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PUBLIC COMMENT OF Kelly Ramirez, Ph.D.

I am writing to oppose any route for El Paso Electric's Pine to McCloud Central 345 kV transmission line that uses Link 1R. I write as a climber at Hueco Tanks State Park and Historic Site, as a regular visitor of the Hueco Valley, and as a Professor of Ecology at the University of Texas at El Paso (UTEP).

Hueco Tanks depends on the land around it. I have climbed at Hueco Tanks for 6 years and visit and hike in the surrounding valley more than half the weekends of the year. Each year I bring a cohort of my college students to experience the park with its cultural and natural resources; for many of them it is a formative experience. The climbing, the open, undeveloped landscape and the quiet are unique and represent a cornerstone El Paso's natural heritage (El Pasoans have been using the area for weekend camping and picnics for over a century). Link 1R would place a line of 125-foot steel monopoles about two miles from the park, across the open land that frames it, and would significantly disrupt and damage that experience. From the boulders and summits, these structures would be in plain view for miles. A park boundary does not protect a viewshed, a wildlife corridor, or a night sky. Those depend on the land outside it.

Ecological concerns. From my professional perspective, Link 1R raises several impacts that the environmental assessment should address directly:

1. **Habitat fragmentation and soil disturbance.** Link 1R requires entirely new right-of-way, with a 150-foot-wide clearing plus access roads. It does not follow any existing transmission corridor. In Chihuahuan Desert systems, disturbed soils and biological soil crusts recover over decades, not years. Cleared corridors and roads also become pathways for invasive plants and for off-road traffic into previously undisturbed desert.
2. **Wildlife impacts.** Tall structures in open desert give ravens and other predators new perches and nest sites. This increases predation on lizards, small mammals, and ground-nesting birds. Conductors and shield wires are a known collision risk for birds, especially for raptors and migrant birds moving along the Hueco Mountains. I ask that the Commission require surveys for sensitive species that occur in this region (e.g., the state-threatened Texas horned lizard) before any route through this area is approved.
3. **Light, noise, and other pollution.** The Hueco Valley has some of the darkest skies remaining near El Paso, and that darkness matters to nocturnal wildlife and to visitors. Construction lighting, any structure or facility lighting, and new access roads that invite further development all erode that darkness. A 345 kV line can also produce audible corona noise, especially in wet weather, in a place currently defined by its quiet. Ongoing right-of-way maintenance, including vegetation clearing and any herbicide use, adds a lasting disturbance.

4. **Irreversibility.** A transmission line is a permanent landscape feature. Once this valley is crossed, the damage cannot practically be undone.

A better alternative exists. EPE's own preliminary link map provides a way around Link 1R. Links 1N, 1T, and 1V connect the same endpoints at a similar length while crossing roughly half as many parcels. I do not oppose meeting El Paso's energy needs. I ask the Commission to meet them on a route that does not sacrifice one of the most ecologically, culturally, and recreationally significant landscapes in West Texas.

I respectfully ask the Commission to reject any route that includes Link 1R.

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