

Board of Supervisors

Ann English
Chairman
District 2

Richard R. Searle
Vice-Chairman
District 3

Patrick G. Call
Supervisor
District 1



Michael J. Ortega
County Administrator

James E. Vlahovich
Deputy County Administrator

Katie Howard
Clerk

April 16, 2013

Mark Mackiewicz, PMP
National Project Manager
Bureau of Land Management
Washington Office
Division of Lands and Realty (WO-350)
Washington, D.C. 20036
Tel: (435) 636-3616

Stationed At:
BLM Price Field Office
125 South 600 West
Price, Utah 84501

Sent via email to: mmackiew@blm.gov

RE: Southline Transmission Line Project – Electromagnetic Spectrum within Buffalo Soldier Electronic Test Range is a Natural Resource for Planning and Management Purposes

Dear Mr. Mackiewicz:

This letter has been prepared by the Cochise County Board of Supervisors on behalf of Cochise County as a local agency partnering with BLM through Coordination and Cooperation under NEPA and FLPMA on the Southline Transmission Line Project (herein referred to as Project) analysis. Cochise County is also submitting these comments as a Cooperating Agency under our BLM MOU for this Project.

We request that our comments be treated as substantive and that they are factored into alternative creation, utilized as decision criteria, and incorporated into alternative analysis during all aspects of the NEPA and BLM resource management planning processes. Our goal is to provide information that will be used throughout the NEPA process and BLM planning to consistently address protection of a significant natural resource, the electromagnetic (EM) spectrum within

the Buffalo Soldier Electronic Test Range (BSETR), which has been designated and protected by Arizona Senate Bill 1387. The unique topography and geology of the mountain ranges surrounding the BSETR create an extremely quiet EM spectrum. The EM spectrum within the BSETR is a natural resource that can be severely damaged by an increase in electromagnetic interference just as other natural resources, such as species habitat, can be impacted by projects. Fort Huachuca has included the EM spectrum as a natural resource in its NEPA documentation over the past year.

In addition to potential damage to this natural resource, the BSETR is of vital economic interest to Cochise County as well as the national security of the United States of America. While consideration of military operations in a separate section of the NEPA document provides a discussion of impacts to national security, this approach fails to evaluate the potential for damage to a unique and irreplaceable natural resource.

We recommend the following measures be taken immediately:

1. Because the Electromagnetic (EM) Spectrum within the Buffalo Soldier Electronic Test Range is a unique and irreplaceable natural resource, the EM Spectrum needs to be evaluated as a natural resource and receive equal treatment with other natural resources in your NEPA documentation.
2. Proper consideration of mitigation of potential damage to the EM Spectrum, such as underground routing of transmission lines, should be a key consideration of alternatives analysis in order to protect this natural resource just as other natural resources are considered in alternatives analysis.
3. On a Statewide level, we also recommend that BLM utilize our recommendations above on all other current and future transmission line projects that have the potential to affect the EM spectrum within the BSETR, including the Sunzia Transmission Project.

Sincerely,

Ann English, Chairman
Cochise County Board of Supervisors

Richard R. Searle, Vice-Chairman

Patrick G. Call, Supervisor, District 1

Cc: Michael J. Ortega, County Administrator
Gussie Motter, Deputy Clerk of the Board