From: Cyd Jenefsky

Sent: Saturday, February 22, 2025 6:08 AM **To:** FS-objections-southwestern-regional-office

Subject: Objection to APS Oak Creek to McGuireville 69kV Transmission Line Project #56977

Dear Reviewing Officer:

The APS Oak Creek to McGuireville 69kV Transmission Line Project #56977 severely violates the will of the community, puts the community at increased risk of fire danger, diminishes property values, and needs to be reconsidered especially in light of this week's committee approval of AZ House Bill 2201 which absolves APS of all responsibility for the damages they are poised to cause.

Summary of Objections

- 1. **Wildfire Risk**: Overhead lines pose significant fire hazards as evidenced repeatedly in California and elsewhere. There is no reasonable or compelling evidence presented to justify <u>putting an</u> <u>entire community at increased fire risk</u>. It is particularly unconscionable to do so in light of evidence of increasing drought in this already-arid region.
- 2. **Scenic Integrity**: The Forest Service's plan violates its own objectives for preserving viewsheds: "The APS Oak Creek to McGuireville 69kV Transmission Line Project proposes a project-specific plan amendment to the Forest Plan for approximately 42.6 acres of the Project where it will not meet Forest Plan guidelines for scenic resources in areas designated as High Scenic Integrity Objective (SIO)" (from: https://cara.fs2c.usda.gov/Public//CommentInput?Project=56977). Given this viewshed is the precise area ALL residents and visitors encounter on the Red Rock Scenic Byway on 179 as they enter the Village of Oak Creek, this is a particularly egregious request for violating the SIO and, to date, void of compelling evidence and insufficiently justified.
- 3. **Cost Discrepancies**: APS's cost estimates for undergrounding are viewed as inflated with no attendant evidence of cost-reasonableness.
- 4. **Inadequate Alternatives Analysis**: No compelling evidence is provided demonstrating proper evaluation of alternative options to the one that puts the community at increased fire risk. Professionally, this is unacceptable and incompetent. It evidences corruption of a project de facto decided in cahoots with the company which stands to profit (APS) rather than a project which has been properly researched and professionally evaluated.
- 5. **Lack of FOIA Response**: A September 2023 FOIA request remains unanswered, limiting the ability to provide fully informed objections.
- 6. Direct Harm to Local Residents Due to Insurance and Property Impact: In addition to the dangerous fire risk the overhead line poses, this project will also directly harm residents of the Village of Oak Creek and nearby areas due to increased insurance premiums, cancellations, and decreased property values due to overhead power lines. This is severely exacerbated by the recent passage by the Arizona House Bill 2201 which absolves APS of ALL responsibility for damage caused by their own power lines, including in the case of wildfire. This severely damages property values and prohibits class-action suits from redressing the dangers and costs posed by the overhead power lines in a drought-stricken desert region. House Bill 2201--which

just passed committee this week--severely exacerbates this increased harm to local residents.

The lines ALL need to be put underground to prevent severe damage to local communities.

Sincerely,

Dr. Cyd Jenefsky

Village of Oak Creek