

March 2, 2025

595 Sunset Ln

Sedona, AZ 86336

TO: Responsible Official, Forest Supervisor Aaron Mayville

Coconino National Forest, USDA

Flagstaff, AZ 86001

RE: APS Oak Creek to McGuireville 69kV Transmission Project on the Coconino National Forest # 56977

Dear Forest Supervisor Mayville,

I am submitting comments on the above project based on new information not available during the previous comment period, which ended January 14, 2022. The Final Environmental Assessment does not appear to have considered many alternatives, which violates the National Environmental Policy Act. In particular, an underground power line sited along the whole route for the new line eliminates wildfire risk and preserves scenery. Please give this option due diligence. Another environmentally friendly alternative would be microgrid generation in the community and battery storage.

The area through which the elevated line would run is labelled "very high risk" for wildfire and destruction, according to the Forest Service's own classification. We see destructive wildfires in similar terrain in Sedona and the Verde Valley on a regular basis, and there are the horror stories of wildfires in California recently caused by above ground lines. Please, not in our back yard. These wildfire risks were promulgated after the January 14 comment period.

Although the APS cost analysis estimated \$7.45 million per mile to bury transmission lines, estimates from California utility Pacific Gas and Electric are \$4 million per mile, and could be less. The justification for the project seems to include reducing power outages, although data and surveys by the Big Park Council indicate minimal and non-impactful prevalence of outages.

Another reason to bury the power lines is environmental aesthetics, what the Forest Plan calls a High Scenic Integrity Objective. The above ground portion of the line will be visible

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from state route 179, one of the most attractive roads in AZ. Please do not impede that view.

The most important justification for burying the lines is that a few million dollars to prevent loss of property and life from a fire caused by above ground transmission lines is a worthy, humane investment. I note that the S in FS and APS is for service, and it would be a tremendous service to the community that APS is proposing to provide with power backup if the FS and APS would avoid creating increased risk of wildfires by doing so. I hope you will do the right thing by the Big Park/Village of Oak Creek community and bury the transmission lines. Thank you for your consideration.

Sincerely,

David L. Myers *Monica L. Bills*

David L. Myers and Monica L. Bills

Copy to Regional Forester Michiko Martin, Albuquerque, NM