



February 11, 2025

Regional Forrester Michiko Martin
333 Broadway Blvd SE
Albuquerque, NM, 87102

Sent electronically to: objections-southwestern-regional-office@usda.gov

Dear Ms. Martin,

Keep Sedona Beautiful (KSB) is a 501(c)(3) nonprofit organization dedicated to protecting the environment and preserving the scenic beauty of Sedona and the Verde Valley. We have a long history of involvement in issues affecting the Coconino National Forest (CNF). Our volunteer "Litter Lifter" crews maintain the cleanliness of Highway 179 and most of Beaverhead Flat Road, and our members regularly enjoy non-motorized recreation on the CNF. We are also committed to advocating for the conservation of wild areas, wildlife habitat, and water resources on the Forest and beyond.

On January 14, 2022, KSB submitted a comment letter on the APS Oak Creek to McGuireville 69kV Transmission Line Project. As a participant in the public comment process, we are now submitting our objections to the Draft Decision Notice and Finding of No Significant Impact (FONSI) for this project.

General Objections

The Verde Valley is renowned for its world-class scenery and unparalleled outdoor recreational opportunities. The proposed overhead powerline would compromise the breathtaking vistas and largely untouched wildlands of the Red Rock Ranger District. The overhead sections of this powerline would introduce a permanent, intrusive fixture into the landscape, sacrificing the scenic protections designated in the CNF Forest Plan for hundreds of acres in the project area. We do not believe this loss of scenic integrity can be adequately mitigated, nor should the local community or visitors from around the world be forced to endure such a visual blight. There are better alternatives available.

While KSB appreciates the Forest Service's initial documentation of a viable underground alternative, we are disappointed that only two segments—crossing State Route 179 and along Beaverhead Flat Road—are recommended for burial. An overhead powerline poses significant risks, most notably the heightened danger of wildfire, which could threaten the Village of Oak Creek, Cornville, McGuireville, and other communities. The added cost of an underground line is a prudent investment in the safety of residents, visitors, and property, especially given the devastating wildfires witnessed in California and other parched regions.

In summary, KSB strongly opposes the construction of an overhead powerline. While we support burying the line as a preferable alternative, we urge the Forest Service to fully evaluate the community micro-grid option proposed by the Big Park Regional Coordinating Council (BPRCC) before finalizing any decision.

Inadequate Range of Alternatives

The National Environmental Policy Act (NEPA) requires that environmental reviews consider a full range of viable alternatives, as upheld by the Ninth Circuit Court of Appeals in *California v. Block*, 690 F.2d 753 (1982). The Draft Environmental Assessment (EA) fails to meet this requirement.

Specifically, the BPRCC and the Clean Coalition proposed a viable alternative to address APS's stated goal of electrical redundancy without constructing a new powerline between McGuireville and the Village of Oak Creek. This alternative could utilize modern technology, such as a solar micro-grid or rooftop solar power with battery storage, to achieve the same objectives. While the Draft EA briefly mentions the micro-grid option, it dismisses it without thorough analysis or public disclosure of its potential benefits and drawbacks. We recommend that this alternative be fully evaluated in a revised EA before any final decision is made.

Alternative 1 Does Not Meet Forest Plan Requirements

The CNF Forest Plan explicitly states on page 104:

"Utility lines, such as pipelines, power lines, fiber optic lines, and telephone lines, are not visible (usually buried) across the landscape unless there are overriding environmental, economic, or technical concerns." (Emphasis added.)

The Draft EA fails to demonstrate that such overriding concerns justify an overhead powerline. To align with the letter and spirit of the Forest Plan, the Forest Service should select a buried powerline alternative or further analyze the BPRCC's Proposed Alternatives 3a and 3b to determine their viability.

In contrast to Alternative 1, the EA acknowledges that the underground design in Alternative 2 can meet environmental and technical concerns, despite its non-negligible impacts. BPRCC's comment letter also notes that over a 25-year period, the construction, operation, and management costs of Alternatives 1 and 2 are comparable. Economic concerns about the long-term cost of Alternative 2 are therefore not overriding. Moreover, BPRCC's Proposed Alternatives 3a and 3b, which incorporate local solar and battery storage, could further reduce long-term costs for APS.

Precedent for Underground Powerlines

To provide a more complete perspective, the Draft EA should have included recent powerline decisions on National Forest lands in the region. For example:

1. When constructing the Red Rock Ranger District building complex and Visitors Center, the Forest Service buried a 3,500-foot powerline to preserve scenic views, opting against overhead lines.
2. In 2012, the Prescott National Forest approved a 6.43-mile underground 12-kV APS powerline near Dewey-Humboldt, determining that only a buried line was suitable to protect the scenic highway corridor and minimize environmental impacts.

These precedents demonstrate the Forest Service's commitment to preserving scenic integrity through underground powerlines. We urge the same commitment for the proposed APS McGuireville-to-VOC powerline.

Wildfire Risk

While APS cites wildfire risk as a rationale for the new powerline, the Draft EA inadequately addresses the risk of wildfires caused by the overhead line itself. Overhead lines are more susceptible to ignition from maintenance activities, extreme weather, and even hot-air balloons or drones. The 2020 Payson outage caused by mylar balloons striking a powerline underscores this vulnerability. Additionally, the EA does not sufficiently address the risk of wildfires sparked by construction activities for either alternative.

Private Land Development Concerns

The presence of a new powerline could encourage significant private land development near the project area, such as large-scale industrial operations or subdivisions. The Forest Service should assess potential development impacts and require mitigation measures, such as APS purchasing private lands for habitat and scenic preservation to offset these impacts.

Conclusions

Keep Sedona Beautiful believes the long-term costs of building and maintaining an overhead powerline are roughly comparable to those of an underground line, particularly when factoring in required mitigation efforts. We request that the Forest Service document all long-term maintenance and mitigation costs to provide a fair comparison of alternatives.

When considering these costs, the increased wildfire risk, and the impacts on scenic values, KSB concludes that Alternative 2—burying the powerline—is the preferable option. However, we strongly recommend fully evaluating the micro-grid alternative proposed by BPRCC. This project has the potential for significant impacts on a beloved area, and the Forest Service and APS have an opportunity to take a bold stance to preserve the Red Rock Ranger District, mitigate wildfire risks, honor the CNF Forest Plan, and invest in sustainable energy solutions.

Thank you for considering our objections. We urge the Forest Service to prioritize the long-term protection of Sedona's natural beauty and community safety.

Sincerely,



Carla Williams

President

Keep Sedona Beautiful