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Regional Forester Michiko Martin

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SENT VIA EMAIL: objections-southwestern-regional-office@usda.gov

RE: APS Oak Creek-McGuireville 69kV Transmission Line Project/Coconino National Forest

Dear Regional Forester Martin:

This is my objection to the above-referenced project on the Coconino National Forest, which I am submitting based on new information not available during the previous comment period, which ended Jan. 14, 2022.

1. 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 in the highest 4% RISK CATEGORY (at "very high risk" of wildfire)(<https://wildfirerisk.org/>). The project documents did not consider this rating of just how at-risk our communities are.

2. 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.

3. "Stewardship Agreement between the State of Arizona and the USDA Forest Service, Southwestern Region," signed October 10, 2024. The APS 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](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1209167.pdf))

\*3. With our older population demographic and limited roadway access, Village and Sedona residents are particularly vulnerable to dying from wildfires. Recent 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). The APS project documents are silent on this major issue.

4. The USFS has not provided responses to community concerns, since 2022, including failure to respond to Freedom of Information requests.

5.APS has used highly inflated project costs, based on our community's own research.

6.APS and USFS have failed to consider an alternate alignment advocated by area residents which avoids the Kel Fox Trail segment, by continuing underground along Beaverhead Flat Road to SR 179, and northward to the Village. THIS IS A POSSIBLE REMEDY TO MANY COMMUNITY OBJECTIONS.

7.Whereas those of us who commonly use Beaverhead Flat Road for our regional travels appreciate APS's proposal to underground the powerline along that alignment, it is very strange that APS and USFS ignore public safety and risk of human tragedy by proposing the Kel Fox Trail alignment on high risk above ground power poles, even higher than those that exist today.

8. 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. The Forest Service excluded this route from consideration and did not develop it as an alternative.

Respectfully submitted,

Signed electronically

David H. Gill

Elizabeth J. Loos