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Archaeology Southwest

Exploring and protecting the places of our past



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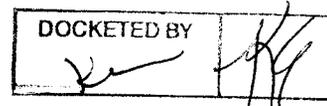
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Arizona Corporation Commission

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OCT 22 2015

Thomas Chenal, Chairman
Arizona Power Plant & Transmission Line Siting Committee
Attorney General's Office
1275 West Washington Street
Phoenix, Arizona 85007



Re: SunZia Transmission, LLC, Docket Number L-00000YY-15-03 18-00171

Dear Mr. Chenal:

Archaeology Southwest, a nonprofit organization based in Tucson Arizona, has been working for the past thirty years exploring and protecting the places of the past. As a result of our work across large parts of Arizona and New Mexico, it has come to light that the San Pedro and the Aravaipa watersheds remain one of the least impacted and relatively intact landscapes in southern Arizona. As such they contain a near-complete record of 12,000 years of past human activity, both Euro-American and Native American. This scale of regional preservation provides an opportunity to interpret sites as part of a broad cultural and economic landscape rather than as isolated phenomena. The great time depth allows us to study changes in this landscape since humans first inhabited the New World. Such opportunities are no longer available in valleys such as Phoenix, Tucson, and Safford, where early development destroyed much of the archaeological record without adequate documentation.

Considering the non-renewable character of cultural resources, we highly recommend that this landscape be preserved for current and future stakeholders, including Native Americans, archaeologists, and the interested public. Construction of a large, electric transmission facility through the lower watershed would have severe detrimental effects on this landscape. These corridors become magnets for a number of levels of system-wide perturbations, including increased motorized public access along the power line roads, increased soil erosion from the construction activities and new permanent roads can serves as dispersal

corridors for invasive plants who thrive on newly disturbed lands. The ultimate outcome from these direct and indirect consequences of the proposed Sunzia Power Transmission facility is significant degradation and fragmentation of a very important minimally impacted natural and cultural landscape. It is important for the Committee to consider whether there are any valleys where, collectively, we can seek to minimize the level of human intrusion or is everything essentially up for grabs?

Archaeology Southwest and previous researchers have identified over 500 archaeological sites on the terraces above the floodplain in the lower San Pedro valley (Benson to Winkelman). About one third of these sites are associated with architecture and are likely to contain human burials. At least 40 sites were villages inhabited by 75-250 people and associated with large cemetery areas. Many of these villages were occupied for centuries, generating considerable archaeological deposits. While, the information in these locations is very valuable for scientific research, the human burials and the cultural values that these sites represent are of great concern to Native American communities. Our previous studies have established that there are strong historical connections and strong cultural interests in the San Pedro valley by the Hopi Tribe, the Pueblo of Zuni, the Western Apaches of both the San Carlos and White Mountain Apache reservations, and the Tohono O'odham.

An element of our preservation work also includes acquiring real property or interests in real property to protect significant archaeological resources. A little bit of putting our money where our mouth is so to speak. In the lower San Pedro River we have protected cultural resources on 4 properties totaling 162 acres. Our small contribution mirrors a much greater level of investment by a number of other agencies and organizations that include the the Arizona Game & Fish Department, Arizona State Parks Department, Bureau of Land, Management, Bureau of Reclamation, Pima County, Saguaro Juniper Corporation, Salt River Project, The Nature Conservancy and U.S. Fish & Wildlife Service. The Resolution Copper Company has proposed to protect additional lands in the valley through a Congressionally-approved land exchange. Together, these partners and other private landowners have protected nearly 200,000 acres and invested over \$42.7 million in acquisition of conservation lands and appurtenant water rights. That investment required 74 separate land transactions, beginning in 1970 and

continuing through 2014. The value of these public and private investments is diminished by this project which remains speculative at best with respect to transmission of renewable energy.

We seriously question the value of this project and the proposed alignment through the lower San Pedro River valley, particularly in light of the proposed Southline project that will soon be before this Committee. It is our recommendation that the proponents be denied a Certificate of Environmental Compatibility by the Committee. Nonetheless, with respect to the proposed alignment there are two specific areas that we draw your attention to and propose that specific conditions be included in the Certificate of Environmental Compatibility should the Committee be so inclined to issue one to this project.

The first area of concern is [redacted] where survey efforts by the project proponent's consultants identified archaeological remains which are associated with people referred to as Sobaipuri. Historical accounts of Eusebio Kino's travels down the San Pedro river in 1697 indicate that a Sobaipuri village was encountered [redacted]. The significance of this protohistoric habitation site cannot be underestimated as it remains one of two largest Sobaipuri habitation sites known in the lower San Pedro River valley and its likely specific association with Eusebio Kino suggest that its eligibility on the National Register of Historic Places would qualify under Criterion B as well as Criterion D. In addition, the Sobaipuri were an O'odham speaking people and of direct ancestral heritage to O'odham people who now reside on the Tohono O'odham Nation and the Gila River Indian Community. The Tohono O'odham Nation has expressed strong concern regarding the current alignment in this area.

Archaeology Southwest proposes specifically that explicit measures be identified that would avoid any disturbance or additional public access to this site.

[redacted] We do not believe that moving the towers in the existing corridor location will accomplish the protection we recommend. In addition, new access routes must avoid this area and following construction we recommend complete road removal for any access and maintenance routes within a half mile of the site. If necessary, the project proponent should be prepared to construct towers [redacted]

and run the power lines using a helicopter to avoid any new road construction.

The second area is the crossing of Edgar Canyon. It is essential that any towers span the breadth of the canyon and that any new construction and maintenance routes be located so that access to the canyon bottom by motorized vehicles is not enhanced. At a minimum any new roads should be located at least one mile from the canyon bottom. If necessary the project proponent should be prepared to construct towers in this vicinity and string the lines by helicopter to avoid any new road construction. This canyon is now protected by Pima County in part and includes a significant archaeological site that at present has received limited public visitation and remains largely undisturbed. As we have previously stated, new access roads associated with construction and maintenance open up many areas to unauthorized public use and can facilitate off road vehicle travel which would threaten this fragile archaeological site.

In summary, the San Pedro valley is the last well-preserved cultural landscape in southern Arizona. There are scientific values, cultural values, and interests of the general public that would all be severely harmed by constructing the Sunzia power transmission line. Considering the tremendous impact (direct and indirect) of the proposed project alignment, Archaeology Southwest strongly recommends that the Arizona Corporation Commission Power Plant and Transmission Line Siting Committee deny the current Certificate of Environmental Compatibility or re-locate this segment of the proposed alignment to avoid entirely the lower San Pedro River valley.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Laurenzi". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Andy Laurenzi
Southwest Field Representative