Mitigation concerns

Background: Placing mitigation topics in the Plan of Development is different than the actual action being taken to reduce a harmful effect during the construction process. A huge concern is that moving already unstable, highly erodible soils for roads, material lay down yards, fueling/service yards, will never be able to be fully re-stablized. Therefore, our ultimate bmp for construction in the Redington Natural Resource Conservation District is to avoid typical mitigation measures by using aircraft to deliver materials and perform construction of the towers and transmission lines. By doing so, it is our impression, the following items are removed from the mitigation proceedures and have many benefits to offset the costs associated with using aircraft methods:

A reduction/elimination of heavy equipment mobilized in and mobilized out to construct the project. Additionally, many of these pieces of equipment require over width, height, and weight permits which cost revenue. Transportation fees for special permit required equipment is costly as well.

Equipment mobilizations add non-productive time to the pre-construction and post construction schedule.

Mobile refueling/equipment maintenance costs are inflated due to proximity of this project through our district.

Construction durations through our district are reduced using aircraft because it eliminates creation of roads, staging yards, equipment yards, and thereby eliminates post construction activities as landscape grading to hide roads used, disguise staging yards, and the need for a large portion of dust control and reclamation of native vegetation to affected areas caused by the construction process.

Fuel and equipment operator costs are able to be converted into aircraft resources.

A water supply and source for dust control over the construction process , and costs to purchase from a landowner, could be in many instances substantially reduced or possibly eliminated contributing to aircraft construction resources.

The need to implement watershed protection and storm water pollution prevention (SWPP) techniques, structures, and BMP's, could be substantially reduced or possibly eliminated contributing to aircraft construction resources.

Low impact construction methods using aircraft will nearly remove any need for regrading.

Low impact construction methods will seriously reduce the need for revegetating which will save time, money and severely reduce the scope of any ongoing, post project, natural resource inspections, interventions, and reclamations.

Construction schedule could be favorable in the Redington District if aircraft were used. Time is money. We believe this would be a section of roughly 24 miles in length.

10/10/2015 in pwep for packets.

CEC Application language found in the preliminary POD causes RNRCD reasons for concern:

"Leave existing co-located roads in same or better condition." Clearly, using a road in a co-locate area should not result in it being left in the same or better condition. If SunZia uses a co-locate access or road it should become an area which is governed by mitigation measures to ensure it is fully restored to as close to undisturbed, original, natural condition. Never in the same as found. Regretfully, most common people would be of an opinion, "better" shows only a minimal effort to improve over "like condition." It is our District's position SunZia should take responsibility to fully reclaim any, and all, of the co-located routes they use in this project as if it were a new road or easement.

Setting the Standard in a Severe Drought affected Region with high erosion soils for construction projects today and tomorrow:

Using low impact aircraft construction BMP's serve to perform this SunZia Project in a method and manner that is unquestionably elevated in its environmental and natural resource focused techniques. This should be important to SunZia on this project as well as on future Arizona Projects they wish to initiate. Furthermore, low impact aircraft construction implemented through the Redington District serves as constructive notice to other applicants when they decide to co-locate upon the SunZia Project alignment in the future. Setting the standard would be of great benefit to all parties and serve as a foundation to reduce and eliminate opposition on future projects of similar magnitude through similar sensitive lands.

Traffic concerns on Redington Road/Cascabel Road for ingress egress during the project:

The weight of large earth moving equipment is a concern due to the width, surface, line of sight, and road surface ability to handle the special permitted equipment loads to the District Area from both Benson and San Manuel. Many areas are very narrow and will have difficulty handling opposing traffic with oversized loads. Moreover, existing cattle guards may require heavy temporary road plates for over weight loads to cross them without damages to existing road structures. Due to on-going grazing activities these plates cannot be left unattended for cattle exit pasture boundaries.

A primary concern is heavy loads using the new, chip sealed portion of Redington Road which lies from the existing asphalt road to the River Road turnoff. Placing heavy loads on that section will crack and most likely have severely detrimental effects on the surface treatment which our community has worked diligently on seeing implemented.

It is important to mention that the unimproved surfacing which provides access to our district are inappropriate for a project of this magnitude. Continual grading of the roads to mitigate the damages done for construction activities, in and of itself, is damage which increases sedimentation into the river basin and causes erosion of the roadway during winds and rains. Unintentional destruction of roads from construction traffic imposes increased repair and maintenance on local residents vehicles and

creates potentially unsafe driving conditions and road surfaces that deteriorate the road's current level of safety.

Conclusions/Summary: The RNRCD believes that there is just cause and plenty of economic reasons for SunZia to immediately do a cost analysis and cost benefit for adopting the BMP for low impact aircraft construction of this transmission line. We reiterate the need for low impact construction in the Redington District and especially for the area which does not provide for existing co- location. The best method to prevent damage of natural resources is to find new and innovative ways to construction which removes the need for roads and material lay down facilities which do not harm sensitive locations.