

**Lynn Smith-Lovin
5999 N Canyon Road
Benson, AZ 85602
(520-212-2376)**

July 9, 2009

U.S. Department of Labor
Bureau of Land Management
New Mexico State Office

SunZia Southwest Transmission Project
c/o EPG, Inc.
4141 N 32nd Street
Suite 102
Phoenix, AZ 85018

To whom it may concern,

I write to object to the routes that SunZia proposes that would place high-capacity transmission lines through the Middle San Pedro Valley (north of Benson, AZ and south of San Manuel, AZ).

The San Pedro valley is a national (indeed international) treasure of both natural and cultural value. The Nature Conservancy, the BLM and other conservation groups have spent literally millions of dollars trying to protect the valley. Of primary importance are the migration and wildlife corridors, both up and down the San Pedro Valley (linking Mexico with more Northern areas) and across the valley at many points (linking the “sky islands” of the Galiuro Mountains Wilderness Area and the Winchesters to the National Forests in the Santa Catalina Mountains and the National Park in the Rincons). The local community has shown a remarkable engagement with these efforts, organizing collective donations of conservation easements and even deeded land to protect these unique ecological resources. The valley has been labeled one of the “last great places” by the Conservancy. BLM has used the area to mitigate environmental damage in other areas. Endangered fish, amphibians, reptiles and birds are creatures that we see almost every day here. Large mammals use the area as a critical movement corridor to allow genetic mixing of populations.

As remarkable as the natural resources here are, the (pre)history of human habitation is just as valuable. The Center for Desert Archeology has identified over 1000 sites in the valley, representing excellent examples of many different eras. Most importantly, there are unique examples of major transition periods that are very rare and not found elsewhere. Indeed, when local land has been put under conservation easement, it has sometimes been difficult to find a building envelope on even large parcels that does not negatively impact some important archeological site. The valley has one of the longest records of continuous human habitation in North America (from pre-Clovis to the present).

It is not conceivable that a large right-of-way for two high-capacity transmission lines could be constructed without damaging these unique features. The much smaller power lines that are already in the valley create significant erosion and have damaged many archeological sites. The local community and other people who care about the valley fought very hard to defeat a proposal for a four-lane interstate by-pass last year. We did not succeed in that fight just to lose the valuable ecological and cultural values to another project.

While you will find many in the San Pedro valley who support the greater use of renewable energy, you will find that most people support placing the infrastructure for that energy transmission in more developed, already spoiled areas. While I do not have the expertise to comment in detail on alternatives, I have heard several alternative routes mentioned that seem greatly preferable to routing a major right-of-way (with access roads, large towers, and a strong electrical field on the ground) through the pristine and extraordinarily valuable natural and cultural resource of the Middle San Pedro Valley.

Thank you for your consideration of these comments. Please place my name and address on any mailing lists for future comments, meetings or hearings about the issue.

Sincerely yours,

Lynn Smith-Lovin
San Pedro Valley landowner and resident