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Docket No. L-00000YY-15-0318-00171
AZ CORP COMMISSION

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October 15, 2015

Arizona Power Plant and Transmission Line Siting Committee
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007-2996

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ARIZONA CORP. COMM
1200 W CONGRESS STE 218 TUCSON AZ 85701

Arizona Power Plant and Transmission Line Siting Committee and Arizona Corp. Commission:

I wish to comment on the SunZia Transmission Line proposal [Docket No. L-00000YY-15-0318-00171], especially with regard to its routing through the San Pedro River Valley. I have lived in Cascabel, Arizona for over twenty years and have been active in conservation concerns here ever since. I helped found the Cascabel Conservation (formerly Hermitage) Association in 1996 and serve on the board of directors. I have been a director of the Cascabel Working Group and was the Cascabel Community Steward for The Nature Conservancy for several years. I have also been a Supervisor for the Redington NRC, have an interest in the Saguaro-Juniper ranch, and own or have financial interests in several properties in the valley. While I have been active in resisting the SunZia proposal, this letter represents my personal comments as a resident landowner.

I support the conclusions of the Cascabel Working Group that the SunZia project is unnecessary and does not represent the financial, energy or environmental interests of the state of Arizona and its citizens.¹ Arizona's solar and wind projects can supply its renewable energy needs without the conflict from these out of state interests. The Southline proposes to provide sufficient grid connectivity while being more considerate of existing utility corridors. Above all, the SunZia project seriously compromises one of Arizona's environmental gems and diminishes its economic generative benefits for the state and its citizens.

The Cascabel Working Group produced a 140 page book documenting and detailing the local, state, national, continental, hemispheric and global environmental importance of the San Pedro River Valley and the detrimental impacts of the proposed Sun Zia routes through it.² These and similar concerns, which were addressed by nearly every local conservation group including state BLM agents, were so summarily dismissed through the NEPA review process that resources were the only impediment to lawsuit by several parties. SunZia's lobbying expenditures paid off with the Washington administration which listed it for fast track approval and it sailed past objections unimpeded. Washington's agenda met opportunistic speculators, neither of whose interests are those of the state of Arizona and its citizens.

The SunZia proposal would detract from rather than enhance the flourishing of the state's economy, not only on the energy front, but especially with regard to the San Pedro River Valley as a financial resource. The project's mile-wide right of way and double-track powerlines, not to mention the unmanageable developments that inevitably follow, will effectively divide and impede a majority of wildlife species and reduce the sustainability of many populations. That has enormous environmental consequences, for there are two noteworthy aspects of the impacted area.

First, a study by The Nature Conservancy demonstrated that a large portion of the lower San Pedro River Valley and eastward encompasses largest unfragmented area in AZ besides the Grand Canyon.³ That calculation is by the strictest metric of no dirt road throughways, but a more commonly employed measure expands the area tremendously. Basically between Tucson's Catalina and Rincon foothills to near Safford, and from Interstate 10 to Hwy 77, there are no paved road throughways or major wildlife inhibiting barriers. That may be the largest unfragmented area in the American Southwest, a condition recognized to be a necessity for

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BY [Signature]

wildlife population sustainability. This unfragmented area contains six Sky Islands and allows them to remain connected by their surrounding semi-desert grassland and desert scrub seas.

The 2012 Arizona Wildlife Linkages Assessment notes of the area that "most of these roads are currently gravel and easily passable by wildlife."⁴ It also finds that,

"The current utility infrastructure that exists within the linkage design may have little effect on the wildlife species that occur here. However, future large-scale utility infrastructure projects, like the proposed SunZia Southwest Transmission Project, may have numerous negative impacts on wildlife in the San Pedro Valley."⁵

Second, largely because of the San Pedro River Valley's fecundity and this northern extent of the Madrean Archipelago, this area is party to the highest biological diversity in the American Southwest.⁶ Biological diversity and unfragmented habitats are the two shining stars in identifying conservation priorities and policy recommendations. Here they overlap in what is likely the largest unfragmented landscape with the highest species diversity in the American Southwest. That likely explains the enormous investment of conservation monies by numerous agencies and NGOs in the lower San Pedro River Valley. The SunZia project will divide and seriously compromise this tremendous environmental resource.

That which has enormous environmental consequences has enormous economic consequences, as was demonstrated not long ago in the BP Gulf oil spill. Maintaining unfragmented landscapes not only contributes to the land's ecological health but can also be a significant investment in contributing to the diversity and vitality of an area's economy. This area already functions well as a working landscape, and it is clear from the inhabitants' near unanimous objection to the SunZia project that this remains their wish.

Beyond negatively impacting ranches and rural lifestyles, the prospects for exploiting recreationists in the adjacent Sun Corridor will be severely diminished. The economic benefits of this wildland resource to the growing recreation sector in southern Arizona should not be discounted. A national survey of fishing, hunting, and wildlife-associated recreation conducted in 2006 reported that state resident and nonresidents spent \$2.1 billion on fishing, hunting, and watchable wildlife related recreation in Arizona (U.S. Department of the Interior 2006). In Pima County alone the survey found in 2001 that:

"...watchable wildlife activities generated a total economic effect of \$327 million, supporting 3,196 jobs, providing residents with \$91 million in salary and wages, and generating \$2.3 million in state tax revenue (Southwick Associates 2003). Fishing and hunting recreation generated a total economic effect of \$105 million for the County, supporting 1,187 jobs, providing residents with \$18 million in salary and wages and generating \$5.4 million in state tax revenue (Silberman 2003)."⁷

The SunZia project demonstrates the meeting of a sweeping federal agenda with opportunistic financial interests whose primary concern is not for the state of Arizona and its citizens. It would be refreshing to see the Arizona Corporation Commission stand-up for our own interests over those of a heavily lobbied Washington bureaucracy and energy industry speculators. I sincerely implore you to do so.

Thank you for your time and consideration.

Daniel Baker

6640 N. Cascabel Rd. / Cascabel, Arizona 85602 / (520) 212-5862

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400 W CONGRESS STE 218 TUCSON AZ 85701

¹ <<http://www.cascabelworkinggroup.org>>

² Cascabel Working Group, "Draft Environmental Impact Statement Contributions for Proposed SunZia Transmission Line Routes Traversing the San Pedro River Valley", July, 2010
<http://www.cascabelworkinggroup.org/downloads/DEIS_final.pdf>

³ "Cumulative Effects Analysis for Proposed Sunzia Transmission Line" by Rob Marshall, Dale Turner, and Dan Majka, The Nature Conservancy, June 18, 2012.

⁴ Arizona Game and Fish Department. 2012. Pima County Wildlife Connectivity Assessment: Detailed Linkages. Santa Catalina/Rincon – Galiuro Linkage Design. Report to the Regional Transportation Authority of Pima County, p. 21.

⁵ Ibid., p. 31.

⁶ Biodiversity Metrics, William G. Kepner, David F. Bradford, Anne C. Neale, Kenneth G. Boykin, Kevin Gergely, EPA/600/F-11/006, May 2011.

⁷ Arizona Game and Fish Department, op. cit., p. 3.

