Data Submitted (UTC 11): 2/26/2025 11:54:15 PM First name: Bridget Last name: Bero Organization:

Title:

Comments: I note that I have "standing" to raise objections, as I previously commented on the project. My objections to the proposed plan re: above/below ground placement of the powerline are:

1. Scenic viewsheds: It is surprising that you chose to bury the power line along Beaverhead Flat Rd and kept it above ground from the Beaverhead Flat Rd into the VOC, with the exception of going under Hwy 179. That decision is the opposite of what it should be. Nobody drives the Beaverhead Flat Rd for a scenic view. But the Kel Fox trail actually has very nice scenic views along the wild mesas surrounding the single track Kel Fox trail and stunning red rock views from the saddle and into the VOC. And, the many residences along the route have to look at aboveground power lines 100% of the time. I object to the lack of consideration of the impact of above ground power lines on the REAL scenic views along the planned route.

2. Wildfire risk: Again, the decision is opposite of what makes sense. The vegetation along the Beaverhead Flat Rd is nowhere near the density of fuel load along the Kel Fox trail and that within the VOC. Data provided by the AZ Dept of Forestry and Fire Management state that this area (Kel Fox & amp; VOC) has a very high fire risk, and your report itself states that the prevailing winds would quickly channel fire over the saddle and into the VOC. Additionally, I don't have confidence that APS would properly maintain fire breaks along the route as evidenced by overgrowth along existing fire breaks and powerlines in the neighborhoods, and the Forest Service itself says that the creation of fire breaks to protect the VOC is up to 10 years in the future (article in Red Rock News in February). You have not provided evidence that the fire risk due to aboveground power lines along the Kel Fox and in the VOC is minimal.

3. No information was provided to support APS's massive cost estimates for underground work. Your report states that the Forest Service has no expertise in cost estimation, so the Forest Service made decisions based on APS's estimates. I object to the fact that you took those numbers at face value in making your decision without requiring APS to provide multiple actual bids for underground work. This is critical as it appears that your decision was greatly influenced by these figures, which were extreme for the Kel Fox section compared to other sections. The Big Park Council stated that their research shows those cost estimates were inflated; regardless, the cost estimates were not justified in your report.

Overall, it appeared to me that your decision did not make sense with respect to protection of scenic viewsheds, did not dig deep enough into the costs of underground work, did not properly explain fire risk (how exactly were the big junipers classified?), and did not justify the decisions made. It is your job to protect the forest, and I don't see the decisions made in this study doing that; it appears that you simply rubber stamped and reinforced APS's choices. I would like to see a public meeting where both you and APS show up and better explain/justify your decisions to all concerned citizens, not just those who have "standing".