



ENVIRONMENTAL COMPLIANCE & PERMITTING • PAB352

P.O. Box 52025
Phoenix, AZ 85072-2025
(602) 236-2830
Fax (602) 236-3407
Ruth.Valencia@srpnet.com

RUTH VALENCIA

Manager, Biological & Cultural Resource Services

Via Email: coconino_national_forest_plan_revision_team@fs.fed.us

March 20, 2014

Coconino National Forest – Plan Revision Team
1824 S. Thompson Street
Flagstaff, AZ 86001

**Re: Comments on Coconino National Forest Draft Land and Resource Management Plan
and Programmatic Draft Environmental Impact Statement (DEIS)**

Dear Sir or Madam:

The Salt River Valley Water Users' Association and the Salt River Project Agricultural Improvement and Power District ("SRP" or "Project") submit these comments in response to the notice of 90-day comment period for the Coconino National Forest Draft Land and Resource Management Plan and the Programmatic Draft Environmental Impact Statement (DEIS).

SRP is a multi-purpose federal reclamation project authorized and constructed under the Reclamation Act of 1902, 43 U.S.C. § 371 *et seq.* Pursuant to various contracts with the United States, SRP operates the Project works, which include, among other things, six dams and reservoirs on the Salt and Verde rivers in central Arizona, and one dam and reservoir on East Clear Creek in northern Arizona. The watersheds for these reservoirs include parts of the Tonto, Apache-Sitgreaves, Coconino and Prescott National Forests. Water is stored by SRP in these reservoirs for electric generation and subsequent delivery to municipal, industrial and agricultural water rights and uses. Within the Coconino National Forest, SRP also operates one dam and reservoir (C.C. Cragin) on East Clear Creek in northern Arizona, and an electrical line associated with this facility pursuant to the Arizona Water Settlement Act (118 STAT.3478 Public Law 108-451- Dec. 10, 2004; "AWSA"). SRP's delivery system in the Phoenix metropolitan area encompasses 1,300 miles of canals and laterals serving cities, Indian communities, irrigation districts, homes, and agricultural enterprises.

SRP also provides power to about 946,000 customers in the Phoenix area, and in certain rural areas of the State. Some of this power is generated through water delivery from SRP's dams and reservoirs. Most of the power is supplied by power plants in Arizona, Colorado, and New Mexico, which are either operated by SRP or in which SRP has an ownership interest. In connection with its power operations, SRP also constructs, operates and maintains electrical transmission and distribution lines and rights-of-way in various areas throughout Arizona. SRP currently operates and maintains almost 400 miles of transmission lines and rights-of-way across Forest Service lands in Arizona, including approximately 7.6 miles on the Coconino National Forest.

**Comments on the Forests Proposed Land and Resource Management Plan and the
Programmatic Draft Environmental Impact Statement (DEIS)**

Recognition of C.C. Cragin Reservoir as a Municipal Water Supply

SRP supports the development of a new Land Management Plan for the Coconino National Forest. The primary purpose for the designation of the Forest was to protect and conserve the water supply for central and southern Arizona – this purpose and need is as essential now as it was in the early 1900s when the forest was created. SRP provided comments on the draft plan in 2010, and we reiterate the importance of healthy and resilient National Forest lands in ensuring a clean and reliable supply of water that is available for the metropolitan Phoenix area. Proper forest management of the lands within the National Forest makes that happen.

Within the Draft Land and Resource Management Plan, there are many references to water supply, water quality and aquatic systems. Of particular importance to SRP, is the recognition of water supply and water quality as it relates to C.C. Cragin Reservoir as a municipal water supply for the Town of Payson and those served by SRP. Under provisions of the Arizona Water Settlement Act of 2004, the United States, acting through the Secretary of the Interior, accepted the transfer of title to C.C. Cragin Reservoir (referenced as Blue Ridge Reservoir at that time) for the exclusive use and benefit to the Salt River Federal Reclamation Project. Upon the transfer of title, SRP assumed care, operation and maintenance of the project pursuant to a 1917 agreement between the United States and SRP.

In addition to the delivery of this water for use by municipal, agricultural and commercial users within the SRP water service territory, a portion of the reservoir storage was made available for municipal and domestic uses in Northern Gila County, in particular the Town of Payson and other Northern Gila County communities. Consequently, as part of the process in updating the Coconino Land and Resource Management Plan, the watershed of the C.C. Cragin reservoir should be designated as a municipal watershed and included as such in Background Descriptions, Desired Conditions and related Objectives.

Significant investment has been made by SRP and the Town of Payson to ensure the reservoir infrastructure, and management of such, will meet the needs of municipal and domestic water users in Payson and the Phoenix metropolitan area. The reservoir will be the primary drinking water source for Payson and is anticipated to be the primary water source for many of the other communities located within Northern Gila County. It is imperative that the Forest Service manage and care for the C.C. Cragin watershed in a manner that protects human health and safety in relation to the reservoir water supply through watershed treatments, such as vegetation thinning or prescribed burns, to prevent catastrophic events such as wildfire that currently have a high probability of occurring.

As was indicated by the Vegetation and Fire Specialist Report, Wilderness Designations, Special Areas, and ROS classifications such as Primitive and Semi-Primitive Non-Motorized are all exceptionally limiting in terms of managing wildland and prescribed fire and allowing for the mechanical treatments needed for restoration activities. Although these land classifications are often adopted to promote the protection of threatened resource values, the paradox is they are much more difficult to protect due to policy limitations on accessibility and tools that can be used.

Support of the Four Forest Restoration Initiative

SRP supports the Four Forest Restoration Initiative (4FRI) and the efforts undertaken by the Coconino National Forest (among others) to carefully consider the need and implementation of large-scale restoration activities, at a rate that will significantly minimize the risk of catastrophic fire. Tremendous time and resources have been expended on the 4FRI effort, both by the four forests, as well as by numerous stakeholders and interest groups. Inasmuch, the selection of an alternative must be consistent with the intent of 4FRI and should not limit landscape application of a variety of restoration tools.

Utility Corridor Management

SRP also realizes the National Forest Service must strike a balance between the nation's energy needs, the development of energy projects and expansion of electrical transmission lines with the protection of public lands for current and future generations. Access to operate and maintain infrastructure and rights-of-way must be allowed to ensure the delivery of safe reliable power. SRP's system is interconnected in the same Western power grid that includes the two large transmission lines on the Coconino Forest, operated by Western Area Power Administration (Western) and Arizona Public Service (APS).

It is important to recognize that as electrical transmission corridors are integrated into overall Forest Planning, the approval of the various routes for the transmission lines is not only subject to the authority and processes of land management agencies but also subject to the authority of the state's Arizona Corporation Commission (ACC) and its public approval process.

Additionally, vegetation must be managed under existing transmission lines and under new future lines. This is done to prevent electric current from arcing from the line to the vegetation that is too close to the lines and to keep trees from falling into the line. The Forest Service should consider the need for utilities to address hazardous vegetation within and along the edge of their rights-of-way. This is important when restrictions are placed on the removal of vegetation in certain size classes. SRP supports a Region-wide amendment to the current 1996 Record of Decision for the Amendment of Land and Resource Management Plans to ensure utilities in Arizona have the ability to manage the integrity of their electric systems in order to deliver safe reliable power to their customers.

While National Forests put conditions on the maintenance of a line granted under a special use permit, the utility also must comply with the maintenance standards (including vegetation maintenance) enforced by the North American Electric Reliability Corporation (NERC). NERC's standards are required by and must be approved by the Federal Energy Regulatory Commission (FERC). SRP recommends that the final Land Management Plan include NERC compliance requirements for vegetation clearing within and adjacent to energy corridors.

One item to note is the 2010 Memorandum of Understanding (MOU) between several federal departments, providing for the coordination among federal agency reviews of electric transmission facilities, was not referenced in the new plan. The MOU was created to help improve efficiency in coordinating the processes and procedures of the various federal agencies in the development of energy projects. SRP recommends the MOU should be referenced in the Proposed Plan as a valuable tool to be utilized in the maintenance and development of energy projects.

Draft Land and Resource Management Plan Comments

- Chapter 1. Background, page 3, Conditions and Trends – This section should also address water sources for municipalities, like C.C. Cragin Reservoir.
- Chapter 2. Forestwide Management, page 18, Watersheds – Description: the Forest should include not only municipal watersheds that are under special use authorization, but should also include areas that have surface water impoundments that provide municipal water, such as C.C. Cragin Reservoir. Desired Conditions – Include “drinking water for municipalities”. Objectives: Add objective of managing C.C. Cragin Watershed as a municipal watershed.
- Chapter 2. Forestwide Management, page 19, Watersheds – Guidelines, #1, add municipal watershed infrastructure. General Description and Background for Water Quality, Water Quantity, and Aquatic Systems – Expand to include C.C. Cragin Reservoir.
- Chapter 2. Forestwide Management, page 20 – Desired Conditions for Water Quality and Water Quantity: consider addition of #8 that states “Watersheds that contain recharge areas for municipal water sources retain water quality for these beneficial uses.”

- Chapter 2. Forestwide Management, page 21 – Management Approaches for Water Quality and Water Quantity – 6th paragraph: this should include the threat of wildfire on municipal water and not be limited to fertilizers.
- Chapter 2. Forestwide Management, page 23 – General Description for Wetland/Cienega and Reservoirs/Lakes: add C.C. Cragin as impoundment for municipal water use.
- Chapter 3. Management Areas and Special Areas, page 128 – Upper Clear Creek General Description should include a statement about C.C. Cragin Reservoir being a municipal water supply for Northern Gila County, owned and operated by SRP. Following, a Desired Condition should be included that lays out the importance of the watershed, forest health, and the protection of the long-term water supply.
- Chapter 2. Forestwide Management, Energy and Minerals, page 83 – this entire section focuses mainly on minerals and does not touch on energy. SRP would like to see the Forest Service identify potential energy corridors. This will allow the Forest Service and the utilities to better manage current and future energy needs.
- Chapter 2. Forestwide Management, Desired Conditions for Special Uses, Land Special Uses FW-SpecUse-DC statement 2, page 97, states that *“Utility lines, such as pipelines, power lines, fiber optic lines and telephone lines, are buried unless there are overriding environmental or technical concerns that would prevent burial.”* Burying lines is not always feasible and/or practical. The burying of power lines still has an impact on the environment. Vegetation will need to be maintained in the right-of-way corridor and access will be needed in order to maintain the line integrity. Additionally, transmission lines are generally not buried.
- Chapter 2. Forestwide Management, Desired Conditions for Special Uses, Land Special Uses FW-SpecUse-DC statement 3, page 98, says *“Power lines and towers are built (construction or reconstruction) to specifications compatible with raptor use.”* New structures are constructed to be bird friendly and bird guarding is installed per the Avian Power Line Interaction Committee (APLIC) *Suggested Practices for Avian Protection on Power Lines- State of the Art in 2006* guidance document. SRP does not have suggested standards specifically for raptors; our suggested standards cover all bird species. Therefore, we suggest this statement be amended to incorporate all protected migratory birds.
- Chapter 2. Forestwide Management, Guidelines for Special Uses, Land Special Uses FW-SpecUse-G statement 1, page 99, states that *“In accordance with scenery desired conditions and landscape character, utility rights-of-way should be located and maintained to conform with natural-appearing patterns of native vegetation.”* It is not always possible for utilities to maintain natural appearing vegetation. SRP and other utilities must comply with the National Electric Reliability Code (NERC) Reliability Standard in addition to other industry standards.
- Appendix B: Proposed and Probably Management Practices, Special Uses, page 240 states that a future proposed or probable management practice is to *“issues and supervise forest product or vegetation management permits to lessen abrupt vegetation*

transition in power line rights-of-way, where it is necessary to clear the right-of-way boundary to meet national standards". All vegetation management work is conducted in accordance to industry standards, regulations and recommendations governing utility maintenance. Utilities are required to keep their permitted rights-of-way clear in order to comply with the various standards. Therefore, the utilities will not be able to feather the vegetation in their right-of-ways. If the Forest Service is suggesting that this transition area occur outside of the permitted right-of-way, then the utilities should not be responsible for the NEPA work or cost in order to reach the desired look. The Forest Service will have to take on the responsibility and costs of the additional work.

DEIS, Volume 1 Comments

- Chapter 3, Affected Environment and Environmental Consequences, Common to All Alternatives, page 547 – The first paragraph states that *"consequently new power lines and transmission corridors would not occur in these areas which could contain roosting, nesting or foraging habitat for bald and golden eagles"*. This sentence is very broad and may be interpreted to mean the entire Forest. We recommend amending the sentence and removing the word "could".

In summary, SRP encourages the development of a revised Plan that integrates and emphasizes the role the Forest has in protecting Arizona's water supply through the support of watershed health projects, including landscape scale forest restoration, vegetation thinning, and prescribed fire and in incorporating the needs of power utilities in order to provide safe and reliable generation and transmission to meet local and regional public energy demands. SRP appreciates the opportunity to present these comments on the Coconino National Forest Draft Land and Resource Management Plan and the Programmatic Draft Environmental Impact Statement. We would like the opportunity to meet with the Forest Plan Revision Team in the near future to discuss our comments and overarching interests. Please contact Lesly Swanson at (602) 236-2893 or Rebecca Davidson at (602) 236-6617 to set up a meeting time, and/or if you have any questions or need further information regarding any of the matters discussed.

Sincerely,



Ruth Valencia
Manager, Biological and Cultural Resource Services

cc: Rick Corven, Director, Electric System Line Maintenance
Rob Kondziolka, Director, Transmission Operations
Steve Cobb, Director, Transmission and Generation Operations
Kara Montalvo, Director, Environmental Compliance and Permitting
Bruce Hallin, Director, Water Rights and Contracts
Rebecca Davidson, Senior Analyst, Water Rights and Contracts
Charlie Ester, Manager, Water Resource Operations Services

File: ORG-1-1-9.1