From: Judi Whitewater

**Sent:** Sunday, March 2, 2025 4:57 PM

**To:** FS-objections-southwestern-regional-office

Subject: NO TO PROJECT: APS Oak Creek to McGuireville 69kV Transmission Line Project #56977

## Dear Reviewing Officer, Regional Forester Ms. Martin:

I am writing to request your support in opposing the Draft Decision by the Coconino National Forest (CNF) Supervisor to allow APS to build an overhead transmission line through an area that is the scenic entrance to Sedona's red rocks.

This same area is a very high wind corridor that has been deemed by the AZ Department of Forestry and Fire Management as an extreme fire risk. Sedona is already at a 96% higher risk of fire than the rest of the US, according to First Street (formerly Risk Factor). Compounding this risk by building a new above ground transmission line into the Village of Oak Creek (VOC) that has only two roads in and out is creating the potential for a catastrophic loss of life and property. The Edison Electric Institute and PG&E have estimated that an underground line is 20x less likely to start a fire that an overhead line.

The CNF developed Scenic Integrity Objectives (SIOs) in 2018 for the area yet is now violating its own objectives by not forcing APS to bury the 0.6 mile portion of the line as it enters the Village of Oak Creek/Sedona from the south. CNF stated that the SIOs are the main reason it decided to have APS bury 6 miles of the line along a lightly trafficked road, yet bizarrely CNF is allowing an overhead line as it enters an area that is visited by 3 million tourists a year. CNF references APS cost estimates for undergrounding the line on this 0.6 mile stretch that are about 40x the current costs of undergrounding lines or horizontal drilling.

The residents of VOC do not oppose the reliability enhancements to the local electrical grid, but not in a way that creates the potential for catastrophic fire risk or impacts Sedona's tourist industry. Notably, transmission lines in high fire risk areas are now frequently being shut down for days at a time during periods of high wind due to Public Safety Power Shutoffs, which could result in a decrease in electric reliability in VOC.

CNF also radically overestimated the costs of other alternatives for enhancing reliability in VOC and McGuireville such as utility-scale batteries, which could provide power during outages and reduce APS operating costs.

USFS has refused for over 2 years to respond to a Freedom of Information Act request filed by the Big Park Council, in direct violation of Federal Law.

Please join me and the overwhelming majority of residents and visitors in opposing this decision, and at a minimum, the decision be delayed until these major deficiencies are fully addressed.

Sincerely

Judi Whitewater