

[REDACTED]  
March 3, 2025

Regional Forester Michiko Martin  
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Send 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 our objection to the above-referenced proposed project on the Coconino National Forest (CNF). We object to the Draft Decision Notice and Finding of No Significant Impact (Draft DN/FONSI) and Final Environmental Assessment (EA).

Pursuant to the requirements of 36 CFR 218.8(d):

- The objectors are Mark Lawler and Rita Race, with address [REDACTED], [REDACTED]. A telephone number [REDACTED].
- A scanned signature is included in this letter.
- The Lead objector is Mark Lawler.
- *Project Name:* APS Oak Creek to McGuireville 69kV Transmission Line Project on the Coconino National Forest
- *Name and Title of Responsible Official:* Aaron Mayville, Forest Supervisor
- *Name of National Forest and/or Ranger District:* Coconino National Forest, Red Rock Ranger District

This objection letter details the following concerns and objections with this proposed project, including with the Final EA and Draft DN/FONSI and other project documents. Our overriding and primary concern with this project is the "Selected Alternative." This alternative, for Segment D to E, proposes a high-voltage power transmission line be built above-ground in the Wildland Urban Interface, immediately adjacent to the Village of Oak Creek. If built, this overhead power line segment would pose an increase in wildfire risk to the Village of Oak Creek, Sedona, and beyond. Our objection letter details issues and concerns with this project, including the increased wildfire risk it poses, lack of credible mitigation measures, community vulnerability, limited evacuation routes, negative impacts to residents' homeowners insurance and property values, project costs, scenic impacts, and other relevant issues relating to this project. Our objection letter also discusses how the Final EA and Draft DN/FONSI are in violation of federal law, regulation, and/or policy.

We voiced our concerns about this project in our scoping letter of February 5, 2019 and our comment letter of January 14, 2022, including wildfire risk, scenic impacts, and project costs. The issues raised in these letters are further examined, detailed, and expanded upon in this objection. This objection also addresses specific issues in the January 16, 2025 Draft DN/FONSI and Final EA, as well as new data and relevant information that has come to light since the comment period ended.

In regard to the comment period, the number of comment letters received by the Forest Service was no doubt reduced by the ongoing Covid pandemic. Many people, especially older residents in the Village of Oak Creek and Sedona, were avoiding large indoor gatherings entirely, such as public meetings. Despite these challenges, citizens still wrote comment letters, and the vast majority of them opposed the above-ground Alternative 1. Yet their comments, which opposed an above-ground power line being built adjacent to the Village of Oak Creek, were not given serious consideration or adequately addressed by Supervisor Mayville when he chose the Selected Alternative.

We want to make clear that we support improving the reliability of our local electrical power grid. However, from the beginning of this project, from scoping to the present, it's become incontrovertible that Village of Oak Creek residents, including ourselves, as well as many Sedona residents, are united in our opposition to a new power line being built above-ground adjacent to the Village of Oak Creek, primarily due to its wildfire risk. This opposition has been consistent through the challenges of Covid, and even at a standing-room-only public meeting on Feb. 19, 2025, where over 200 residents attended. Unfortunately, we feel that the Forest Service has failed to address this virtually unanimous concern when it chose the Selected Alternative that has the above-ground Segment D to E next to the Village. This would seem to demonstrate that the Forest Service is unwilling to give due concern to the safety and well-being of residents in regards to an increase in wildfire risk here, even though a feasible, viable underground alternative is available.

## **Wildfire risk**

The primary issue facing the communities of Sedona and the Village of Oak Creek is the additional wildfire risk that would be created by the above-ground power line in Segment D to E—adjacent to the southern edge of the Village of Oak Creek—as proposed by the Forest Supervisor in the Selected Alternative. The Forest Service is tasked by a multitude of authorities and policies to protect communities from wildfire. Therefore, the safety of the community should be the Forest Service's top priority in this project.

There are 6400 residents in the Village of Oak Creek and over 9800 in Sedona, a few miles downwind. As stated in the Draft DN/FONSI (p. 6), the Selected Alternative “would result in a new risk of wildfire ignition due to the construction of a new overhead transmission line where one currently does not exist.” As stated by the Forest Supervisor, the proposed project puts the community at higher risk of wildfire, plus those living in the greater McGuireville area—which is unacceptable.

<https://www.census.gov/quickfacts/fact/table/villagefoakcreekbigparkcdparizona/POP010220>;  
(<https://www.census.gov/quickfacts/fact/table/sedonacityarizona#> , estimated as of July 1, 2024)

The valley in the Wildland Urban Interface where Segment D to E would be located is roughly aligned with prevailing winds that come from the southwest. A wildfire ignited by an above-ground powerline there would likely be carried northward toward the Village of Oak Creek. As stated in the Final EA: “The portion of the Project that is located directly south of the VOC could increase the potential for wildfire ignition in this area within the path of the prevailing winds toward the community.” (p. 82)

## **“Fire and Fuels Management Report” is deficient and inadequate**

The Report, dated Feb. 2, 2022 and updated Aug. 9, 2024, was prepared by CNF staff to address public concerns about an increase in wildfire risk to the adjacent Village of Oak Creek “by providing details on the **fuels, expected fire behavior, and potential mitigations/fire response for unplanned ignitions** for the two sections of overhead lines planned for this project.” It is found in the “Final Environmental Assessment” folder in the project documents.

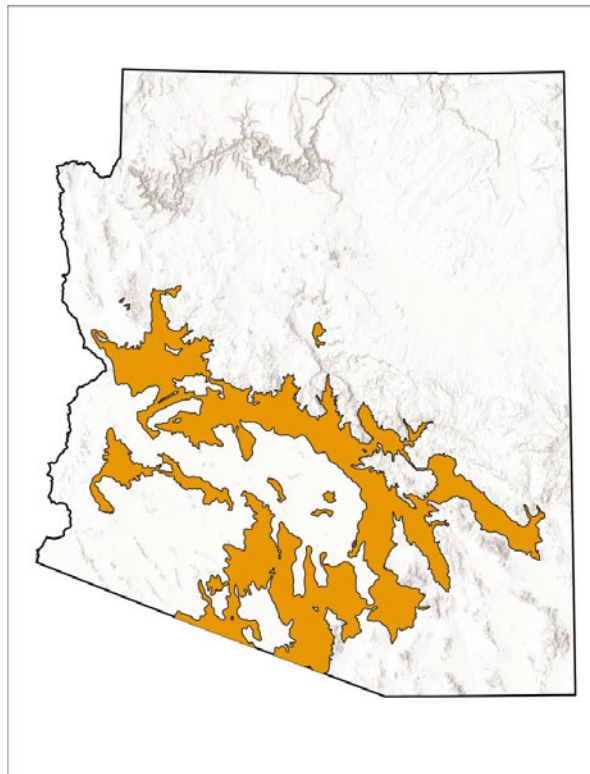
This Report has a number of deficiencies regarding the power line above-ground Segment D to E, adjacent to the Village of Oak Creek:

### **The Report’s description of Fuels is inaccurate and incomplete**

The Report states:

“The vegetation throughout the project area fits the definition of Sonoran mid-elevation desert scrub and semi-desert grassland (Zouhar 2023). These observations are supported by the Interagency Fuel Treatment Decision Support System (IFTDS), which is a tool which uses LANDFIRE data to show fuel types based on the 40 fuel models.”

The following Arizona Game and Fish Commission map shows in orange where Sonoran desert scrub is located. The project area is well to the north of all Sonoran desert scrub areas.



Distribution of upland Sonoran desert scrub habitats in Arizona.

<https://awcs.azgfd.com/habitats/upland-sonoran-desertscrub>

Please also refer to the photograph below, taken from page 10 of the Big Park Regional Coordinating Council’s Objection on this project, which clearly demonstrates that the landscape adjacent to the southern edge of the Village of Oak Creek, where Segment D to E would be run, is predominantly a pinyon-juniper forest, with closely spaced trees.

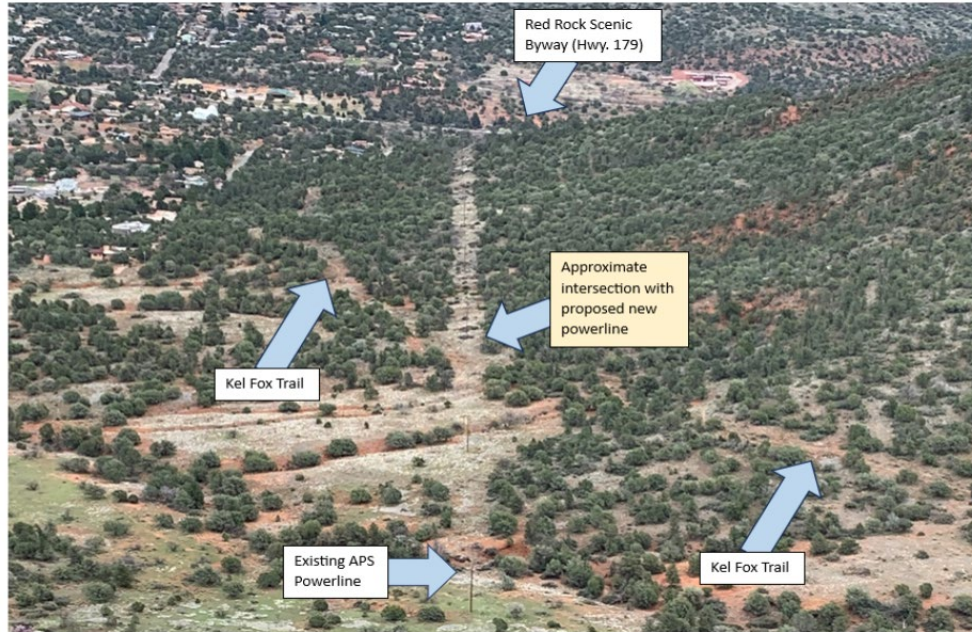


Photo taken Mar. 23, 2024, 1:54 pm.

A paper titled, “Descriptions of Biotic Communities on the Red Rock Ranger District,” published by the Forest Service, has the following description:

Pinyon-Juniper Woodland – This is the most expansive biotic community found on the district. Tree species that occur in this vegetation type includes pinyon pine and various species of juniper trees including Utah and red berry. At higher elevations, one may find alligator juniper. In the Sedona area, large stands of Arizona cypress may be present within this biotic community...

[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5349881.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5349881.pdf)

Finally, Table 22 and Figure 11 in the Final EA (pp. 85-86) show very low percentages of “timber litter” fuels in the “Alternative 1 Wildfire Analysis Area.” The EA data indicates a very low percentage of pinyon-juniper woodland, but as described above, pinyon-juniper woodland is the dominant vegetation community adjacent to the Village of Oak Creek.

It is evident that the Report’s characterization of the vegetation in the Segment D to E area adjacent to the Village of Oak Creek as “Sonoran desert scrub” is in error. It is actually pinyon-juniper woodland, as defined by the Forest Service above, and will have different fuel loading and fire propagation characteristics than claimed in the Report and Final EA.

**The “Fire and Fuels Management Report” does not disclose data for, or adequately analyze, “expected fire behavior and potential mitigations/fire response to unplanned ignitions”**

The Report fails to account for, and document, wind speed profiles in the area where the above-ground Segment D to E is proposed, including the maximum sustained winds possible in that valley, the likely direction of the winds, the highest gust velocities, and the highest possible temperatures and lowest humidity levels in exceptional events. The agency must plan for the very worst-case conditions, not merely “97th percentile” conditions.

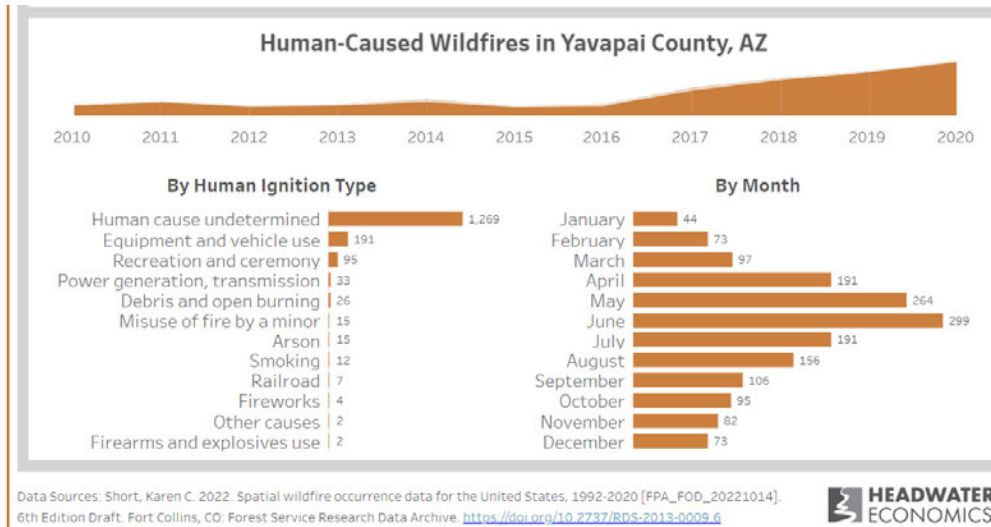
Much critical new information has come to light after the release of the Final EA and DN/FONSI. The catastrophic January 2025 Los Angeles wildfires have forced the California Department of Forestry and Fire Protection (Cal Fire), and a host of fire behavior and modeling experts, to realize that their modeling of wildfire propagation has been inadequate and incomplete. Cal Fire admits that it improperly assigned low wildfire risk to much of Altadena. This assignment negatively impacted local fire districts’ preparations and planning, and ultimately undermined their ability to respond to the massive recent wildfires in the Altadena area.

We have attached the in-depth *Los Angeles Times* story from Feb. 4, 2025, “Cal Fire’s predictions didn’t foresee the Altadena inferno. Now it’s changing its fire-hazard maps.” The story’s main takeaways are:

- ‘Only 21% of properties within the Eaton fire perimeter were in Cal Fire’s “very high” fire hazard severity zones.
- Yet 94% of those properties had “severe” or “extreme wildfire risk, according to more advanced wildfire models.
- Cal Fire knew its model couldn’t account for extreme wind-driven fires like Eaton, but decided that more complex approaches were not developed enough to rely on.’

There is a sobering parallel between how Cal Fire approached wildfire risk and preparations for Altadena before the L.A. fires, and what the Forest Service is now doing for the Village of Oak Creek and Sedona. In both cases, the agencies have minimized wildfire risk to a community, have not adequately modeled fire propagation, and have not accounted for conditions where there are “exceptional winds... and exceptional dryness,” to quote the *L.A. Times* story. The *Times* goes on to describe how previous fires showed that Cal Fire’s fire risk or fire hazard severity ratings were inadequate, and that 83% of destroyed structures in the Altadena area were outside of Cal Fire’s “very high” fire hazard zones.

Also, the Fire and Fuels Management Report has no data regarding ignitions from power lines. Yet Forest Service historical data, which has been only publicly available starting in 2022, shows that in Yavapai County, power lines caused 33 wildfires between 2010 and 2020, 2% of all human-caused ignitions—see the following figure.



<https://wildfirerisk.org/reduce-risk/prevent-ignitions/>

All 33 wildfire ignitions were from power lines within APS’s service territory, which includes all of Yavapai County, as shown in the following figure.



<https://www.aps.com/en/Residential/Service-Plans/Service-Area-Maps>

This Report should have accessed the Forest Service’s own data sources that went into the “Human-Caused Wildfires in Yavapai County, AZ” graphic shown above. By so doing, the Report could have been based on a relevant data set rather than the unsupported, subjective

statements found on page 4-5, such as “There has not been a fire start directly attributed to power line arcing or contact with vegetation within the area of response in the Verde Valley and surrounding areas.” These statements are called into question by information in the Final EA (p. 3) which describes actual storm events that have taken down power poles in the Verde Valley and that could have contacted vegetation. Such past events would have provided a historical basis for understanding the “method of power line caused ignitions, power line conditions under which an ignition could occur,” etc. (Report page 1). The reality is that the “method of power line conditions under which an ignition could occur was not evaluated in this Report or in the Final EA and Draft DN/FONSI.

**Regarding potential mitigations/fire response for unplanned ignitions**, the Report also claims that if a fire were to be started, there would be a “robust and rapid response from federal, state and local governments fire management organizations.” This is no longer an accurate or credible statement due to the recent layoffs in the Forest Service that have depleted the ranks of many staff who would contribute to firefighting efforts. Considering that it will take years to hire and train replacement staff, the Forest Service can no longer claim or guarantee that its own resources would be available to adequately suppress a wildland fire started by the proposed new APS above-ground power line. It is now unlikely that the depleted resources could prevent the fire from entering the Village of Oak Creek and spreading beyond.

Also, this Report does not disclose any peer reviews of its modeling software or methodology, including the IFTDS System, and LANDFIRE data. For example, the Report used “97th percentile fire weather conditions” instead of the most severe possible fire weather conditions, which was the case for the 2018 Camp Fire that destroyed Paradise, CA and the 2025 Eaton Fire that burned through Altadena, CA. In both those cases, forests had suffered an extended period of drought with temperatures considerably higher than normal. The Verde Valley, the Village of Oak Creek, and Sedona are now experiencing a similar situation.

Important Forest Service data on wildfire risks became publicly available at <https://wildfirerisk.org/>, the “Wildfire Risk to Communities” website, in May of 2024 and is thus new information since the public comment period. The Village of Oak Creek and Sedona are rated on this website as at “Very High Risk” of wildfire. **Yet nowhere in the project documents is this level of risk acknowledged or addressed.** Given this “Very High Risk,” an extensive wildfire risk assessment should have been prepared and fully addressed in the project analysis and decision, not merely the “Fire and Fuels Management Report,” with its limited scope and inadequacies described above.

As a land management agency, the Forest Service should also be aware of the enormous scale that wildfire impacts can now have on its own lands in exceptionally dry conditions with sustained high winds, notably the 2022 Calf Canyon/Hermits Peak Fire in New Mexico that burned over 340,000 acres that was caused by its own prescribed burning projects. A catastrophic wildfire sparked by an above-ground APS power line could also lead to similarly devastating consequences, with impacts lasting many decades for Coconino National Forest lands, but this possible impact to National Forest lands is not discussed in the Final EA or DN/FONSI.

*The project documents have done an inadequate job of analyzing and disclosing wildfire risk and have followed similar patterns to the failed approach by Cal Fire in Altadena, CA, not addressing and analyzing the latest wildfire risk data and methods based on sound scientific methodology, and not incorporating*

*the possibility of extreme weather and dryness, nor are possible impacts to surrounding National Forest lands disclosed. Therefore the Final EA and the Draft DN/FONSI violate National Environmental Policy Act (NEPA) rules and case law for full disclosure of environmental impacts. As such, there is no basis for the Forest Service to conclude that this project has No Significant Environmental Impact.*

## **Stewardship Agreement between Arizona and Forest Service**

On October 10, 2024, a “Stewardship Agreement between the State of Arizona and the USDA Forest Service, Southwestern Region” was signed by Arizona Governor Katie Hobbs, Arizona State Forester Thomas Torres, Homer L. Wilkes, Under Secretary for Natural Resources and Environment, US Department of Agriculture, and yourself. This agreement postdates the Jan. 14, 2022 comment deadline and is new information relevant to this project.

The Agreement includes:

“6. 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.” (Stewardship Agreement page 5; emphasis added)

The new policy objectives created by this agreement were not described or addressed in the Final EA or Draft DN/FONSI. The Final EA admits for Segment D to E:

“There would be an increased wildfire risk to the community under certain weather conditions if a wildfire were to be ignited where Alternative 1 would add a new overhead transmission line to the landscape between Beaverhead Flats Road and the existing 69kV line.” (Final EA p. 87)

Despite this acknowledgement of the added risk, which the Final EA and Draft DN/FONSI also admit cannot be fully mitigated, these documents do not address whether the project’s design and mitigation measures address the Agreement’s requirement to “manage risk across broad landscapes...maintain resilient landscapes, [and] create fire-adapted communities.”

In addition, the Final EA and Draft DN/FONSI did not disclose or address impacts on “vulnerable communities” near the Wildland Urban Interface impacted by this project. Please see the next section about vulnerable communities.

*The Final EA and Draft DN/FONSI fail to disclose how this project addresses new policy requirements of the Stewardship Agreement, including prioritization of vulnerable communities, and therefore violate NEPA and the Administrative Procedure Act.*



## Vulnerable communities at risk

Given the requirement of the above-cited Stewardship Agreement to prioritize vulnerable communities, the Final EA and Draft DN/FONSI should have disclosed information about vulnerable communities and why they need special consideration and attention as required in the Agreement.

In 2020 the Village of Oak Creek had 3205 residents who were 65 or older (of 6128 total), and in 2024 Sedona had 3790 residents age 65 or older (of 9684 total). Older individuals can have limited mobility, medical issues, and limited access to transportation, thereby facing extra challenges to evacuate rapidly in case of an emergency situation. It would be a daunting challenge to safely and rapidly evacuate the entire Village and Sedona population of 15,000 from a major wildfire, along a very limited number of evacuation routes where all highways except one are two-lane. Evacuation challenges are not discussed at all in the project documents.

The Village also has a large assisted living and memory care facility (Sedona Winds) and a nursing/recovery home (Haven Health). Evacuating these groups of several hundred residents each would be an enormous challenge; they are about 1.5 miles from the proposed above-ground Segment D to E of the power line that is adjacent to the Village. If this segment is built above-ground, a wind-driven wildfire from this segment could be catastrophic to the community and causing greater loss of life due to the aforementioned demographics of residents.

(<https://www.census.gov/quickfacts/fact/table/villageofoakcreekbigparkcdparizona/POP010220>;  
(<https://www.census.gov/quickfacts/fact/table/sedonacityarizona#> , estimated as of July 1, 2024)

The following recent quote highlights the grim statistics of the January L.A. wildfires:

“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).

In addition, a scientific paper shows that older people die in catastrophic wildfire events at a much higher rate than the general population. (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)

*The Final EA and Draft DN/FONSI fail to disclose, and address measures for, the large population of older residents and that they are at much higher likelihood of dying in severe fire events, thereby violating NEPA and the Administrative Procedure Act and unfairly putting at risk the “vulnerable communities,” in violation of the requirements of the Stewardship Agreement.*

## Wildfire Mitigation Relies on APS Comprehensive Fire Mitigation Plan

The Draft DN/FONSI and Final EA rely heavily on an APS “Comprehensive Fire Mitigation Plan” (CFMP) to reduce wildfire risks. (E.g. Draft DN/FONSI p. 6) This plan was written solely by APS employees and describes a general approach that applies to the entire state of Arizona. It does not have any data or analysis that specifically address the project area, such as fuels, ignition risks, fire propagation, or other issues that would inform the Forest Service regarding wildfire risk for this project. Also, no outside professional fire experts or fire district staff were consulted. It is not appropriate for the Forest Service to rely on a plan written by the very utility seeking a Special Use Permit. Indeed, this could be construed as

a direct conflict of interest, especially since the APS plan has never been subject to a federal environmental review.

Importantly and disturbingly, the CFMP was first provided to the Forest Service on Jan. 14, 2022, the last day of the comment period. (See References at the end of the Draft DN/FONSI and Final EA documents), Therefore it was impossible for the public to comment on this document that the Forest Service uses extensively for wildfire risk mitigation, and to justify its selection of above-ground powerline segments (including Segment D to E adjacent to the Village of Oak Creek).

Further, the CFMP has a date of March 2022, which is after the original Jan. 14, 2022 posting date on the project website. Additionally, the CFMP includes a statement on page 3, "This document is intended for APS use only. Do not share or transfer any portion of this document outside of APS without APS management approval. 3/2022." Given that, it would appear that this information was purposely withheld so the public could not review it along with other project documents during the comment period.

This plan was never discussed in the Draft EA and was not posted to the project website until Sept. 30, 2024, so the public was denied full disclosure of this key document that the Forest Service now relies on to claim it is minimizing the risk of wildfire ignition from above-ground power line segments such as Segment D to E along the Kel Fox Trail.

The Draft DN/FONSI and Final EA do not describe any specific elements of the APS Comprehensive Fire Mitigation Plan (CFMP) that APS would apply in the project area. Such details would logically include when, how, where, and by whom actions would be taken. The project documents also lack any quantitative analysis of the ability of the APS CFMP to reduce ignitions from above-ground power lines, and reduce overall wildfire risk to nearby communities, to be able to justify claiming in the Draft DN/FONSI (e.g. p. 6) that wildfire risk would be "minimized." The Final EA and Draft DN/FONSI contain no quantitative analysis of the impact the CFMP would have on overall wildfire risk to nearby communities.

The "No-Reclose Strategies" (CFMP, pp. 40-41) are not discussed adequately in the CFMP so that nearby communities can understand the specific circumstances under which APS would de-energize a power line during extreme weather events. The CFMP has no specified procedure for decision-making that would reassure nearby communities that a sound process is in place to protect them during extreme weather events. Information that has come to light recently shows how chaotic the decision-making and communication process was for parts of the Los Angeles area when catastrophic fires broke out in January 2025. Sound decision make becomes exceedingly difficult, if not impossible, during a crisis event such as the L.A. fires. From the NPR story, "Power lines sparked new fires in LA after the Eaton Fire began, radio traffic shows":

"The radio communications also indicate the utility company failed to respond quickly to multiple requests from firefighters to shut power off and sent confusing and sometimes incorrect information to first responders working on the Eaton Fire, which ultimately claimed 17 lives and caused billions of dollars in damages."

(<https://www.npr.org/2025/02/17/nx-s1-5282086/los-angeles-eaton-fire-altadena-power-lines>, updated February 20, 2025)

This story highlighted the fact that some power lines that had supposedly been de-energized were actually still live because some backup generators were inadvertently feeding power back into those lines.

The CFMP assumes that utility managers can rapidly assess weather and fire conditions and make informed decisions to de-energize a power line. Data and history do not support this, as evidenced by the recent L.A. fires. The CFMP also envisions a future with advanced sensors, communication devices, and switching technologies, but there is no timeframe for implementing these systems for the proposed APS power line project.

Another means that the Draft DN/FONSI intends to use to minimize wildfire ignition risk is “USDAFS restrictions implemented on the Coconino National Forest during periods of high wildfire risk.” (Draft DN/FONSI p. 6) The Draft DN/FONSI and Final EA do not include any references about what is included in these USDAFS restrictions, and details of how they would be applied. Nor do they perform a full analysis of the pros, cons, strengths, weaknesses, benefits, and costs of the Forest Service’s reliance on these measures compared to other possible measures.

Finally, with recent new information about layoffs of many on the Coconino NF, the ability of the Forest Service to effectively implement its “USDAFS restrictions” is now severely compromised, as well as its ability to patrol the project area during and after severe storms, and to be able to aggressively fight a fire ignited by an above-ground power line in Segment D to E area where there are no roads.

*The Forest Service thereby has failed to perform an in-depth comparative analysis of possible measures that could achieve a goal of minimizing or eliminating wildfire risk. The public has also been denied full disclosure of the basis for, and validity of, the Forest Service’s claims that relying on the APS plan and the “USDAFS restrictions” will minimize wildfire risk from a new above-ground power line immediately south of the Village of Oak Creek. For all these reasons, the Final EA and Draft DN/FONSI violate NEPA and the Administrative Procedure Act.*

## **Actual long-term costs are not adequately considered or disclosed**

APS’s long-term operation and maintenance (O&M) costs must be accurately factored into the Forest Service’s evaluation of the costs of various alternatives. The Final EA (p. 86) and DN/FONSI (p. 6) discuss relying on the CFMP (see discussion above). The substantial cost of implementing APS’s Comprehensive Fire Management Plan (CFMP), discussed above, should therefore also be included in overall maintenance cost estimates, which would clarify O&M cost differences between an above-ground line versus an underground line.

In other words, ALL costs associated with Operation and Maintenance (O&M) an above-ground power line must be assessed so that alternatives can be fairly compared and full disclosure to the public can be ensured. Because the CFMP is new information only available to the public after the comment period, it is particularly important that costs specific to the CFMP be disclosed.

But the O&M cost discussion in the Final EA makes no mention that CFMP implementation costs are included. Instead, the O&M costs discussed in the Final EA are vague and inconclusive, and the Final EA (pp. 123-124) and Draft DN/FONSI contain **no** actual estimated O&M costs for the alternative power line configurations.

The Final EA includes rough guesstimates of the relative O&M costs from old, stale sources (2003 and 2011) but does not show the **actual** estimated costs of O&M of the different alternatives. It would be reasonable to believe that each segment will have a different O&M cost per mile, depending on access, terrain, and other circumstances. For example, above-ground power line segments are envisioned for herbicide treatments in Alternative 1 (e.g. Final EA p. 59), but herbicides are not mentioned (and are probably not needed) for underground segments in Alternative 2. The timeframes for the costs are also not described so that the public can see, over a period of decades, how much lower the O&M costs are for underground segments of line compared to above-ground segments. All such detailed O&M cost data would further aid the public to understand the differences between alternatives. But there is no such detailed information in the project documents.

*This lack of complete, accurate, and up to date O&M cost information prevents a proper and fair comparison of alternatives. The Forest Service has also failed to demonstrate that it has incorporated APS's costs of implementing the CFMP into the analysis of the Final EA and Draft DN/FONSI, denying full disclosure to the public for a measure that the Forest Service itself relies on to minimize wildfire risk. For all these reasons, the Final EA and Draft DN/FONSI violate NEPA and the Administrative Procedure Act.*

## **Project documents fail to disclose design details of above-ground power line and its ability to withstand severe weather events**

Microbursts have “maximum windspeeds sometimes exceeding 100 mph,” according to the NOAA Severe Storms Laboratory. (<https://www.nssl.noaa.gov/education/svrwx101/wind/types/>) Arizona storms are known to create microburst events, and as described in the Final EA, p. 3, microbursts in past weather events have damaged or toppled some above-ground high-voltage power lines in the Verde Valley. This information was not provided to the public during the comment period ending Jan. 14, 2022.

This is the type of event that an above-ground power line must be engineered to handle. The Draft DN/FONSI, p. 6. states, “this risk of wildfire ignition would be minimized through the use of steel poles (which are less likely to be downed during high winds or storms).”

However, the Final EA and Draft DN/FONSI do not disclose any quantitative data that would reassure the public that the above-ground power line segment(s) can withstand damage from microbursts or other extreme events such as:

- The types of weather events that the above-ground segments of power line will be engineered to withstand, including sustained and gust wind speed and duration, including when there has been ice or snow accumulation on the conductors, poles, insulators, or other components
- The engineering factor of safety that is used for the design of the above-ground power line
- The probability, over time, that such storm events could bring down power poles, cause conductor lines to contact each other or disconnect from insulators, or otherwise spark a wildfire

*The Final EA and Draft DN/FONSI fail to disclose crucial details of APS's design for the above-ground power line segments that would assure the public that all components of the power line can indeed withstand the very worst foreseeable storm damage without igniting a wildfire. Such details could provide quantitative justification for the Draft DN/FONSI's claims that “risk of wildfire ignition...would be*

*minimized.” But the Final EA and Draft DN/FONSI fail to provide such detailed design information or quantitative justification and therefore violate NEPA and the Administrative Procedure Act.*

## Property values and insurance

Our home owner’s insurance has increased by **151%** in the three years from January 2022 to January 2025, mostly due to wildfire risk, persistent drought, and rising temperatures. The assessed value of our property increased only modestly during that time and was a minor component of this increase. If a new nearby above-ground power line further increases our community’s wildfire risk, homeowner insurance rates will go up more. We could ultimately be in a situation where our insurer will no longer insure us, and replacement insurance would be unaffordable. Any homeowner who cannot obtain reasonably affordable insurance or, worse, no insurance, faces a massive devaluation in their property value. Some residents in the Village of Oak Creek have already had their insurance cancelled and are having difficulty finding an insurer.

The Forest Service must consider this extra financial burden on local residents. Many Village of Oak Creek and Sedona residents are on a fixed income (see age class data in Vulnerable Communities section above) and could not afford continued excessive insurance rate increases.

People move to the Village and Sedona to take advantage of the broad vistas, magnificent scenery, and outdoor recreation. These amenities are a major reason for our property values being what they are. We don’t need studies from elsewhere in the U.S. to know how valuable these amenities are, and how they can be damaged by unsightly above-ground power lines in the vicinity. The Forest Service’s claim that property values won’t be impacted are completely bogus and entirely ignore the negative impact of having 65-ft tall power transmission lines in view of many homes.

Here is another way to compare property values to APS’s added cost to build underground Section D to E. Victoria Wylde & Roy Grimm are local real estate experts who use sales statistics specific to this area. They found that in 2024, in the Village of Oak Creek, the median recorded sales price was \$900k (for 137 transactions). (Sedonamonthly.com, March 2025, p. 14) Using this figure, APS’s estimated \$15.7 million cost to underground Section D to E is the equivalent of the value of only **18 homes** in the Village.

Older 2020 Census data (cited above) shows 3468 households in the Village of Oak Creek and a median value of owner-occupied units (2019-2023) as \$654k. Even taking this much lower value and multiplying by the number of households yields an approximate total property value (not including businesses) of \$2.27 billion. Adding personal belongings would certainly take the total to well over \$2.5 billion. And this figure would not include cleanup and restoration costs after a major catastrophic fire, so it is a conservative figure. Applying the somewhat different numbers in Table 31 of the Final EA, one would still come up with a total property value of over \$2 billion.

<https://www.census.gov/quickfacts/fact/table/villageofoakcreekbigparkcdparizona/POP010220>;  
(<https://www.census.gov/quickfacts/fact/table/sedonacityarizona#> , estimated as of July 1, 2024)

This estimated value of all property and personal belongings computed above is **120 to 160 times more than** the added \$15.7 million expense APS claims is needed to put the 2.5 miles of Section D to E of the power line underground. (Draft DN/FONSI p. 7) We are sure that residents would be willing to pay a few more dollars a year toward their electric bills to minimize increases to insurance, and especially to

eliminate the increased wildfire threat to their lives and property from an above-ground power line next to, and upwind from, their community.

Both of these comparisons show how minimal APS's added \$15.7 million cost to underground Segment D to E is compared to the property values at risk, particularly when considering that the company's revenues are over \$4 billion/year, and that it had an 8% rate increase approved in 2024.

Unfortunately, the Forest Service project documents fail to give any such comparisons to show the financial assets at risk, and how small APS's added cost would be in comparison to the area's property values. Considering what is at stake in terms of lives, and the possibility of a community ruined forever by a major fire, the clear conclusion is that the Forest Service should require APS to build Segment D to E, adjacent to the Village of Oak Creek, underground to eliminate any new risk of wildfire.

*By failing to disclose these impacts described above, the Final EA and Draft DN/FONSI violate full disclosure requirements of NEPA and the Administrative Procedure Act.*

## **Highway 179 Alternative**

In our Feb. 5, 2019 scoping letter, we recommended that the Forest Service develop an alternative that would route the power line underground "alongside Highway 179." A 3.2-mile underground power line segment is briefly described in "Beaverhead Flat to Village of Oak Creek Boundary Along State Route 179 Alternative" (Final EA Appendix F, p. F-4), which would be buried as we recommended in 2019. This possible alternative was considered but eliminated from detailed study in the Final EA. However, there is nothing in the EA's discussion that points to a fatal difficulty that could not be overcome so that the power line could ultimately be buried along this route.

The following new information became available since the comment period ended on Jan. 14, 2022: Yavapai County government, through the Yavapai County Broadband Initiative, has been seeking a communication provider to build a high-speed internet fiber-optic cable connection to the Village of Oak Creek. (<https://yavapaicoesa.gov/yavapai-county-broadband-initiative/>) This cable would follow Highway 179 from the trunk line buried next to Interstate 17. We recommend that the discarded State Route 179 alternative be expanded to provide for both the communications provider and APS to co-locate their lines into one trench along Highway 179, to reduce costs and overall environmental impacts. Co-locating the two should substantially reduce costs for both companies, while eliminating new wildfire risk to nearby communities from this northern stretch of new power line. The Forest Service and APS should have recognized this opportunity to reduce costs of this alternative and then fully analyzed it in the Final EA so that it could be fairly compared to other alternatives.

We feel that the Final EA's dismissal of this alternative due to scenic impacts is spurious: the idea should be to bury the power line within the existing highway right-of-way, where there is already heavy impact in the form of a graded slope, unraveling pavement, gravel, numerous side roads, parking pullouts, etc. ***This highway right of way is not pristine***, and trenching and filling and properly revegetating would not end up significantly impacting scenery along Highway 179, and would certainly not require amending the CNF Forest Plan to eliminate SIO protections. The Final EA claim of "substantial impacts to scenic resources" is completely overblown. The Forest Service should have fully evaluated this alternative that has many merits.

*Environmental impact reviews must offer a full range of viable alternatives, as required by the Ninth Circuit Court of Appeals in California v. Block, 690 F.2d 753 (1982). By producing a Final EA with only an Alternative 1 (above-ground) and Alternative 2 (underground), both following almost exactly the same route, the Forest Service has failed its legal requirements cited above to produce a full range of viable alternatives that can explore the benefits of different routes and different combinations of features to reduce cost while not introducing new wildfire risk to nearby communities. Also, this Final EA is inadequate by not including a No Action Alternative so that action alternatives can be fairly compared to a possible scenario where a new power line is not built. Finally, the Highway 179 alternative was unfairly rejected for no legitimate reasons.*

## **Appearance of conflict of interest**

We are concerned that the Forest Service has overly relied on the perspective of APS, which seeks a Special Use Permit for this project, and that the Forest Service overly relies on APS's approach to wildfire risk management. This reliance verges on having the appearance of a conflict of interest.

For example, the plan documents include a "Site Visit Documentation" memo from Oct. 10, 2023 (in the project's "BriefingPapersAndMeetingNotes" folder). This visit had three representatives from the Forest Service and three from APS. There were no independent observers, no experts such as geologists, no representatives from the local Sedona Fire District—who would likely be first responders in case of a wildfire ignition in the study area—and no university researchers who might have offered their expertise or experience. None of the Forest Service representatives were experts on fire management, wildfire risk, or scenic integrity. The visit notes describe impacts to scenic integrity only from a few specific locations, rather than the loss of scenic integrity across the entire area of thousands of acres, as discussed in this objection's section below, "CNF Forest Plan's land management and special use requirements violated."

Without subject matter experts on the field visit, Forest Service officials were left to believe the claims of APS that undergrounding the power line in certain areas would be extremely difficult and cause various major impacts. No one was there to counter such claims and offer other possible solutions, such as using Horizontal Directional Drilling in areas with challenging geology or access issues.

We feel that the resulting Draft DN/FONSI reflects this lack of adequate staffing and examination of this project to ensure that decisions were made based on a sound scientific and technical basis, and that public concerns were being fully addressed. The reality is that much of the project direction and technical information has come from APS.

This project involves a contractual arrangement between APS and the Federal Government, whereby the Forest Service would approve a Special Use Permit for APS to construct and operate a new power line on CNF lands. This permit is a contract between APS and the government. Federal Acquisition Regulations (FAR) therefore apply. The FAR regulations, Part 3, include:

*"Government business shall be conducted in a manner above reproach and, except as authorized by statute or regulation, with complete impartiality and with preferential treatment for none. Transactions relating to the expenditure of public funds require the highest degree of public trust and an impeccable standard of conduct. The general rule is to avoid strictly any conflict of interest or even the appearance of a conflict of interest in Government-contractor relationships. While many*

Federal laws and regulations place restrictions on the actions of Government personnel, their official conduct must, in addition, be such that they would have no reluctance to make a full public disclosure of their actions.” (Emphasis added.)

(FAR FAC Number 2025-03, Effective Date 01/17/2025, [https://www.acquisition.gov/far/part-3?searchTerms=conflict%20of%20interest#FAR\\_3\\_000](https://www.acquisition.gov/far/part-3?searchTerms=conflict%20of%20interest#FAR_3_000))

*By not seeking relevant input from appropriate subject matter experts on power line design and mitigation as needed, and relying primarily on data and input from APS, a corporation seeking a Special Use Permit to build and operate on CNF land, the Final EA and Draft DN/FONSI are heavily biased toward APS’s preferred design for above-ground power line segments. This unfair bias has led to a largely unsubstantiated decision that violates the Administrative Procedure Act and raises concerns of conflict-of-interest violations in Federal Acquisition Regulations (FAR).*

## Regulations on amending the CNF Forest Plan are violated

In our Jan. 14, 2022 comment letter, we stated, “We ***strongly oppose amending the forest plan’s requirements for scenic integrity objectives*** or semi-primitive land management designation, to facilitate Alternative 1, or a mix of Alternative 1 and 2.” (Emphasis added)

Forest Service regulations place a very high bar on project-level amendments of a forest plan. The National Forest Management Act (NFMA) at 36 CFR 219.3 “Role of science in planning” states:

“The responsible official's determination [regarding a forest plan amendment] must be based on the purpose for the amendment and the effects (beneficial or adverse) of the amendment, and informed by the ***best available scientific information, scoping, effects analysis***, monitoring data or other rationale.” (Emphasis added)

The use of best available scientific information is also required at 36 CFR 219.3:

“The responsible official shall document how the ***best available scientific information was used to inform the assessment***, the plan or ***amendment decision***, and the monitoring program as required in [§§ 219.6\(a\)\(3\)](#) and [219.14\(a\)\(3\)](#). Such documentation must: Identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered.” (Emphasis added)

Neither the Final EA nor the Draft DN/FONSI discuss what “best available scientific information” was used for informing the decision to make a forest plan amendment. In fact, the words “science” or “scientific” do not appear in the plan documents (except in titles of some reference documents and responses to a few comments, Appendix B, none of which have to do with plan amendment).

The Draft DN/FONSI includes a “Forest Plan Amendment” section on p. 11, stating, “This decision also includes a Project-specific Forest Plan amendment for approximately 42.6 acres of the Selected Alternative where it would be located in areas designated as High SIO.” Thus this document is where the decision is to be made to amend the forest plan.



But as just discussed, no mention is made that the Forest Service has demonstrated that the decision to amend the plan is informed by the “best available scientific information.” Nor do the Draft DN/FONSI or Final EA “explain the basis for that determination, and explain how the information was applied to the issues considered.” For example, the EA could have assessed why an above-ground power line in Segment D to E might be more or less reliable than an underground line, with hard quantitative facts on the reliability of each.

But the Forest Service and APS cannot provide a scientifically justifiable basis for choosing the above-ground power line when an underground line is a viable alternative, as admitted throughout the Final EA, with much lower impact to scenery and to wildfire risk than the chosen above-ground alternative, and with no need to amend the CNF Forest Plan in any way.

*Because the Final EA and Draft DN/FONSI fail to address the above-cited requirements of Forest Service regulations, they are in violation of law and regulation, in particular the NFMA and its implementing regulations. The decision to make a site-specific Amendment of the CNF Forest Plan also fails the requirements of law and regulation, including the NFMA.*

## **CNF Forest Plan’s land management and special use requirements violated**

In our Jan. 14, 2022 comment letter, we stated, “Alternative 1, an overhead powerline, would create unacceptable impacts to scenery and semi-primitive recreation opportunities across a large area. We oppose this alternative, and we oppose amending the Coconino NF forest plan to allow for reduced scenic integrity objectives.”

We believe that constructing over 2.5 miles of above-ground powerline, in Segment D to E, would mar scenery in the entire valley where the current Kel Fox Trail is located with permanent man-made 65-ft-tall steel pole structures. The experience and setting would be permanently altered, violating the Coconino Forest Plan’s designation of the area as Semiprimitive Motorized within the Recreation Opportunity Spectrum (ROS), located within the larger House Mountain-Lowlands Management Area:

“Semiprimitive Motorized – Similar setting to semiprimitive non-motorized except this area provides a motorized backcountry experience where trails and primitive roads are designed for high-clearance, four-wheel-drive vehicles. Moderate probability of experiencing solitude. High degree of self-reliance and challenge in using motorized equipment. These areas are ***predominantly natural***, lacking some human modification, except when necessary for site protection.” (CNF Forest Plan FEIS Vol. 1, p. 291; emphasis added)

“Desired Conditions for House Mountain-Lowlands Management Area MA-HouseMtn-DC :

... Facilities are few and the ***character of these developments appears rustic and primitive...***”  
(Emphasis added)

(CNF Forest Plan p. 155)

We submit that the presence of a continuous line of 65-foot steel poles with power conductor wires is not a “predominantly natural” landscape and does not have a character that is “rustic and primitive” as required in the CNF Forest Plan cited above.

In order to implement the above-ground Alternative 1 for this segment of power line, the Forest Service would **also** have to amend the CNF Forest Plan's designation of this area as being in the Semiprimitive Motorized ROS, and assign the area to a different Management Area other than House Mountain-Lowlands, all while meeting the above-stated regulations and requirements for amending a forest plan.

The Draft DN/FONSI or Final EA make no mention of amending the forest plan to accommodate this significant change to recreational opportunities or Management Area desired conditions. While moving the Kel Fox Trail as proposed in the Draft DN/FONSI mitigates to some extent how the present, predominantly natural area would be altered by the presence of an above-ground power line, the fact remains that the land itself underneath and surrounding an above-ground Segment D to E of the power line is currently designated Semiprimitive Motorized and is managed as part of the House Mountain-Lowlands Management Area in the forest plan.

Additionally, the CNF Forest Plan states a specific preference that power lines should **usually** be buried:

“Utility lines, such as pipelines, power lines, fiber optic lines, and telephone lines, are not visible (usually buried) across the landscape **unless there are overriding environmental, economic, or technical concerns.**” (CNF Forest Plan, Desired Conditions for Special Uses FW-SpecUse-DC, Land Special Uses, p. 104; emphasis added)

Nothing in the Final EA or Draft DN/FONSI demonstrates that the Selected Alternative meets this “unless” requirement. These documents fail to show that APS cannot afford to build Section D to E underground, and they further detail that the entirely underground Alternative 2 can meet environmental requirements of the Forest Plan and is technically feasible. Without full justification of overriding environmental, economic, or technical concerns, selecting an above-ground alternative for Segment D to E of the power line violates the CNF Forest Plan.

*The Draft DN/FONSI therefore violates the CNF Forest Plan's Semiprimitive Motorized ROS designation of this area, the Desired Conditions for House Mountain-Lowlands Management Area, and the Desired Conditions for Special Uses FW-SpecUse-DC. The Draft DN/FONSI and Final EA are thereby in violation of law and regulation, in particular the National Forest Management Act (NFMA) and its implementing regulations.*

## **Mitigation of significant scenic impacts required to justify “Finding of No Significant Impact”**

Our Jan. 14, 2022 comment letter stated, “To truly be able to justify no significant cumulative impacts from this alternative, the Forest Service would have to implement major mitigation measures, including (1) amending the forest plan to **add more land in protected semi-primitive classifications**, (2) **requiring APS to pay for restoring scenic integrity** and/or removing roads in other large, contiguous Coconino NF landscapes nearby that have been compromised by past development...” (Emphasis added)

The Forest Service has issued a Finding of No Significant Impact. Yet the project documents acknowledge that above-ground power line segments would harm scenic views, violating the CNF's SIO (also called “level of intactness” in the Final EA, p. 100) over thousands of acres. The Final EA has over eight pages of description, including photo simulations, of how scenic views would be harmed or compromised (Final EA, pp. 100-108). Scenic character is described in terms of foreground, middleground, and background zones, which range up to 0.5 and even as far as 4 miles away. (Final EA p. 93)

From the Final EA's portrayal, scenic impacts are on the order of thousands of acres, not merely the 42.6 acres where SIO protection would be removed by amending the CNF Forest Plan. To truly reflect the scenic impacts, a much larger area, in the thousands of acres, would have to have its SIO designation removed. The claim of "No Significant Impact" is thus not true—this would be a major impact on the region's resource of magnificent scenery. Moreover, this is all located within the greater Sedona red rock area, with incredibly high value to the state of Arizona and the nation, as it serves as a destination for millions of visitors every year.

We therefore maintain that the above-ground power line in Segment D to E constitutes a *significant impact* to the scenic integrity of this extensive area that has been protected by the CNF forest plan since its inception, impacting the scenic views from thousands of nearby acres—not merely the "42.6 acres of the Selected Alternative where it would be located in areas designated as High SIO." It is disingenuous for the agency to assert that only this narrow strip of high SIO value needs to be excluded from forest plan protections while ignoring that large adjacent areas will have scenic value highly impacted by the presence of the industrial structure of an above-ground powerline.

The Forest Service could possibly claim "No Significant Impact" through a FONSI if it were to require that such impacts to scenery be offset by meaningful mitigation measures, such as restoration of other large, contiguous landscapes as we suggested in our 2022 comments. We maintain that APS would have to pay for such mitigation measures. In this case, such costs would have to be incorporated into the overall expense to APS of building and maintaining above-ground segments of the power line, since scenic impacts from underground segments are far less, and disclosed in the Final EA as part of the costs to APS of the above-ground power line.

In contrast, scenic impacts created by an underground power line are visible only from nearby locations, and, as we have seen from the existing buried natural gas pipeline near the Kel Fox Trail, as vegetation regrows over a number of years, the impacts to scenery are drastically reduced. And for underground segments, the Forest Service could include a revegetation plan for disturbed locations to speed up recovery.

*Because the Final EA and Draft DN/FONSI authorize an above-ground powerline to be built in Segment D to E, yet only amend the CNF Forest Plan's SIO designation for 42.6 acres, they fail to acknowledge and disclose the very significant impacts to scenery across a large, undeveloped, predominantly natural area of thousands of acres beyond just that 42.6 acres. The National Forest Management Act, NEPA, and the Administrative Procedure Act are therefore violated.*

## Forest Service officials have actively suppressed release of information and discouraged public involvement

We have been gravely concerned that the Forest Service has actively tried to suppress public input and involvement and public access to information about the project:

- The Forest Service never responded to Freedom of Information Act requests from Big Park Regional Coordinating Council (also called Big Park Council) on Sept. 25, 2023, and Keep Sedona Beautiful on Nov. 15, 2023 (submitted by the undersigned Mark Lawler on behalf of Keep Sedona Beautiful). Despite involvement by Senator Mark Kelly's office on the former request, no releases of information have been forthcoming; not even a FOIA tracking number was provided for the latter request. By not responding to such FOIA requests, the Forest Service has violated the Freedom of Information Act that requires the release of unclassified information.
- A Forest Service press release on the APS project was printed verbatim, using over 17 column inches, in the *Sedona Red Rock News*, the main local newspaper, on Jan. 22 and Feb. 5, 2025, and in the Feb. 1, 2025 *Villager*, a monthly newspaper. Despite including many details about the project, the release completely omitted the fact that the Draft Decision would build an above-ground power line in the 2.5-mile segment just south of the Village of Oak Creek. From reading this release alone, readers would never know about this controversial segment of the power line that is upwind of the Village and that would increase the area's risk of wildfire.
- On Feb. 26, 2025, a week after Forest Service staff failed to appear at an open public meeting on February 19 about the power line project sponsored by Big Park Council with over 200 attendees, Alex Schlueter, District Ranger for the Red Rock Ranger District, was quoted in the *Red Rock News*. His quote included, "eligible objectors are only those who have previously submitted timely, specific written comments during the specified public comment periods." But Schlueter's quote omitted the final part of the sentence in the Forest Service's own Legal Notice printed on Jan. 16, 2025 in the *Arizona Sun* newspaper (Legal Notice folder on project website, <https://www.fs.usda.gov/project/?project=56977>) that continues "..., unless based on information not available during an earlier designated opportunity for public comment (i.e., new information)." By this omission, Schlueter made it appear that only those who commented can submit an objection. He thereby discouraged many members of the public who, according to the Forest Service's Legal Notice, could actually have submitted an objection.

*For the above reasons, the Forest Service has violated the Freedom of Information Act as well as its own ethics rules requiring full and accurate disclosure of its own procedures.*

## Conclusion

For the many reasons we have discussed, the project should be revised to ensure that it *introduces no new risk of wildfire to the Village of Oak Creek and Sedona*, and so that the CNF Forest Plan does not have to be amended.

**Our requested remedy** is that the Draft DN/FONSI and Final EA be revised, including the Fire and Fuels Management Report, to address the deficiencies we describe herein. Also, the Selected Alternative must be revised as follows so that we and our local communities can rely on the safest possible power line design that does not increase the risk of wildfire and needlessly threaten property or lives:

1. APS must build the power line underground in Segment D to E, which is adjacent to the Village of Oak Creek. The underground alternative is the only one that eliminates any new wildfire risk now and in coming years. In fact, the project's Fire and Fuels Management Report (second paragraph) clearly states, "...there is no above ground equipment that could ignite a fire under this alternative," and "risk of ignition is not expected to change from the current condition as a result of an underground line over the long-term."
2. OR The underground Highway 179 alternative must be developed in a revised EA and ultimately chosen as part of the final Selected Alternative. This alternative should also include consideration of co-locating the underground power line with a proposed broadband internet fiber-optic cable. The environmental and cost benefits of this colocation should be disclosed in a revised EA and Final Decision Notice.
3. The CNF Forest Plan is not amended to accommodate this project.

In closing, we ask that you remand this project back to Forest Supervisor Mayville to:

- Revise the Draft DN/FONSI and Final EA as we (and other objectors) request
- Open up new public comment opportunities
- Provide multiple opportunities to brief the public
- In all public announcements, be completely transparent about the proposal
- Clearly and accurately explain to the public how citizens can become involved and provide their comments.
- Apply our requested remedy as described above.

We also request to meet with the Forest Service to discuss issues raised in our objection and potential resolution, per 36 CFR 218.11(a).

Sincerely,

[REDACTED]

Mark Lawler, Lead Objector, and Rita Race

[REDACTED]