

Cascabel Community Center
c/o 6520 Cascabel Road
Benson AZ 85602

August 24, 2009

Mr. Adrian Garcia, Project Manager
SunZia Southwest Transmission Project
Bureau of Land Management
P.O. Box 27115
Santa Fe, New Mexico 87502-0115

RE: SunZia Southwest Transmission Project in Arizona

Dear Mr. Garcia,

We are very appreciative of the extended comment period. It has given us time to work together and provide comments that reflect our shared concerns about the environmental and cultural impacts that high-voltage transmission lines would have on the Lower San Pedro River Valley and the Aravaipa Canyon watershed.

We represent the Cascabel Community Center membership in the San Pedro River Valley between the Benson Narrows and Redington. The Cascabel Community Center is a non-profit 501(c)4, and for over twenty years has provided the only public gathering place in our rural neighborhood. All residents are members of the Community Center and can choose to become voting members with an annual payment of one dollar.

Of course, the community itself reaches back some twelve thousand years as the valley has been a migratory path for humans as well as animals and plants for at least that long. The human migrations in archaeological terms came to an end some time ago, but their evidence remains in over 500 known sites with an unknown number of sites yet to be documented in this relatively pristine landscape.

The animals and plants are still using this pathway, making it *the* major one from North America to Central and South America. The migratory paths are not just north and south, but also from east to west between the mountain ranges that parallel the river corridor. These paths between “sky islands” are essential for wildlife population survival and the maintenance of predator-prey balanced relationships.

The vegetation beneath transmission lines is by necessity controlled. In areas of cottonwood-willow stands particularly, this control would be devastating to the rare habitat for both resident and migratory endangered and threatened bird and fish species. Because of the resources still found in the San Pedro Watershed, many federal agencies,

environmental organizations, and corporations with mitigation properties are deeply invested here. So you see, while the current human population may be relatively sparse, this Valley is teeming with life, financial interests, and concern for its welfare.

Regarding the current human population, we think it quite safe to say that we are a community in a true sense: we are united in respecting our diversity, we communicate, and we are concerned with the welfare of one another and of the community itself. We know that the quality of our lifestyle here would be negatively affected by the visual impact of the transmission lines and that our property values would be lowered by electromagnetic emissions. Further, the lines and their service roads would complicate ranch management and recreational vistas.

We cannot be clear enough in our response to SunZia's proposal to establish transmission lines north and south through the San Pedro River Valley or Aravaipa Canyon east and west. The Aravaipa is a very important part of our watershed. It is at the heart of three designated wilderness areas, deserving of the same protections for the same reasons.

This area is a desert - and by definition, extremely fragile. Water quality, soil integrity, and native vegetation would be imperiled by the establishment of transmission lines. Service roads invite off-road vehicle drivers who cannot be stopped from leaving service roads onto the fragile desert ground and cannot be stopped from throwing trash. Invasive plant species could more readily establish along the routes. We are also concerned with wildfire fuels management under the lines and its negative impacts both in the uplands as well as along the river.

For all these reasons and more, the best route for the SunZia transmission line would be along *already disrupted* pathways: Interstate 10, Highway 60, and railroad corridors.

We greatly appreciate this opportunity to participate in and contribute to the draft Environmental Impact Study. We trust that the BLM will conduct a comprehensive study and protect the ecosystem services and cultural heritage that are so important to us. We look forward to working co-operatively with the BLM and SunZia Southwest Transmission as this project moves forward.

Sincerely,

Anna Lands,
2008-2009 Board of Directors

Anna Lands, Chairperson; Janet Trumbule, Secretary; Barbara Clark, Treasurer; Jim Flood, Member; Bob Evans, Member; Erik Revere, Member

For further information about the middle San Pedro Valley, visit:

<http://cascabel.org/>, <http://www.sanpedrorivervalley.org/>, <http://cascabelworkinggroup.org>