

Reviewing Officer
Regional Forester
333 Broadway Blvd SE
Albuquerque, NM 87102

Subject line: Objection to APS Oak Creek to McGuireville 69kV Transmission Line Project (36 CFR 218.8(d))

Name of the proposed project objected to is: The proposed APS Oak Creek to McGuireville 69kV Transmission Line Project and proposed project-specific Forest Plan amendment.

These objections are based on information not available during earlier designated opportunities for the public to comment due to new information published by the 1) Forest Service on new Fire Risk, 2) APS Fire Mitigation Plan 2022, 3) Stewardship agreements between the State of AZ and USDA Forest Service, Southwestern Region, and elderly population protection from wildfires. The proposed APS Oak Creek to McGuireville 69kV Transmission Line Project and proposed project-specific Forest Plan amendment is subject to these objections pursuant to 36 Code of Federal Regulations §218 Subparts A and B and an extension should be granted to mitigate wildfires that could damage property, harm elderly populations, compromise fragile endemic wildlife living in the Coconino Forest. The transmission lines should be buried, alternative sources of power considered and fire response and evacuation established for vulnerable elderly populations.

1. The existing above ground transmission lines and newly proposed should be buried underground in the Village of Oak Creek area, Sedona and all along the route to reduce wildfire risk. The proposed plan does not consider the post 2022 comment period Forest plan fire risk rating of “very high risk” for wildfire ([wildfire risk.org](http://wildfire.risk.org)) that now stands. An accurate assessment of risk was not considered by the Forest service to bury the wiring in the Village of Oak Creek Area. A new plan with cost estimates is needed for public review.
2. All current public objections or comments should be considered on the APS Comprehensive Fire Mitigation Plan dated March 2022 which was published after the prior comment period. The original Draft Environmental Assessment to “mitigate the increased wildfire risk of new above-ground APS power lines were not mentioned and the public had no opportunity to assess the plan. An extension should be granted to mitigate wildfire risk and bury the lines for public review.
3. The Forest Service must incorporate policies and its ongoing projects to address the new agreement with the State of Arizona and USDA Forest Service Southwestern Region signed 10/10/2024. 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 woodland 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. Various studies and analyses show that older populations have died at proportionally much higher rates in recent catastrophic wildfire events. Village of Oak Creek residents with an older population are particularly vulnerable. This information is corroborated by the Washington Post Feb 9, 2025; Rachel M. Adams et al., Mortality From Forces of Nature Among Older Adults by Race/Ethnicity and Gender, Journal of Applied Gerontology Sept 10, 2020.

In conclusion data and information for the public was absent from prior comment periods thus requiring all comments to be submitted relevant. As stated above transmission lines proposed should be buried all along the corridor and especially in the Village of Oak Creek, alternative sources of power should be considered to avoid expenses for false redundancy, and fire response and evacuation established for vulnerable populations as well as endemic wildlife.

Thank you for your consideration