

Appendix C. Agency and Public Comments on *Natural Gas Pipeline SR 179 (Village of Oak Creek to Sedona)* Draft Environmental Assessment

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A. AGENCIES AND ORGANIZATIONS				
Agency/Organization	Letter Date	No.	Comment	Response
Arizona Department of Transportation (ADOT)	June 30, 2004	A1-1	ADOT concurs with the Purple Alternative.	Comment is noted in project record.
		A1-2	The Purple Alternative would minimize construction impacts to scenic resources and the traveling public.	Comment is noted in project record.
		A1-3	ADOT commits to work closely with UniSource to integrate these two projects with the goal of minimizing construction impacts to the Coconino National Forest.	Comment is noted in project record.
Big Park Regional Coordinating Council	July 8, 2004	A2-1	Agrees that the Purple Alternative would be preferred.	Comment is noted in project record.
		A2-2	EA should be modified to confirm that ADOT has agreed to develop the precise location of the new southbound highway lane and provide that information to UniSource in time to support pipeline construction	Coordination with ADOT, Coconino National Forest (CNF), and UniSource Energy Services (UES) has been ongoing throughout the development of this project. In response to the Draft Environmental Assessment (DEA) ADOT submitted a letter—dated June 30, 2004—in which it committed to work with UES and the CNF to integrate these projects. A copy of this letter from ADOT is included in the project record.
		A2-3	EA should be clarified with respect to revegetation of the construction area specifying that the disturbed natural vegetation will be replaced as soon as possible with the same types of vegetation as were removed.	UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
Big Park Pipeline Transportation Sub Committee	June 24, 2004	A3-1	The subcommittee unanimously favors the Purple Alternative. The Purple alignment best addresses the subcommittee's concerns for minimizing impacts to the traveling public, construction costs, and environmental effects on the National Forest.	Comment is noted in project record.

Voice of Choice for 179, Inc.	July 3, 2004	A4-1	The Purple Alternative appears to provide the most opportunity for coordination to minimize impacts to the National Forest from the gas line and the ADOT project; however, concerned that if ADOT does not develop the precise location of the southbound lanes in time for the project, there will be one very wide or two separate disturbance areas.	Coordination with ADOT, CNF, and UES has been ongoing throughout the development of this project. In response to the Drat Environmental Assessment (DEA) ADOT submitted a letter—dated June 30, 2004— in which it committed to work with UES and the CNF to integrate these projects. A copy of this letter from ADOT is included in the project record.
		A4-2	EA should include specific wording stating that ADOT agrees “to develop the precise location for the new southbound lane and provide that information to UniSource in time to support the pipeline construction through the Forest.”	Refer to response to comment A4-1.
		A4-3	Believes that more specific wording should be included to specify that UniSource will immediately replace disturbed vegetation to prevent soil erosion, and after construction replace vegetation with the same type as originally removed.	As stated in the DEA, UES would revegetated disturbed areas not on designated trails; however, the 10-foot wide permanent ROW would only be revegetated with grasses and seedlings- to allow maintenance access of the pipeline (pg. I-5). Additionally, UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
		A4-4	UniSource should be encouraged to greatly reduce/minimize the number of staging areas in the Forest.	UES has agreed to limit staging areas to three locations along the Purple Alternative. This change will also result in a smaller overall area of disturbance for the Proposed Action. Additionally, Mitigation Measure V3 requires that the locations of staging areas be coordinated with CNF and existing cleared areas be used where possible. Updated information will be added to the FEA.

B. INDIVIDUAL LETTERS/E-MAIL

Name	Letter Date	No.	Comment	Response
Eich, William	July 1, 2004	B1-1	Supports the Red Alternative because it does not have the time constraints of the Purple Alternative and does not depend on coordination with ADOT. Given the arrangement reached among CNF, UniSource, and ADOT, can agree with Purple, especially if all parties do their best in following through with implementation.	<p>Comment will be noted in the project record.</p> <p>Coordination with ADOT, CNF, and UES has been ongoing throughout the development of this project. In response to the Drat Environmental Assessment (DEA) ADOT submitted a letter—dated June 30, 2004— in which it committed to work with UES and the CNF to integrate these projects. A copy of this letter from ADOT is included in the project record.</p>

Eich, William (continued)	July 1, 2004	B1-2	If there is a need to move any portion of the gas line after the roadway is constructed, wants the discarded path of the pipeline to be completely reforested.	Once the pipeline is installed, UES would have “prior rights”. This means that if ADOT required any portion of the pipeline to be relocated, the relocation would be at ADOT’s expense, and the area treated in accordance with the mitigation measures set forth in the December 2002, <i>SR 179 Village of Oak Creek to Sedona Final Environmental Assessment</i> .
		B1-3	Would like mitigation limiting the construction company, such as minimizing damage to trees, rocks, and other natural elements.	Mitigation minimizing impacts of construction—including impacts to vegetation, rocks, and other natural elements—are included in the DEA (refer to Table II-2). These mitigation measures include the preparation of a resource protection plan, which will be reviewed by the CNF. UES will ensure that its contractors follow the mitigation measures as stated in the FEA, and are responsible for the implementation of these measures. CNF monitoring will provide additional oversight.
		B1-4	Requests before and after photos be taken at intervals for reforestation reference.	UES will take photographs of the construction site prior to construction (an existing UES policy). However, because construction under the Purple Alternative would be within the ADOT roadway disturbance, long-term revegetation will be completed in coordination with ADOT.
		B1-5	Requests that the number and size of staging locations be limited and selected areas to be located where impacts would be minimal.	UES has agreed to limit staging areas to three locations along the Purple Alternative. This change will also result in a smaller overall area of disturbance for the Proposed Action. Additionally, Mitigation Measure V3 requires that the locations of staging areas be coordinated with CNF and would use existing cleared areas where possible. Updated information will be included in the FEA.
		B1-6	Requests the 40-foot-wide construction right-of-way be strictly adhered to; and that this be inspected by personnel other than construction contractor who may take liberty with the limitations or may not be aware of limitations.	Adhering to the 40-foot easement will be a requirement of the project. According to mitigation measure SR15 (of the June 2004 DEA), the clearing limits within the National Forest will be staked. Furthermore, it is UES’s practice to mark the boundary of the construction path. UES and CNF will both provide oversight and monitoring for the overall project, and UES will provide specific language to its contractor to penalize work outside of the marked boundaries.
		Gibson, Jim	July 9, 2004	B2-1

Gibson, Jim (continued)	July 9, 2004	B2-2	If by choosing the Purple Alternative, it would be possible that the SR 179 highway project could be compromised, then this commenter objects to this choice. Requests assurances from ADOT that under no circumstances will the SR 179 process or route choice be compromised by placement of the pipeline.	Coordination with ADOT, CNF, and UES has been ongoing throughout the development of this project. In response to the Drat Environmental Assessment (DEA) ADOT submitted a letter—dated June 30, 2004— in which it committed to work with UES and the CNF to integrate these projects. A copy of this letter from ADOT is included in the project record.
Iverson, Wayne	July 7, 2004	B3-1	There is no evaluation of scenic impacts from the Chapel of Holy Cross, the Chapel area subdivisions, Sky Mountain ranch subdivision and Back O' Beyond subdivision. Scenic evaluations should apply to all lands, National Forest and private. Under past policy, scenic impacts to private lands were considered more important, in many cases, than impacts to National Forest lands.	<p>The scenic impacts from six additional viewpoints were evaluated. These viewpoints include: 1) the Chapel of the Holy Cross, 2) the Chapel Bell Estates Subdivision (on the CNF boundary south of the Cougar Drive terminus), 3) Chapel Vista Subdivision (near the east end of Gambel Lane on the CNF boundary), 4) Back O' Beyond #1 (at the western end of Back O' Beyond Road on the Rainbow Road Loop), 5) Back O' Beyond #2 (north of Back O' Beyond Road approximately 0.25 miles west of SR 179), and 6) Sky Mountain Ranch subdivision (at the western end of Skyline Drive near the top of the hill).</p> <p>A visibility analysis was completed assuming that there were no other structures or vegetation such as trees present that would filter or obscure the line of sight to the pipeline alignment.</p> <p>None of the alternative alignments would be visible from the Back O' Beyond #1 viewpoint.</p> <p>Approximately 2% of the Red and Orange Alternatives would be visible within the immediate foreground area of one of the viewpoints, Chapel Bell Estates Subdivision. The Orange Alternative would also be visible within the immediate foreground area of Back O' Beyond #2 viewpoint (approximately 2%). The Red and Orange Alternatives would be visible in the middleground distance zone from two viewpoints, Chapel Bell Estates Subdivision (approximately 6% of both alignments), and Back O' Beyond #2 (approximately 2% of both alignments). The Red and Orange Alternatives would be visible in the middleground distance zone from four viewpoints, Chapel of the Holy Cross (approximately 36% of the Red Alternative/37% of the Orange Alternative alignment), Chapel Vista Subdivision (approximately 28% of the Red Alternative/26% of the Orange</p>

Iverson, Wayne (continued)	July 7, 2004	B3-1		<p>Alternative), Back O' Beyond #2 (approximately 3% of both alignments), and Sky Mountain Subdivision (approximately 51%of the Red Alternative/46% of the Orange Alternative alignment)</p> <p>The Blue Alternative would not be visible within the immediate foreground area of any of the viewpoints. The Blue Alternative would be visible in the middleground distance zone from two viewpoints, Chapel Bell Estates subdivision (approximately 7% of the alignment), Chapel Vista Subdivision (approximately 27%of the alignment), and Back O' Beyond #2 (approximately 2% of the alignment). The Blue Alternative would be visible in the middleground distance zone from three viewpoints, Chapel of the Holy Cross (approximately 32% of the alignment), Chapel Vista Subdivision (approximately 24%of the alignment), and Sky Mountain Subdivision (approximately 47% of the alignment).</p> <p>The Yellow and Purple Alternatives would not be visible within the immediate foreground area from any of the viewpoints and approximately 9% of this alternative would be visible from one viewpoint, Chapel Bell Estates Subdivision within the foreground area. The Yellow and Purple Alternatives would be visible in the middleground distance zone from three viewpoints, Chapel of the Holy Cross (approximately 36% of the alignment), Chapel Vista Subdivision (approximately 27% of the alignment), and Sky Mountain Subdivision (approximately 53%of the alignment).</p> <p>In summary, the Yellow and Purple Alternatives are the least visible from the six viewpoints; seen from the foreground from only one viewpoint and from three viewpoints in the middleground. The Yellow and Purple Alternative would be slightly more visible than the other alternatives in the middleground distance zone from the Sky Mountain Subdivision viewpoint. The Blue Alternative is slightly more visible overall than the Yellow and Purple Alternatives, seen from two viewpoints in the foreground and three in the middleground. The visibility of the Orange and Red Alternatives would be similar; visible from two viewpoints in the foreground area and four in the middleground.</p>
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Iverson, Wayne (continued)	July 7, 2004	B3-1		<p>The Orange Alternative would be the most visible because this alignment would be seen in the immediate foreground, foreground, and middleground of at least two of the viewpoints.</p> <p>CNF is not aware of any past or current policy that states that scenic impacts to private lands are 'considered more important, in many cases, than impacts to National Forest lands'. CNF is not mandated to manage, nor has control over, occurrences on private land.</p>
		B3-2	Lack of information regarding staging areas indicates they have not been selected and therefore not evaluated in regards to scenic impacts	<p>The staging areas have not been selected and site-specific scenic impacts were not determined. UES has agreed to limit staging areas to three locations along the Purple Alternative. This change will also result in a smaller overall area of disturbance for the Proposed Action. Mitigation Measure V3 requires that the locations of staging areas be coordinated with CNF, and the contractor will use existing cleared areas where possible that will minimize scenic impacts. Updated information on the number of staging areas will be included in the FEA.</p>
		B3-3	The 40-foot-wide construction corridor will probably cause more clearing and scaring of the landscape than will much of the SR 179 road construction, in many areas. Believes construction area can be reduced to 28 feet where slopes are less than or equal to 10 percent	<p>According to ADOT, the construction limits of the new southbound bifurcated section of SR 179 have not been determined at this time. If there are construction areas that are limited to a 28-foot area, these areas will be cleared and grubbed. The new southbound alignment will have passing lanes that will require greater clearing areas substantially greater than 40 feet in addition to other areas such as the construction of a bridge over an unnamed wash. The pipeline construction will not clear and grub the entire 40-foot width of vegetation. The construction of the pipeline will avoid mature trees where possible and trample vegetation rather than clearing.</p>
		B3-4	Requirement for a 40-foot construction corridor stems from the choice to use large construction equipment in order to reduce cost. This lowest construction cost option results in greater scenic and other environmental impact to forest lands. The corridor width could be reduced, at least in areas where roadway would not create a larger clearing requirement. A 30-foot-wide construction corridor would largely resolve the problem.	<p>Although reducing the construction corridor would be possible in some locations in the project limits, costs would be prohibitive and it would require "work around areas" for necessary movement of boom trucks and welding rigs. Additionally, in many areas smaller equipment would be unfeasible due to the necessity of cutting through rock.</p>

Iverson, Wayne (continued)	July 7, 2004	B3-5	The most critical section for scenic impact is that from Station 496+00 to 497+600/. This section is viewed from the Chapel and Sky Mountain/Back O' Beyond areas, and includes rugged terrain on the southbound alignment. Any staging areas in this section could cause the scenic impact to drop to Very Low Scenic Integrity in SMS, or Maximum Modification in VMS.	No staging areas will be located from Station 496+000 to Station 497+000, an area approximately 0.75 mile in length. These station locations are based on the proposed southbound alignment of SR 179 as identified in the <i>SR 179 (Village of Oak Creek to Sedona) Environmental Assessment</i> prepared by ADOT.
Kusner, Bill	July 7, 2004	B4-1	Agrees with the Purple Alternative	Comment is noted in project record.
		B4-2	Concerned with UniSource restoring revegetation in construction path. Considers previous revegetation efforts on other projects (e.g., Kell Fox trail) as unacceptable.	As stated in the DEA, UES would revegetated disturbed areas not on designated trails; however, the 10-foot wide permanent ROW would only be revegetated with grasses and seedlings- to allow maintenance access of the pipeline (pg. I-5). Additionally, UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
Robinson, Judith	July 8, 2004	B5-1	Against Purple Alternative, supports Red Alternative.	Comment is noted in project record.
C. COMMENT SHEETS FROM JUNE 23, 2004 PUBLIC MEETING				
Name	Date	No.	Comment	Response
Aberg, Bob	June 23, 2004	C1-1	The Purple Alternative has least impact to environment, is probably the least expensive, and is nonintrusive to most everyone	Comment is noted in project record.
Carson, Diane and Gary	June 23, 2004	C2-1	Commenter is a resident on Sky Mountain, and is concerned about the visual impact to the south. ADOT's original Plan C stated that the south side of Sky Mountain was the most impacted.	Based on additional visibility analyses, Sky Mountain would be the most impacted of the residential areas as determined by a representative point at the western end of Skyline Drive near the top of the hill. Approximately 53% of the Yellow and Purple Alternatives would be seen in the middleground area of this viewpoint, 51%of the Red Alternative, 47%of the Blue Alternative, and 46%of the Orange Alternative.

Carson, Diane and Gary (continued)	June 23, 2004	C2-2	Reforestation is the most important issue. Not just low vegetation (e.g., cacti, shrubs) but large trees to replace those disturbed in construction.	As stated in the DEA, UES would revegetated disturbed areas not on designated trails; however, the 10-foot wide permanent ROW would only be revegetated with grasses and seedlings-to allow maintenance access of the pipeline (pg. 1-5). Additionally, UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
		C2-3	Do we need 12 staging areas, and will they be replanted?	UES has agreed to limit staging areas to three locations along the Purple Alternative. This change will also result in a smaller overall area of disturbance for the Proposed Action. Additionally, Mitigation Measure V3 requires that the locations of staging areas be coordinated with CNF and would use existing cleared areas where possible. UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
Cornelison, June	June 23, 2004	C3-1	Concerned about the unknown location of cut and fill slopes for southbound SR 179; specifically concerned that UniSource not be surprised by ADOT and that the pipe be buried deep enough to prevent exposed pipe.	Coordination with ADOT, CNF, and UES has been ongoing throughout the development of this project. In response to the Draft Environmental Assessment (DEA) ADOT submitted a letter—dated June 30, 2004—in which it committed to work with UES and the CNF to integrate these projects. A copy of this letter from ADOT is included in the project record. ADOT has agreed to supply cut and fill slopes to UES prior to construction, this information will include data on road grades. UES is committed to construct the pipe deep enough to avoid cut and fill work done by ADOT. Additional information about coordination with ADOT will be included in the FEA.
		C3-2	Are staging areas really necessary every 1,500 feet?	UES has agreed to limit staging areas to three locations along the Purple Alternative. This change will also result in a smaller overall area of disturbance for the Proposed Action. Additionally, Mitigation Measure V3 requires that the locations of staging areas be coordinated with CNF and would use existing cleared areas where possible. Updated information about staging areas will be included in the FEA.

Cornelison, June (continued)	June 23, 2004	C3-3	Regarding the necessity for a 40-foot-wide swath based on equipment requirements: smaller equipment is available and has been used in the past.	Although reducing the construction corridor would be possible in some locations in the project limits, costs would be prohibitive and it would require “work around areas” for necessary movement of boom trucks and welding rigs. Additionally, in many areas smaller equipment would be unfeasible due to the necessity of cutting through rock.
		C3-4	Can the pipe be laid 5 feet off the shoulder of the road?	If the planned ADOT roadway improvements did not require cut and fill areas the pipeline could be constructed closer the roadway. However, a sufficient distance from the roadway is required for the safety of maintenance personnel, and, continued operation of traffic on the highway.
Gillam, John	June 23, 2004	C4-1	Concerned that the precise location of the new SR 179 southbound alignment is unknown, and that, therefore there will be two wide swaths of disturbance-close together. This would result in disturbance that would look like a second or third road through the forest. Assurance from ADOT is needed for this alternative.	Coordination with ADOT, CNF, and UES has been ongoing throughout the development of this project. In response to the Drat Environmental Assessment (DEA) ADOT submitted a letter—dated June 30, 2004—in which it committed to work with UES and the CNF to integrate these projects. A copy of this letter from ADOT is included in the project record. Additional information about coordination with ADOT will be included in the FEA.
		C4-2	Concern about the type of vegetation to be replanted in the disturbed area; specifically that it be restored to preconstruction conditions.	As stated in the DEA, UES would revegetated disturbed areas not on designated trails; however, the 10-foot wide permanent ROW would only be revegetated with grasses and seedlings-to allow maintenance access of the pipeline (pg. I-5). Additionally, UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
Hutchinson, Tom	June 23, 2004	C5-1	Supports the Purple Alternative from an economic and environmental perspective, because it will minimize revegetation costs and losses and disturbance can be incorporated into the SR 179 roadway.	Comment is noted in project record.
Johnson, Joanne F.	June 23, 2004	C6-1	Supports the Purple Alternative, because it will have the least impact on Scenic Resources.	Comment is noted in project record.

		C6-2	Would like the cleared area to be used as a trail on the western side of SR 179 in the bifurcated section.	The purple alternative did not include a trail; this is consistent with ADOT's NBIP process selected alternative. During the NBIP public process, the existing Bell Rock Pathway was determined to be adequate to meet current needs. At this time, the CNF is respecting that public process. If an additional trail is needed at some time in the future, a separate analysis would be initiated.
Johnson, Joanne F. (continued)	June 23, 2004	C6-3	Strongly opposes the Red Alternative.	Comment is noted in project record.
Fink, John	June 23, 2004	C7-1	Supports the project and the Purple Alternative.	Comment is noted in project record.
Fink, Zona	June 23, 204	C8-1	Supports the Purple Alternative.	Comment is noted in project record.
Maddock, Ms. Eddie S.	June 23, 2004	C9-1	Supports the Red Alternative because believes it would be the least invasive and most easily restored to its natural state.	Comment is noted in project record; refer to Section II. Alternatives for more information on the impacts associated with the considered alternatives.
		C9-2	Wants UniSource to replant the entire route of excavation, regardless of the route selected.	UES has committed to several mitigation measures that will dictate the revegetation of the project area. These mitigation measures include stipulations for progressive revegetation, as well as specific plant types, and have been approved by the CNF. Refer to Section III. B. Vegetation and Invasive Species in the FEA.
		C9-3	Thinks it is important that the Forest Service monitor the work.	As stated in the DEA (pg. II-19), USFS representative(s) would monitor ground-disturbing activities during construction and would periodically visit the site following construction. For additional information about monitoring, please refer to Section II. E. Monitoring.