



DEPARTMENT OF GEOGRAPHY
507 McCone Hall # 4740
BERKELEY, CALIFORNIA 94720-4740
(510) 642-3903
FAX (510) 642-3370

16 December 2013

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

RE: Sierrita Pipeline Project, Docket Nos. CP13-73-000 and CP13-74-000

Dear Secretary Rose,

I am writing to express my strong opposition to the proposed Sierrita Pipeline Project through the Altar Valley of south-central Arizona. As a scholar, I have studied the Altar Valley for the past 18 years, and my book *Ranching, Endangered Species and Urbanization in the Southwest* (published by University of Arizona Press in 2002) was the first comprehensive treatment of the valley's history and environmental geography. Subsequently I served on Pima County's Ranch Technical Advisory Team for the Sonoran Desert Conservation Plan, and was the lead author on the Team's report. We found that the Altar Valley was *the most important conservation priority* for long-term, comprehensive endangered species habitat preservation in Pima County, and therefore critical to compliance with the Endangered Species Act.

The Draft Environmental Impact Statement prepared for the project is, I believe, seriously flawed in numerous ways. Specifically:

1. The proposed vegetation reclamation plan, although modest, is unrealistically optimistic. Restoring natural vegetation in the semi-arid desert grasslands of southeastern Arizona has proved exceedingly difficult, despite more than a century of dedicated scientific effort. The only perennial grass species likely to succeed is the non-native Lehmann lovegrass (*Eragrostis lehmanniana*), which is deemed invasive by the NRCS and disallowed for federally funded or authorized projects. The promise that "areas disturbed by pipeline construction would begin to resemble the surrounding area after at least 20 years" (page ES-7) is arbitrary, as there is no evidence in the scientific literature that 20 years is adequate to desert grassland vegetation recovery. It is also deeply disingenuous and duplicitous: after all, "after at least 20 years" literally promises nothing—it could mean 25 years, 50 years, or never!
2. Even if vegetation recovery were ecologically possible, it would never actually occur due to border security issues. Recovery of vegetation cannot occur if even a small amount of vehicular traffic takes place on the pipeline right-of-way. Abundant experience throughout the US-Mexico border region

indicates unequivocally that the right-of-way will indeed be used, both for illicit purposes and by Customs and Border Patrol for border enforcement purposes. To pretend that any construction, monitoring or enforcement strategies are capable of eliminating such uses to zero is simply fanciful nonsense. The EIS effectively grants this in passing responsibility for managing “any possible increase in human trafficking, narcotic trafficking, and cross border-related illegal activity resulting from the Project” to the Border Patrol. In short, the vegetation reclamation and the right-of-way management components of the draft EIS are in contradiction with each other.

3. The Project’s impacts on fire restoration would interfere with important conservation practices. The discussion of Fire Regimes on page 4-56 is wholly inadequate and misleading. It acknowledges the evolutionary role of recurrent fires in the southern (higher) portion of the Altar Valley, but it erroneously asserts that the relative absence of such fires in the recent past has turned the entire area into “non-fire tolerant scrub species.” This is factually incorrect on three counts: 1) fire has been actively restored in much of the area, especially in the past 25-30 years; 2) perennial grass cover persists in much of the area; and 3) the scrub species in question (such as mesquite) *are* fire tolerant. The importance of fire for long-term grassland conservation and restoration is recognized by the valley’s ranchers, the Buenos Aires National Wildlife Refuge, and scientists—indeed, fire restoration has been a unifying objective of conservation region-wide over the past several decades. It is hard to imagine how a natural gas pipeline—even a buried one—would not interfere with these efforts. At the very least, the Project should not be permitted unless the pipeline owner promises, in writing, to allow fire (both natural and prescribed) to play its evolutionary role in the valley forevermore and no matter what.

There are many other problems with the proposed project, including whether the much longer pipeline segment in Mexico will in fact be built and whether the economic rationality of selling natural gas there will be realized. Even putting those problems aside for the moment, it seems abundantly clear that the alternative that should be pursued—if the pipeline is to be built in the Altar Valley at all—is to route it alongside the existing highway all the way to the border. This would minimize or eliminate all three of the concerns listed above.

If the proposed route—which follows the highway for about one-third of the pipeline’s length—was chosen due to the US Fish and Wildlife Service’s determination that the pipeline is incompatible with the Buenos Aires NWR (as seems likely from the draft EIS), I would point out that this is a double standard that cannot be justified on scientific or ecological grounds. The private and state lands of the Altar Valley are every bit as important to the conservation of biodiversity and endangered species as the USFWS lands, and arguably more important (e.g., for the jaguar).

Countless private citizens and public agencies have invested significant time, effort, and money in conservation of the Altar Valley. Permitting the Sierrita Pipeline Project to be built there, especially along the proposed route, would be a reckless and foolish capitulation on the part of the FERC, allowing short-term private gain to take precedence over the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan F. Sayre". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nathan F. Sayre
Associate Professor and Chair