Dear Sir:

Please find attached comments provided by the Cascabel Working Group on the draft Plan of Development for the SunZia Transmission Project. We would welcome support in opposition to the project. This may be your last chance to help us out with this. Please be creative.

Since its first involvement in the process, the Cascabel Working Group has maintained that the biological wealth and uniqueness of the San Pedro Valley is sufficient to preclude development of a new large-scale infrastructure corridor through previously undisturbed land.

* The San Pedro Valley is the most intact wildlife corridor between the Rocky Mountains and the Sierra Madre Mountains. In a study conducted by the EPA, it was found that the San Pedro Valley may have more vertebrate biodiversity than anywhere in Arizona, New Mexico, Nevada, Utah, or Colorado. In southern Arizona, the San Pedro Valley has been the go-to place to mitigate for infrastructure developments. Over a third of the San Pedro Watershed is now in protected status.
* SunZia has tried to justify impacts to the San Pedro Valley with claims of renewable energy benefits imported from New Mexico. However, it has become clear that SunZia is not invested in renewable energy, and that it is interested only in selling the permits, regardless of how the lines would be used. The main utility involved with the transmission project, Salt River Project, is now saying that its only interest in the SunZia project is to import fossil-fueled energy from eastern Arizona, which would significantly fragment the same watershed SRP used to compensate for its prior impacts at Roosevelt Lake.
* It is conceptually insupportable to damage a region which has been set aside, presumably in perpetuity and in good faith, to compensate for prior damage to other ecosystems. Energy benefits for the “Sun Corridor” should be achieved by following existing infrastructure paths.

The Cascabel Working Group and other organizations are supporting a case in the Arizona Court of Appeals that challenges the Certificate of Environmental Compatibility granted by the Arizona Corporation Commission.

For more information, visit www.cascabelworkinggroup.org.

Thank you.

Elna Otter, Anna Lands

Cascabel Working Group