

02/24/25



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

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 an objection considering issue(s) based on new information not available during the previous comment period, which ended Jan. 14, 2022.

- With recent cuts in Federal staffing and funding by the Trump administration [Via Elon Musk and the Department of Government Efficiency (DOGE)] there may not be adequate Staff or Fire Fighters available to combat wildfires that do occur in the Sedona area. Fire mitigation and prevention activities will most likely be curtailed due to lack of funding placing the Residents of Sedona at greater risk. These budget and staffing cuts were not foreseen in 2022 but may seriously impact the Forest Service's ability to prevent and fight wildfires going forward.
- In light of recent fires in Los Angeles, California (January 2025) for which video evidence has shown at least one fire to have been ignited by above ground power lines that sparked when there was a power surge due to fires in close proximity, it is clear that above ground power lines pose a real, identifiable risk of wildfire. There have been multiple incidents of birds such as crows and raptors landing on power lines causing an arc which ignites wildfires. One such fire occurred just last week in the Prescott area, which was fortunately caught early and extinguished, this will not always be the case.
- The Forest Service documents do not properly consider concerns such as wildfire risk which could result in potentially Billions of dollars in property loss, loss of human lives, loss of livestock and animal life, and loss of wildlife and plant life. There was a reported loss of 16,000 structures and 29 Human Deaths in the recent Los Angeles fires. An unmitigated or improperly funded fire fighting force could tragically result in great loss of human life and structures in a wildfire experienced in the Sedona area which results from arcing, sparking or other malfunctions of above ground power lines. This risk is especially important when taking into consideration the limited availability of evacuation routes in the Sedona and VOC areas.

- 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. This is especially important due to the limited availability of evacuation routes in the area.
- The Arizona House Bill 2201 which is currently being considered will absolve APS and all utility companies of responsibility for damage resulting from wildfires ignited by malfunctioning or improperly maintained equipment and power lines. Essentially even knowing the risk of wildfire and protests by residents, if fires and loss of property do occur, APS would be held harmless, meaning Insurance Companies would bear the risk of making property owners whole after a damaging fire passes through the Sedona area, Or property owners would be left to bear the loss on their own, without help from insurance companies. With current DOGE budget and staffing cuts, there may not be FEMA support or other Federal support available to residents after a wildfire, resulting in homeowners being left homeless with no support or preparations for obtaining food, clothing, or shelter. Homeowner policies will be cancelled, and Sedona residents may find it impossible to obtain any future insurance, thus resulting in reduced home & property sales and home values as a consequence. It appears this “hold harmless” bill would extend to Forest Service Lands and Buildings, so if the Ranger Station on Hwy 179 in Sedona were to burn in a wildfire caused by the above ground APS lines, APS would not be held liable or responsible for replacing the Forest Service buildings and equipment damaged in a wildfire.
- Home Insurance Rates have doubled for many Sedona residents since 2022 due in large part to substantial increased Risk of Wildfires in the Sedona area. There are many homeowners whose Insurance Companies have cancelled their policies, and they have been unable to obtain homeowner’s insurance as of the date of this writing. Our Insurance Premium has increased considerably since we purchased our property in 2013. We feel fortunate that our policy was not cancelled this year, but that may not be the case in 2026.
- 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.
- 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 did not 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. It would seem if House Bill 2201 passes, mitigation measures would not have a standard written into the bill therefore APS would not be responsible for formulating or submitting such a plan.
- In the Sedona area the scenery is a main consideration for Tourism from which the area derives the bulk of income in the form of meals, shopping, hotel stays, hiking and tours.

Without the scenery Sedona will lose those Tourism dollars sending the area into a recession with resulting loss in home and land values.

- Property values have been shown to decrease by 18% or more due to proximity of Above Ground Power lines. This link is to an article regarding this issue of property devaluation: <https://orchard.com/blog/posts/power-lines-and-property-value> The South Dakota Public Utilities Commission published reports on the loss of property values and concluded that there was a minimum of 10% decrease in property values related to Above Ground transmission lines. <https://puc.sd.gov/commission/dockets/electric/2017/el17-055/exhibit19.pdf> In light of the recent loss of property in the January 2025 Los Angeles Fires it would seem prudent to conclude that the loss in property values in that area would be substantially higher, although all the losses have not been tallied as of the writing of this letter.
- The **Proposed Remedy** to the detrimental effects of Above Ground Power lines would be to bury the lines so they are not exposed. If APS lacks the technology, equipment, or workforce to perform this work, then they should consider contracting the services of an outside company. Many other states including California and Michigan are now routinely burying power lines, so there is no lack of innovation or understanding of how this process is carried out. APS claims burying power lines is cost prohibitive, yet they are currently experiencing record profit levels. IMHO taking the time, effort and use of financial resources to bury the power lines would actually increase the public perception of APS as a responsible company committed to the safety and welfare of the residents and environment in the areas they serve, which in turn would increase investment in the company profiting both APS and the Shareholders in the long run.

Thank you for your time and consideration.

Barbara Pickett Land Line [REDACTED]

