

March 3, 2025

Alicia Asher and Kirk Gardiner [REDACTED]

PG 1 of 2

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**

Dear Regional Forester Martin:

This is my objection to the above-referenced project on the Coconino National Forest.

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

1. There have been more catastrophic California wild fires. And now more these recent fires and the past fires, have been proven to be caused by above ground power lines, like the APS lines. This did not happen during the first objection deadline.
2. Recent AZ drought conditions, which were not happening during the first objection deadline, have also created a higher fire risk to the residents. This is also a condition that caused the CA fires to be so severe. AZ has had record breaking drought records, which includes VOCA. It's predicted that AZ will have future drought conditions.

#### **VIOLATIONS OF FEDERAL LAW, REGULATION, OR POLICY**

Even though a utility has land easement and development rights, once they take actions that are known to be hazardous, they are violating tort laws and they are endangering the lives and property of the people and the forest animals that live in VOCA. We have the right to be protected from these hazards.

For example, if a utility company is building something that puts toxic chemicals in the environment, this is endangerment. They may have the right to build it, but not if it's known to cause injuries, death and damage to property. The fires in CA have proven above ground electrical towers have caused some of these fires. With the drought conditions, this risk is increased. By building these towers APS will be endangering our lives and property.

Another example is a car driver who may have a license to drive, but once he becomes intoxicated, and drives, that's reckless endangerment. If APS builds these towers, they will negligently and recklessly be endangering the lives of VOCA residents, endangering their property, and endangering the forest animals and forest land. Under tort laws, what the driver has done is illegal. I see the actions of APS as doing this.

#### **ISSUES OF CONCERN:**

1. By allowing the towers this will have a devastating effect on our property values, or ability to get home owners' insurance and ability to get reasonable home insurance rates. This is also going to cause problems with the VOCA real estate market and resident's ability to buy and sell houses if they can't get insurance. If they find a company to insure them it's at prices that are 3 to 4 times higher.

A few weeks ago I got bids on my house and I had to give a lot more information to the insurance company. They are looking now at the topography of the areas surrounding my house. I practically had to give them a DNA sample and blood! I can tell by their questions they are looking for ways to exclude people. It was obvious the information requested was triggered by the CA fires.

I have friends who live in San Diego who can't get insurance or it's higher, and they're hundreds of miles away from the fires; but it's because of the fires. It's been in CA news and national news how many people are forced to go without insurance on their homes. The insurance companies will do the same thing in the VOCA, especially since the towers will be very close to our homes. My brother is struggling to sell his house because the buyers can't get insurance on his house if they buy it. My brother has wanted to buy homes but then discovered he can't get insurance for it or the insurance is unreasonably high.

2. 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.

**I FEEL THE FOREST SERVICE DOCUMENTS ARE INADEQUATE FOR THESE REASONS:**

- 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.

**SOLUTIONS TO THE DISAGREEMENT:**

Build the power lines below the ground.

Alicia Asher [REDACTED]

[REDACTED]  
[REDACTED]  
Alicia Asher/ Date

Steven Kirk Gardiner [REDACTED]

[REDACTED]  
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