

February 21, 2025

Joanne Johnson

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](mailto:objections-southwestern-regional-office@USDA.gov)

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

Dear Regional Forester Martin:

I am submitting the issues below based on new information not available during the previous comment period which ended Jan 14, 2022.

- The Final Environmental Assessment lacks an adequate range of alternatives, which violates the National Environmental Policy Act. For example, an underground power line routed alongside Highway 179 between Beaverhead Flat Road and the Village of Oak Creek (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.
- Crucial information was not disclosed to the public during the prior 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 after the comment period closed, so the public hasn't had a chance to assess whether it provides adequate or appropriate mitigation measures to reduce wildfire risk.
- The Forest Service failed to consider information critical to making an informed decision, such as its own rating of the VOC and Sedona as at "very high risk" of wildfire.
- Numerous studies and analyses show that older residents have died at proportionally much higher rates in recent catastrophic wildfire events. "Most of the victims of the Los Angeles fires were elderly. Their deaths offer a warning to the entire country about the threat climate disasters pose to society's oldest and most vulnerable members." (Washington Post, Feb. 9, 2025). With our older population demographic, VOC and Sedona residents are particularly vulnerable to dying from wildfires. The project documents are silent on this major issue.
- "Stewardship Agreement between the State of Arizona and the USDA Forest Service, Southwestern Region," signed October 10, 2024. The project documents do not consider this important new agreement, where the Forest Service agreed to new policy objectives with specific instructions such as, "Manage risk across broad landscapes for improved fire suppression prevention capabilities, by helping communities in the wildland urban interface mitigate wildfire impact through the three goals of the National Cohesive

Wildland Fire Management Strategy to maintain resilient landscapes, create fire-adapted communities, and improve wildfire response.”

Thank you for considering these issues regarding the proposed project. I am strongly opposed to the addition of any above ground power lines in the VOC.

Sincerely

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Joanne Johnson

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