

February 26 2025

Ken and Linda Barnes



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REGIONAL FORESTER'S OFFICE
SOUTHWESTERN REGION

TO: Responsible Official and Reviewing Officer, Regional Forester Michiko Martin
333 Broadway Blvd SE
Albuquerque, NM 87102

RE: APS Oak Creek to McGuireville 69kV Transmission Line Project on the Coconino National Forest

Proposed APS Power Line—a 13.7 mile 69kV high-voltage power transmission line is proposed to be built by APS from McGuireville to the Village of Oak Creek on Coconino National Forest land.

U.S. Forest Service (USFS) performed an Assessment and decided to let APS build the approximately 6 mile section between McGuireville and Beaverhead Flat Road above ground. The 5 mile section along Beaverhead Flat Road will be **underground** (to protect scenery).

USFS intends to allow APS to build over 2.5 miles of high-voltage power lines **ABOVE GROUND**, just south of the VOC (along the Kel Fox trail).

I am requesting the following:

- **the USFS and APS place the 2.5 miles of high-voltage power lines along the Kel Fox trail UNDERGROUND!**
- **APS bury the lines. Burying the lines is affordable for APS (costs will be passed to consumers anyway), and long-term maintenance costs will be lower.**
- **APS and USFS place resident and wildlife safety FIRST! In addition, the revenues brought to the state by the scenic beauty of Sedona needs to be preserved.**

CONCERNS:

- **Safety Risks to VOC residents due to wildfire**
 - Much of the VOC population is older and vulnerable to dying from wildfires
 - There are only 2 exit routes available to VOC residents in case of wildfire
- **Wildfire Risks Threaten Lives, Property, and Scenic Integrity of VOC**
 - **Village of Oak Creek (VOC) is in the top 4 percentile for fire risk relative to other US communities.** Persistent drought, combined with rising temperatures, make conditions optimal for a wildfire in the VOC.
 - Since the 2022 comment period, **the USFS published a fire risk map, rating the VOC and Sedona “at very high risk” (see www.wildfirerisk.org).** The project documents do not consider this rating.
 - Across the Western United States, countless wildfires have been sparked by above ground power lines. **The Western Fire Chiefs Association advises communities to “underground” their power lines.**
 - The Paradise, CA fire in 2018 was started from above-ground high-voltage power lines. This inferno claimed 85 lives (80% of them over the age of 65 years).
- **Lack of RESPONSE by APS and USPS to legitimate safety, environmental, and economic concerns of VOC citizens**
 - USFS has not responded in legal time allotted to Freedom of Information Act (FOIA) request by Big Park Council
 - Submitted FOIA on 9-15-23
 - Agency response due within 20 business days (extended to 40 days for voluminous requests)
 - Case Number not issued until 12-6-23
 - One communication received on 3-12-24
 - No further communication
- **Lack of TRANSPARENCY regarding legitimate safety, environmental, and economic concerns of VOC citizens**
- Costs to implement are inflated and inaccurate.
 - Boring and tunneling estimates are 100 times what Big Park Council (BPC) found during analysis of other areas with similar issues

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- Maintenance cost of buried line is 3 to 7 times less expensive than overhead power line
- Lifespan of buried lines are 2 to 3 times greater than overhead power lines
- There has been **inadequate analysis of power line alternatives** (such as solar and battery systems)
 - Estimate of local generation and battery storage alternatives are inflated
 - Footprint of a solar generation alternative is overstated
 - APS published a Comprehensive Fire Mitigation Plan (March 2022) after the Comment Period.
 - Draft Decision Notice (DFN) and Final Environmental Assessment rely on this plan
 - No mention of the original DFN to mitigate increase wildfire risk with the above-ground APS lines.
 - No opportunity of public to see the plan during comment period
- **Lack of SAFETY ACCOUNTABILITY regarding legitimate safety, environmental, and economic concerns of VOC citizens**
 - ***Stewardship Agreement Between the State of Arizona and the USDA Forest Service, Southwest Region*** (signed 10-10-24).
 - Includes policy objectives 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.”*
 - Is not considered in the Project Documents for this Transmission Line Project.
- Economic Impact on VOC Population

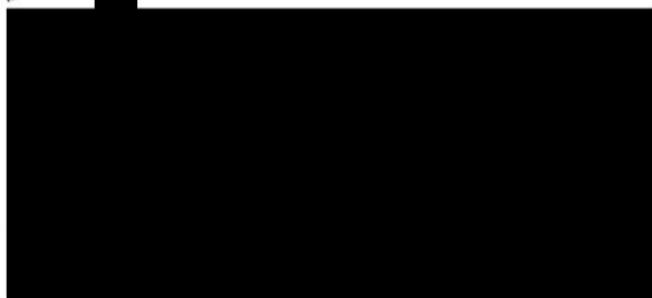
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- Approximately 16% of **VOC residents have experienced insurance rate increases** due to wildfire risk in last several years
- Approximately 6% have experienced multiple insurance rate increases. Rate increases have accelerated since the USFS Comment Period closed
- **Violating of USFS own Scenic Integrity objectives** (available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd552190.pdf)
 - A catastrophic wildfire in VOC/Sedona will **impact the scenic integrity, beauty, and economic impact of the community for decades to come.**
 - The above ground lines will be extremely **unsightly, and decrease property values.** In addition, if a wildfire occurs, this will **decrease or destroy lives and property.**
 -

Please stop the proposed overhead power line.



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