

**Misc. Notes from SunZia DEIS, Volume 1, Chapter 3, “Affected Environment”  
Ralph Waldt, Cascabel Working Group**

**Page 3-72:** No mention is made of the fact that Arizona State law provides for the protection of numerous non-game species. The law states that these species are not to be handled, collected, or killed. Heavy construction activities and habitat destruction associated with the transmission line project will kill many of these animals. Among the species that are protected by state law that live directly within the route proposed for the SunZia transmission lines in the San Pedro Valley are the following animals:

Lowland Leopard Frog *Rana yavapaiensis*

Ornate Box Turtle *Terrapene ornata*

Desert Tortoise *Gopherus agassizii*

Gila Monster *Heloderma suspectum*

Nowhere in the DEIS is there any substantial mention of the population of *Heloderms* within the middle San Pedro Valley. This valley may stand alone as hosting the largest remaining population of this rare species in the United States.

**Pages 3-79:80:** Table 3-29 does not list several of the most serious noxious weeds present in the San Pedro Valley. Some of these omissions are nothing short of astonishing. Two species in particular, Tumbleweed or Russian Thistle, *Salsola iberica/kali*, and Johnson Grass, *Sorghum halepense*, are very common in the valley. The construction activities and road building planned by SunZia will undoubtedly spread these serious weeds.

**Page 3-84:** Your written paragraph on Lesser Long-Nosed Bats minimizes or ignores the fact that this species is reliably and commonly found in numerous locations throughout the San Pedro Valley. Your text states:

“...these populations forage within the study area occasionally.”

This bat species does not use the study area “occasionally”; it uses the area on a constant, annual basis during summer months.

**Page 3-89:** Your document states that no recent records of jaguars within the study area exist. The Cascabel Working Group has photographs of jaguar tracks taken inside the study area during the past three years that represent clear evidence of at least two different jaguars. In November 2011 a jaguar was sighted south of this area within Cochise County. Thus it is possible for jaguars to occur here.

**Page 3-93:** The DEIS states that Yellow-Billed Cuckoos “may occur” within the study area. The Cascabel Working Group can provide documentation from field surveys conducted during the past several years proving that these birds are regular,

breeding residents along the study route. Stating that these birds “may occur” is misleading and untrue.

**Page 3-96:** The information on Desert Tortoise populations within the study area is incomplete, and your designations of what constitutes high-quality habitat are based on poor fieldwork and arbitrary assumptions, not good science. Sonoran Desert Tortoises are so widespread and abundant within the middle San Pedro Valley that neglecting to designate most of the area as habitat of the highest importance and quality is stunning.

**Page 3-98:** No mention is made at all of the occurrence of Spikedace, *Meda fulgida*, in the perennially wet section of the river immediately downstream from the proposed SunZia transmission line river crossing point. This species is the most common fish in this section of the river. Erosion and sedimentation of the river channel caused by construction activities will degrade habitat for this species.

**Pages 3-108:109:** The DEIS completely ignores, and otherwise omits, the wildlife linkage zone between the Rincon, Santa Catalina, and Galiuro Mountains. The proposed route for the SunZia lines bisects the area. Not recognizing the existence and exceptional biological importance of this linkage zone is unpardonable.

**Note:** Mr. Waldt is a professional naturalist who spent much of his career with the Nature Conservancy.