 3 and the relevant projects presented in
23 table 4.21-1.

24 Past and present actions have had adverse impacts on farmlands and rangelands. Construction and
25 operation of linear projects such as roads, railroads, transmission lines, and pipelines, and the expansion
26 of other land uses (residential, commercial, and industrial) have occurred throughout the analysis area.
27 These past and present actions have converted farmlands to non-agricultural uses and have removed
28 forage habitat on rangelands permitted for grazing.

29 Reasonably foreseeable actions in the analysis area that have the potential to result in cumulative impacts
30 to farmlands and rangelands by converting farmlands to non-agricultural land use and removing forage
31 habitat from lands permitted for grazing. These projects include the Tri-County RMP, the proposed
32 SunZia project, small (<100 MW) and large-scale (>100 MW) solar projects, substation construction
33 and expansions, and the future expansion of the communities and roadways within the analysis area
34 (e.g., Tucson). Like the action alternatives, these projects would likely avoid directly impacting existing
35 active farmlands by converting them to non-agricultural land uses. Therefore no cumulative impact would
36 be expected to occur to farmlands. The development of these projects, however, would remove areas from
37 active grazing and create a long-term adverse cumulative impact on available rangeland. The cumulative
38 impact on rangeland would be considered minor because of the vast amount of land currently available
39 for grazing and the relatively small portion of grazing habitat that the proposed Project and reasonably
40 foreseeable future actions would remove.

41 **MILITARY OPERATIONS**

42 The geographic scope for analyzing cumulative effects to military operations is the Project footprint in
43 addition to the MTRs, MOAs, and the BSETR that would be intersected by the Project. The temporal

1 scope is for the life of the Project, which is 50 years. The CEAA for analyzing potential cumulative
2 impacts to military represents a reasonable region in which existing military operations, when assessed in
3 combination with other cumulative actions, would be impacted if the proposed Project were implemented.

4 Past and present actions considered for military operations include the establishment of DOD land,
5 operations at Fort Huachuca, and the BSETR. In addition, community development (particularly those
6 that offer large-scale airports) and transportation infrastructure also are considered as past and present
7 cumulative actions that have impacted military operations, both in the establishment and the function of
8 such operations.

9 **Construction**

10 Reasonably foreseeable and future projects that could affect military uses in the analysis area during
11 construction include the proposed SunZia project, proposed Red Horse 2 Wind project, the Whetstone
12 Ranch Solar Project, the Sasabe lateral Project and the 5-MW solar power generation project. These
13 projects could impact military uses by limiting existing and/or future military activities.

14 The proposed SunZia project would cross several MTRs, including VR-259, VR-260, VR-263, and
15 VR-1233. The minimum training altitude for these MTRs ranges from 100 to 700 feet AGL. The
16 construction of the SunZia project could alter use of the MTRs, since aircraft could be required to
17 increase the minimum flight altitude for low-level training to avoid collisions with transmission line
18 facilities.

19 The Sasabe Lateral Project, an approximately 60-mile-long, high-pressure natural gas pipeline, crosses
20 the Tombstone MOA. Cumulative impacts during construction of the proposed Southline Project with the
21 Sasabe project on the use of the MOA would be minimal as most project facilities would be located
22 belowground and military use of this area is for aerial training and maneuvers.

23 **Operations**

24 The proposed Southline Project would intersect the BSETR, MTRs, and MOAs within the military
25 operations cumulative effects analysis area, furthering the likelihood of requiring the military to
26 acknowledge potential shifts in AGL of existing MTRs as well as the need to revise its radio frequency
27 emitter inventories.

28 The proposed Southline Project includes upgrading the existing Western 115-kV line across the BSETR;
29 the EMI from the existing Western line is already part of the baseline calculations for EMI. Further, no
30 electronic testing is conducted in the area of the existing Western line currently because of the existing
31 Western line, I-10 corridor, topography, and other interference disturbances. The proposed SunZia project
32 would also cross the BSETR and two renewable energy projects (Red Horse Wind 2 and Whetstone
33 Ranch Solar Project) would be located within the BSETR. Each time a new source of interference is
34 introduced into the BSETR, it minimizes the test space because “mitigation” for the BSETR is basically
35 to avoid the source of interference (i.e., transmission line, solar or wind farm, etc.). In other words, the
36 BSETR test footprint shrinks. Additionally, the BSETR would have to revise its radio frequency emitter
37 inventory for testing area to account for the new interferences. In 2012, the U.S. Army conducted a seven-
38 month quantitative analysis of the impacts of transmission lines on the electromagnetic spectrum of 500-
39 kV lines. This study found that it is reasonable to expect EMI to occur along a power line corridor for up
40 to 1 km on either side of the transmission lines.

41 Therefore, while the existing Western line already introduces EMI that is accounted for in the baseline
42 measurements, upgrading the line could produce slightly more EMI (higher voltage line). However, the
43 proposed Southline Project would include EMI dampers on the conductors to minimize EMI.

1 EMI from the upgrade of the Western line in combination with the proposed SunZia and renewable
2 energy projects noted above, could have a cumulative impact to, and limit, the testing operations at
3 BSETR. Southline has been consulting with Fort Huachuca in accordance with State Bill 1387. These
4 consultations have resulted in identified mitigation measures (e.g., EMI dampers) since the beginning of
5 Project development. Thus, the incremental impact of the SunZia and renewable energy project in
6 BSETR, along with the proposed Southline Project is anticipated to result in minor cumulative impacts to
7 the BSETR's military operations.

8 Some reasonably foreseeable future actions may not provide EMI mitigation. If the BSETR were to
9 become limited in capabilities due to reasonably foreseeable future actions such as SunZia and other yet-
10 to-be proposed linear ROW projects, Fort Huachuca may suspend certain operations on the BSETR. As
11 the BSETR is a vital asset to Cochise County, many services, tax incentives, development incentives, and
12 military agreements may not occur. The overall cumulative effect of limiting or suspending operations at
13 the BSETR would result in major, long-term impacts to military operations.

14 ***Special Designations***

15 The geographic analysis area for cumulative impacts to special designations is the CEAA described in
16 section 4.21.2. The temporal scope is for the life of the proposed Project, which is 50 years. This CEAA
17 for analyzing potential cumulative impacts to special designations represents a reasonable region in which
18 existing or proposed special designations, when assessed in combination with other cumulative actions,
19 would be impacted if the proposed Project were implemented. Cumulative actions discussed herein are
20 based on the existing conditions of the special designations affected environment described in chapter 3
21 and the relevant projects presented in table 4.21-1.

22 **CONSTRUCTION**

23 The past uses in the CEAA have had a direct effect on the establishment of special designations, as
24 described in chapters 3 and 4. Recognition by various agencies of a landscape's unique and valuable
25 resources led to protective measures enacted by federal, Tribal, and local governments. FLPMA is the
26 primary legislation used to protect special designations, although several other enabling legislative actions
27 may also prescribe special designations, as stated in chapter 3. Construction of the proposed Project, when
28 combined with the past and present actions, would not likely have a cumulative effect to special
29 designations since most special designations preclude the types of uses included in the proposed
30 Southline Project. Therefore, the cumulative impact of the past and present uses, when combined with the
31 proposed Southline Project would be minor.

32 Since the proposed Project is largely routed to follow existing ROWs and disturbed areas, the likelihood
33 that a special designation occurs within the Project footprint is very low; therefore no cumulative impacts
34 are anticipated. Similarly, the likelihood that users of special designations (i.e., hiking, nature study, or
35 photography) will be seeking special designations proximate to the other past, present, and reasonably
36 foreseeable actions within the CEAA during construction is also unlikely, since the existence of these
37 actions would likely already dictate whether or not the area has been specially designated. Some users of
38 the special designations may experience indirect impacts (i.e., noise, visual intrusions); however, these
39 would cease once construction is completed. Cumulative impacts during construction would be minor and
40 short-term.

41 **OPERATION AND MAINTENANCE**

42 For the same reasons described under construction, special designations would be avoided by the
43 proposed Southline Project. Similarly, the reasonably foreseeable future actions described in table 4.21-1

1 also must avoid special designations. Therefore, in general, the cumulative impacts of the proposed
2 Project, when combined with reasonably foreseeable future actions would be minor, but would be long-
3 term and occur throughout the life of the Project. Reasonably foreseeable and future projects that could
4 affect special designations in the analysis area are discussed below. Potential impacts from these projects
5 could affect special designations by indirectly changing the natural, historic, cultural, or visual character
6 of some special designations or by conflicting with management objectives.

7 The proposed SunZia project pass nearby (within 5 miles) of the Peloncillo Mountains Wilderness Area,
8 in a similar layout as is proposed by Southline. Portion of the proposed Southline Project (DN1, LD4)
9 would potentially be constructed in the same corridor as the proposed SunZia project, and therefore would
10 contribute to the modification of special designations' scenic resources (setting) associated with the
11 analysis area. Although construction of these projects would not occur at the same time, the introduction
12 of these reasonably foreseeable actions (linear projects) would increase dominance along the Project
13 analysis area and would affect scenic resources and recreation viewers. If these projects are consolidated,
14 then construction disturbance would be focused within a specific area, rather than multiple projects
15 occurring at intermittent locations. Cumulative effects would be greater where they are not consolidated
16 because more trail-related resources, qualities, values, and associated settings may be affected by these
17 actions. Where these projects may be consolidated, cumulative effects during construction could be
18 further reduced if structure spans were matched (where feasible), potential ROW distance minimized, and
19 restoration of temporary construction areas (i.e., access roads) occurred.

20 Cumulative impacts to trails would occur in areas where linear ROW proliferation may detract the trails
21 recreational setting, particularly around the Hidalgo substation where the CDNST crosses the proposed
22 Southline Project. These impacts would occur primarily on privately-owned lands since the CDNST trail
23 corridor would preclude many activities that would detract from the Trail Corridor's setting. The
24 cumulative impact would be moderate and long-term.

25 The incremental impact of this action when combined with the proposed Southline Project would
26 nonetheless be minor since these projects would be located along an existing ROW among other existing
27 linear features; however, the cumulative impact would be long-term.

28 ***Wilderness Characteristics***

29 The geographic scope of the analysis area for assessing potential cumulative effects to wilderness
30 characteristics is the Project footprint and all WIUs that intersect a 1-mile corridor on either side of the
31 proposed Project and alternatives' centerlines. The total acreage for geographic analysis area is
32 approximately 585,000 acres. The temporal scope of the analysis area is the life of the Project (50 years).
33 As shown on figure 3.13-1, the WIUs that are within the analysis area all occur in the New Build Section.

34 **CONSTRUCTION**

35 A number of areas with wilderness characteristics occur within the analysis area, as described in section
36 3.13. In addition, many of the cumulative actions listed in table 4.21-1 would have similar impacts to
37 areas with wilderness characteristics as the proposed Southline Project. Construction of the proposed
38 Project, when considered in combination with the actions listed in table 4.21-1 are linear features (such as
39 pipelines and transmission lines) that have the potential to impact areas with wilderness characteristics
40 directly by reducing the size (5,000 acres or more of undeveloped and unroaded lands), the naturalness
41 condition (reduction of vegetation, wildlife, recreation, or other natural resources), or any supplemental
42 values identified for those lands. Construction of the proposed Southline Project and the cumulative
43 action projects can also affect areas with wilderness characteristics by reducing opportunities for solitude
44 and/or primitive recreation.

1 **OPERATION AND MAINTENANCE**

2 The cumulative impacts from operation and maintenance of the proposed Project and placement of other
3 linear features and human-made structures on the landscape would further decrease the amount of
4 undeveloped landscapes (areas with wilderness characteristics) along the transmission line route. Areas
5 with wilderness characteristics directly affected by the Project and any reasonably foreseeable present or
6 future actions identified above could split areas with wilderness characteristics into separate parcels or
7 reduce them in size below the 5,000-acre requirement by placement of human structures and roads.

8 The cumulative effects of operation and maintenance of the proposed Project with other reasonably
9 foreseeable projects could also reduce naturalness in areas with wilderness characteristics by introducing
10 unnatural or human-made objects to the landscape, and affecting or reducing the amount of soils,
11 vegetation, or natural habitats in the region.

12 Finally, the cumulative effects of operation and maintenance of the proposed Project with other
13 reasonably foreseeable projects could alter the setting required to support opportunities for solitude and/or
14 primitive recreation for visitors to areas with wilderness characteristics. It would be more difficult for
15 visitors to find opportunities for solitude and/or primitive recreation throughout the region because fewer
16 parcels would be out of sight or sound of modern human devices. Therefore, the cumulative effect of
17 operation and maintenance of the proposed Project with other reasonably foreseeable projects could
18 further reduce the availability of undeveloped areas with wilderness characteristics within the New Build
19 Section analysis area. This would result in an overall minor effect since all of the WIUs (Afton East being
20 the sole exception) would maintain the size criteria.

21 There would be no cumulative effects to wilderness characteristics within the Upgrade Section analysis
22 area since no WIUs are present.

23 ***Recreation***

24 The geographic analysis area for cumulative impacts to recreation is the CEAA described in section
25 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This CEAA for analyzing
26 potential cumulative impacts to recreation represents a reasonable region in which existing recreation
27 opportunities and activities, recreation settings, desired recreation experiences, and adjacent recreation
28 areas, when assessed in combination with other cumulative actions, would be impacted if the proposed
29 Project were implemented. Cumulative actions discussed herein are based on the existing conditions of
30 the recreation resources affected environment described in chapter 3 and the relevant projects presented in
31 table 4.21-1.

32 **CONSTRUCTION**

33 The past uses in the CEAA have had a direct effect on the recreation settings, as described in chapters 3
34 and 4. Historic proliferation of mining and ranching roads, the establishment of Federal, state, and private
35 lands, and community development have all shaped the recreation opportunities, settings, and desired
36 experiences in the CEAA. Land in the analysis area is largely undeveloped and is characterized by both
37 developed (i.e., utility ROWs) and undeveloped desert, agricultural lands, and by areas used for grazing,
38 transportation corridors, utilities, recreation, and widely dispersed, low-density residential development.
39 As described in chapter 3, past actions drive the locations and intensity for many of the current
40 recreational opportunities of the CEAA (i.e., hunting in areas where existing road networks from past
41 mining or ranching activities have created hunting access road networks). However, these same past
42 activities may also detract the locations and intensity for other current recreational opportunities of the
43 CEAA (i.e., outstanding opportunities for solitude and primitive or unconfined recreation). The present

1 actions in the CEAA would be very similar to the past actions. In general, construction activities from the
2 proposed Project in would contribute to the modification of the character of the recreation setting, which
3 would contribute to potentially detracting from desired recreation experiences. Construction activities are
4 not anticipated to detract the recreational opportunities since construction would be phased along the
5 alignment (i.e., recreational opportunity would continue in areas not being actively constructed),
6 recreational opportunity would not be lost permanently (i.e., construction activities may only take a few
7 days) and no recreational opportunities would be completely precluded, even during construction at any
8 time since all recreation opportunities identified within the CEAA are able to be pursued in adjacent and
9 similar areas.

10 As stated in chapter 4 (Section 4.14, “Recreation”), minor, short-term impacts to recreation resources
11 would occur during construction. This is due to the presence of machinery, surface disturbing activities
12 (i.e., ground blading, vegetation clearing), and noise. As noted previously, most areas of the ROW would
13 still be available for lawful use.

14 Reasonably foreseeable actions in the analysis area that, when combined with the proposed Project
15 construction, may have cumulative impacts to recreation resources include the completion of the
16 Tri-County RMP, the proposed SunZia Transmission Line Project, small (<100 MW) and large-scale
17 (>100 MW) solar projects, substation construction and expansions, maintenance and upgrades to existing
18 distribution and transmission lines (ranging from less than 230 kV to greater than 500 kV lines), and the
19 future expansion of the communities and roadways (i.e., planned residential development) within the
20 analysis area (e.g., Tucson) (see table 4.21-1).

21 Since the proposed Project is largely routed to follow existing ROWs and disturbed areas, the likelihood
22 that primitive or unconfined recreational settings and desired are currently being pursued is low, therefore
23 no cumulative impacts are anticipated. Similarly, the likelihood that users will be seeking primitive and
24 unconfined recreational opportunities (i.e., backpacking, nature study) proximate to the other past,
25 present, and reasonably foreseeable actions within the CEAA during construction is also unlikely, since
26 the existence of these actions would likely already dictate which recreational opportunities can be
27 successfully pursued.

28 Depending upon the recreation opportunity, setting, or desired experience, the interaction of the combined
29 effects (past, present, and reasonably foreseeable future actions) for construction of the proposed Project
30 and alternatives would generally result either a beneficial contribution to (i.e., additive) or adverse and
31 detracting (i.e., countervailing) cumulative effect to recreation. These two scenarios are dependent upon
32 the type of recreational opportunity that is being pursued because certain recreation settings and
33 experiences are maximized in developed settings such as ROWs with access roads, and certain recreation
34 settings may be severely detracted by developed settings such as ROWs with access roads.

35 During construction, the interaction of the actions within the CEAA and the proposed Project would be a
36 beneficial, minor and short-term cumulative effect for recreational settings and experiences that promote
37 or utilize access roads, OHV activity, or even hunting. Recreational settings that include existing or new
38 access roads that may comprise the cumulative actions or proposed Project are attractive to OHV users
39 and hunting because users would be able to legally access areas of land (where lawful) that may be
40 remote or isolated without having to hike or walk long distances. These types of activities tend to be
41 concentrated around more urbanized areas. Conversely, the interaction of the actions within the CEAA
42 and the proposed Project would be an adverse, moderate cumulative effect for recreational setting and
43 experiences that require undeveloped, natural settings. These types of activities tend to be concentrated in
44 rural, undeveloped areas. However, as stated previously, due to the current occupancy of facilities and
45 previously-disturbed setting of the cumulative actions and the proposed Project, recreational opportunities
46 in undeveloped, natural settings are not actively pursued currently, and would not likely be sought during

1 construction since the existing conditions already dictate which recreational opportunities can be
2 successfully pursued.

3 The quality of the recreational setting and desired experiences could be degraded by the loss of
4 undeveloped landscape character and visual intrusion on the landscape as a result of the cumulative
5 impact of the proposed Project construction and the past, present, and reasonably foreseeable actions
6 described above. However, as the proposed Southline Project would follow existing ROWs that have been
7 previously developed, the level of degradation would not eliminate existing recreation opportunities, and
8 would only temporarily alter the recreation setting and desired recreation experiences. The cumulative
9 impact of this temporary alteration of the recreation setting would be minor since recreation settings
10 would be available in adjacent settings, other cumulative actions would be far-removed and would not
11 affect adjacent lands along the entire ROW, and would be returned to existing settings following
12 construction. Therefore the cumulative impacts of past and present projects to recreation, when combined
13 with the proposed Project and alternatives construction would be minor and short-term in both the rural
14 portions of the CEAA and the more urbanized portions.

15 **OPERATION AND MAINTENANCE**

16 The cumulative impacts to recreation resources, from construction would largely dissipate during
17 operation and maintenance of the proposed Project, since recreation activities would not be precluded in
18 the majority of the ROW and the short-term disturbances associated with construction would cease.

19 The cumulative effect to recreation during operation and maintenance would remain minor but shift to
20 long-term since maintenance, emergency, or repair activities could occur at any time during operation.

21 As future development (renewable energy projects, proposed transmission lines, etc.) within the CEAA
22 occurs, the rural environment may become increasingly more residential, commercial, and industrial;
23 resulting in cumulative changes to the recreation setting and experiences, and certain recreation
24 opportunities and activities to be pushed further from development, increasing visitation to areas that
25 formerly received low levels of recreational use. Operation and maintenance for the proposed Project,
26 when combined with future development would contribute only a minor cumulative effect since the
27 majority of the proposed Project utilizes existing ROWs and disturbed areas. This minor impact would be
28 long-term and for the life of the proposed Project. Further, operation and maintenance activities of the
29 proposed Project would result in minor cumulative effects, since the proposed Project would already be
30 constructed and standard operation and maintenance activities would be so periodic as to not affect
31 recreation opportunities, experiences, or desired settings.

32 As more reasonably foreseeable actions are constructed such as additional transmission lines, solar energy
33 development, and residential development, the possible alignments that future ROWs can be taken to
34 avoid recreation resources can become limited. OHV use is on BLM lands within the CEAA is considered
35 light. OHV users may have increased opportunities available as a result of the operation and maintenance
36 included under proposed Project via new access roads constructed and/or maintained for the Project.
37 The incremental contribution of the effects of the proposed Project when added to the effect of other past,
38 present, and reasonably foreseeable future actions would result in a minor and long-term cumulative
39 effect. Table 4.21-6 at the end of this section provides a summary of the direct, indirect, and cumulative
40 effects to recreation resources.

1 ***Socioeconomics and Environmental Justice***

2 **SOCIOECONOMICS**

3 The geographic analysis area for cumulative impacts to socioeconomics is the socioeconomic analysis
4 area described in section 3.15.1, which consists of four counties in southern New Mexico and five
5 counties in southern Arizona. This analysis area (which is larger than the CEAA used for most other
6 resources) reflects the fact that socioeconomic effects such as changes in employment or the demand for
7 local services are not confined to the land area immediately proximate to the transmission line right of
8 way. The temporal scope is for the life of the Project, which is 50 years. Cumulative actions discussed
9 herein are based on the existing conditions of the socioeconomic and environmental justice resources
10 affected environment described in chapter 3 and the relevant projects presented in table 4.21-1.

11 Past and present projects and activities have largely defined the socioeconomic setting described in
12 chapter 3. Historic and current activities, such as mining, ranching, trading and tourism led to the
13 development of communities in the analysis area. Availability of private land and locations of key
14 infrastructure such as railroads, highways and water systems have helped define where population and
15 economic growth has occurred throughout the area. With the exceptions of the Tucson and Las Cruces
16 metropolitan areas located on the western and eastern ends of the socioeconomic analysis area, and the
17 Sierra Vista metropolitan area located south of the proposed transmission line right of way in Cochise
18 County, low population density has also tended to limit the economic development opportunities in the
19 area. Long distances to larger markets and relatively small labor forces, along with other factors, make it
20 challenging to attract and support projects that would substantially increase employment, earnings and
21 other economic activity in much of the analysis area.

22 As presented in table 4.21-1, 32 reasonably foreseeable future activities (RFFAs) have been identified for
23 the cumulative effects analysis, 16 of these activities are in the New Build Section and 16 are in the
24 Upgrade Section. These RFFAs include 10 solar energy projects, 9 transmission line projects (including
25 removal of portions of the existing Western transmission line in the Upgrade Segment if the proposed
26 Southline Project is developed), 3 substation upgrade projects, 3 non-solar renewable energy projects,
27 2 conventional energy development projects, a proposed copper mine, designation of a new National
28 Monument near Las Cruces, major road improvements in the Tucson area and general residential and
29 commercial development in portions of both the Upgrade Section and the New Build Section.

30 A number of these projects have documented construction or operation and maintenance activities that
31 may overlap with the anticipated schedule for the Project (Southline 2013a). Among that group, the
32 following proposed projects could be especially relevant from the standpoint of cumulative
33 socioeconomic impacts:

- 34 • The proposed SunZia project would be proximate to the proposed Southline Project in parts of the
35 New Build Section (DN1 and LD4). As noted earlier, some local alternatives for the proposed
36 Southline Project might co-locate in the same ROW with portions of the proposed SunZia project
37 line.
- 38 • The proposed High Plains Express Transmission Project is a proposed 1,300-mile transmission
39 line in Wyoming, Colorado, New Mexico, and Arizona, and is anticipated to come on line
40 between 2020 and 2025. No routing or siting information has been finalized.
- 41 • The Sapphire Energy Algae Facility may be expanded. This facility is located near Columbus, in
42 Luna County, an area of potential concern in regard to possible housing and public service
43 impacts if the Proponent Alternative is selected for the proposed Southline Project.

- 1 • The proposed Lightning Dock Geothermal Power Plant Project would be located about 20 miles
2 southwest of Lordsburg, in Hidalgo County. This is also an area of potential concern in regards to
3 housing and public services for the proposed Southline Project. Commercial startup is anticipated
4 by late 2014, so construction may be complete prior to Southline construction.
- 5 • The planned Safford Solar Energy Project would construct a 250-MW power plant in
6 northeastern Cochise County, another area of potential concern in regard to availability of short-
7 term housing and public services.
- 8 • The proposed Bowie Power Station natural gas electrical generating facility and the proposed
9 Bowie Power 345-kV Transmission Line would also be located in northeastern Cochise County,
10 east of Willcox.
- 11 • The proposed Whetstone Ranch Solar Project would be located near Benson, in northeastern
12 Cochise County (Southline 2013a).

13 Whether these proposed projects, or the other reasonably foreseeable activities identified in table 4.21-1
14 would proceed to actual development, and whether construction would occur during the same time period
15 as construction of the proposed Southline Project, is uncertain. If construction of some or all of the
16 projects identified above does overlap with the proposed Southline Project, these activities would likely
17 place additional stress on the available housing options and public service providers in the western
18 portions of the New Build Section and the eastern portions of the Upgrade Section. Depending on the
19 overlapping activities and their location, simultaneous construction activity in the more sparsely
20 populated western portion of the New Build Section or eastern portion of the Upgrade Section could
21 result in significant, though short-term, impacts on housing and the demand for public services.
22 The possibility for overlapping major construction projects in these areas emphasizes the need for
23 advance planning and coordination with local authorities, as discussed earlier under additional mitigation
24 measures. Other reasonably foreseeable activities with defined construction timelines are located in Pima
25 County, Arizona. Simultaneous construction of these projects and the proposed Southline Project could be
26 more easily accommodated due to the greater housing and public services capacity available in the
27 Tucson area.

28 As noted in section 4.15, the longer-term socioeconomic effects from operation of the proposed Southline
29 Project would include improved capability of the electrical transmission system to meet long-term
30 economic and population growth in the area, facilitation of the development of renewable energy projects
31 and additional property tax revenues for local governments. The other reasonably foreseeable
32 transmission and substation upgrade projects would further add to these benefits. The relatively large
33 number of proposed renewable energy projects among the RFFAs could provide significant additional
34 economic benefits in the region (in terms of employment, tax revenues and other metrics) and would be
35 facilitated by development of the proposed Southline Project and/or the other proposed transmission lines
36 in the area.

37 **ENVIRONMENTAL JUSTICE**

38 The geographic analysis area for cumulative impacts to environmental justice (CEAA) consists of the
39 communities most proximate to the proposed Southline transmission line as defined in section 3.15.10.
40 This analysis area is intended to capture the populations most likely to be disproportionately affected by
41 construction, operations and maintenance of the proposed transmission line. The environmental justice
42 analysis area was defined based on the census tracts traversed by the Project alternatives and consists of
43 52 census tracts, including 9 census tracts in New Mexico and 43 census tracts in Arizona.

44 Like most proposed transmission lines, the proposed routes for the Southline Project, under the various
45 alternatives, would use the corridors of existing linear features (such as transmission lines, roads,

1 pipelines and railroads) as much as possible. Co-locating with existing linear infrastructure tends to
 2 minimize environmental and social impacts, and by avoiding relatively undisturbed areas.

3 Co-locating a new transmission line in an area that already has existing transmission facilities or other
 4 linear infrastructure would add to any existing impacts from that infrastructure on visual resources,
 5 quality of life, property values and other aspects of nearby properties. It is likely, however, that the
 6 incremental impact of adding an additional transmission line in areas that already have linear
 7 infrastructure in place would not be a significant adverse effect, and that co-location would result in less
 8 impact than adding a new transmission line in an area without existing linear facilities.

9 Table 4.21-4 shows the census tracts in the New Build Section that would be traversed by the proposed
 10 Southline Project alternatives and identifies the basis(es) for classifying the population in each tract as an
 11 environmental justice community. As noted in section 3.15, all of the census tracts traversed by the
 12 proposed Project in the New Build Section are environmental justice communities. The table also
 13 indicates whether there is existing linear infrastructure (transmission lines or gas pipelines) located in
 14 each tract, and whether or not any of the reasonably foreseeable future linear infrastructure projects would
 15 be located in the tract. In some cases, the RFFA involves the removal/replacement or upgrading of
 16 existing transmission facilities (rather than the development of a new transmission line) – these instances
 17 are coded as “Remove/replace” in table 4.21-4. It is important to recognize that the RFFAs shown in table
 18 4.21-4 do not include non-linear projects, such as proposed renewable energy facilities. These proposed
 19 projects do not have sufficient geographic specificity at this time to identify the census tracts in which
 20 they would be located.

21 **Table 4.21-4.** Existing Infrastructure and RFFAs in Census Tracts Traversed by Proposed Southline
 22 Alternatives for the New Build Section

County/ Census Tract	Total Population	Environmental Justice Community?/ Basis	Existing Linear Infrastructure*	RFFAs*
Arizona				
Cochise	131,346			
100	1,971	Poverty	No	No
2.01	3,747	Minority	Transmission/Gas	New Transmission
2.02	3,982	Minority/Poverty	Transmission/Gas	No
2.03	2,740	Poverty	Transmission/Gas	Remove/Replace
Graham	37,220			
9615	4,449	Poverty	Transmission/Gas	New Transmission
9616	3,161	Minority/Poverty	Transmission/Gas	New Transmission
Greenlee	8,437			
9603	2,588	Poverty	Transmission/Gas	New Transmission
New Mexico				
Doña Ana	209,233			
15	6,119	Minority	Transmission/Gas	No
16	2,910	Minority/Poverty	Transmission/Gas	No
17.01	5,842	Minority/Poverty	Transmission/Gas	No
17.02	1,692	Minority/Poverty	Transmission/Gas	No

23

1 **Table 4.21-4.** Existing Infrastructure and RFFAs in Census Tracts Traversed by Proposed Southline
2 Alternatives for the New Build Section (Continued)

County/ Census Tract	Total Population	Environmental Justice Community?/ Basis	Existing Linear Infrastructure*	RFFAs*
Grant	29,514			
9648	1,764	Minority	Transmission/Gas	New Transmission
Hidalgo	4,894			
9700	2,195	Poverty	Transmission/Gas	New Transmission
9702	2,699	Minority/Poverty	Transmission/Gas	No
Luna	25,095			
4	5,936	Minority/Poverty	Transmission/Gas	Remove/Replace
5	4,338	Minority	Transmission/Gas	New Transmission

3 Source: Census Bureau (2011).

4 *Geographic data for existing linear features included locations of transmission lines and gas pipelines. Geographic data for location of new projects
5 only included linear features with known, proposed locations. Other projects, such as proposed renewable energy facilities, do not have sufficient
6 information available at this time to precisely identify their future locations.

7 As shown in figure 4.21-1, almost all of the Census tracts in the New Build Section that would be
8 traversed by the proposed Southline alternatives already have existing transmission lines and gas
9 pipelines. Seven of the 16 tracts that would be traversed by the proposed Southline alternatives are also
10 anticipated to experience the development of another new transmission line—primarily as part of the
11 proposed SunZia project.

12 Table 4.21-5 shows the census tracts in the Upgrade Section that would be traversed by the proposed
13 Southline Project alternatives and indicates whether the tract is an environmental justice community. Like
14 the previous table for the New Build Section, table 4.21-5 also shows the presence of existing linear
15 infrastructure and whether or not any of the reasonably foreseeable future linear infrastructure projects
16 (would be located in the tract).

17 All but one of the census tracts in the Upgrade Section that would be traversed by the proposed Southline
18 alternatives already have existing transmission lines. Most also have gas pipelines in place. In most cases,
19 linear RFFAs in these areas involve the removal or replacement of existing transmission lines (primarily
20 the existing Western line in the Upgrade Section and/or the Tucson-Apache Pole Replacement Project).
21 Five of the census tracts, including two which are environmental justice communities, are anticipated to
22 experience the development of another new transmission line (the proposed SunZia project).

23 **Table 4.21-5.** Existing Infrastructure and RFFAs in Census Tracts Traversed by Proposed Southline
24 Alternatives for the Upgrade Section

2010 Census Tract	Total Population	Environmental Justice Community?/ Basis	Existing Linear Infrastructure*	RFFAs*
Arizona				
Cochise	131,346			
2.01	3,747	Minority	Transmission/Gas	New Transmission
2.03	2,740	Poverty	Transmission/Gas	Remove/Replace
3.01	4,212	Poverty	Transmission/Gas	No
3.02	4,851	No	Transmission/Gas	Remove/Replace

1 **Table 4.21-5.** Existing Infrastructure and RFFAs in Census Tracts Traversed by Proposed Southline
 2 Alternatives for the Upgrade Section (Continued)

2010 Census Tract	Total Population	Environmental Justice Community?/ Basis	Existing Linear Infrastructure*	RFFAs*
3.03	3,457	No	Transmission/Gas	New Transmission
4	2,206	Poverty	Transmission/Gas	Remove/Replace
Pinal	375,770			
8.02	4,154	No	Transmission/Gas	New Transmission
21.03	5,143	No	Transmission/Gas	Remove/Replace
Pima	980,263			
2	4,409	Minority/Poverty	Transmission/Gas	No
1	514	Poverty	Transmission/Gas	No
11	2,900	Minority/Poverty	Transmission/Gas	New Transmission
12	3,791	Minority/Poverty	Transmission/Gas	Remove/Replace
25.01	6,213	Minority	Transmission/Gas	No
25.03	4,153	Minority/Poverty	Transmission	No
25.04	5,825	Minority/Poverty	Transmission	Remove/Replace
25.05	6,534	Minority/Poverty	Transmission	Remove/Replace
39.01	2,095	Minority/Poverty	Transmission	Remove/Replace
39.02	2,701	Minority/Poverty	Transmission	Remove/Replace
39.03	3,232	Minority	Transmission/Gas	Remove/Replace
40.61	4,821	No	Transmission/Gas	New Transmission
41.09	5,304	No	Transmission/Gas	Remove/Replace
41.14	5,424	Minority/Poverty	Transmission	Remove/Replace
43.1	2,084	Minority	Transmission/Gas	Remove/Replace
44.11	7,085	Poverty	Transmission/Gas	No
44.14	3,194	Minority	Gas	No
44.15	1,622	Minority/Poverty	Transmission/Gas	Remove/Replace
44.18	3,348	No	Transmission/Gas	Remove/Replace
44.19	6,287	Poverty	Transmission/Gas	Remove/Replace
44.22	5,312	Minority	Transmission/Gas	Remove/Replace
44.23	4,324	No	Transmission/Gas	Remove/Replace
44.25	6,166	No	Transmission/Gas	Remove/Replace
44.27	8,138	No	Transmission/Gas	Remove/Replace
44.29	7,398	No	Transmission/Gas	Remove/Replace
44.3	2,454	Poverty	Transmission/Gas	Remove/Replace
44.31	3,903	No	Transmission/Gas	Remove/Replace
45.04	7,131	Minority/Poverty	Transmission/Gas	Remove/Replace
4105.02	6,243	Minority	Transmission/Gas	Remove/Replace
9409	1,885	Minority/Poverty	Transmission/Gas	Remove/Replace

3 Source: Census Bureau (2011).

4 *Geographic data for existing linear features included locations of transmission lines and gas pipelines. Geographic data for location of new projects
 5 only included linear features with known, proposed locations. Other projects, such as proposed renewable energy facilities, do not have sufficient
 6 information available at this time to precisely identify their future locations.

1 As the preceding tables indicate, almost all of the environmental justice communities that could be
2 affected by construction and operation of the proposed Southline alternatives already have existing
3 transmission lines in place. Development of a new transmission line in these areas would likely have a
4 smaller cumulative impact than in areas without such existing linear features. In many cases, cumulative
5 impacts would also be reduced by the anticipated future removal of an existing transmission line
6 (primarily the existing Western line that would be replaced by the proposed Southline Project).

7 Table 4.21-6 summarizes direct, indirect, and cumulative effects of the proposed Southline Project on
8 socioeconomics and environmental justice.

9 ***Public Health and Safety***

10 The geographic analysis area for cumulative impacts to public health and safety is the CEAA described in
11 section 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This CEAA for
12 analyzing potential cumulative impacts to public health and safety represents a reasonable region in which
13 occupational risks, severe weather and fire risks, and potential exposure to EMFs, when assessed in
14 combination with other cumulative actions, would be impacted if the proposed Project were implemented.
15 Cumulative actions discussed herein are based on the existing conditions of the recreation resources
16 affected environment described in chapter 3 and the relevant projects presented in table 4.21-1.

17 Past and present actions have had a negligible impact on public health and safety. Construction of linear
18 projects such as roads, railroads, transmission lines, and pipelines has occurred throughout the analysis
19 area, with negligible impact on public health and safety. EMFs from the existing transmission lines are
20 not impacting public health and safety.

21 Reasonably foreseeable actions are in the analysis area that have the potential to result in cumulative
22 impacts to human health and safety by increasing the potential for occupational and fire risks, and
23 generating EMFs where they previously did not exist. These projects include the proposed SunZia project,
24 small (<100 MW) and large-scale (>100 MW) solar projects, substation construction and expansions,
25 and the future expansion of the communities and roadways within the analysis area (e.g., Tucson).
26 Construction of these projects would have a short-term minor impact to public health and safety by
27 temporarily increasing occupational risks and fire risks. However, because construction of these projects
28 would be unlikely to occur at the same time and location as construction of the proposed Project, there
29 would not be a cumulative impact. Future transmission projects that would occur within the analysis area
30 would increase the potential for public exposure to EMFs; however, this impact would be considered
31 negligible because they would not exceed EMF exposure guidelines outside of the transmission line
32 ROW.

33 ***Hazardous Materials and Hazardous and Solid Waste***

34 The geographic analysis area for cumulative impacts from hazardous materials and hazardous and solid
35 waste is the CEAA described in section 4.21.2. The temporal scope is for the life of the Project, which is
36 50 years. This CEAA for analyzing potential cumulative impacts from hazardous materials and hazardous
37 and solid waste represents a reasonable region in which existing conditions, when assessed in
38 combination with other cumulative actions, would be impacted if the proposed Project were implemented.
39 Cumulative actions discussed herein are based on the existing conditions of the hazardous materials and
40 hazardous and solid waste affected environment described in chapter 3 and the relevant projects presented
41 in table 4.21-1.

42 None of the actions identified in the list of cumulative actions, when combined with the proposed Project,
43 would contribute to a cumulative effect on the generation of hazardous materials and solid waste in the

1 analysis area. This proposed Project and the other actions identified would not produce any obvious
2 changes to the health and safety of humans or the environment as they relate to the use of hazardous
3 materials. The potential projects would result in additional use of hazardous materials and increased
4 quantities of waste generated during their construction and operation, within their respective project
5 locations. However, it should be noted that like the proposed Southline Project, these other projects are
6 also required to adhere to Federal, State, and local laws, ordinances, and regulations, and implement
7 safety-related plans and programs to ensure safe handling, storage, and use of hazardous materials.
8 Therefore, implementation of proper mitigation measures and compliance with Federal, State, and local
9 laws, ordinances, and regulations would provide sufficient mitigation to minimize or completely eliminate
10 direct or indirect impacts from the use of hazardous materials by these activities.

11 ***Transportation***

12 The geographic analysis area for cumulative impacts to transportation is the CEAA described in section
13 4.21.2. The temporal scope is for the life of the Project, which is 50 years. This CEAA for analyzing
14 potential cumulative impacts to transportation represents a reasonable region in which traffic impacts on
15 primary roads, impacts to BLM roads and roadless areas, consistency with transportation plans, and
16 impacts to airports, when assessed in combination with other cumulative actions, would be impacted if
17 the proposed Project were implemented. Cumulative actions discussed herein are based on the existing
18 conditions of the recreation resources affected environment described in chapter 3 and the relevant
19 projects presented in table 4.21-1.

20 Past and present actions have had negligible to beneficial impact on transportation. Construction of linear
21 projects such as roads and transmission lines has occurred throughout the analysis area, with negligible
22 impact on primary roadway traffic. Once constructed, new roads have had a beneficial impact on primary
23 roadway traffic by improving the transportation network and conforming to long-term transportation
24 plans. The construction of roads on or near BLM lands has increased public accessibility to BLM roads
25 and roadless areas.

26 Reasonably foreseeable actions are in the analysis area that have the potential to result in cumulative
27 impacts on the transportation system. These actions include various future transmission and generation
28 projects, minor improvements to existing transportation facilities, and the City of Tucson's Silverbell
29 Road Improvement project. The construction of these future projects would generate minor short-term
30 traffic on primary roadways; however it is unlikely that construction would occur at the same time and
31 location as construction of the proposed Project. These projects would be expected to be in conformity
32 with future transportation plans. Any project that is within the vicinity of an airport would be expected to
33 consult with the airport to ensure conformity with airport operations and plans. Therefore, there would not
34 be a cumulative impact to traffic on primary roadways, future transportation plans, and airports.

35 When combined with the new access roads that would be constructed for the proposed Project, the
36 construction of new roads to facilitate access to other new transmission lines and generation projects
37 would be expected to increase public access to BLM roads and roadless areas. However, there would be
38 minimal potential to open access to land areas where it is not currently available and no large expanses of
39 land that are currently inaccessible would become available because of the existing network of roads and
40 trails. Therefore, the cumulative impact of new access roads constructed as part of the proposed Project
41 and reasonably foreseeable actions would be considered a long-term, minor impact.

42 ***Intentional Acts of Destruction***

43 In general, past acts of sabotage and terrorism on transmission lines have been rare and the resulting
44 damage has been minimal. Future acts of sabotage and terrorism are impossible to predict and the

1 magnitude of damage that these acts may have is impossible to calculate. Because predicting an act of
2 sabotage or terrorism and the magnitude of the potential damage on the proposed Project and other
3 transmission lines would be purely speculative, a cumulative effects analysis on intentional acts of
4 destruction is not possible.

5 **4.21.5 Summary**

6 A summary of cumulative impacts by resource is presented in table 4.21-6.

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Air Quality	Past and current emission sources include power plants, mines, and manufacturing facilities (see table 3.2-5 in section 3.2 for list of past and current major air pollutant emission sources). Pollutant PM ₁₀ non-attainment area (Rillito, AZ) and CO maintenance area (Tucson, AZ).	Air quality anticipated to remain the same as currently measured by existing ambient air quality monitors.	Minor, short-term construction emissions; minor, long-term operation and maintenance emissions	Potential construction of new air emissions sources (e.g., electric utilities, mines, manufacturing facilities) and potential expansion of existing ones.	Minor impact to air quality during construction and moderate impact to air quality during operations and maintenance; however, proposed Project contribution to any air quality degradation would be negligible.
Noise	Residential and commercial development, including one urban area (Tucson) and several small- and medium-sized towns; roadways, including where the proposed Project would pass near interstate highways, multiple airports.	Noise levels anticipated to remain the same as currently existing ambient noise levels.	Major but short-term, temporary, and intermittent increase in noise levels during construction activities. During operation and maintenance, noise levels would be anticipated to remain at current levels.	Potentially major, but short-term, temporary, and intermittent increases to noise levels from construction activities associated with future development. Minor impact to noise levels from on-going maintenance and operations of reasonably foreseeable future projects.	Minor cumulative effect from proposed Project and past, present, and reasonably foreseeable future activities.
Geology and Minerals	No Impact	No Impact	No Impact	No Impact	No Impact
Soils	Any ground-disturbing activities from existing pipelines, transmission lines, and railroads	Existing pipelines, transmission lines, and railroads would remain in operation through the life of the proposed Project. No additional ground disturbance or impacts to soil resources are likely from continued operations	Minor, temporary decrease in soil production during construction. Avoidance and implementation of BMPs mitigates most potential impacts	Minor, temporary short-term impacts to soil resources and functioning due to construction activities and operation of facilities where collocated	Minor negligible cumulative effect during construction and operation.

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Cultural Resources	<p>The construction of existing transmission lines, gas pipelines, and railroads likely adversely affected cultural resources; however, adverse impacts would have been mitigated primarily through avoidance and data recovery. Many past linear projects following travel corridors where historic trails are found and alter the setting of these trails, as well as some historic properties.</p>	<p>Current operations of existing transmission lines, pipelines, and railroads have little impact on cultural resources. Some ground disturbance may occur during maintenance activities which may impact resources. Alterations to setting of historic trails and historic properties continue.</p>	<p>Impacts to cultural resources by the proposed Project would primarily come from construction. Direct impacts range from minor to major; however, adverse effects would be mitigated with the primary form of mitigation being avoidance. Some visual effects through alteration of setting are expected for historic trails and some historic properties.</p>	<p>Impacts to cultural resources would primarily come from construction phases of future projects; however, for the majority of those projects, adverse effects to cultural resources would be mitigated.</p>	<p>Adverse direct effects of past actions, the proposed Project, and future actions would be mitigated; therefore, there are no cumulative direct effects. Because many of the past linear projects, the proposed Project, and future linear projects follow historic travel corridors, cumulative visual impacts to historic trails are expected from alterations to their settings.</p>
Water Resources (Mimbres Subbasin)	<p>Ground disturbance within same watersheds from existing pipelines, transmission lines, and railroads. Any impacts to water quality and water quantity from these past actions are already reflected in the description of existing conditions.</p>	<p>Existing pipelines, transmission lines, and railroads would remain in operation through the life of the proposed Project. No additional ground disturbance or impacts to water quality or quantity are likely from continued operations.</p>	<p>Avoidance and implementation of BMPs mitigates most potential impacts. Significant impacts exist for Proposed Midpoint substation (permanent structures within floodplains).</p>	<p>Fifty-eight miles of proposed SunZia and High Plains Express route lie within same watershed as Proposed Midpoint substation; placement of permanent pole structures in floodplains are unlikely to cause significant impacts. An additional 54,800 acres of the proposed Organ Mountains Desert Peaks National Monument is partially within the same watershed; management as a national monument is likely to improve watershed conditions overall. Four energy projects (Sapphire, New Solar Ventures, Brightsource, NextLight) are also located within the same watershed, but insufficient detail is known to determine impact. Impacts from residential development likely mitigated by municipal stormwater systems.</p>	<p>Proposed projects are unlikely to result in significant impacts to the same floodplains within which the Proposed Midpoint substation is located, and therefore are unlikely to result in cumulative impacts to floodplain resources. Energy projects have large footprints, and these projects could potentially result in cumulative impacts.</p>

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Water Resources (Willcox Playa Subbasin)	Same as above	Same as above	Avoidance and implementation of BMPs mitigates most potential impacts. Significant impacts exist for Willcox Playa (unavoidable WUS or wetlands).	Twenty-one miles of proposed SunZia and High Plains Express route lie within same watershed as Willcox Playa; avoidance and implementation of BMPs mitigates most potential impacts. In addition, proposed route is located over 10 miles north of Willcox Playa. Buffalo Soldier Range overlies this watershed but is unlikely to have surface disturbance. Impacts from projects on existing utility lines likely mitigated by avoidance and implementation of BMPs.	Proposed projects are unlikely to result in significant impacts and are not located near Willcox Playa, and therefore are unlikely to cause cumulative losses of WUS or wetlands associated with Willcox Playa.
Water Resources (San Simon Subbasin)	Same as above	Same as above	Avoidance and implementation of BMPs mitigates most potential impacts. Significant impacts exist for Stein's Creek (unavoidable WUS or wetlands).	Thirty-six miles of proposed SunZia and High Plains Express route lie within same watershed as Stein's Creek; avoidance and implementation of BMPs mitigates most potential impacts. An additional 22,891 acres of disturbance for proposed Safford Solar Energy project, and unspecified acreage for work between Bowie Power Station and Willow Substation also occur within same watershed. Impacts to WUS unlikely to be avoided from large footprint of project.	Both proposed Project and proposed ground-disturbing projects have likelihood of unavoidably impacting WUS and/or wetlands within the same watershed. Cumulative impacts to downstream waters on the main stem of the San Simon River could include incremental degradation of water quality and changes in water flow amount, frequency, or flooding severity.
Water Resources (Upper Santa Cruz Subbasin)	Same as above	Same as above	Avoidance and implementation of BMPs mitigates most potential impacts. Significant impacts exist for Santa Cruz River (unavoidable WUS or wetlands).	Approximately 200 acres of ground disturbance from the UA Tech Park Thermal Storage project and 8 miles of Silverbell Road improvements lie within same watershed as the Santa Cruz River; avoidance and implementation of BMPs mitigates most potential impacts. Impacts from projects on existing utility lines likely mitigated by avoidance and implementation of BMPs. Impacts from residential development likely mitigated by municipal stormwater systems.	Proposed projects are unlikely to result in significant impacts, and are therefore unlikely to cause cumulative impacts on the main stem of the Santa Cruz River downstream from potential unavoidable impacts to WUS and/or wetlands from the proposed Project.

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Water Resources (Lower Santa Cruz Subbasin)	Same as above	Same as above	Avoidance and implementation of BMPs mitigates most potential impacts. Significant impacts exist for proposed Marana substation (permanent structures within floodplains).	Ten miles of proposed SunZia and High Plains Express route lie within same watershed as Proposed Marana substation; placement of permanent pole structures in floodplains are unlikely to cause significant impacts. Impacts from projects on existing utility lines unlikely to cause additional impacts to floodplains. Impacts from residential development unlikely to be located within floodplains.	Proposed projects are unlikely to result in significant impacts to the same floodplains within which the Proposed Marana substation is located, and therefore are unlikely to result in cumulative impacts to floodplain resources.
Vegetation	Many areas are already disturbed by agriculture, grazing, transmission lines, pipelines, and a variety of roads.	Current activities and impacts to vegetation communities are expected to remain at current levels, however because the area is subject to existing disturbance and collocated facilities there is likely to be continued expansion particularly of linear transmission lines and pipeline facilities.	Minor short-term impacts to vegetation due to construction activities and operation of facilities.	Minor short-term impacts to vegetation due to construction activities and operation of facilities where collocated. Projects that impact large acreages of landscape not already disturbed, such as solar array projects that will result in thousands of acres of new impacts, are likely to contribute to Southline cumulative impacts more so than linear transmission or pipeline projects that may share already disturbed acreages or other indirect impacts with Southline.	Minor, negligible cumulative effect during construction and operation. Collocated facilities reduce overall impacts to vegetation communities and application of PPMs mitigate impacts. Most vegetation communities impacted by cumulative actions are common and widespread geographically. Cumulative impacts to vegetation communities would therefore result in only short-term, minor impacts to vegetation communities, special status species, and noxious weeds.
Wildlife	Major, long-term impacts from livestock grazing; roadways and developments; electrical transmission and generation; mining; water impoundment and groundwater pumping; conversion of land to agricultural uses; and introduction and spread of non-native species.	Moderate, long-term impacts from livestock grazing; roadways and developments; electrical transmission and generation; mining; water impoundment and groundwater pumping; conversion of land to agricultural uses; and introduction and spread of non-native species.	Minor/Negligible to Moderate habitat loss, disturbance and direct mortality from construction equipment during construction. Minor/negligible to Moderate operational/maintenance impacts to migratory bird species from collisions with transmission lines/towers.	Moderate, short-term to long-term habitat loss, degradation, fragmentation and species mortality during construction only. Increased non-native plant introduction and spread. Minor/negligible, long-term operational impacts including impacts to migratory bird species from collisions with transmission lines and other man-made structures.	Major to moderate, long-term cumulative effect during construction and moderate, long-term effects from operation.

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Paleontological	No fossil localities encountered as a result of past development such as transmission lines, pipelines, railroads, urban development, or agriculture.	Current operations of existing transmission lines, pipelines, railroads, and other facility have no impact to paleontological resources.	Potential major to moderate impacts to paleontological resources due to ground disturbance if fossils are present for the New Build Section. Minor/negligible or no impact for the Upgrade Section. Adverse impacts would be mitigated according to the appropriate regulation.	New Build: Proposed new National Monument would positively effect paleontological resources through protection. Majority of projects near New Build Section are in areas of low PFYC, so no negative effects are anticipated. One project, the SunZia Transmission Line has the potential to negatively impact paleontological resources; however, adverse impacts would be mitigated according to appropriate regulation. The potential for the discovery of new important fossils during development may also be positive. Upgrade: No impacts anticipated for Upgrade Section.	No impacts from past or present projects and any negative impacts from the proposed Project or future projects would be mitigated; therefore, no cumulative impacts are anticipated.
Visual Resources	Transmission lines, structures, gas pipelines, residential and industrial developments, dirt surface roads and paved roads have all contributed to changes to the existing scenic quality and landscape in the area	Present actions in the CEAA are minimal and consist of incremental growth in residential and commercial development near Deming, Lordsburg, and throughout the city of Tucson. Impacts to landscape and scenic quality are similar to existing conditions.	The proposed Project would result in changes to the existing landscape and scenic quality.	Future actions including additional transmission projects, renewable energy projects would contribute to changes to the existing landscape.	Past, present, and reasonably foreseeable future actions when combined with impacts of the proposed Project would incrementally convert the scenic quality of the natural landscapes into a more developed and industrialized landscape that would adversely affect scenery, and sensitive viewers over time.
Land Use	Establishment of Federal, Tribal, state, and private lands; establishment of allowable land uses.	Land Ownership, management of lands (i.e., Comprehensive, General, Resource Management or Forest Plans), land use authorizations and future or planned land uses occur CEAA-wide.	No impacts to land ownership, moderate impacts to management of lands, minor impact to land use authorizations, moderate impact to future or planned land uses.	Moderate but temporary impacts to management of lands during construction.	Moderate cumulative effects during construction and operation.

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Farmlands and Rangelands	Establishment of Federal, state, and private lands; community and agricultural development, construction of linear projects such as roads and transmission lines.	Continued operations and maintenance of transportation and transmission infrastructure.	The proposed Project would avoid existing active farmlands, therefore it would only have short-term minor adverse impacts to farmland should a laydown area be required in farmland. A long-term minor adverse impact would occur to rangeland as a result of removing forage habitat on lands permitted for grazing.	Construction and operation of future transmission, generation, and transportation projects would potentially have short-term to long-term minor adverse impacts to farmland and rangeland as a result of converting farmland or removing forage habitat on lands permitted for grazing.	No cumulative impact on farmland because proposed Project would not convert existing active farmlands. Long-term minor adverse impacts to rangeland would occur by removing forage habitat on lands permitted for grazing.
Military	Community settlement, transportation infrastructure, Fort Huachuca and BSETR established.	BSETR activities, DOD operations, transmission line operation, community development	Minor, short-term impacts to military operations, MTRs, and military installations	Major, long-term impacts to military operations, MTRs, and military installations if the BSETR becomes limited or certain activities are suspended.	Moderate cumulative effect to military installations (BSETR).
Special Designations	Prehistoric and Historic use of natural features or routes, Establishment of Federal, state, and tribal special designations; road, ranching, and mineral development	Use of special designations are anticipated to remain at current seasonal levels; there is a noticeable increase in activities during summer and hunting seasons.	Minor, temporary impact to special designations during construction only.	Moderate impact if Organ Mountains – Desert Peaks National Monument is designated.	Minor cumulative effect since the proposed Southline project and all future cumulative actions must conform to the prescriptions of special designations
Wilderness Characteristics	Development around roads, towns, and water sources. Lands far removed from these features tend to possess wilderness characteristics more than lands proximate to these features.	Establishment of lands managed to maintain wilderness characteristics via RMP amendment and in accordance with FLPMA.	Moderate, long-term impact to Afton east WLU since the size would be reduced to less than 5,000 acres.	Minor, long-term impacts if future actions reduce size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, or supplemental values.	Minor, long-term effect. The Afton East WLU would be further reduced by other linear ROW projects.

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Recreation	Proliferation of mining and ranching roads; establishment of Federal, state, and private lands; community development.	Recreation activity anticipated to remain at current seasonal levels; there is a noticeable increase in recreational activities during summer and hunting seasons.	Minor, temporary decrease in recreational setting and desired experiences during construction only. During operation and maintenance, recreational activity would be anticipated to remain at current levels.	Minor, temporary decrease in recreational activities during construction only. Some large-scale energy production projects would preclude all recreation during construction and operation.	Minor/negligible cumulative effect during construction and operation.
Socioeconomics	Historic economic activities (mining, ranching, tourism, trade, etc.) Availability of private land and locations of key infrastructure such as railroads, highways and water systems	Low density development in central portions of analysis area. Economic development constrained by distance to markets and modest labor force availability.	Short-term economic benefits from construction activity. Potential short-term adverse impacts on housing and local services in more remote areas during construction. Long-term negative impacts on immediately adjacent property values. Long-term significant benefits in tax revenues for some communities and improved electrical service quality and capacity to meet demand from new growth.	Other proposed transmission lines, renewable energy facilities, and other projects.	Southline could facilitate development of new renewable energy projects. Such projects could offer significant economic and fiscal benefits to local communities.
Environmental Justice	Numerous environmental justice communities located in analysis area.	Many of these communities already proximate to existing linear infrastructure such as transmission lines, gas pipelines, highways and railroads	Minor, incremental adverse effect on communities where linear infrastructure is already present.	Removal of some existing linear infrastructure (existing Western line). Other proposed transmission lines (primarily SunZia).	Removal of existing linear infrastructure would reduce impacts on environmental justice communities. Other proposed transmission lines (could add to incremental adverse effects for some environmental justice communities).

Table 4.21-6. Summary of Direct, Indirect, and Cumulative Effects (Continued)

	Past Actions	Present Actions	Proposed Project	Future Actions	Cumulative Effect
Public Health and Safety	Establishment of Federal, state, and private lands; community development; construction of transmission lines.	Continued operations and maintenance of existing transmission infrastructure.	Negligible increase potential for occupational risks to occur during construction; negligible increase of potential for fire risks to occur during construction; negligible increase in potential for public exposure to EMFs during operation.	Linear projects such as roads and transmission lines would be constructed in the vicinity of proposed transmission lines, temporarily increasing the potential for occupational risks and fire risks to occur during construction. Long-term increase in potential for public exposure to EMFs during operation of future transmission lines.	No cumulative impact to occupational risks, or fire risks. Negligible increased risk of public exposure to EMFs when combined with other future transmission projects
Hazardous Materials and Solid Waste	No Impact	No Impact	No Impact	No Impact	No Impact
Transportation	Establishment of Federal, state, and private lands; community development; construction and operation of roads.	Continued operations and maintenance of existing transportation infrastructure.	Temporary, short-term minor adverse impacts to traffic on primary roadways. Long-term, minor adverse impacts of increasing accessibility to areas currently not accessible by the public. No impact to future transportation plans and airports.	Future transmission, generation, and transportation projects would generate short-term minor adverse impacts to traffic on primary roadways, conform to transportation plans, not impact airports, and have the potential to increase access to BLM roads and roadless areas.	No cumulative impact to traffic on primary roadways because construction would not likely occur at the same time and location as future actions. No impact to future transportation plans and airports. Long-term minor adverse impact to increasing accessibility to BLM roads and roadless areas.
Intentional Acts of Destruction			Not applicable	Not applicable	Not applicable

1 Chapter 5

2 CONSULTATION AND COORDINATION

3 5.1 INTRODUCTION

4 BLM and Western conducted consultation and coordination activities as required by CEQ regulations
5 (40 CFR 1500–1508) regarding NEPA and applicable Federal laws, such as requirements to afford
6 Federal and intergovernmental agencies, tribes, stakeholders, organizations, and the public with
7 meaningful opportunities to provide input and identify concerns regarding the EIS.

8 The purpose of the scoping process is to identify important issues, concerns, and potential impacts that
9 require analysis in the EIS and to eliminate insignificant issues and alternatives from detailed analysis.
10 Public involvement is a vital component of NEPA for vesting the public in the decision-making process
11 and allowing for full environmental disclosure. The list of stakeholders and other interested parties is also
12 updated and generally expanded during the scoping process.

13 This chapter summarizes specific consultation and coordination efforts carried out by the BLM and
14 Western throughout the development of the EIS. Though not a part of the NEPA process, this chapter also
15 summarizes Southline’s public involvement efforts conducted prior to their filing of the formal ROW
16 application.

17 5.2 PUBLIC INVOLVEMENT

18 5.2.1 Southline’s Pre-NEPA Public Coordination

19 Early in the process, and prior to filling out the ROW application, Southline embarked on a public
20 engagement program that was designed to identify stakeholders and to work closely with these
21 stakeholders. As discussed in chapter 1, Southline conducted a series of over 25 stakeholder meetings and
22 workshops New Mexico and Arizona throughout July, August, and September 2011 (see table 1-6).
23 The goals of the meetings were to give the public early notification of the proposed Project and to begin
24 work on Project routes with interested stakeholders, such as land management agencies, local
25 jurisdictions, community organizations, and landowners.

26 Pre-NEPA public meetings were hosted in Deming and Lordsburg, New Mexico (September 21–22,
27 2011); in Willcox, Tucson, and Marana, Arizona (September 27–29, 2011); and in Benson, Arizona
28 (November 10, 2011). Routing workshops were hosted in Deming (September 22, 2011) and Tucson
29 (September 28, 2011). Southline also met with county commissioners and supervisors from Hidalgo and
30 Luna counties in New Mexico, from Cochise and Pima counties in Arizona, and city administrators from
31 Deming, Columbus, Willcox, and Tucson.

32 Because of Southline’s early public outreach efforts, the public was informed about the proposed Project
33 and was familiar with the goals of the proposed Project prior to the formal agency public scoping process.
34 Stakeholders had participated in the preliminary routing process, leading to a better public understanding
35 about Southline’s approach to routing. Southline used the input generated from this early public
36 involvement to develop Project routes as proposed in their ROW application, and this initial public
37 outreach formed the foundation for the proposed Project’s NEPA public process.

5.2.2 NEPA Public Scoping Period

The public was informed about the formal application for the Project and public scoping period by an NOI published in the Federal Register on April 4, 2012. This initiated the NEPA process for the Project and began a 60-day public scoping period, during which the public had the opportunity to provide input on potential issues to be addressed in the EIS.

As a result of public requests for an extension of the 60-day scoping comment period (ending on June 5, 2012), the scoping comment period was extended by 30 days (ending on July 5, 2012). Notification of the 30-day extension was disseminated via Internet news release and email. NEPA scoping was particularly effective since agencies and the public were already familiar with the proposed Project and had actively been engaged in formulating routing alternatives during Southline’s pre-NEPA public outreach. The comments received became part of the administrative record and are included in the EIS analysis.

Members of the public had several methods for providing comments during the scoping period:

- Comments could be handwritten on comment forms at the scoping meetings. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Emailed comments could be sent to a dedicated email address: BLM_NM_Southline@blm.gov.
- Individual letters and comment forms could be mailed via U.S. Postal Service to the BLM Las Cruces District Office.

All comments were given equal consideration, regardless of method of transmittal.

5.2.3 Scoping Meetings

BLM and Western held a total of six public and two agency scoping meetings for the proposed Project: one agency meeting and three public meetings in New Mexico, and one agency and three public meetings in Arizona. As much as possible, public scoping meeting were held in locations intended to provide more immediate and easier access for potential environmental justice communities. The scoping meetings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates. Table 5-1 identifies the meeting notification methods and dates.

Table 5-1. Meeting Notification Methods and Dates

Publicity Item	Venue and Date
NOI	Federal Register – April 4, 2012
Newspaper ads	Las Cruces Sun-News – April 20 and May 4, 2012 The Deming Headlight – April 20 and 27, 2012 Hidalgo County Herald – April 19 and May 3, 2012 San Pedro Valley News-Sun – April 19 and May 3, 2012 Arizona Daily Star – April 20 and May 7, 2012 Arizona Range News – April 25 and May 2, 2012 The Eastern Arizona Courier – April 29 and May 9, 2012 The Explorer – May 9, 2012
Email distribution	Email to BLM Stakeholder List – April 27, 2012 – Agency and public scoping notification (653 recipients) June 4, 2012 – Notification of extended comment period (790 recipients) June 28, 2012 – Notification of scoping comment period end date (788 recipients)

1 **Table 5-1. Meeting Notification Methods and Dates (Continued)**

Publicity Item	Venue and Date
Postcard distribution	U.S. Postal Service (Public and agency recipients) – April 23, 2012 – Agency and public postcard notice (626 recipients) April 25, 2012 – Agency and public postcard notice (64 recipients) May 1, 2012 – Notification to permittees (206 recipients)
BLM web site	http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html Posting of the meetings at least 15 days prior to the meetings

2 Table 5-2 gives the dates, times, and locations of the public and agency scoping meetings, as well as the
 3 number of attendees.

4 The meetings were conducted in an open-house format, with a PowerPoint presentation and question-and-
 5 answer period following the presentation. The open-house format and presentation were designed to allow
 6 attendees to view informational displays and hear a presentation of the proposed Project and summary of
 7 the NEPA process, as well as to allow members of the public to ask agency staff about the proposed
 8 Project and the EIS process and submit written or verbal comments onsite.

9 **Table 5-2. Public and Agency Scoping Meetings**

Date	Time	City/State	Address	No. of Attendees
Public Meetings				
May 8, 2012	5:30 p.m.	Las Cruces, New Mexico	Mesilla Valley Days Inn and Suites 901 Avenida de Mesilla	22
May 9, 2012	5:30 p.m.	Deming, New Mexico	Mimbres Valley Special Events Center 2300 East Pine Street	30
May 10, 2012	5:30 p.m.	Lordsburg, New Mexico	Dugan-Tarango Middle School 1352 Hardin	20
May 15, 2012	5:30 p.m.	Willcox, Arizona	Quality Inn 1100 West Rex Allen Drive	20
May 16, 2012	5:30 p.m.	Benson, Arizona	Benson Unified High School 360 South Patagonia Street	22
May 17, 2012	5:30 p.m.	Tucson, Arizona	Palo Verde High Magnet School 1302 South Avenida Vega	31
Agency Meetings				
May 8, 2012	10:00 a.m.	Las Cruces, New Mexico	Mesilla Valley Days Inn and Suites 901 Avenida de Mesilla	18
May 17, 2012	10:00 a.m.	Tucson, Arizona	National Advanced Fire and Resource Institute 3265 East Universal Way	31

10 Meeting attendees were asked to sign in upon entering, at which time they were provided with handouts
 11 and informed of the meeting format and how to comment at the meeting. The handouts (i.e., comment
 12 form, newsletter, and contact business card) and informational displays provided information about the
 13 following:

- 14 • NEPA and the EIS process;
- 15 • Agency purpose and need;

- 1 • Project background;
- 2 • Location maps;
- 3 • Similarities and differences between the Southline Project and the SunZia project;
- 4 • Potentially affected resources and issues to be analyzed in the EIS;
- 5 • Planning process and potential amendments to RMP(s); and
- 6 • How to provide comments to the BLM and Western.

7 Additionally, an interactive GIS mapping station was available for meeting attendees to view the
8 proposed Project to aid them in providing comments about specific locations within the analysis area.

9 These meetings served to provide information on Project planning activities to date, and to give agency
10 personnel and members of the public the opportunity to ask questions or make comments. Presentations
11 were given at each meeting by the BLM National Project Manager and a representative of Southline.
12 Western staff members were also available at the meetings for questions, as were staff members from
13 BLM’s Las Cruces, Safford, and Tucson Field Offices, and staff members from Southline. Meeting
14 attendees were encouraged to ask questions and were allowed to provide oral comments after the
15 presentation. However, BLM asked attendees to submit their comments in writing, as no court reporter
16 was present and the meetings were not recorded.

17 **5.2.4 Scoping Comments**

18 Scoping comments were submitted in a variety of formats (i.e., U.S. Postal Service, email, and comment
19 form). All comments and corresponding information (e.g., exhibits, photographs, and maps) were entered
20 into the comment database. Comments were coded to reflect the subject matter of concern, sorted, and
21 summarized for consideration in the development of the EIS. Table 5-3 gives the number of comments
22 received by source.

23 **Table 5-3. Number of Scoping Comments Received by Source**

Source	Comments Received
U.S. Postal Service	39
Email	68
Comment Form	26
Total	133

24 Note: Scoping comments received May 8 through August 1, 2012.

25 During public and agency scoping, 109 non-duplicative comments were submitted, and 24 comments
26 were received from the same person or organization, for a total of 133 comments received. Comments
27 often addressed multiple issues and included input on several issue categories, which when broken out
28 totaled 576 comments. Table 5-4 shows the comments categorized by issue.

29 A more detailed description of the scoping process, preliminary issues, and scoping comment analysis is
30 contained in the “Scoping Summary Report” (BLM and Western 2012). The “Scoping Summary Report”
31 is available at the BLM Project website: [http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_](http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html)
32 [transmission.html](http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html).

1

Table 5-4. Summary of Scoping Comments Received by Issue

Issue Category	Comments Received	Percentage of Total
Air Quality	8	1.4%
Biological Resources	109	18.9%
Cultural Resources	29	5.0%
Hazardous Materials	1	0.2%
Intentional Destructive Acts	1	0.2%
Lands	23	4.0%
Noise	1	0.2%
Military	8	1.4%
Reclamation	1	0.2%
Public Health and Safety	7	1.2%
Recreation	13	2.3%
Request	47	8.2%
Socioeconomics	37	6.4%
Soils and Geology	5	0.9%
Transportation	14	2.4%
Visual Resources	27	4.7%
Water Resources	19	3.3%
Wilderness	4	0.7%
Miscellaneous	23	4.0%
NEPA/Process	199	34.5%
Total	576	

2

Note: All comments were received by August 1, 2012.

3

Comments received may have included input on several issue categories.

4 **5.2.5 Project Status**

5 The Project website as well as email was used to provide information regarding Project status to agencies,
 6 stakeholders, and other interested parties. There were no direct mailings; however, a copy of the Project
 7 newsletter with flyers advertising scoping meetings was sent to libraries, community centers, city and
 8 town halls, and senior centers, as well as to the BLM State, District, and Field Offices.

9 In addition, there is a toll-free information line (800-356-0805) that is provided on written Project
 10 material. The information line is maintained and updated by BLM with deadlines, important comment
 11 dates, and publication notification information. Also included are meeting details when meetings are
 12 announced, and Project contacts.

13 **5.2.6 Draft Environmental Impact Statement Distribution**

14 The DEIS will be made available for public review and posted on the Project website. The notice of
 15 availability (NOA) of the DEIS will be announced in the Federal Register, and posted on the Project
 16 website. The NOA will also be advertised in the local and regional media and announced via newsletters,
 17 postcards, and emails. Everyone on the most current mailing list will receive notification of the release of

1 the DEIS via mailing with a detachable postcard that can be returned to request a copy of the DEIS on
2 CD. Hard copies will be available for public viewing at BLM offices (New Mexico State Office, Las
3 Cruces District Office, Arizona State Office, Safford Field Office, and Tucson Field Office).

4 Public comments will be accepted for 90 days, during which public meetings or hearings will be held to
5 receive comments on the DEIS. The BLM and Western will review and consider all comments received
6 on the DEIS. The document will be modified as appropriate based on public comments; all substantive
7 comments and responses will be incorporated into the FEIS.

8 **5.2.7 Final Environmental Impact Statement Distribution**

9 NOA of the FEIS will be announced in the Federal Register, and posted on the Project website. The NOA
10 will also be advertised in local and regional media and announced via newsletters, postcards, and emails.
11 Notification will be made to those on the most current mailing list and hard copies of the FEIS will be
12 made available as described above. A ROD selecting the alternative to be implemented will be made by
13 the DOI no sooner than 30 days after the date the NOA of the FEIS is published in the Federal Register.

14 **5.2.8 Record of Decision**

15 Once a ROD is issued, it will be distributed to cooperating agencies, tribes, interested organizations, and
16 individuals, published in the Federal Register, and advertised in the newspapers listed above in table 5-1.
17 It will also be made available to everyone who requested a copy of the FEIS and posted on the Project
18 website. If a plan amendment were required, the public may protest the proposed RMP Amendments
19 during a 30-day protest period following the publication of the final EIS, and the BLM would resolve
20 protests prior to issuing a ROD. A plan amendment would also require a 60-day Governor's consistency
21 review to allow the Governor of New Mexico to ensure consistency with state and local plans, policies,
22 and programs.

23 A separate ROD would not be issued by Western, but instead, if Western decides to allow Southline to
24 upgrade its existing facilities and to use its existing transmission easements as part of the proposed
25 Project, Western and Southline would enter into a joint project agreement.

26 **5.3 CRITERIA AND METHODS USED TO EVALUATE PUBLIC** 27 **INPUT**

28 All scoping comments and corresponding information, exhibits, photographs, and maps were entered into
29 the comment database. Comments were coded to reflect the subject matter of concern, sorted, and
30 summarized for consideration in the development of the EIS. Comments that were received after the
31 scoping comment period end date (July 5, 2012) were reviewed to determine whether new issues were
32 raised that need to be included in the EIS.

33 **5.4 AGENCY CONSULTATION AND COORDINATION**

34 As defined by CEQ regulations, a cooperating agency, or cooperator, is an agency (other than the lead
35 agency) that has special expertise with respect to an environmental issue and/or has jurisdiction by law.
36 Federal, State, and local agencies that have clear jurisdiction over portions of the proposed Project routes
37 were invited via formal letter to become a cooperator in the preparation of the EIS. Tribal governments

1 were also invited to participate in the Project as a cooperating agency and to provide special expertise
2 with respect to environmental issues.

3 The role of a cooperator is to participate in the process and provide leadership, expertise, guidance, and
4 review, as well as to offer information related to the agency's authority. Cooperators were asked to submit
5 a signed memorandum of agreement that identifies the agreed-upon responsibilities for preparing and
6 participating in the EIS, including activities outlined in 40 CFR 1501.6(b). A cooperator could be a
7 Federal, State, tribal, or local agency with jurisdiction by law or special expertise with respect to an
8 environmental issue. An invitation letter was sent to potential cooperators listed below.

9 Agencies invited included:

- | | | | |
|----|------------------------------------|----|--------------------------------------|
| 10 | • Arizona Air National Guard | 39 | • FHWA |
| 11 | • ADOT | 40 | • FRA |
| 12 | • AGFD | 41 | • FWS |
| 13 | • ASLD | 42 | • U.S. Forest Service |
| 14 | • City of Sierra Vista, AZ | 43 | • NPS |
| 15 | • Cochise County, AZ | 44 | • Ak-Chin Indian Community |
| 16 | • Doña Ana County, NM | 45 | • Comanche Nation |
| 17 | • Graham County, AZ | 46 | • Fort Sill Apache Tribe of Oklahoma |
| 18 | • Grant County, NM | 47 | • Gila River Indian Community |
| 19 | • Greenlee County, AZ | 48 | • Kiowa Tribe of Oklahoma |
| 20 | • Hidalgo County, NM | 49 | • Mescalero Apache Tribe |
| 21 | • Luna County, NM | 50 | • Navajo Nation |
| 22 | • NMDGF | 51 | • Pascua Yaqui Tribe |
| 23 | • NMDOT | 52 | • Pueblo of Acoma |
| 24 | • NMSLO | 53 | • Pueblo of Isleta |
| 25 | • Pima County, AZ | 54 | • Pueblo of Laguna |
| 26 | • Pima County Department of | 55 | • Pueblo of Tesuque |
| 27 | Environmental Quality | 56 | • Pueblo of Zuni |
| 28 | • Pinal County, AZ | 57 | • Salt River Pima-Maricopa Indian |
| 29 | • U.S. Air Force Davis-Monthan Air | 58 | Community |
| 30 | Force Base | 59 | • San Carlos Apache Tribe |
| 31 | • USACE | 60 | • The Hopi Tribe |
| 32 | • U.S. Army Fort Huachuca | 61 | • Tohono O'odham Nation |
| 33 | • U.S. Border Patrol | 62 | • Tonto Apache Tribe |
| 34 | • BIA | 63 | • White Mountain Apache Tribe |
| 35 | • Reclamation | 64 | • Yavapai-Apache Nation |
| 36 | • DOD | 65 | • Ysleta del Sur Pueblo |
| 37 | • EPA | | |
| 38 | • FAA | | |

66

1 Sixteen agencies accepted invitations to participate; the following Federal, State, and local agencies have
2 signed on and have been consulted as cooperating agencies during preparation of the EIS:

- | | | | |
|----|--|----|---------------------------------|
| 3 | • USACE (Albuquerque District) | 12 | • AGFD |
| 4 | • Reclamation (Phoenix Area Office) | 13 | • ASLD |
| 5 | • DOD Clearinghouse | 14 | • NMDGF |
| 6 | • EPA | 15 | • NMSLO |
| 7 | • DOD Fort Huachuca | 16 | • Cochise County, Arizona |
| 8 | • NPS | 17 | • Greenlee County, Arizona |
| 9 | • U.S. Forest Service (Coronado National | 18 | • Graham County, Arizona |
| 10 | Forest) | 19 | • City of Sierra Vista, Arizona |
| 11 | • FWS (Region 2) | | |

20 On October 4, 2012 and December 12, 2012, BLM and Western conducted webinars for the cooperating
21 agencies to participate in alternatives development process for the proposed Project. The agency
22 alternatives developed, as presented in section 2.7 of this DEIS, were based in part on input from
23 cooperating agency staff attending these webinars.

24 On August 24, 2012 and April 13, 2013, BLM and Western conducted Tumamoc Hill outreach meetings
25 in Tucson, Arizona. A follow-up webinar was hosted by BLM and Western on November 7, 2013 to
26 update workshop attendees on proposed Project alternatives and present visual simulations of the
27 proposed Project alternatives around Tumamoc Hill. These meetings and webinars were stakeholder
28 workshops designed to gain input on proposed Project alignments and resource sensitivities around the
29 sensitive Tumamoc Hill area. Attendees at these workshops included agencies and local officials.
30 Coordination with Tucson Ward 1 and their participation in these meetings specifically reached out to
31 potential environmental justice populations in neighborhoods surrounding Tumamoc Hill.

32 Additionally, on June 13, 2013, BLM and Western met with representatives from DOD Fort Huachuca to
33 discuss potential issues with potential alignment alternatives. Representatives from Fort Huachuca
34 expressed concerns regarding impacts from the proposed Project on the BSETR. Meeting notes are
35 included as a part of the administrative record.

36 **5.5 SECTION 106 AND TRIBAL CONSULTATION AND** 37 **COORDINATION**

38 Federal agencies are required to consult with American Indian tribes as part of the ACHP regulations,
39 “Protection of Historic Properties” (36 CFR 800), implementing Section 106 of the NHPA. Accordingly,
40 the NHPA outlines when Federal agencies must consult with tribes and the issues and other factors this
41 consultation must address. In addition, pursuant to EO 13175, executive departments and agencies are
42 charged with engaging in regular and meaningful consultation and collaboration with tribal officials in the
43 development of Federal policies that have tribal implications and are responsible for strengthening the
44 government-to-government relationship between the United States and Indian tribes.

45 The BLM serves as the lead agency for compliance with Section 106 of the NHPA. Federal agencies are
46 required to consult with the public and tribes on the identification of historic properties and the impact
47 that the agencies’ undertaking may have on these properties. Western participates with the BLM in this
48 consultation. BLM’s consultation with the tribes is conducted on a government-to-government basis, as

1 prescribed by EOs and legislation, including the AIRFA, ARPA, NEPA, and EO 13007. Government-to-
2 government consultation is conducted in accordance with guidance provided in BLM Manual 8120.
3 Consultation efforts are coordinated by the Project lead for tribal and Section 106. All records of
4 coordination and consultation efforts, including logistical support for meetings and preparation of
5 materials, are part of the administrative record. Although the BLM and Western are responsible for
6 government-to-government consultation with regard to the proposed Project, other cooperating Federal
7 agencies may elect to engage in separate government-to-government consultation with regard to issuance
8 of permits and/or impacts on cultural resources on lands within their jurisdiction. The BLM and Western
9 area also using the NEPA scoping process to satisfy the public involvement process for Section 106 of the
10 NHPA (16 U.S.C. 470f), as provided for in 36 CFR 800.2(d)(3).

11 In addition to the American Indian tribes mentioned in the following section, additional groups have been
12 identified as consulting parties for the Project: ACHP, National Trust, Archaeology Southwest, Arizona
13 and New Mexico SHPOs, ASLD, NMSLO, USACE (Albuquerque Office), NPS, FS (Coronado National
14 Forest), University of Arizona Desert Laboratory on Tumamoc Hill, Arizona State Museum, Pima
15 County, and City of Tucson. Section 106 kick-off meetings were held in Albuquerque, New Mexico on
16 August 8, 2013 and in Tucson, Arizona on August 15, 2013; a GoTo Meeting/Conference call for those
17 who wish to participate but cannot attend in person. Consultation with American Indian tribes is being
18 conducted in accordance with applicable policies; tribal concerns, including the impact on Indian Trust
19 Assets, are given due consideration.

20 In 2012, the BLM contacted the following federally recognized tribes:

- | | | | |
|----|--------------------------------------|----|-----------------------------------|
| 21 | • Ak-Chin Indian Community | 32 | • Pueblo of Laguna |
| 22 | • Comanche Nation | 33 | • Pueblo of Tesuque |
| 23 | • Fort Sill Apache Tribe of Oklahoma | 34 | • Pueblo of Zuni |
| 24 | • Gila River Indian Community | 35 | • Salt River Pima-Maricopa Indian |
| 25 | • The Hopi Tribe | 36 | Community |
| 26 | • Kiowa Tribe of Oklahoma | 37 | • San Carlos Apache Tribe |
| 27 | • The Navajo Nation | 38 | • Tohono O’odham Nation |
| 28 | • Mescalero Apache Tribe | 39 | • Tonto Apache Tribe |
| 29 | • Pascua Yaqui Tribe | 40 | • White Mountain Apache Tribe |
| 30 | • Pueblo of Acoma | 41 | • Yavapai-Apache Nation |
| 31 | • Pueblo of Isleta | 42 | • Ysleta del Sur Pueblo |

43 Tribes listed above were contacted to notify them of the proposed Project, initiate government-to-
44 government consultation, invite them to participate as a cooperating agency in the preparation of the EIS,
45 and to participate in Section 106 consultations. On October 30, 2013, a draft Programmatic Agreement
46 (PA) was circulated to the Section 106 consulting parties for their review and comment. A copy of the
47 draft PA, in working form, is provided in appendix L.

48 Table 5-5 is a summary of the in-person meetings that have taken place thus far.
49

1 **Table 5-5. In-Person Meetings with Native American Tribe/Tribal Organizations**

Date	Native American Tribe/ Tribal Organization	Description
10/4/2011	San Carlos Apache Tribe	BLM meeting with San Carlos Apache and White Mountain Apache which included an overview of the Project. BLM staff present: Jane Childress, Connie Stone, Dan McGrew, Amy Sobiech, Joan Galanis, Mike Johnson, and Tom Dabbs. San Carlos Apache Tribe attendees: Vernelda Grant, Tribal Historic Preservation Office; Harold Hofchissey, Recreation and Wildlife; Daniel Juan, Recreation and Wildlife. Vernelda Grant expressed concern about springs and plant resources near Lordsburg and wondered if there were plans to establish a utility corridor in the area.
10/4/2011	White Mountain Apache Tribe	BLM meeting with San Carlos Apache and White Mountain Apache which included an overview of the Project. BLM staff present: Jane Childress, Connie Stone, Dan McGrew, Amy Sobiech, Joan Galanis, Mike Johnson, and Tom Dabbs. White Mountain Apache Tribe attendees: Mark Altaha and Mae Burnette, Tribal Historic Preservation Office.
7/18/2012	Tohono O'odham Nation	Meeting at San Xavier with San Xavier District Tohono O'odham. Project overview and discussion with handouts of Project presentation, maps, and timeline. Tribal concerns with ROW across their lands.
7/20/2012	Four Southern Tribes	Meeting with BLM and Four Southern Tribes. Project update and presentation.
8/28/2012	Pueblo of Zuni	Introductory presentation on the Project, including PowerPoint presentation.
10/15/2012	Ysleta del Sur Pueblo	Introductory presentation on the Project, including PowerPoint presentation and handouts of Project map.
10/18/2012	San Carlos Apache Tribe	Introductory presentation on the Project, including PowerPoint presentation and handouts of Project map.
11/9/2012	Ysleta del Sur Pueblo	Introductory presentation on the Project, including PowerPoint presentation and handouts of Project map.
4/23/2013	Tohono O'odham Nation	Meeting to discuss issues related to Tumamoc Hill. Tribal representatives expressed concerns regarding any routing of the proposed Project that includes Tumamoc Hill.

2 **5.6 FORMAL CONSULTATION**

3 The BLM and Western are required to prepare the EIS in coordination with any studies or analyses that
4 are required under the ESA (16 U.S.C. 1531 et seq.) and the NHPA, as amended (16 U.S.C. 470 et seq.).

5 **5.6.1 Section 7 of the Endangered Species Act**

6 Section 7 of the ESA requires Federal agencies to ensure that their actions do not jeopardize the continued
7 existence of threatened or endangered species or result in the destruction of their designated critical
8 habitat. It may also require consultation with the FWS in making this determination.

9 A letter from BLM inviting FWS to participate in the scoping of the Project was sent on April 23, 2012.
10 The FWS provided a written response on June 4, 2012 with comments and recommendations on specific
11 species to evaluate for potential effects as well as suggested mitigation measures. FWS was also
12 consulted on the development of species specific mitigation used in this DEIS. FWS comments and
13 recommendations are addressed in Sections 3.8 and 4.8, "Biological Resources," and consultation is
14 ongoing.

5.6.2 Section 106 of the National Historic Preservation Act

Section 106 of the NHPA requires Federal agencies to consider the effects of their actions on historic properties (including archaeological sites) that are listed, or are considered eligible for listing on the NRHP (a historic property is an eligible site). In so doing, the lead agency must consult with Indian tribes, ACHP, interested members of the public, and the appropriate SHPO. The ultimate goal of consultation is to identify and resolve any adverse effects of an undertaking on historic properties.

BLM initiated consultation with the New Mexico and Arizona SHPOs via letter on April 23, 2012. A list of consultation activities is given below in table 5-6.

Table 5-6. Section 106 Consultation Activities

Date	Agency	Contact Type	Description
4/23/2012	Arizona SHPO, State Historic Preservation Officer	Letter from BLM	Invitation to agency scoping meetings. Map attached.
4/23/2012	Arizona SHPO, Public Archaeology Programs Manager	Letter from BLM	Invitation to agency scoping meetings. Map attached.
4/23/2012	New Mexico SHPO, State Historic Preservation Officer	Letter from BLM	Invitation to agency scoping meetings. Map attached.
4/23/2012	New Mexico SHPO, Archaeologist	Letter from BLM	Invitation to agency scoping meetings. Map attached.
5/14/2012	Arizona SHPO, Public Archaeology Programs Manager	Letter to BLM	Handwritten comment on copy of 4/23/2012 agency scoping meeting invitation indicating that Arizona SHPO looks forward to Section 106 consultation on the Project. SHPO also asked whether BLM or Western would be taking the lead on the Section 106 consultation.
11/14/2012	Arizona SHPO, Director	Letter from BLM	Project notification letter to Arizona SHPO. Map and Project newsletter attached. Copy to Nancy Brown, ACHP.
11/14/2012	New Mexico SHPO, Director	Letter from BLM	Project notification letter to Arizona SHPO. Map and Project newsletter attached. Copy to Nancy Brown, ACHP.
3/1/2013	ACHP, Director	Letter from BLM	Notification letter to ACHP that the Southline Project would have an adverse effect on historic properties in New Mexico and Arizona and invitation to participate in the Project.
3/19/2013	ACHP, Executive Director	Letter to BLM	Letter advising BLM that ACHP has decided to participate in consultation for the Southline Project.
8/8/2013	Consulting parties	In-person meeting	Kick-off meeting hosted by BLM and Western in Albuquerque, New Mexico. GoTo Meeting conference call was available for those who could not attend.
8/15/2013	Consulting parties	In-person meeting	Kick-off meeting hosted by BLM and Western in Tucson, Arizona. GoTo Meeting conference call was available for those who could not attend.
12/4/2013	Consulting parties	Webinar	Webinar hosted by BLM and Western for resource sensitivity and draft PA review.

5.7 LIST OF PREPARERS AND REVIEWERS

This EIS was prepared and reviewed by a team from the BLM. A team associated with SWCA Environmental Consultants assisted the BLM in conducting research, gathering data, and preparing the EIS and supporting documents. Table 5-7 identifies BLM team members and their roles.

1 **Table 5-7. BLM and Western Preparers and Contributors**

Name	Title	Involvement (Section(s) of EIS)	Office
Mark Mackiewicz	Senior National Project Manager	BLM Project Manager	Washington, DC
Mark Wieringa	NEPA Document Manager	Western Project Manager	Western Natural Resources Office
Eddie Arreola	RECO Manager	Military	Arizona State Office
Matt Basham	Archaeologist	Cultural Resources	Arizona State Office RECO
Steve Blazek	NEPA Compliance Officer	Project initiation	Department of Energy Golden Field Office
Donald Byron	Project Management Team Lead	Engineering Point of Contact	Western Desert Southwest Region
Bill Childress	Las Cruces District Manager	Authorized Officer	Las Cruces District Office
Jane Childress	Cultural and Tribal Lead	Project cultural and tribal Point of Contact	National Transmission Support Team
Jeff Conn	Natural Resource Specialist	Wildlife	Safford Field Office
Johnida Dockens	Environmental Protection Specialist	Local Office Point of Contact	Western Desert Southwest Region
Claire Douthit	Attorney/Advisor	Legal	Office of General Counsel
Kristen Duarte	Range Management Specialist	Vegetation Farmlands and Rangeland	Tucson Field Office
Vanessa Duncan	Safety & Occupational Health Specialist	Hazardous Materials	Las Cruces District Office
Linda Dunlavey	Realty Specialist	Lands	Tucson Field Office
R.J. Estes	Rangeland Management Specialist	Farmlands and Rangeland/Grazing Vegetation	Safford Field Office
Dennis Godfrey	Public Affairs Officer	Public Affairs	Arizona State Office, RECO
Oswaldo Gomez	Outdoor Recreation Planner	Visual	Las Cruces District Office
Stacey Harris	Public Utilities Specialist	TIP Office Point of Contact	Western Corporate Services Office
Becky Heick	Branch Chief, Minerals and Lands	Minerals	Arizona State Office
Ray Hewitt	Geographer/GIS	GIS Data	Las Cruces District Office
Christopher Horyza	Planning and Environmental Coordinator	Wilderness Characteristics	Arizona State Office
Michael Johnson	Sun Zone Social Scientist	Socioeconomics	Arizona State Office
Craig Knoell	TIP Office Manager	TIP Office Point of Contact (retired)	Western Corporate Services Office
Debby Lucero	Lead Realty Specialist	Land Use	New Mexico State Office
Frank Lupo	Attorney Advisor	Legal	Office of the Solicitor
Dan McGrew	Archaeologist	Cultural Resources (Arizona)	Safford Field Office
Kenneth Mahoney	Program Lead: National Monuments, National Conservation Areas, Wilderness, Wild & Scenic Rivers	Wilderness Characteristics	Arizona State Office
Linda Marianito	Environmental Division Manager	Local Office Point of Contact	Western Desert Southwest Region

2

1 **Table 5-7. BLM and Western Preparers and Contributors (Continued)**

Name	Title	Involvement (Section(s) of EIS)	Office
Frances Martinez	Realty Specialist	Land Use Special Designations	Las Cruces District Office
Mark Massar	Wildlife Biologist	Wildlife	National Transmission Support Team
Lisa Meiman	Public Affairs Team Lead	Public Affairs	Western Natural Resources Office
Francisco Mendoza	Outdoor Recreation Planner	Recreation Visual	Tucson Field Office
Lisa Meyer	Cultural Resources Lead	Western Cultural Point of Contact	Western Corporate Services Office
Jennifer Montoya	Planning and Environmental Specialist	BLM NEPA point of contact	Las Cruces District Office
Daniel Moore	Geologist	Air Quality Minerals (in Geology) Paleontological Resources	Tucson Field Office
Patrick Moran	Geologist	Minerals (in Geology) Paleontological Resources	Las Cruces District Office
Mohammad Nash	Hydrologist	Air Quality Noise Soils Water Resources (Surface and Ground)	Las Cruces District Office
Jackie Neckels	Environmental Coordinator	Military	Arizona State Office, Renewable Energy Coordination Office
Ron Peru	Realty Specialist	Land Use Special Designations Visual	Safford Field Office
Tom Phillips	Acting State Recreation Lead-New Mexico State Office	Wilderness Characteristics	Working from Las Cruces District Office
Todd Rhoades	Project Management	Engineering Point of Contact	Western Desert Southwest Region
Lynn Richardson	TIP Liaison	TIP Point of Contact	Western Consultant
Dana Robinson	GIS Specialist	GIS Data	Arizona State Office
Karla Rogers	Visual Resources Field Coordinator	Lead Visual Resources	National Operations Center
Jose Sanchez	Natural Resources Specialist	Recreation	Las Cruces District Office
Pam Shields		Project Initiation	Western Desert Southwest Region
Phil Smith	Range Specialist	Farmlands and Rangeland/Grazing Vegetation	Las Cruces District Office
Darrell Tersey	Natural Resource Specialist	Wildlife	Tucson Field Office
Larry Thrasher	Geologist	Minerals (in Geology) Paleontological Resources	Safford Field Office
Steven Torrez	Wildlife Biologist	Wildlife	Las Cruces District Office
Steve Tromly	Native American Liaison	Tribal, Cultural Point of Contact	Western Corporate Services Office
Melissa Warren	RECO Project Manager (former)	Military	Arizona State Office (former)
Scott Whitesides	Planning and Environmental Coordinator	Land Use	National Transmission Support Team

5.8 THIRD-PARTY CONTRACTOR—SWCA ENVIRONMENTAL CONSULTANTS

A team associated with SWCA assisted the BLM and Western in conducting research, gathering data, and preparing the EIS and supporting documents. Table 5-8 identifies SWCA team members and their roles.

Table 5-8. SWCA Preparers and Contributors

Name	Involvement (Role or Section(s) of EIS)
Ken Houser Cara Bellavia DeAnne Rietz David Brown Charles Coyle	Project Management, NEPA Adequacy
Brad Sohm Dan Whitley Daniel Sloat	Air Quality Climate Change Noise
Matt Bandy Adrienne Tremblay	Cultural Resources Paleontological Resources
Peter David	Farmlands and Rangeland/Grazing
Ryan Rausch Jeffery Johnson	Farmlands and Rangeland/Grazing Land Use Special Designations Military
David Lightfoot Vicki Amato	Farmlands and Rangeland/Grazing Vegetation
Steve O'Brien	Geology Minerals (in Geology) Wastes and Hazardous Materials
DeAnne Rietz	Wastes and Hazardous Materials
Jonathan Rigg	Electrical Characteristics (EMF) Transportation Human Health and Safety Intentional Destructive Acts
Doug Jeavons (BBC Research)	Socioeconomics and Environmental Justice
Cody Stopki	Soils
Eleanor Gladding Russell Waldron Jeffery Johnson Lara Dickson	Noxious Weeds Wildlife
Pam Cecere Steve Leslie	Visual
Chris Garrett	Water Resources (Surface and Ground)
Matt McMillan	Water Resources (Wetlands) Wildlife
Jean-Luc Cartron	Migratory Birds
Chris Query Glenn Dunno Allen Stutz	GIS Cartography

5.8.1 Contract Disclosure Statement

SWCA Environmental Consultants is the contractor assisting the BLM and Western in preparing the draft EIS for the proposed Southline Transmission Line project. BLM and Western are responsible for reviewing and evaluating the information and determining the appropriateness and adequacy of incorporating any data, analyses, or results in the EIS. BLM and Western determine the scope and content of the EIS and supporting documents and have and will furnish direction to SWCA, as appropriate, in preparing these documents.

The CEQ's regulations (40 CFR 1506.5 (c)), require contractors who prepare an EIS to execute a disclosure statement specifying they have no financial or other interest in the outcome of the project. The term "financial interest or other interest in the outcome of the project" for the purposes of this disclosure is defined in the March 23, 1981, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," 46 *Federal Register* 18026-18028 at Questions 17a and 17b. Financial or other interest in the outcome of the project includes "any financial benefit such as promise of future construction or design work on the project, as well as indirect benefits the consultant is aware of (e.g. if the project would aid proposals sponsored by the firm's other clients)" (46 *Federal Register* 18026-18038 and 10831).

In accordance with these regulations, SWCA hereby certifies that it has no financial or other interest in the outcome of the Project.

Certified by:



Signature

Ken Houser

Name

Principal, Southwest Operations

Title

January 5, 2014

Date

5.9 RECIPIENTS OF THE ENVIRONMENTAL IMPACT STATEMENT

BLM and Western will circulate copies of the EIS to any agencies that have jurisdiction and special expertise, those authorized to develop and/or enforce environmental standards, and any agencies or individuals requesting a copy of the document. Copies will also be made available at BLM State, District, and Field Offices, as well as at libraries and on the Project website.

Tribes and cooperating agencies listed in section 5.4 will receive copies of the DEIS; cooperating agencies also participated in the finalization of the DEIS. Everyone on the most current mailing list will receive notification of the release of the DEIS via mailing with a detachable postcard that can be returned to request a copy of the DEIS on CD. Hard copies will be available for public viewing at BLM offices

1 (New Mexico State Office, Las Cruces District Office, Arizona State Office, Safford Field Office, and
2 Tucson Field Office). An electronic copy of the DEIS will also be available via BLM's Southline Project
3 website.

4 A number of organizations and special interest groups have been notified and coordinated with for this
5 Project and have been placed on the Project mailing list. A list of these organizations is provided in
6 table 5-9.

7 **Table 5-9. Organizations and Special Interest Groups Notified**

8	
9	Advisory Council on Historic Preservation
10	American Wind Energy Association
11	Anglers United
12	Animas Foundation
13	Archaeological Conservancy
14	Archaeology Southwest
15	Arizona Association for Environmental Education
16	Arizona Audubon Society
17	Arizona Cattle Growers Associations
18	Arizona Dude Ranch Association
19	Arizona Farm Bureau
20	Arizona Land and Water Trust
21	Arizona League of Conservation Voters
22	Arizona Mining Association
23	Arizona Natural Resource Conservation Districts
24	Arizona Off-Highway Vehicle Coalition
25	Arizona Power Authority
26	Arizona Public Service
27	Arizona Riparian Council
28	Arizona Society of Range Management
29	Arizona Solar Energy Association
30	Arizona Trails Association
31	Arizona Wilderness Coalition
32	Arizona Wildlife Federation
33	Audubon New Mexico
34	Avra Valley Coalition
35	Back Country Horsemen of America
36	Cascabel Working Group
37	Center for Biological Diversity
38	Center of Excellence for Hazardous Materials Management
39	Central Arizona Land Trust
40	Coalition for Sonoran Desert Protection
41	Coalition of Renewable Energy Landowners Association
42	Cochise County Farm Bureau
43	Community Watershed Alliance
44	Continental Divide Trail Alliance
45	Defenders of Wildlife
46	Desert Foothills Land Trust
47	Desert Laboratory on Tumamoc Hill
48	Doña Ana County Farm Bureau
49	Drylands Institute
50	Ecology and Evolutionary Biology Department, University of Arizona

**Table 5-9. Organizations and Special Interest Groups Notified
(Continued)**

1	
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4	Empire-Fagan Coalition
5	Environmental Arizona
6	Freedom to Roam
7	Friends of Agua Fria National Monument
8	Friends of Ironwood Forest
9	Friends of Sonoita Creek
10	Friends of the Santa Cruz River
11	Gila Conservation Coalition
12	Gila Watershed Partnership of Arizona
13	Graham County Farm Bureau
14	Grand Canyon Wildlands Council
15	Grant County Farm Bureau
16	Greenlee County Farm Bureau
17	Hidalgo County Farm Bureau
18	Huachuca Audubon
19	International Brotherhood of Electrical Workers 611
20	International Society for the Protection of Mustangs and Burros
21	Interstate Stream Commission
22	Las Cruces 4-Wheel Drive Club
23	Luna County Farm Bureau
24	Mountain Bike Association of Arizona
25	National Parks Conservation Association
26	National Tribal Environmental Council
27	National Trust for Historic Preservation
28	National Trust for Historical Conservation
29	National Wildlife Federation
30	Natural Resources Defense Council
31	The Nature Conservancy
32	The Nature Conservancy of New Mexico
33	The Nature Conservancy, New Mexico Field Office
34	New Mexico Cattle Grower's Association
35	New Mexico Conservation Voters
36	New Mexico Environmental Law Center
37	New Mexico Farm and Livestock Bureau
38	New Mexico Farm and Livestock Bureau, Collegiate Farm Bureau
39	New Mexico Federal Lands Council
40	New Mexico Land Conservancy
41	New Mexico Natural History Institute
42	New Mexico Off Highway Vehicle Alliance
43	New Mexico Off Highway Vehicle Association
44	New Mexico Solar Energy Association
45	New Mexico Wilderness Alliance
46	New Mexico Wildlife Federation
47	New Mexico Wind Working Group
48	New Mexico Wool Growers
49	Pima County Farm Bureau
50	Pinal County Farm Bureau
51	Public Lands Foundation
52	Public Lands Interpretive Association
53	Redington Natural Resource Conservation District

**Table 5-9. Organizations and Special Interest Groups Notified
(Continued)**

1	
2	
3	
4	Rocky Mountain Bird Observatory
5	San Pedro Natural Resource Conservation District
6	Shooting Roundtable
7	Sierra Club
8	Sierra Club, El Paso Group
9	Sierra Club Rincon Chapter
10	Sierra Club Rio Grande Chapter
11	Sky Island Alliance
12	Solar Reserve
13	Sonoran Institute
14	Southern Arizona Buffelgrass Coordination Center
15	Southern Arizona Leadership Council
16	Southwest Environmental Center
17	Southwest Natural Resources
18	Southwest New Mexico Grazing Association
19	Southwest Regional Conservation Committee
20	Southwestern Power Administration
21	Tonopah Area Coalition
22	Trust for Public Land
23	Tucson Audubon
24	Tucson Mountains Association
25	Union of Concerned Scientists
26	Upper Gila Watershed Alliance
27	Upper San Pedro Partnership
28	Western Environmental Law Center
29	Western Governors' Association
30	Western Interstate Energy Board
31	Western Regional Partnership
32	Western Resource Advocates
33	Western Watersheds Project
34	WildEarth Guardians
35	Wilderness Land Trust
36	The Wilderness Society
37	The Wilderness Society / BLM Action Center
38	Wings Over Willcox

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Chapter 6

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