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TO: Responsible Official and Reviewing Officer,
Regional Forester Michiko Martin
333 Broadway Blvd SE
Albuquerque, NM, 87102
SENT VIA EMAIL: objections-southwestern-regional-office@usda.gov

February 20, 2025

RE: APS Oak Creek to McGuireville 69kV Transmission Line Project on the Coconino National Forest

Dear Regional Forester Martin,

This is my objection to the above-referenced project on the Coconino National Forest. I am submitting several issues based on new information not available during the previous comment period, which ended Jan. 14, 2022.

ISSUES:

1. The Final Environmental Assessment **lacks an adequate range of alternatives**, which violates the National Environmental Policy Act (NEPA). For example, an underground power line routed alongside Highway 179 between Beaverhead Flat Road and the VOC is feasible and would eliminate wildfire risk and protect scenery. But the Forest Service excluded this route from consideration and did not develop it as an alternative.
2. **Crucial information was not disclosed** to the public during the comment period. For example, the Draft Decision Notice claims that wildfire risk created by the above ground line near the VOC would be mitigated based on an APS "Comprehensive Fire Mitigation Plan." That plan was not available to the public until March 2022, which was after the comment period closed. So, the public didn't have a chance to assess whether the APS plan—written by the company that would build the powerline—provides adequate or appropriate mitigation measures to reduce wildfire risk.
3. **The Forest Service failed** to consider information critical to making an informed decision, such as its own rating that the VOC and Sedona are at "very high risk" of wildfire. The proposed above ground lines will run thru HIGH-Risk Red areas as noted on Figure 1 map below.
4. **SIDE EFFECTS OF ABOVE GROUND HIGH VOLTAGE LINES**

While the primary concern with above-ground high voltage lines is the risk of electric shock from direct contact, potential side effects associated with their presence include: concerns about exposure to electromagnetic fields (EMFs) which may be linked to potential health issues like headaches, fatigue, anxiety, and some studies suggest a possible increased risk of childhood leukemia, although conclusive evidence is lacking; additionally, they can disrupt wildlife habitats and pose a fire risk due to potential sparks igniting nearby vegetation.

Key points about potential side effects of high voltage lines:

- **Electromagnetic fields (EMFs):**
The primary concern is the exposure to EMFs generated by high voltage lines, with some studies linking prolonged exposure to potential health issues like

headaches, fatigue, sleep disturbances, and potential increased risk of certain cancers, particularly childhood leukemia, although the research is not conclusive.

- **Environmental impact:**

High voltage lines can have negative environmental impacts like disrupting wildlife habitats through construction and maintenance, and potential risk of bird collisions with power lines.

- **Psychological impact:**

Some people living near high voltage lines may experience anxiety or stress due to the perceived health risks, even if scientific evidence is limited.

Important considerations:

- **Distance matters:** The strength of the EMF decreases significantly with distance from the power line, however there are a # of homes that the proposed APS above ground line will pass thru.
- **Individual sensitivity:** Some individuals may be more sensitive to EMF exposure than others.



Figure 1

Thank you for your attention to this matter as it is extremely urgent that we provide the safest and the least risk option for this project to ensure everyone's safety, protection of homes/businesses, nature, wildlife and our beautiful Sedona especially due to Climate changes increased effects. If there was a severe fire, the APS projected cost would be nothing compared to the devastating irreplaceable losses. APS will be passing on the costs to customers, so why not do it correctly with the safest option of burying 100% of the line.

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