

March 3, 2025

FROM: Eric and Michelle Bosset



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 our objection to the above-referenced project on the Coconino National Forest. We are submitting this objection letter based on new information not available during the previous comment period, which ended Jan. 14, 2022. We are residents of the Village of Oak Creek with line-of-sight proximity to the new 0.6 mile high-voltage, above-ground transmission line that APS has proposed to construct from Highway 179 through the southern portion of the Village of Oak Creek and over the Kel Fox Trail ridge to Beaverhead Flat Road. The proposed construction would occur in a high-risk wildfire zone according to the Forest Service, the State of Arizona, and risk analysts for the insurance industry, which is exacerbated by a “wind tunnel” effect between the two mesas along Kel Fox that blows north in the direction of several hundred homes located within 1-2 miles, and the VOC’s commercial district (including a Hilton hotel and resort property) located within 1-4 miles, of the proposed new above-ground line.

Specifically, the new information on which this objection letter is based includes as follows:

- After the end of the above-mentioned 2022 comment period, the Forest Service 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 and conclusion showing 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 relied on this plan, which was never mentioned in the original Draft Environmental Assessment, to “mitigate” the increased wildfire risk of a new above-ground APS power line. However, the public had no opportunity to see and comment on this plan document during the comment period to be able to assess whether it provides adequate mitigation for wildfire risk.*
- *The project documents do not address the requirements of the “Stewardship Agreement between the State of Arizona and the USDA Forest Service, Southwestern Region,” signed October 10, 2024, in which 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)

- *Published 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 of Oak Creek and Sedona residents are particularly vulnerable to dying from wildfires. *The project documents are silent on this critical risk factor, including the undeniable fact that there is **only a single evacuation route** for the VOC’s 6000+ residents – a ten-mile, two-lane stretch of Highway 179 towards Interstate 17.*
- *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 2022 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.” *However, that plan was not available to the public until March 2022, which was after the comment period closed. So, the public did not have a chance to comment on whether the APS plan—written by the company that would build the powerline—provides sufficient and appropriate mitigation measures to reduce wildfire risk.*

As demonstrated above, the Forest Service failed to consider information critical to making an informed decision, including its own rating that the VOC and Sedona are at “very high risk” of wildfire. The construction of a new, above-ground high voltage transmission line **undeniably** increases the risk of a wildfire caused by wind and weather-related events to the power line (or other failures of the line) along the 0.6 miles of land where no such lines currently exist.

We fully support the reasonable alternatives addressed by the Big Park Council in its separate objection letter dated February 26, 2025, and its prior objection letters during the 2022 comment period. As BPC has explained, for example, building *underground* could be achieved more economically than APS asserts because of evolving technologies and recent experiences in other states that the Forest Service (and APS) did not evaluate.

Particularly in the wake of the tragic human and economic consequences caused by the recent Los Angeles fires, some of which are reportedly associated with power lines, the Forest Service cannot uncritically accept APS's representations and assertions for building above ground through VOC and along the Kel Fox ridge, and instead must perform a rigorous analysis of APS's above-ground proposal for this segment.

Respectfully submitted,

A solid black rectangular box redacting the signature of the sender.

Eric and Michelle Bosset