Cascabel Clayworks 5360 N. Teran Road Benson, AZ 85602

July 9, 2009

The U.S. Department of Interior, Bureau of Land Management Adrian Garcia, Project Manager SunZia Southwest Transmission Project

c/o EPG, Inc. 4141 N. 32<sup>nd</sup> Street Suite 102 Phoenix, AZ 85018

Please include these comments in the Scoping phase of the SunZia Southwest Transmission Project process:

Dear Mr. Garcia;

Thank you for the opportunity to comment on the siting of new transmission lines. No doubt some will be needed as we prepare to use renewable sources of energy, which we must do because we now realize the cumulative fiscal and environmental consequences of depending on non-renewable and polluting sources.

As we recognize the problems associated with past policies and approaches to energy generation and switch to more sustainable sources, now is the time to also designate environmentally sustainable utility corridors for this alternative energy. This point is extremely important and easily overlooked if we continue to conduct "business as usual" and let the economic and political factors override ecologic considerations.

I have lived in Cascabel, 25 miles north of Benson, in the Lower San Pedro River Valley for the past 40 years. I have come to appreciate and begin to understand the ecologic values here along this reach of the river and its tributaries; in fact, for the entire watershed. It is one of the few remaining intact natural systems in the Southwest. Because of the relatively pristine conditions here, the valley supports endangered species and the highest density of neo-tropical migratory birds in the West. The topography supports the convergence of several ecoregions which in turn provide habitat for an amazing diversity of resident species of mammals, birds, fish, amphibians, and reptiles.

In addition to a conservation ethic shown by the rural residents, many governmental agencies and private organizations have invested substantial amounts of time and money to help protect the ecosystem here.

The few sparsely populated areas left in the state that also provide high-value habitat and ecological services, which provide benefits way beyond the immediate region, should not be sacrificed to provide any kind of power transmission between urban load areas and distant generating sites.

The valley has a centuries-old history of human occupation that is very unique and the extensive archaeological resources would be threatened by the footprint of the towers. The new access to sites created by the service roads would increase the incidence of vandalism. We need to protect our cultural resources as well as our natural resources.

Powerline construction and long-term maintenance necessitates access roads that will lead to soil erosion, invasive plant species, water quality degradation/ non-point pollution, and off-road vehicle misuse that will further these problems. The need to protect the infrastructure by suppressing wildfire or preventing proscribed burns will hamper vegetation management tools that are useful to improve upland watershed conditions.

Lines that intersect riparian areas will require removal (fuels mitigation of tall vegetation) of the very trees that provide habitat for endangered species, bank and floodplain stabilization for soil and water quality, and the valued global ecoservices of transpiration and carbon exchange.

In this section of the study area, please route the proposed transmission lines along the existing highway and rail lines between Bowie and Vail. Those service and transportation corridors are already impacting the environment and have the added benefit of already established access for new line construction and maintenance. This route will avoid Aravaipa Canyon, Tres Alamos Wash, and the entire Lower San Pedro River Valley.

It is time to match the implementation of renewable energy sources with transmission infrastructure that does not degrade the very environment it purports to enhance. Our future quality of life depends on the decisions –some possibly difficult, many hopefully visionary--that we make today.

Thank you for considering my comments,

Barbara Clark

Withhold personal information? \_\_\_\_\_no Add to the SunZia mailing list? \_\_\_yes Receive notification of EIS availability? \_\_yes