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**From:** Mark Conrad [REDACTED]  
**Sent:** Saturday, March 1, 2025 12:45 PM  
**To:** FS-objections-southwestern-regional-office  
**Subject:** [External Email]APS Oak Creek to McGuireville 69kV Transmission Line Project on the Coconino National Forest

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**March 1, 2025**

Mark Conrad  
[REDACTED]

**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](mailto: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.
- Provide a proper and validated safety risk management document for all citizens concerned to review, including the national insurance industry.
- What is the role of the insurance industry in fire prevention and risk management?
- Insurers are integral to climate and wildfire risk management in two key ways:
- **Risk assessment and mitigation:** By analyzing data on climate and wildfire risks, insurers encourage preventive actions through risk-based pricing and premium discounts for mitigation efforts that effectively reduce the impacts of disaster.
- **California Wildfires** - The state leads in wildfire-prone properties, with 2.1 million homes at risk—a number nearly three times higher than Texas (750,000), Colorado (380,000), and **Arizona (250,000)**, according to the Insurance Information Institute. However, wildfires affect each state differently.
- What is the role of risk management in insurance companies?
- Importance: Insurance companies operate in a highly regulated environment, with strict rules governing financial solvency, reporting, and consumer protection. —
- Impact: Risk management ensures compliance with regulatory requirements, helping to avoid legal penalties, fines, and reputational damage. Jul 30, 2024

In Arizona, residents of Flagstaff live beside one of the highest risk places in the U.S., as do folks in nearby Prescott and Scottsdale.



## 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 above-ground 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

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPhone