

March 3, 2025

150 Diamond Sky Dr

Sedona, AZ. 86351

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:

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

Below I have listed my issues of concern:

- 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 (VOC) 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)

- 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.

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 (BPC) 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,

Susan Smith

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