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Ms. Jeanine Derby
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, AZ 85701

**RE: Development of New Electric Transmission Corridors on United States
Forest Service Lands**

Dear Ms. Derby:

The transmission regulators, governmental entities, transmission users, owners, operators, and environmental entities that participate in the Southwest Area Transmission (SWAT) Planning Group would like to convey their support for the identification of new transmission line corridors across lands managed by the United States Forest Service (USFS). The goal of SWAT is to promote responsible regional transmission planning in the Desert Southwest while maintaining the integrity of the existing facilities. SWAT strongly supports the identification of new transmission line utility corridors across federally-managed forests in Arizona as part of the ongoing Forest Plan Revision process. For more information about the SWAT Planning Group and the SWAT members please visit our Web site at http://www.westconnect.com/init_regionalplan.php.

Electric utilities operate and maintain hundreds of miles of electric transmission lines on federally-managed forests in Arizona and throughout the Southwest. The location of current and future power sources and locations of electric load have increased the likelihood that new transmission lines will need to cross one or more of the forests within Arizona. For example, many of the existing and proposed generating resources that provide energy to Arizona's metropolitan areas are located in northeastern Arizona and northwestern New Mexico. These same geographic regions have been identified as having favorable resource conditions for the development of renewable energy generation projects, including solar, wind, and biomass facilities. Based on a recent mandate by the State of Arizona that will require utilities to incorporate renewable energy resources for 15% of their base energy load by 2025, additional electrical transmission lines across forests in Arizona will be required.

The designation of separate corridors for future power lines crossing USFS-managed land in Arizona will enable utilities to reduce the potential for multiple transmission line outages resulting from forest fires or other significant events impacting multiple transmission lines within the same corridor. The effects of the ongoing regional drought and bark beetle damage have been well documented. These effects have significantly increased the potential for prolonged and devastating forest fires, evidenced

by several large-scale fires in recent years. These fires put at risk all built elements within their path, including transmission lines and associated infrastructure. Electrical outages from fire damage can have wide-ranging implications on a utility's ability to provide electric service, especially when the typical fire season occurs during the same timeframe as peak electric usage. The concept of locating new transmission lines immediately adjacent to existing like facilities, as has been the guideline in current Forest Plans for many of the forests in Arizona, does not mitigate the potential effects of forest fires. The designation of new utility corridors separate from existing corridors will assist the utilities in maintaining the reliability of the regional electric network.

The energy industry believes that creating new corridors can be done in an environmentally sensitive manner and consistent with NEPA requirements. The industry further recognizes the importance of US Forest Service values and goals. SWAT is not requesting the Forest Service to abandon their existing policy on co-location of energy facilities. As previously noted with DOE, co-location is acceptable but only when regional reliability studies indicate additional separation is not required. We believe new plans can be developed, with stakeholder participation, for criteria and processes to be utilized to site new lines in existing or new corridors.

SWAT has participated in the Department of Energy (DOE) efforts to implement provisions of EAct 2005 Section 368 (Energy Corridors on Federal Lands). During the public scoping process SWAT submitted verbal and written comments on the need for new transmission corridors from the Phoenix metropolitan area to the Arizona-New Mexico border area. SWAT reiterated the need for new transmission corridors in its comments on the draft corridor map issued by DOE. For your convenience, SWAT's written comments are attached.

SWAT understands that Arizona Public Service has provided written comments to the Apache-Sitgreaves, Coconino, Coronado, Kaibab, Prescott, and Tonto National Forests regarding the need to identify and designate new utility corridors as part of the Forest Plan Revisions. SWAT supports APS in its efforts and would like to work with the U.S. Forest Service to support a process that will allow utilities to site and construct new facilities in a responsible and efficient manner.

Please contact me at (602) 236-0971 or Robert.Kondziolka@srpnet.com if you have questions or would like to discuss this matter. Thank you for your consideration of our concerns.

Sincerely,

Robert E. Kondziolka

Robert E. Kondziolka
Chair, SWAT Oversight Committee

Attachment

cc: Robert Smith, APS Transmission Planning Manager
Larry Krueger, APS Transmission and Facility Siting Manager
Arizona State Land Department
SWAT Oversight Committee
WestConnect Steering Committee