From: Mark Conrad

Sent: Saturday, March 1, 2025 10:57 AM

To: FS-objections-southwestern-regional-office

Subject: [External Email]Re: APS Oak Creek to McGuireville 69kV Transmission Line Project on the

Coconino National Forest

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March 1, 2025

Mark Conrad

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 APS Oak Creek to McGuireville 69kV Transmission Line Project on the Coconino National Forest.

Issues of Concern

I am deeply concerned about the proposed above-ground 69kV transmission line's impact on wildfire risk, scenic integrity, property values, and home insurance rates in the Village of Oak Creek (VOC) and Sedona areas. These are critical issues for residents like myself who rely on the Forest Service to protect our community and its natural environment.

Violations of Federal Law, Regulation, or Policy

- 1. **Inadequate Alternatives under NEPA**: The Final Environmental Assessment (EA) violates the National Environmental Policy Act (NEPA) by failing to include a sufficient range of alternatives. For instance, an underground power line routed alongside Highway 179 between Beaverhead Flat Road and the VOC is a feasible option that would eliminate wildfire risk and preserve the iconic red rock scenery. However, this alternative was not developed or seriously considered, limiting the scope of analysis and public input.
- 2. Lack of Transparency: The Draft Decision Notice references an APS "Comprehensive Fire Mitigation Plan" to claim wildfire risks are mitigated, but this plan was not disclosed to the public until March 2022—well after the comment period closed on January 14, 2022. This violates NEPA's requirement for full disclosure of relevant information during public review, as I had no opportunity to evaluate the adequacy of APS's mitigation measures.

Proposed Remedies

- Develop and fully analyze an underground transmission line alternative along Highway 179 as a safer and less visually intrusive option.
- Reopen the public comment period to allow review of the APS "Comprehensive Fire Mitigation Plan" and any other newly available documents, ensuring transparency and informed decision-making.
- Require an independent wildfire risk assessment, rather than relying solely on APS's self-authored plan, to ensure objectivity and public safety.

Supporting Reasons

- Wildfire Risk: The Forest Service's own data rates the VOC and Sedona areas as "very high risk" for wildfires, yet the EA downplays this by relying on an unavailable APS plan rather than addressing the inherent dangers of an aboveground line in a fire-prone region. Recent wildfires in Arizona underscore the need for proactive prevention, not reactive mitigation.
- Scenic Integrity: The above-ground line would mar the pristine views that draw millions of visitors and sustain local property values. The EA fails to adequately weigh this economic and cultural loss against the project's benefits.
- Inadequate Public Input: By withholding key documents like the APS mitigation plan, the Forest Service prevented me and others from providing informed feedback during the comment period, undermining the NEPA process. My earlier comments from December 2021 raised wildfire and scenery concerns, but these were not meaningfully addressed due to missing information.

Connection to Prior Comments

I highlighted the heightened wildfire risk and potential damage to Sedona's scenic character. The final EA and Draft Decision Notice fail to resolve these issues, instead exacerbating them by excluding viable alternatives and withholding critical data until after the comment period.

I urge you to reconsider this project's approval in its current form and adopt solutions that prioritize community safety and environmental preservation. Please feel free to contact me with any questions or to discuss this objection further.

Sincerely,
Mark Conrad

Sent from my iPhone