14990 S. Sasabe Road
Tucson, AZ 85736

www.altarvalleyconservation.org

September 17, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Regarding: **Comments concerning revegetation, reclamation and monitoring aspects of proposed Sierrita Lateral Pipeline Project, FERC Docket No. CP13-73-000**

Dear Ms. Bose:

The Altar Valley Conservation Alliance is a non-profit collaborative conservation group focused on the Altar Valley watershed. As stated in previous letters, this group opposes location of the proposed Sierrita Lateral Pipeline in the Altar Valley. However, should the project be located in the Altar Valley, it is essential that revegetation, reclamation and the like be done well and in a manner appropriate to the climate and geography of the Altar Valley. Intense vehicle and human traffic associated with illegal immigrant and smuggling traffic, and related law enforcement activities, will make an already difficult job even more challenging.

We have invested a substantial effort in review of various Sierrita Lateral Pipeline plans filed with FERC in July 2013, that were updated following the FERC sponsored public meeting in June 2013 (specifically the Erosion Control, Revegetation, and Maintenance Plan; Reclamation Plan; and Post-Construction Vegetation Monitoring documents). In general, we are very concerned by Sierrita's lack of response to our concerns and those of partners, as well as the lack of specificity in these plans.

We have attached annotated versions of these plans to share our concerns with you. In addition, we have summarized basic concepts that are of great concern to us. You will see that these concepts correlate to annotations throughout the plans

We recommend that revegetation **and watershed stability** be considered as the primary goals of post-construction activity. Successful revegetation coupled with watershed stability would provide the basic foundation necessary for protection of other key resources both within and adjacent to the project area, such as wildlife habitat and cultural resources. Accordingly, specific

on-site (and possibly adjacent location mitigation actions) would need to be described in detail, with associated monitoring indicators added to the monitoring plan. **Thus, the monitoring document would be more aptly titled "Post –Construction Vegetation, Watershed Stability and Other Critical Resources Monitoring Document".**

We recommend that **access roads be considered part of the project area on equal par with the right-of-way itself**, with pre, during and post-construction treatment clearly described, with follow through into the monitoring phase. Also, access road management and rehabilitation should be designed according to specifications described by Bill Zeedyk, which focus on draining roads using structures appropriate to the type of traffic that use the roads, minimizing road width to that necessary for traffic, and where possible locating roads in suitable locations. These treatments require planning and construction techniques that are not familiar to all operators nor engineers, though our local experience has shown that operators, public officials, and private landowners quickly see the benefits.

It is difficult to discern which erosion control treatments are temporary versus permanent. It appears that water bars are the primary permanent treatment proposed, but there are few details concerning the design and placement of those structures. Then to add further complexity, Sierrita proposes 18" by 3' "imprinting" mounds to block vehicular access -- plus there will be dead trees replanted, plus rocks scattered. Sierrita's plans lack thoughtful integration and detail. What will this actually look like on the ground? The orientation of water bars and imprinting mounds relative to topography and water flow patterns would significantly determine their effectiveness for erosion control. If located inappropriately, they could become sources of erosion in and of themselves.

Similarly, Sierrita's plans for wash crossings are very unclear. A critical sentence must have a typo, because it makes no sense: "When crossing a wash, the pipeline will be located in a relatively stable, steady-state environment to one of the intermittent but intense erosion potential. (Reclamation Plan, July 2013, p 5). The stated objectives for wash crossings are "prevent pipeline exposure and to promote dry wash bed and bank stabilization" (ibid, p 5). **A third objective must be added such as: to prevent excessive erosion (head-cutting) emanating from washes.**

The Alliance recommends that Sierrita consider placing rock stabilization structures within drainage channels, above and below the location where the pipe crosses the drainage. It is essential that these structures be built during the immediately post-construction reclamation effort, as staging the rock, and accessing the drainage to do the work can cause disturbance. Given the goal of keeping vehicles out of the ROW, it would be difficult if not impossible to return to eroding drainages to do this type of work – and it would surely be necessary should erosion problems become more severe in drainages crossed by the pipeline, or emanating from these areas of impact.

In sum, Sierrita's current documents do not allow us to piece together a logical picture of what Sierrita will actually do. It would be very helpful if Sierrita would provide diagrams, images, examples or some better form of description that ties all their proposed treatments together into a clear and detailed on-site mitigation plan. It seems to us that equal attention to watershed

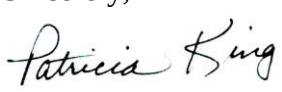
stability and revegetation will create the integrated approach necessary to achieve success, and serve a variety of other critical resource concerns, such as cultural resource sites located within 50 feet of the ROW that could otherwise be negatively impacted by erosion emanating form the ROW.

We acknowledge that Sierrita intends to keep an eye out for erosion problems during their monthly overflights and report them to landowners to plan action. This approach lacks the necessary specificity and direction. We believe that erosion prevention measures as well as erosion related monitoring must be formally incorporated into post-construction site rehab and the monitoring that would follow.

We would like to commend FERC and Sierrita for recognizing the importance of a third party monitoring entity. We recommend that this monitoring be locally directed, by a stakeholder committee. We recommend that FERC require a substantial "reclamation fund" that this committee would administer to address maintenance and reclamation problems that will arise over the life of the project.

Thank you for your time and attention to this issue. Please be in touch if you have any questions about these comments or the attached annotated reports.

Sincerely,



Patricia King
President,
Altar Valley Conservation Alliance

Mary Miller
Vice-President - Programs
Altar Valley Conservation Alliance

Attachments:

- ***Reclamation Plan***, July 2012, with AVCA annotations.
- ***Post-Construction Vegetation Monitoring Document***, July 2013, with AVCA annotations.
- ***Sierrita Upland Erosion Control, Revegetation, and Maintenance Plan***, July 2013, with AVCA Annotations.