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**From:** judy themer [REDACTED]  
**Sent:** Monday, March 3, 2025 2:44 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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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**

March 3, 2025  
[REDACTED]

Dear Regional Forester Martin:

I am submitting an issue based on new information not available during the previous comment period, which ended January 14, 2022.

- The Final Environmental Assessment lacks an adequate range of alternatives, which violates the National Environmental Policy Act (NEPA). For example, an underground power line routed alongside Highway 179 between Beaverhead Flat Road and the VOC is feasible and would eliminate wildfire risk and protect scenery. But the Forest Service excluded this route from consideration and did not develop it as an alternative.
- Crucial information was not disclosed to the public during the comment period. For example, the Draft Decision Notice claims that wildfire risk created by the above ground line near the VOC would be mitigated based on an APS "Comprehensive Fire Mitigation Plan." That plan was not available to the public until March 2022, which was after the comment period closed. So the public didn't have a chance to assess whether the APS plan—written by the company that would build the powerline—provides adequate or appropriate mitigation measures to reduce wildfire risk.
- The Forest Service failed to consider information critical to making an informed decision, such as its own rating that the VOC and Sedona are at "very high risk" of wildfire.
- After the end of the above-mentioned 2022 comment period, the Forest Service has published a rating, with fire risk maps, showing that the Village of Oak Creek and Sedona are at "very high risk" of wildfire (<https://wildfirerisk.org/>). The project documents did not consider this rating of how at-risk our communities are.
- APS published a Comprehensive Fire Mitigation Plan in March 2022, after the comment period. The Draft Decision Notice and Final Environmental Assessment now rely on this plan, never mentioned in the original Draft Environmental Assessment, to "mitigate" the increased wildfire risk of a new above-ground APS power line. The public had no opportunity to see this plan document during the comment period to be able to assess whether it provides adequate mitigation for wildfire risk. This APS plan is posted at the project website in the "References Used" folder.
- "Stewardship Agreement between the State of Arizona and the USDA Forest Service, Southwestern Region," signed October 10, 2024. The project documents do not consider this important new agreement, where the Forest Service agreed to new policy objectives with specific instructions such as, "Manage risk across broad landscapes for improved fire suppression prevention capabilities, by helping communities in the wildland urban interface mitigate wildfire impact through the three goals of the National Cohesive Wildland Fire Management Strategy to maintain resilient landscapes, create fire-adapted communities, and improve wildfire response. Authorities and programs that require prioritization of disadvantaged and vulnerable communities will be considered when managing these risks." ([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1209167.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1209167.pdf))

- Various studies and analyses show that older residents have died at proportionally much higher rates in recent catastrophic wildfire events. "Most of the victims of the Los Angeles fires were elderly. Their deaths offer a warning to the entire country about the threat climate disasters pose to society's oldest and most vulnerable members." (Washington Post, Feb. 9, 2025). With our older population demographic, Village and Sedona residents are particularly vulnerable to dying from wildfires. The project documents are silent on this major issue.

Judy Themer

[REDACTED]

Terry DeMars

[REDACTED]