

Cascabel Working Group  
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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:

We are gratified that the comment period on the SunZia transmission line proposal has been extended. Hopefully this indicates serious attention to public input, as we believe the case against any routes through or across the San Pedro River Valley (SPRV) except at the junction of Interstate 10 is overwhelming. We are further motivated by hearsay that a SunZia project representative advertised that there was local support for this route, which we hope to make clear is unequivocally false.

In our first letter of objection to a SPRV route we outlined some of the scientific case against the impacts that 500KV transmission lines would effect. That documentation is easy to assemble and present. The Nature Conservancy did not name this area as the first of its Last Great Places on Earth on a whim, nor have a host of other agencies and NGO's invested many millions for environmental and cultural preservation in the SPRV on the basis of anything other than sound science. That documentation does not stop at the boundary of certain properties that have been able to be placed under protected status. The USGS study that demonstrated the SPRV as the major avian migratory flight corridor in the West noted that it was the full complement of mountain and valley oases as well as the mainstem river that served this purpose. The ecology of landscape fragmentation on the diversity and health of plant and animal species is well researched and has obvious importance for this area of the greatest diversity of mammal species in North America and the greatest biodiversity of any landlocked area in the U.S.

The import of that science and understanding is that it is generic and systemic with regard to the SPRV ecosystem. There is no way to thread the needle of these lines through protected properties or along existing power corridors without impacting the whole. We also recognize that in addition to its immediate and maintenance impacts, the establishment of such infrastructure corridors is the first wave of more to come which this critical and sensitive desert river system can ill afford. There is already and will continue to be a great host of environmentally concerned organizations, scientists and individuals who will adamantly make this case should a route through the SPRV be further considered.

We also wish to make clear that there is considerable passion to attend this reasonableness. Anyone who lives in this valley or knows it or even visits it cannot help but acknowledge its

specialness. That people have lived here for over 12,000 years and it contains the longest continuous archaeological record in the lower 48 states should be testimony enough. When reason meets passion it is a formidable force.

Our Cascabel Working Group (CWG) is a voluntary community organization to educate governmental and non-governmental organizations and the public about environmental, archaeological, cultural, recreational, agricultural, economic and other features of the San Pedro River Watershed, and we have a solid history of working with them on our natural and cultural resource issues. We had an outsized impact on the demise of the I-10 bypass route through this valley, and we and our network of many SPRV friends are committed to a similar effort in this case.

We of course appreciate the importance of alternative energy sources which this project purports to facilitate. At the same time we recognize that there is no law to mandate the exclusion of conventional energy sources using these lines which will likely make up the vast majority for years to come. Nor does it make any sense to try to “save the earth” in the course of destroying one of its Last Great Places. Our preference is for the local generation of electricity, but to the extent that major power corridors may be necessary or inevitable we heartily advocate for using the already established and impacted route of Interstate 10.

We all have busy lives and hope that reason will prevail to exclude the San Pedro River Valley route from consideration for the SunZia transmission lines. If it does not we will not stoop to uncivil behavior or supercilious theatrics, but the resoluteness and tenacity of our effort should not be doubted. We hope that you will take seriously our pleas and thank you very much for your consideration.

Sincerely,

The Cascabel Working Group

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For views of the middle San Pedro River, visit: <http://sanpedrorivervalley.org> . Our new CWG website, <http://cascabelworkinggroup.org> , is up, includes contact information for us, and will be regularly updated as we gather and post information about this issue

Cc:

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