

February 26, 2025

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TO: Responsible Official and Reviewing Officer  
Regional Forester Michiko Martin  
333 Broadway Blvd SE  
Albuquerque, NM 87102

RE: APS Oak Creek to McGuireville 69V 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, Red Rock Ranger District. I am submitting an objection based on new information not available during the previous comment period, which ended January 14, 2022.

I am concerned that the above ground sections of the transmission lines are a potential hazard to trigger a wildfire during a high wind event or during some equipment malfunction. The dangers of above ground transmission lines in areas of high or extreme wildfire risk have been demonstrated the Camp Fire in Paradise, CA in 2018 and Eaton Canyon wildfires in Pasadena and Altadena, CA in 2025. It is my understanding that wildfire risk has increased in northern Arizona due to hotter, dryer conditions the past few years. We did not have the usual monsoon rains in 2023 and 2024 and temperatures have been warmer. The Forest Service now rates the Village of Oak Creek (VOC) as a "very high risk" for wildfire. This is new information released after the comment period.

The proposed plan does include underground lines for much of the project. A solution to my objection would be to bury the lines in other areas, especially closer to the Village of Oak Creek where the scenery is spectacular. I attended the community meeting in Sedona on February 19 and at that time I learned that burying transmission lines might initially be more costly than above ground towers. Yet other communities in and around Phoenix have opted to bury lines to reduce risk from potential fires if above ground lines fail. Buried lines also preserve scenic vistas. Preserving the scenery was one rationale used by APS for proposing to bury the lines along Beaverhead Flat Road and it would seem to apply to the scenery just south of VOC as well.

It appears that new stewardship agreements between the State of Arizona and the USDA Forest Service were released in 2024 after the APS Oak Creek to McGuireville 69V Transmission Line Project was developed in 2020 and the comment period opened in 2021. This new agreement should apply to any project, like this one, still under consideration.

I hope your office will consider my objection based on the new information and experience people have had with wildfires, especially in areas where people live and work.

Thank you,

Charles H. Sullivan

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