

Cascabel Working Group
c/o 6590 N. Cascabel Road
Benson AZ 85602

August 18, 2009

The U.S. Department of Interior, Bureau of Land Management
Adrian Garcia, Project Manager
SunZia Southwest Transmission Project

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

Please include these comments in the Scoping phase of the SunZia Southwest Transmission Project process:

Dear Mr. Garcia;

Thank you for extending the comment period for the scoping phase of the SunZia Transmission Line Project Environmental Impact Statement (EIS). We are pleased to be a part of this process now and welcome the opportunity to provide information about the proposed Arizona routes that would impact the Middle and Lower San Pedro River and its major tributary, Aravaipa Canyon.

Responsible development of alternative energy is critical to the issues facing our country and we trust that the Bureau of Land Management (BLM) will be an integral and important leader in designating utility corridors and locating generating sites that are ecologically sensitive as well as economically efficient. Land use decisions in this hopeful new era must be based on sustainable guidelines and priorities that recognize the immense value of the eco-services provided by functional landscapes.

The Cascabel Working Group (CWG) serves as a voluntary community organization to educate governmental organizations and individuals within the government, non-governmental organizations and individuals within those organizations, and the public about environmental, archaeological, cultural, recreational, agricultural, economic and other features of the San Pedro River Watershed. The rural, unincorporated area we represent is in the Middle San Pedro watershed, north of Benson and south of San Manuel. The CWG has a solid history of working with neighbors, educational institutions, governmental agencies and non-governmental organizations on our natural and cultural resource issues. Moreover, the conservation ethic of the private landowners in this area is evident in the land-use decisions many have made to preserve and enhance the ecoregion. We are not a group of NIMBY obstructionists, but responsible residents and stewards of a beautiful, arid landscape that is an international treasure because of the river that runs through it and the large, relatively unfragmented wildland surrounding it.

That the San Pedro River is the last major free-flowing river in the arid southwest is well known, but its connection to and dependence upon one of the largest unfragmented landscapes in the lower 48 states is less widely recognized. This, in conjunction with the meeting of four major ecoregions (Chihuahuan, Sonoran, Madrean and Rocky Mt.) explains its assemblage of the greatest diversity of mammal species in North America, and the greatest biodiversity of any landlocked state. Ecologists understand that the river's health depends upon the health of the uplands. Furthermore, studies acknowledge that the whole valley, including its upland oases, is now the major migratory corridor for neo-tropical birds in the West. At the same time, and for many of the same reasons, the San Pedro River Valley has the longest continuous archaeological record in the lower 48 states.

Wherever the transmission lines might be placed, it would have negative impacts on the entire ecosystem. Because this watershed is so ecologically and culturally important, we believe it is in our local, state, and national best interests to avoid the undeveloped areas of the San Pedro River Watershed and site the SunZia energy corridor elsewhere.

Ecological impact concerns to be considered:

- The river and its major tributaries support endangered species and are used for mitigation projects for several bird and fish species by state and federal agencies
- Water quality in the river and its tributaries depends on stable upland soils
- Water quality and soil integrity would be compromised by construction and continued maintenance along service roads
- State-wide planning has identified these areas as significant wildlife corridors and habitat and an energy corridor would contribute to fragmentation
- Service roads would encourage ATV access and subsequent off-road abuses which would lead to soil erosion and have detrimental effects to wildlife
- Invasive non-native weeds would spread along the disturbed soils of service roads
- Wildfire and prescribed fire management would be determined by need to protect line integrity rather than the health of the ecosystem
- Transmission lines impact raptors even with expensive mitigation efforts, and the impacts of electrical magnetic fields on wildlife are uncertain.
- The few remaining undeveloped and highly functional landscapes in our arid lands should not be used for infrastructure corridors.

Cultural impacts to be considered:

- Archaeological sites between Benson and Winkelman number more than 500 and the area has not yet been extensively studied.
- Tower footprint would need to avoid sites
- Service roads would allow access and looting
- Historic sites are varied and many are respected by residents and visitors
- Ranch management would be more difficult with service road ATV abuses
- Current landowners would bear the loss of property values and vista enjoyment

- Electromagnetic fields would negatively affect property values and usefulness
- Hunting and recreational quality of experience would decrease

Effective, sustainable implementation of renewable energy sources to be considered:

- Local generation (rooftop, brownfields) of alternative energy should be encouraged near the point of use, rather than long-distance transmission
- Loss of energy in long-distance transportation is inefficient use of infrastructure
- Public subsidies should be applied only to energy transportation from renewable sources
- Place what corridors are ultimately deemed necessary along already established transportation corridors (rail and highway)
- These transportation corridors have existing access roads and are already negatively impacting landscape and watershed function

Thoughtful siting of the SunZia transmission lines will preclude extensive inventory of the species of concern and the considerable natural and cultural resources in the San Pedro River watershed. It will further preclude mitigation expenses for the project's impact on this unique watershed's habitat values.

We would be glad to provide more information and support to the BLM and those who are charged with the responsibility of making decisions that will leave a lasting legacy of sustainable development for the future benefit of all.

Sincerely,

The Cascabel Working Group

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