United States Department of Agriculture
Forest Service
Southwestern Region
Regional Office
333 Broadway SE
Albuquerque, NM 87102
505-842-3292
Fax: 505-842-3800

File Code: 1570
Date: May 2, 2025

APS Oak Creek to McGuireville 69kV Transmission Line Project

Dear Eligible Objector:

On behalf of the Coconino National Forest (COF), I would like to thank you for your involvement in the APS Oak Creek to McGuireville 69kV Transmission Line Project on the Red Rock Ranger District. This letter is in response to the objection you filed regarding the Final Environmental Assessment (EA) and Draft Decision Notice (DN). I have read and considered your objection and reviewed the project record and Final EA, including the environmental effects. My review of your objection was conducted in accordance with the administrative review procedures found at 36 C.F.R. 218, Subparts A and B.

PROJECT OVERVIEW

Arizona Public Service (APS) proposes to construct an approximately 13.7-mile long 69kV transmission line to improve reliability and resilience of the Verde Valley power grid. The proposed transmission line is designed to connect communities that depend on single source radial transmission lines so that the Verde Valley power grid creates a loop, and both of these communities are connected from either side. Two action alternatives, one overhead and one underground, were analyzed for the transmission line and the decision includes a blend of the two. Both action alternatives would require a Forest Plan amendment.

ADMINISTRATIVE REVIEW PROCESS

Regulations at 36 C.F.R. 218 provide for a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections (36 C.F.R. § 218.8). The legal notice for the objection filing period was published on January 16, 2025. According to 36 C.F.R. § 218.5(a), objections may be filed by individuals and entities who have previously submitted timely, specific written comments regarding the project during a designated opportunity for public comment. Twenty-five eligible objections were received. A list of objection letters from individuals and entities, and their objection number identifiers, is available in Appendix A.

Objection regulations also inform us that issues may be raised based on new information that arose after the designated opportunities for comment (36 C.F.R. § 218.8(c) and § 218.8(d)(6)). While multiple submissions claimed objection eligibility based on new information, most did not result in new issues except for the new information described in Appendix A. The new information topics raised in objections are related to the APS Comprehensive Fire Mitigation Plan (CFMP) and scenery issues related to transitions between above and below ground powerlines. Thirty-six individuals who had not previously commented during a designated comment period, had objection submissions that considered new information presented in the Final EA or Draft Decision Notice.

Each objection was thoroughly considered and is responded to in Appendix A to this letter. The objection review and remedies suggested did not reveal opportunities for resolution; therefore, I did not hold a resolution meeting. This letter, including instructions to the Responsible Official and enclosed summary of responses (Appendix A), is my written response to the objections.

OBJECTIONS SUMMARY

There were multiple issues raised by the objectors. The objectors raised concerns around compliance with the National Environmental Policy Act (NEPA), National Forest Management Act (NFMA), concerns about impacts to recreation and scenery, and concerns about wildfire ignition risk. While each objection was considered and reviewed independently, the contentions and responses were grouped and combined into similar objection contentions. These contentions are summarized from multiple objector statements and are intended to address the objectors' concerns but may not be a comprehensive listing of all points raised. Per 36 C.F.R. § 218.11(b), objection responses do not need to be point-by-point. Each contention identifies objectors by a four-digit portion of the objection numbers. Please see Appendix A for more details on reading the objection responses.

CONCLUSION

I have reviewed the project in light of the issues presented in the objection letters received. My review finds that the project is in compliance with all applicable laws and the 2018 COF Forest Plan. However, based on my review, I am instructing COF Forest Supervisor Aaron Mayville to:

- Provide more detail on how the APS CFMP would serve to mitigate wildfire ignition risk.
- Clarify that the Selected Alternative is consistent with the desired condition for Special Uses (FW-SpecUse-DC-03).
- Correct the Final EA through an erratum to indicate the above ground segment D to E contains Semi-Primitive Motorized, Roaded Natural, and Rural ROS classifications that are consistent with the selected Alternative. Provide more information to demonstrate this finding.
- Clarify impacts to SR 179 viewsheds for Segments C to D and D to E, including potential impacts from project activities in viewsheds along SR 179, as this is a scenic road with the All American Road designation.
- Clarify the effects to scenery determination that Alternative 2 will have more impacts than Alternative 1.
- Include information on transition infrastructure between affected Segments where the transmission line is installed undergrounded and then moved above-ground and vice versa.

My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 C.F.R. § 218.11(b)(2)].

If you have any questions or concerns, please contact Roxanne Turley, Regional Administrative Review Coordinator, at roxanne.turley@usda.gov.

Sincerely,

JACOB NUTTALL

Digitally signed by JACOB NUTTALL
Date: 2025.05.08 08:36:55 -06'00'

JACOB NUTTALL
Deputy Regional Forester

Enclosure (1)

cc: Aaron Mayville, Mike Dechter, Roxanne Turley

APS Oak Creek to McGuireville 69kV Transmission Line Project

Coconino National Forest

Summarized Objection Contentions and Responses

A. Objection Response Reading Guide

The responses to the objections are organized into four resource topic areas, Fire and Fuels, National Environmental Policy Act (NEPA), National Forest Management Act (NFMA), and Scenery. Each topic area contains individual objection issues that are addressed in the following format: contention summary, which includes the objector(s) identification number assigned when the submission was received; a response to the contention including citations to pertinent documents in the project record; and any instructions to the forest which must be completed before signing the decision. Where applicable, similar contentions raised in objection have been combined into one contention and response.

Objection identification numbers are assigned when the submissions are entered into the Content Analysis and Response Application (CARA) database. The general format for an objection identification number is 25-03-00-0001-O218. The four-digit portion of the number is used to identify the individual objector(s) that raised the contention(s). These are used to identify objectors throughout the response document. Please refer to Table 1 and Table 2 in Appendix A, Section B, for the list of objection numbers associated with names of each eligible objector. When multiple names were listed on an objection submission, and a lead objector was not identified, the first eligible objector on the list was identified as the lead objector.

Project record (PR) documents and information are cited throughout responses with their project specific document number and page referring to in reference, for example: [PR 267, pp. 1-3].

The U.S. Forest Service Reviewing Officer reviewed all objection submissions. This document presents a summary of contentions that were raised in objection along with the Reviewing Officer's written response to those contentions. The applicable regulation at 36 C.F.R. 218.11 states:

(b) Reviewing officer's response to objections. (1) A written response must set forth the reasons for the response but need not be a point-by-point response and may contain instructions to the responsible official, if necessary. In cases involving more than one objection to a proposed project or activity, the reviewing officer may consolidate objections and issue one or more responses.

B. Eligible Objectors

A total of 25 timely objections were received for the proposed project. The objectors participated in previous designated opportunities for public comment and were thus determined to be eligible for objection review (Table 1). Additionally, 36 individuals who had not previously commented during a designated comment period, but submitted timely objections, submitted eligible objection submissions for review because specific objection issues raised were based on new information presented in the Final EA (Table 2). The new information topics raised in objection are related to the APS Comprehensive Fire

Mitigation Plan (CFMP) and scenery issues related to transitions between above and below ground powerlines.

Table 1. Timely Objection Submissions Eligible for Review.

Total	Name	Organization	Objection Number
1	Debra Christian	--	25-03-00-0051-O218
2	Loren Nardick	--	25-03-00-0052-O218
3	Suzanne Read	--	25-03-00-0053-O218
4	Rosemary Mays	--	25-03-00-0054-O218
5	Dena Yasner	--	25-03-00-0055-O218
6	Catherine Martines	--	25-03-00-0057-O218
7	John Neville	--	25-03-00-0058-O218
8	Pamela Kaegi	--	25-03-00-0073-O218
9	Carla Williams	Keep Sedona Beautiful	25-03-00-0083-O218
10	Shareall Stillwater	--	25-03-00-0085-O218
11	William Stillwater	--	25-03-00-0086-O218
12	Mary Malek	--	25-03-00-0093-O218
13	Mart Schonberg	--	25-03-00-0100-O218
14	David Gill	--	25-03-00-0125-O218
15	Diana Judson	--	25-03-00-0126-O218
16	Susan Barber	Big Park Council	25-03-00-0131-O218
17	Loren Nardick	--	25-03-00-0140-O218
18	William Hendrix	--	25-03-00-0144-O218
19	Karen Cerilli	--	25-03-00-0154-O218
20	Lori Feine	--	25-03-00-0167-O218
21	Andrew Wilcox	--	25-03-00-0171-O218
22	David Whisner	--	25-03-00-0175-O218
23	Jackie Barbour	--	25-03-00-0178-O218
24	Mark Lawler	--	25-03-00-0197-O218
25	David Hadcock	--	25-03-00-0213-O218

Table 2. Timely Objection Submissions Eligible for Review Based on New Information.

Total	Name	Organization	Objection Number
1	Diann Keller		25-03-00-0101-O218
2	Joanne Johnson		25-03-00-0106-O218
3	Scott Brewster		25-03-00-0107-O218
4	Steven Galginaitis		25-03-00-0108-O218
5	Gina Shiflett		25-03-00-0112-O218
6	Martine Pigeon		25-03-00-0114-O218
7	Raymond Johnson		25-03-00-0115-O218
8	Cyndie Koopsen		25-03-00-0116-O218
9	James Vogel		25-03-00-0117-O218
10	Brenda Page		25-03-00-0118-O218
11	David Mascone		25-03-00-0119-O218
12	Barbara Pickett		25-03-00-0121-O218
13	Beth Sullivan		25-03-00-0122-O218
14	Zachary Hilgemann		25-03-00-0123-O218
15	Mark Blosser		25-03-00-0129-O218
16	Berry Webb		25-03-00-0133-O218
17	Martha Childress		25-03-00-0134-O218
18	Zachary Hilgemann		25-03-00-0142-O218
19	Mitch Laurich		25-03-00-0163-O218
20	Chris Silk		25-03-00-0169-O218
21	Mark Conrad		25-03-00-0172-O218
22	Gail Woody		25-03-00-0174-O218
23	Patrick Conlon		25-03-00-0176-O218
24	Antoinette Beiser		25-03-00-0182-O218
25	Judy Themer		25-03-00-0187-O218
26	Randy Barbour		25-03-00-0188-O218
27	Michele Shapiro		25-03-00-0190-O218
28	Eric Bosset		25-03-00-0192-O218
29	Margaret Chanler		25-03-00-0193-O218
30	Susan Smith		25-03-00-0194-O218
31	Alicia Asher		25-03-00-0195-O218
32	Steven Gardiner		25-03-00-0196-O218
33	Elizabeth France	Concerned Citizens of Sedona (VOC)	25-03-00-0200-O218
34	Jan Soldan	Concerned Citizens of Sedona (VOC)	25-03-00-0201-O218
35	Karen Gwardys		25-03-00-0202-O218
36	Karen Butler		25-03-00-0203-O218

C. Summarized Objection Contentions and Responses

Fire and Fuels

Objection Issue: General Risk

Objectors contend the project poses an extreme fire hazard, particularly with changing climate, high winds, and extreme drought. Objectors are opposed to an above-ground transmission line due to a growing number of devastating wildfires started by powerlines. The project's response to comments indicates there are expected increases in the size and severity of wildfires. The construction and activation of new electric transmission lines could instigate a catastrophic fire. APS should bury 100% of the powerlines for this project to eliminate the risk of a future fire from downed powerlines. The added cost of an underground line is a prudent investment in the safety of people and property, especially given the possibility of devastating wildfires in parched regions. [0073, 0083, 0085, 0154, 0167, 0178]

Response

The wildfire ignition risk resulting from each alternative is analyzed in the Final EA, Chapter 3 [PR 267, pp. 82-90]. Construction activities associated with implementation of an overhead or underground transmission line could temporarily increase the risk of wildfire ignition [PR 258, p. B-2]. This risk is minimized through the use of the APS Comprehensive Fire Mitigation Plan (CFMP) (APS 2022a) [PR 204] and Forest Service restrictions implemented on the Forest during periods of high fire risk. The Ranger District completed a fire risk analysis to assess risk of fire ignition and risk of wildfire spread from such an ignition to the nearby community of VOC. The analysis concludes that due to factors including vegetation types, terrain, lack of continuity of fuels, fire history, and location of the transmission line alignment primarily along main travelways, the proposed overhead transmission line results in a minimal risk of wildfire impacts to adjacent communities [PR 258, p. B-2]. The Final EA and Draft DN detail impacts, constraints, and risks of both. Rationale for the decision is fully explained by segment in the Draft DN.

Objection Issue: Risk Considerations – Fire Behavior, Wind, Dry Conditions

Objectors contend that the Selected Alternative, the above-ground powerline in Segment D to E, would put the communities of Sedona and the VOC at an additional wildfire risk. The Wildland Urban Interface (WUI) 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 VOC (Final EA, p. 82). Objectors contend 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.

Objectors contend that project documents fail to disclose design details of the above-ground powerline and its ability to withstand severe weather events. The Final EA and Draft DN do not disclose any quantitative data to indicate above-ground powerline segment(s) can withstand damage from microbursts or other extreme events such as sustained and gust wind speed and duration; the engineering factor of safety that is used for the design of the above-ground powerline; and, the probability 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. [0085, 0131, 0197]

Response

The Ranger District completed a fire risk analysis to assess risk of fire ignition and risk of wildfire spread from such an ignition to the nearby community of VOC. The analysis includes factors such as vegetation types, terrain, weather factors and fire history. The Interagency Fuel Treatment Decision Support System (IFTDSS) analysis completed as part of the Fire and Fuels Management Report (Report) models the 97th percentile or "worst case" fire weather conditions- including wind, temperature, etc. [PR 250, pp. 4-5]. Expected rates of spread given by the IFTDSS model are documented in the Report [PR 250, p. 4]. Procedures outlined in the APS CFMP and Forest Service fire restrictions provide additional information to address mitigation and response during periods of extreme fire risk [PR 204].

The Wildfire Risk section of the Final EA references the APS 2022 CFMP, including the grid modernization technologies implemented by APS, and restricted activities during elevated fire conditions [PR 268, pp. 83-84]. The APS CFMP further details the environmental and fuels conditions triggering wildfire preparedness levels, the work restrictions implemented for each preparedness level, and the wildfire response resources required on-site for each preparedness level [PR 205, pp. 13-21]. The Final EA and Report incorporated standard analytical methods to assess wildfire potential, and the project provides mitigation to reduce risk overall as well as prepare for and be responsive to elevated risk conditions.

Objection Issue: Risk Considerations – Susceptibility and Vulnerability

Objectors contend the Final EA inadequately addresses the risk of wildfires caused by the overhead line. Overhead lines are more susceptible to ignition from construction or maintenance activities, extreme weather, or other sources.

Objectors contend the Final EA did not consider that under wildfire conditions VOC and Sedona residents are particularly vulnerable due to their older populations and limited roadway access. Evacuation routes and options are limited.

The proposed above-ground transmission line creates a new fire risk that cannot be eliminated, whereas underground lines virtually eliminate that risk. The fire risk in VOC is already substantial and well-documented; it should not be increased. The proposed line is routed along an area that was estimated by the Arizona Department of Forestry and Fire Management to vary from very high to extreme fire risk. Objectors contend the project does not consider the post-2022 Forest Service-published rating and risk, with fire risk maps, showing that the VOC and Sedona are in the highest 4% risk category (i.e., "very high risk").

Objectors contend the Fire and Fuels Management Report does not disclose any peer reviews of its modeling software or methodology, including the IFTDSS, and LANDFIRE data. The Report used "97th percentile fire weather conditions" instead of the most severe possible fire weather conditions, such as where forests suffered an extended period of drought with higher-than-normal temperatures. The Verde Valley, the VOC, and Sedona are now experiencing a similar situation. Forest Service data on the "Wildfire Risk to Communities" website indicates the VOC and Sedona are rated as "Very High Risk" of wildfire. Project documents do not acknowledge or address this level of risk. Given this risk, an extensive wildfire risk assessment should have been prepared and fully addressed in the project analysis and decision. The Final EA and the Draft DN violate NEPA for lacking full disclosure of environmental

impacts and cannot conclude that this project has No Significant Environmental Impact. [0083, 0131, 0197]

Response

Wildfire ignition resulting from maintenance crews is addressed given detailed procedures outlined in the APS CFMP and Forest Service fire restrictions, which limits potential maintenance work that could potentially cause ignition during periods of extreme fire risk [PR 204]. As cited in Appendix B, the location of the proposed transmission line along existing utility lines and major roads is unlikely to affect hot-air balloons, private aircraft, and large drones as these areas are already encumbered with non-compatible flight space [PR 258, p. B-3].

Appendix B also addresses wildfire risk. The Ranger District completed a fire risk analysis and concluded that the proposed transmission line results in minimal risk of wildfire impacts to adjacent communities because of vegetation types, terrain, lack of continuity of fuels, fire history, and location of transmission lines along main travelways [PR 258, p. B-2]. The IFTDSS analysis completed as part of the Fire and Fuels Management Report models the 97th percentile or "worst case" fire weather conditions- including wind, temperature, etc. [PR 250, pp. 4-5].

The Wildfire Risk section of the Final EA refers to the detailed fire risk assessment and management actions in the APS CFMP that found the project will result in minimal potential increase in risk of wildfire ignition from overhead transmission lines [PR 268, pp. 84-89]. Additionally, the Fire and Fuels Management Report references the APS CFMP right-of-way (ROW) mitigation measures, along with other existing environmental conditions, such as fuel discontinuity and existing roads and trails, as minimizing the risk of a new fire start and spread within the project area [PR 250, p. 5]. The mitigation actions during elevated weather conditions detailed in the APS CFMP, coupled with other APS measures such as grid modernization and regular ROW vegetation maintenance, will lessen the increase in ignition risk long-term [PR 268, p. 84].

The topic of limited evacuation routes is a community planning issue that is not within the jurisdiction of the Forest Service to address and is not part of the stated purpose and need of this project. The risk of wildfire started by this project was determined to be low based on analyses in the project record, and evacuation routes would not be affected by this project.

Objection Issue: Risk Considerations – Mitigations

Objectors contend the Draft DN does not specify detailed guidelines that APS must follow to reduce fire risks for either above-ground or buried lines. For above ground lines this includes: avoiding use of equipment in high fire risk areas that is known to cause sparking on lines (e.g., reclosers, switched, etc.), and frequent vegetation management along the ROWs in high fire risk areas.

The Forest intends to use "USDAFS restrictions implemented on the Coconino National Forest during periods of high wildfire risk" to minimize wildfire ignition risk, but the Final EA and Draft DN 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 an analysis of the Forest's reliance on these measures compared to other possible measures. The Forest 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's claims that relying on the APS plan and the "USDAFS restrictions" will minimize wildfire risk from a new above-ground powerline

immediately south of the VOC. For all these reasons, the Final EA and Draft DN violate NEPA and the Administrative Procedure Act. [0126, 0131, 0197]

Response

The Wildfire Risk section of the Final EA references the APS 2022 CFMP, including the mitigation actions of regular inspection and fuels management in the 40-foot-wide ROWs for Alternatives 1 and 2, grid modernization technologies implemented by APS, and restricted activities during elevated fire conditions [PR 268, pp. 83-84]. The APS CFMP further details the environmental and fuels conditions triggering wildfire preparedness levels, the work restrictions implemented for each preparedness level, and the wildfire response resources required on-site for each preparedness level [PR 205, pp. 13-21]. Additional mitigation measures detailed in the CFMP include defensible space criteria around poles, training requirements for crews and contractors, and a communication plan [PR 205, pp. 27 and 30-41].

Alternative 1 would replace the aging wood poles of the existing transmission line south of the VOC with stronger and less flammable steel poles [PR 268, pp. 84 -90]. The purpose of the project entails improving power reliability. Because alternatives must meet the stated purpose and need, the agency is not required to perform an in-depth comparative analysis of all possible measures that could achieve a goal of minimizing or eliminating wildfire risk. The record reflects that project-specific wildfire ignition risk reduction from proposed activities was analyzed for each alternative.

Forest Service Southwest Region staff reviewed and agreed to the APS CFMP measures and precautions for operations and maintenance [PR 430].

Objection Issue: Analysis – Fuel Types

Objectors contend that the Final EA analysis appears to misrepresent the primary fuel type along the proposed route and underestimates the risk. The Draft EA (p. 44) describes the vegetation communities in the project area as Apacherian-Chihuahuan Mesquite Upland Scrub (52% of study area) and Madrean Pinyon-Juniper Woodland, the "second most common landcover type," covering 16% of the study area. When combined it is two-thirds of the study area (68%). Yet the Fire Report indicates two types of grass categories (GR1 and GR2), at 46% dominate the "analysis area" (located adjacent to the VOC and McGuireville). Only 3% of the Analysis Area is listed as a form of "Timber Litter" (TL3, 5 and 6) that, in the Fire Report, is described as moderate to high loads of conifers, mostly generating low flames. But the project area immediately south of the VOC is not a grassland but rather dominated by a mix of juniper and pinyon woodland, with significant combustible fuel sources. COF's Fire Report states "The vegetation in both line segments is not continuous, broken by areas free of any vegetation" (Fire Report, p. 2).

Objectors contend the “Fire and Fuels Management Report” and the Final EA (pp. 85-86) contain deficiencies regarding the powerline above-ground Segment D to E, adjacent to the VOC, including the description of fuels as “Sonoran mid-elevation desert scrub and semi-desert grassland” and “a very low percentage of pinyon-juniper woodland”. An Arizona Game and Fish Commission map shows the location of Sonoran desert scrub and states that the project area is well to the north of all Sonoran desert scrub areas; a paper titled, “Descriptions of Biotic Communities on the Red Rock Ranger District,” published by the Forest Service, indicates that pinyon-juniper woodland is the most expansive biotic community on the District. Objectors contend that the landscape adjacent to the southern edge of the VOC, where Segment D to E would be run, is predominantly a pinyon-juniper forest, with closely spaced trees. The Report’s characterization of the vegetation in the Segment D to E area adjacent to the VOC as

“Sonoran desert scrub” is in error. It is actually pinyon-juniper woodland and will have different fuel loading and fire propagation characteristics than claimed in the Report and Final EA. [0131, 0197]

Response

According to the Fire and Fuels Management Report (Report), 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 (IFTDSS), which is a tool that uses publicly available LANDFIRE data to classify vegetation as 40 fire behavior fuel models [PR 250, p. 2]. The arrangement of fuel models present in the project area is supported by Table 1 of the Report documenting predominantly grass (GR) and grass/shrub (GS) fuel types (GR1 15%, GR2 31% and GS2 38%) [PR 250, p. 3]. This is in alignment with the map showing LANDFIRE fuel models [PR 250, p. 7]. Fuel models utilized in fire behavior modeling, such as in IFTDSS, may characterize vegetation differently than other vegetation classification systems because fuel models are used in a mathematical fire spread model to predict surface fire behavior. Fuels were analyzed appropriately and characterized using LANDFIRE data through IFTDSS, a scientifically based modeling system.

Objection Issue: APS CFMP

Objectors contend the public did not have access or opportunity to evaluate APS’s CFMP published in March 2022, after the comment period. The Draft DN and Final EA rely on this plan to "mitigate" the increased wildfire risk of a new above-ground APS powerline. This plan was written 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 regarding wildfire risk for this project. No outside professional fire experts or fire district staff were consulted. It is not appropriate for the Forest to rely on a plan written by the utility seeking a Special Use Permit. The CFMP was first provided to the Forest Service on January 14, 2022, the last day of the comment period. Therefore, it was impossible for the public to comment on this document that the Forest uses extensively for wildfire risk mitigation, and to justify its selection of above-ground powerline segments (including Segment D to E adjacent to the VOC). The Draft DN and Final EA do not describe any specific elements of the CFMP that APS would apply in the project area. The project documents also lack any quantitative analysis of the ability of the APS CFMP to reduce ignitions from above-ground powerlines, and reduce overall wildfire risk to nearby communities, to be able to justify claiming in the Draft DN that wildfire risk would be “minimized.” [0101, 0106, 0107, 0108, 0112, 0114, 0115, 0116, 0117, 0118, 0121, 0122, 0125, 0129, 0133, 0134, 0142, 0163, 0169, 0171, 0172, 0174, 0176, 0182, 0187, 0188, 0190, 0192, 0193, 0194, 0195, 0196, 0197, 0200, 0201, 0202, 0203, 0219]

Response

APS engaged a subject matter expert, their Fire Mitigation Specialist, along with institutional knowledge to interpret the basis of their risk assessment framework [PR 205, p. 22]. Forest Service Southwestern Region staff reviewed and agreed to the APS CFMP measures and precautions for operations and maintenance [PR 430].

The APS CFMP details the wildland fire indices used to determine preparedness levels, risk levels, and the appropriate mitigation measures and precautions for determined levels [PR 205, pp. 13-25]. The APS service territory has been divided into 13 districts based on fuels, topography, and weather conditions; the preparedness level is set per district [PR 205, p. 14]. The Wildfire Risk section of the Final EA refers to the detailed fire risk assessment and management actions found in the APS CFMP that will result in minimal increased fire risk from overhead transmission lines for line segments of Alternatives 1 and 2

[PR 268, pp. 84-89]. Additionally, the Fire and Fuels Management Report references the APS CFMP ROW mitigation measures, along with other existing environmental conditions, such as fuel discontinuity and existing roads and trails, as minimizing the risk of a new fire start and spread within the project area [PR 250, p. 5]. The mitigation actions during elevated weather conditions detailed in the APS CFMP, coupled with other APS measures such as grid modernization and regular ROW vegetation maintenance, will lessen the increase in wildfire ignition risk long-term [PR 268, p. 84].

Instruction - APS CFMP

Provide more detail on how the APS CFMP would serve to mitigate wildfire ignition risk.

Objection Issue: Fire Data

Objectors contend the Fire and Fuels Management Report has no data regarding ignitions from powerlines. Objectors share that Forest Service historical data shows that in Yavapai County, powerlines caused 33 wildfires between 2010 and 2020, 2% of all human-caused ignitions. An APS service territory map indicates that all 33 wildfire ignitions were within APS's service territory. Objectors contend that the Forest should have accessed its own data rather than rely on unsupported statements in the Final EA. The method of powerline conditions under which an ignition could occur was not evaluated in the Report or in the Final EA and Draft DN. [0197]

Response

The project area, while wholly in Yavapai County, will permanently disturb approximately 35 acres in Alternative 1 and approximately 66 acres in Alternative 2 [PR 268, pp. 16 and 22]. This is a small percentage of the total land acreage of Yavapai County. The Fire and Fuels Management Report (Report) states that there has been one wildfire with a known electrical cause in the local vicinity of the proposed transmission line since 2010 [PR 250, p. 4]. Transmission line conditions under which an ignition is more likely to occur would be mitigated by proposed actions in the APS CFMP, such as grid modernization, vegetation maintenance in ROW, and regular line inspections [PR 268, p. 84]. Additionally, modeled fire behavior in the Report shows the existing fuels, terrain, and "worst case scenario" weather conditions would result in low to moderate fire behavior if there was a fire start – incident response and resource capabilities, coupled with fuel discontinuity in the area, would prevent large fire spread [PR 250, pp. 4-6]. There would not be a significant ignition risk from the proposed overhead lines [PR 250, p. 5].

Objection Issue: Stewardship Agreement

On October 10, 2024, a "Stewardship Agreement between the State of Arizona and the USDA Forest Service, Southwestern Region" was signed. Objectors contend the new policy objectives created by this agreement were not described or addressed in the Final EA or Draft DN. Despite the Final EA and Draft DN's acknowledgement of the added risk, 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." The Final EA and Draft DN also did not disclose or address impacts on "vulnerable communities" near the Wildland Urban Interface (WUI) impacted by this project. The Final EA and Draft DN 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. [0197]

Response

The AZ Shared Stewardship agreement states its purpose as recognizing shared goals for land management across the entire state of Arizona. The Agreement is generally in reference to how wildfire risk and hazardous fuels reduction projects will be implemented and is not directly relevant to this project.

NEPA

Objection Issue: Effects – General

Objectors contend this project would cause irreparable harm to the environment and oppose it because of destruction to the natural landscape and harm to wildlife habitat. The project will need a 30-40' easement which will mean cutting trees and spraying herbicide. Mudflow from disturbed land will flow downward, along with added herbicides in the soil. All work to be done for the proposed powerline will affect the natural drainage of the mountain. Numerous acres of relatively untouched and pristine public land will be permanently defaced with construction of access roads, huge metal power poles on concrete foundations, and all the other construction points and staging areas deemed 'necessary' for the project and its maintenance. Vibrational hum from high-voltage electric lines will spoil the quiet of nature and electromagnetic field (EMF) radiation emitted from wires will be damaging to all life. This damage is irreversible and will affect the health of residents and natural beauty of the Forest and wildlife habitat. The Forest should plan for underground transmission lines. [0051, 0052, 0055, 0057, 0085, 0086, 0140, 0213]

Response

Forest Service NEPA regulations require analysis and disclosure of effects related to the proposed action and alternatives. The project record reflects consideration of effects raised by objectors.

Potential interruptions to drainage patterns from erosion were acknowledged for both alternatives [PR 267, pp. 134-135]. The project record addressed soil and watershed impacts, and sedimentation [PR 267, pp. 125-135]. Soil-related Best Management Practices (BMPs) and design features are indicated, which also incorporated consideration of drainage issues [PR 267, pp. 37-38, 47]. These objection points were also addressed in Appendix B [PR 258, p. B-12]. The Draft DN describes how different resource effects, including those related to disturbance, soil, and watershed impacts were compared between alternatives to determine the Selected Alternative [PR 268, pp. 6-9].

The Final EA states that herbicide use under either alternative would comply with the 2019 *Decision Notice for Herbicide Use within Authorized Power Line Rights-of-Way on National Forest System Lands in Arizona.* Potential effects to wildlife from herbicide use for vegetation maintenance in the right-of-way (ROW) were analyzed and disclosed in that 2019 decision [PR 267, pp. 32, 72]. The Final EA lists wildlife protection measures [PR 267, pp. 40-41] and indicates consideration of effects to wildlife [PR 267, pp. 62-78].

Vegetation-related BMPs and conservation measures are included in the Final EA [PR 267, pp. 39-40]. The Final EA acknowledges that vegetation maintenance may include use of herbicides on re-sprouting vegetation within the ROW to discourage re-growth of taller vegetation such as mature junipers or mesquite trees under portions of the transmission line to meet safety standards. This is expected to result in a transition of some vegetation types to more low-lying vegetation with a higher percentage of grass and low-lying shrubs within the ROW [PR 267, p. 59]. Effects to vegetation were further detailed in the related section [PR 267, pp. 50-62].

Appendix B indicates consideration of the impacts of the vibrational hum in the response regarding EMF radiation. The Final EA, Appendix B, addresses concerns around EMF radiation, explaining that studies have been conducted, and expert panels have reviewed the research, which is inconclusive and inconsistent. The powerline would result in audible noise from electric corona discharge only within close

proximity. This type of noise is usually a design concern for 345 kV transmission lines [PR 258, pp. B-32 – B-33].

The project record considered impacts to views, including the need for a project-specific plan amendment related to visual impacts [PR 267, pp. 90-116].

The Draft DN reflects how effects to different resources were weighed and compared in determining the Selected Alternative. The Selected Alternative includes portions of Alternative 2 that would be buried [PR 268, pp. 6-9].

Objection Issue: Project Need

Objectors contend APS has not proven a need for additional power in this area. Reports indicate that this project will not increase electrical capacity for either the McGuireville area or VOC. Objectors suggests that, instead, minor routine maintenance of the existing 'grid' infrastructure, including replacing poles as needed and keeping underbrush cleared away from pole bases, would effectively eliminate the danger of service interruptions from grass- or brush-fire damage to existing powerlines. [0086]

Response

Forest Service regulations require a discussion of the need for the proposal, and describes what an EA must contain, including a proposed action and alternative(s). The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or prescribed. The project record reflects sufficient descriptions of the project need and alternatives considered.

According to the Final EA, APS is one of the largest electric suppliers in Arizona and the main electric power supplier in the VOC and McGuireville communities. Based on existing trends and expected increasing risks to power infrastructure, APS determined these communities need additional power reliability [PR 267, p. 1]. The Final EA states the purpose of the Project is to improve power grid reliability and operational flexibility by creating a loop feed to decrease the risk of long-term outages and eliminate capacity overload on upstream transmission lines. It further states the Project would result in improved region-wide power grid redundancy and reliability and a secondary power source for VOC and McGuireville communities, making them more resilient to storms, wildfires, and other power service interruptions. The Oak Creek and McGuireville substations are at the end of long radial segments without a backup source of electricity. If this area remains single-sourced (without this additional transmission line), rotating outages for Verde Valley are expected to increase with increasing outages from storms, wildfires, or other unexpected events. Building the Oak Creek to McGuireville 69kV transmission line would improve redundancy for the area and flexibility of the system to help mitigate the risk of rotating outages for the Verde Valley in the event of fire damage to critical infrastructure [PR 267, pp. 3-6]. The construction of the Project's transmission system is not intended to bring new additional power into the Verde Valley. The Final EA indicates enhancing transmission line connectivity throughout the Verde Valley would allow more flexibility managing power needs amongst all communities tied to the grid and would facilitate improved capacity management issues [PR 267, pp. 3-6]. These explanation points along with additional details and anecdotes were reiterated in Appendix B [PR 258, pp. B-15 – B-17]. Finally, the Draft DN explains the segment-by-segment considerations and other alternatives that were considered to meet the stated purpose and need [PR 268, pp. 9-10]. Unmet maintenance needs did not drive the project's purpose, and concern for outage events were not limited to wildfire threat.

The project record demonstrates a logical explanation for the purpose and need and provides sufficient rationale for alternatives considered but not carried forward. The Draft DN further details the context and considerations contributing to the alternative selection.

Objection Issue: Range of Alternatives – Beaverhead Flat Road to Highway 179

Objectors contend that powerlines should be laid underground, as in Alternative 2, to protect the safety and beauty of the area. They are unsightly and create a high fire danger if they are downed in an area of dry brush/forest. Other objectors suggest APS should focus on the development of residential and commercial solar installations in the Verde Valley, where the need to extend powerlines from central power plants would be eliminated. Some objectors suggest the most direct route should be chosen while others contend the most environmentally friendly route would be to follow Beaverhead Flat Road to Highway 179 to the substation, to eliminate wildfire risk and protect scenery, including the scenic byway.

One objector contends that the "Beaverhead Flat to Village of Oak Creek Boundary Along State Route 179 Alternative" could result in burying the powerline along this route within the existing highway right-of-way (ROW), where there is already heavy impact. This highway ROW is not pristine and trenching, filling, and properly revegetating would not significantly impact scenery along Highway 179, and would not require amending the COF Forest Plan to eliminate Scenic Integrity Objective (SIO) protections. The Forest excluded this route from consideration and did not develop it as an alternative. One objector also recommended that the Forest consider the Yavapai County Broadband Initiative's effort to build a high-speed internet fiber-optic cable connection to the VOC. The discarded State Route 179 alternative could be expanded to provide for both the communications provider and APS to collocate their lines into one trench along Highway 179, to reduce costs and overall environmental impacts. Due to the lack of consideration of these points, the Final EA lacks an adequate range of alternatives, which violates the NEPA. [0053, 0054, 0058, 0131, 0171, 0175, 0178, 0197]

Response

Forest Service regulations require a discussion of the need for the proposal, and describe what an EA must contain, including the proposed action and alternative(s). The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or prescribed. Identification or selection of an environmentally preferred alternative is not required in an EA. The project record reflects sufficient descriptions of the project need and alternatives considered to meet the need. It includes a discussion of visual and safety effects between alternatives along with rationale describing why other alternatives were not carried forward.

The Final EA states the purpose of the project is to improve power grid reliability and operational flexibility by creating a loop feed to decrease the risk of long-term outages and eliminate capacity overload on upstream transmission lines. It further states the Project would result in improved region-wide power grid redundancy and reliability and a secondary power source for VOC and McGuireville communities, making them more resilient to storms, wildfires, and other power service interruptions. The Final EA also describes Alternative 2, which includes a version of buried underground cable along the entire route [PR 267, pp. 19-24]. Appendix F further includes a discussion of alternatives considered but eliminated from detailed study. This section describes alternatives to the overhead and underground transmission line routes including solar power generation, microgrid, and alternative routing along State Route 179 [PR 262, pp. F-1 – F-12].

According to Appendix F, the State Route 179 to VOC Alternative would avoid potential scenic impacts along the southern border of the VOC and scenic and recreational impacts to the Kel Fox Trail. However,

the Alternative would occur completely within High SIO areas and would impact a designated Scenic Byway, affecting comparatively more people and changing the road segment scenic value, requiring a Forest Plan amendment. Due to the foreground's topography and location within the Scenic Byway, this Alternative's burial method would not avoid or reduce all scenic impacts. The Alternative would also alter Red Rock Scenic Road Corridor Management Plan areas where there are unique geologic features, and two key scenic viewpoints associated with the Scenic Byway. The record indicates this alternative would not improve Forest Plan consistency but instead would result in more contrasts due to unavoidable scenic impacts in a largely intact scenic segment of the Red Rock Scenic Byway [PR 262, pp. F-4 – F-5].

The record also reflects that solar power in combination with a battery system was considered for generation and back-up power for a multi-day transmission line outage. Since the Forest Service and APS do not have authority over private or commercial solar, it was estimated that approximately 500-acres of Forest System lands would be needed to install and maintain the 50 MWh photovoltaic and battery storage micro grid infrastructure to generate, transmit, and store power needed at both VOC and McGuireville. This Alternative would more than double the total impact area compared to the proposed transmission line, and impacts would be concentrated adjacent to the VOC and McGuireville communities. A solar alternative would result in substantially greater impacts to all other forest resources including scenery, soil, watersheds, wildlife, and invasive species. The project record estimated costs for this Alternative likely would be more than double the cost estimated for an underground transmission line and more than triple the cost of an overhead transmission line. While the microgrid alternative developed at both communities could result in some extent of source power, it would not provide the same reliability level and load sharing capability as a connected power grid [PR 262, pp. F-6 – F-10].

The Final EA analyses and Draft DN described and compared impacts from different alternatives to various resources, including visuals and safety [PR 267, pp. 8, 9-10, 82-116]. Fiber optic communication was part of the Final EA in which telecommunications wire as a 423-strand optical ground wire (OPGW) was included [PR 267 pp. 15, 21, 24]. These explanations along with additional details and anecdotes were also reiterated in the Appendix B [PR 258, pp. B-15 – B-21]. Finally, the Draft DN explains the segment-by-segment deliberations and other alternatives that were considered to meet the stated purpose and need [PR 268, pp. 2-10].

The project record demonstrates a logical explanation for the purpose and need and provides sufficient rationale for alternatives considered but not carried forward. The Draft DN further details the context and considerations contributing to the alternative selection.

Objection Issue: Range of Alternatives – Options and Cost

Objectors contend the Final EA fails to meet the requirement of a full range of viable alternatives. Objectors proposed alternatives to address APS's stated goal of electrical redundancy without constructing a new powerline between McGuireville and the VOC. Objectors contend an Alternative option is to utilize modern technology, such as a solar micro-grid or rooftop solar power with battery storage, to achieve the same objectives. The Final EA, Appendix F, provides a brief analysis of these options. Objectors state the cost analysis provided for these alternatives appear to be much higher than current costs, and do not reflect the rapidly decreasing costs – particularly with respect to battery costs. The COF analysis assumed that a battery able to meet the 25MW load in VOC or McGuireville would cost about $25 million but objectors contend this assumption is 400-500% too high. Objectors contend that a 4-hour battery system would be able to provide power in VOC and McGuireville during almost all outages since there are few outages in APS' territory that are over 4 hours.

Some objectors suggested that APS focus on development of residential and commercial solar installations in the Verde Valley, in partnership with business and homeowners. With proper solar and storage systems in place, the need to extend powerlines from central power plants would be eliminated. COF cost estimates for a 25MW solar facility of about $25 million appear appropriate, but costs for community solar systems have also fallen by over 80% over the last 10 years and are expected to continue to fall. In comparison, transmission line development costs have increased over time.

Objectors contend that the project's 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's evaluation of the costs of various alternatives. The Final EA and Draft DN rely on APS's CFMP to minimize wildfire risk but fail to demonstrate the incorporation of APS's costs of implementing the CFMP, denying full disclosure. The cost of implementing it should also be included in overall maintenance cost estimates. This lack of complete, accurate, and up to date O&M cost information prevents a proper and fair comparison of alternatives. [0058, 0083, 0131, 0197]

Response
Forest Service regulations require a discussion of the need for the proposal, and describes what an EA must contain, including the proposed action and alternative(s). The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or prescribed. Identification or selection of an alternative related to its cost is not required in an EA. The project record reflects sufficient descriptions of the project need and alternatives considered to meet the need. It includes consideration of operations and maintenance costs within different components of the record. The record provides rationale describing why other alternatives were not carried forward, with cost as one, but not the sole, factor.

In the Final EA estimated costs were described for both alternatives carried forward [PR 267, pp. 119-121]. For alternatives not carried forward, cost was one of multiple factors considered in why the microgrid alternative was not carried forward [PR 262, pp. F-5 – F-11]. Costs were not the single factor determining which alternatives to move forward or to select. Appendix B also addresses the inclusion of segment-by-segment costs that were added resulting from the draft EA comment period [PR 258, pp. B-26–B-27].

Objection Issue: Analysis Information

Objectors are concerned that the Forest overly relied on the perspective of APS, and their approach to wildfire risk management. This reliance verges on having the appearance of a conflict of interest. The resulting Draft DN reflects the lack of 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. Much of the project direction and technical information came from APS. By not seeking relevant input from appropriate subject matter experts on powerline design and mitigation, and relying primarily on data and input from APS, a corporation seeking a Special Use Permit to build and operate on COF land, the Final EA and Draft DN are heavily biased toward APS's preferred design for above-ground powerline segments. This unfair bias has led to a largely unsubstantiated decision that violates the Administrative Procedure Act (APA) and raises concerns of conflict-of-interest violations in Federal Acquisition Regulations (FAR).

Objectors contend that it does not appear that APS provided COF data on the reliability impacts of Public Service Power Shutoffs ("PSPSs") for above ground lines, a utility best practice to shut off power during periods of high fire risk. The above ground route for this proposed APS line correlates closely with those

lines most likely to be shutoff – i.e., lines that traverse high fire risk areas with high wind in the Wildland-Urban Interface (WUI). The duration of PSPS outages tend to be quite long, oftentimes 1-2 days, and sometimes as long as four days. The duration of a single day-long PSPS is 600% longer than the historical outages in APS' service territory. The combination of this new operating procedure and additional overhead lines has the potential to reduce the reliability of power. The Final EA does not acknowledge this potential reliability risk created by above ground lines. [0131, 0197]

Response

APA establishes procedures for federal agencies to follow when making rules and outlines standards for judicial review of agency actions. FAR is invoked when the Forest Service is using contracts to get work done or purchasing items. Neither of these situations are occurring with this project. APS submitted a special use request and is the subject matter expert on how to construct, operate, and maintain a large-scale power system throughout Arizona.

The Final EA, Appendix B, addresses socioeconomic concerns, explaining that the purpose of the project is to improve reliability and flexibility of the power grid for the VOC and other communities [PR 258, p. B-28]. The Final EA also describes this in the Purpose and Need section, stating that the Oak Creek and McGuireville substations are at the end of long radial segments without a backup source of electricity. Without this additional transmission line, the area is expected to experience increased power outages [PR 267, pp. 3-4].

The Final EA, Appendix F, outlines several alternatives that were considered, including four alternative routes for the powerline location, as well as other alternatives such as battery storage to provide backup power availability, microgrid alternatives that would create a network of electricity users with a local power source like diesel, natural gas, or solar. Appendix F explains why these alternatives were not considered in the Final EA for various reasons [PR 262, pp. 1-15]. The Draft DN also explains these other alternatives considered [PR 268, p. 10].

The Draft DN contains a detailed rationale for the Selected Alternative, which is a combination of the two action alternatives analyzed. The decision is based on a segment-by-segment balance of costs versus benefits of placing the transmission line overhead or underground. The costs of Alternative 2 are substantially higher than Alternative 1 [PR 268, pp. 4-9].

The Draft DN and Final EA adequately consider best available scientific information. There is not a conflict of interest with APS and neither the APA nor FAR have been violated.

Objection Issue: Effects – Recreation

The Kel Fox Trail is a recreational area enjoyed by the community. Objectors contend this project will make the use of the former Kel Fox Trail undesirable. The project fails to consider an alternate alignment which avoids the Kel Fox Trail segment. [0057, 0086]

Response

The Final EA, Appendix B, addresses concerns about the Kel Fox Trail, explaining that Alternative 1 re-routes the Kel Fox Trail to mitigate recreational and scenic impacts where the overhead powerline would result in a new scenic impact [PR 258, p. B-12]. Additionally, Appendix B states that the Draft DN includes elements of both alternatives, with both underground and overhead powerlines to minimize impacts, including scenery [PR 258, p. B-11].

The Draft DN describes that the Selected Alternative would include removal of a portion of existing overhead 69kV transmission line, replacement of this line to underground line, as well as realignment of the Kel Fox Trail [PR 268, p. 1]. The Draft DN breaks the proposed powerline into several segments and explains which Alternative was selected for each segment [PR 268, pp. 4-9]. For the segment containing the Kel Fox Trail, the decision selects Alternative 1 and re-routes the trail away from the powerline ROW onto a single-track trail [PR 268, p. 6]. The Final EA explains that the realignment of trail would involve about half, or 3.6 miles of the 7-mile trail [PR 267, p. 13]. The Final EA contains a map showing the location of the trail and its realignment in relation to the proposed powerline; half of the trail parallels the proposed powerline [PR 267, p. 14].

The Effects to Recreation and Visuals section of the Final EA describes that Alternative 1 includes a modification to the Kel Fox Trail to address public comments about the project's impact to recreation experience. Alternative 1 would result in the overhead transmission line along about 1.6 miles of the northern portion of the Kel Fox Trail. Effects to recreation from the powerline are expected to be minimal because this north part of the trail lies along an existing gas pipeline and two-track dirt road [PR 267, p. 99]. The south part of the trail will be realigned to avoid the new powerline and existing gas line to minimize scenic impacts and improve the recreation experience [PR 267, p. 100].

Additional supporting documents provide analysis and rationale for the Selected Alternative, including Appendix F of the Final EA, with analysis and consideration of effects of alternatives [PR 262].

The Final EA adequately considers the project's effects to the Kel Fox Trail, including modifying Alternative 1 to realign part of the trail to avoid the proposed powerline. The Draft DN provides adequate rationale for the Selected Alternative (Alternative 1 for this section of the powerline).

Objection Issue: Effects – Safety

Objectors contend the proposal to underground the powerline along Kel Fox Trail alignment is preferred. The above ground power pole proposal ignores public safety and risk of human tragedy along Kel Fox Trail. See also Response to Objection Issue: Effects – Recreation above.

Objectors contend the Final EA and Draft DN should have disclosed information about vulnerable communities and why they need special consideration and attention as required in the 2024 Stewardship Agreement. This area has very limited evacuation routes and this is not discussed in the project. If the proposed above-ground Segment D to E of the powerline is built adjacent to the Village, a wind-driven wildfire from this segment could be catastrophic to the community and cause greater loss of life due to the demographics of residents. Most of the people who live in this area are seniors. [0086, 0197]

Response

Regarding the Kel Fox Trail, Appendix B states that under Alternative 1, the trail would be re-routed to maintain or improve recreational experience [PR 258, p. B-12].

Appendix B also addresses wildfire risk. The Ranger District completed a fire risk analysis and concluded that proposed transmission line results in minimal risk of wildfire impacts to adjacent communities because of vegetation types, terrain, lack of continuity of fuels, fire history, and location of transmission lines along main travelways [PR 258, p. B-2]. Limited evacuation routes are a community planning issue unrelated to this project. If risk of wildfire is low, evacuation routes should not be an issue and are outside the scope of this project.

The Final EA's Safety/Wildfire Risk section responds to the public's concerns of increased chance of wildfire ignitions from an overhead transmission line and risks to vehicle traffic along roads from

installation of a transmission line by describing the area's wildfire history and concluding that most wildfires greater than 50 acres in northern Arizona are caused by lightning. One difference between areas where fires ignite from powerlines, such as California, is that most California wildfires are human-caused. Vegetation is also different between the two states. Arizona's wildfire risk from powerlines is much lower because of sparse desert vegetation which is less likely to carry fire. APS regularly inspects and maintains the vegetation within the powerline right-of-way to limit wildfire ignitions [PR 267, pp. 82-83]. This section of the Final EA breaks down the powerline construction effects to wildfire ignition risk and safety into 8 segments, generally concluding construction could increase risk of wildfire ignition in the short term. Long-term risk of ignition would not change [PR 267, pp. 83-89]. The No Action Alternative would result in an increased risk of wildfire ignition in some segments of the powerline because of aging wood poles and a narrower right-of-way [PR 267, p. 90].

The Final EA adequately discloses the project's effects on public safety, including the effects of transmission line risk along a recreational trail and limited wildfire evacuation routes.

Objection Issue: Effects – Property Values

Objectors contend the Final EA states that there would likely be no impact on property values from the above-ground line, but the study cited was rejected as "selective and incomplete." In addition, the Final EA lacks mention of several studies that measured significant impacts on property values. Objectors contend the 'statistical study' that attempts to discount the amount of damage that this project will do to property values in the VOC, is invalid. The VOC is a unique area with its own considerations for both quality of life and resultant property values. The legal considerations of Peaceful Enjoyment of Property, Nuisance, Diminution of Property Values, and Displacement of Current Residents must be weighed seriously.

Objectors contend that if a new above-ground powerline further increases the community's wildfire risk, homeowner insurance rates will go up. The Forest's claim that property values won't be impacted ignore the negative impact of having 65-ft tall power transmission lines in view of many homes. APS's cost to underground Segment D to E is minimal compared to the property values at risk. The Forest's 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.

Objectors contend the installation of an overhead line could encourage significant private land development near the project area, such as large-scale industrial operations or subdivisions. The Forest should assess potential development impacts and require mitigation measures to offset impacts, such as APS purchasing private lands for habitat and scenic preservation. [0083, 0086, 0131, 0144, 0197]

Response

Regarding property values, Appendix B explains that a literature review on property values and construction or installation of transmission lines found little or no effect [PR 258, p. B-29]. In other words, the proposed powerline would not result in measurable effects to property values.

The Final EA analyzed the project's effects to socioeconomics, including residential property values, and concluded that studies relying on property owner surveys show more negative impacts than market response studies. Studies indicate property values near transmission lines are not consistently, measurably, and substantially affected by the view of transmission line facilities. Other factors such as characteristics of each property and local economic information have more effect on residential real estate values and homebuyer decisions than the presence of a transmission line [PR 267, pp. 118-119]. Other

activities that could cumulatively affect local socioeconomics were considered, including a new hotel and trail system in the area, which could lead to slowly increasing property values [PR 267, p. 124].

Appendix B also addresses wildfire ignition risk. In response to public comments regarding this risk, the Ranger District completed a fire risk analysis and concluded that the proposed transmission line results in minimal risk of wildfire impacts to adjacent communities because of vegetation types, terrain, lack of continuity of fuels, fire history, and location of transmission lines along main travelways [PR 258, p. B-2].

The Final EA explains that wildfire risk from powerlines is lower than in California or Colorado because of sparse desert vegetation and different weather patterns which is less likely to carry fire in the analysis area. Additionally, APS regularly inspects and maintains vegetation within the powerline right-of-way to limit the possibility of wildfire ignition [PR 267, p. 83].

The Final EA does not address homeowner insurance rates.

Appendix B also states that the proposed transmission line would not trigger new development, that development is limited because most of the surrounding area is National Forest System land [PR 258, p. B-31].

The Final EA adequately discloses the project's impacts on property values, increases to wildfire risk, and increased private land development.

NFMA

Objection Issue: Alternative Justification

Objectors contend that the COF Forest Plan states a specific preference that powerlines should usually be buried (COF Forest Plan, p. 104), "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*." The "USDA Letter File Code: 1950 Date: January 2, 2020", states "Guidelines for special uses, as outlined in the forest plan, that apply to this APS project include: Utility lines should be buried to maintain scenic values." Objectors contend that nothing in the Final EA or Draft DN demonstrates that the Selected Alternative meets this "unless" requirement and justifies an overhead powerline. Project 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 powerline violates the COF Plan. To align with the letter and spirit of the Plan, the Forest should select a buried powerline alternative or further analyze the objector's Proposed Alternatives to determine their viability. Objector notes that over a 25-year period, the construction, operation, and management costs of Alternatives 1 and 2 are comparable. Economic concerns about the long-term cost of Alternative 2 are therefore not overriding. [0083, 0085, 0197]

Response

The COF Forest Plan includes the desired condition "FW-SpecUse-DC-03 Utility lines, such as pipelines, powerlines, fiber optic lines, and telephone lines, are not visible (usually buried) across the landscape unless there are overriding environmental, economic, or technical concerns" [PR 4, p. 104].

The Draft DN provides justification for the selected alternative that addresses the environmental, economic, and technical considerations:

"*Compared to Alternative 2* [Underground]*, the authorization of Alternative 1*[Overhead] *in this segment* [Segment D to E] *would result in substantially less impact to soils and vegetation. Alternative 2 would require constructing a cleared 40-foot-wide ROW corridor. An overhead line would limit the permanent ground disturbance in this segment to approximately 4.1 acres (access, trail realignment, and structure pads). This is compared to approximately 13.2 acres of permanent disturbance that would result from the buried line and associated with the cleared ROW and access*" [PR 268, p. 6].

"*My decision to authorize Alternative 1 in this segment would cost substantially less than the construction of Alternative 2. The Final EA identified that construction costs for underground transmission lines can cost between 5 and 14 times more than overhead transmission lines. Due in large part to difficult access and geological conditions, the cost estimate for constructing Alternative 2 in this segment would* [be] *six times that of Alternative 1 – or approximately an additional 15.7 million dollars. The substantial additional cost of installing the transmission line underground and its associated resource impacts would not notably reduce or remove impacts associated with scenic resources, wildfire risk, property values, or other COF resources from Alternative 1*" [PR 268, p. 7].

The Draft DN clearly documents that there are "overriding environmental, economic, or concerns". Therefore, an exception is not needed for the Selected Alternative to meet this desired condition. However, the DN should more directly state this determination.

Instruction – Alternative Justification

Clarify that the Selected Alternative is consistent with the desired condition for Special Uses (FW-SpecUse-DC-03).

Objection Issue: ROS Designation

Objectors contend that constructing over 2.5 miles of above-ground powerline, in Segment D to E, would mar scenery in the entire valley where the Kel Fox Trail is located with permanent steel pole structures. The experience and setting would be permanently altered, violating the COF Forest Plan's designation of the area as Semi-Primitive Motorized within the Recreation Opportunity Spectrum (ROS), located within the larger House Mountain-Lowlands Management Area. 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 COF Forest Plan (COF Plan, pp. 291, 155). To implement the above-ground Alternative 1 for Segment D to E, the Forest would also have to amend the COF Forest Plan's designation of this area as being in the Semi-Primitive Motorized ROS and assign the area to a different Management Area. The Draft DN or Final EA make no mention of amending the Forest Plan to accommodate this significant change to recreational opportunities or Management Area desired conditions. Moving the Kel Fox Trail as proposed in the Draft DN mitigates to some extent how the present, predominantly natural area would be altered by the presence of an above-ground powerline. But the land itself underneath and surrounding an above-ground Segment D to E of the powerline is currently designated Semi-Primitive Motorized and is managed as part of the House Mountain-Lowlands Management Area in the Forest Plan. [0197]

Response

The COF Forest Plan contains the following desired condition (FW-SpecUse-DC-01): "Authorized activities are consistent with desired Recreation Opportunity Spectrum settings" [PR 4, p. 104]. The Final EA states that permanent impacts from Alternative 1 (above ground transmission line) would cross an area designated in the ROS as Semi-Primitive Motorized (approximately 2.4 acres) located along the Kel

Fox Trail and an area designated in the ROS as Rural (approximately 5.5 acres) near the VOC and McGuireville. Construction and maintenance of new roads in and adjacent to the study area may affect Semi-Primitive ROS classifications. However, the re-route of the Kel Fox Trail in the segment south of the VOC is an important mitigation to minimize effects to the ROS along this segment.

The Recreation section of the Final EA says "Overhead transmission line structures and permanent access roads would introduce synthetic materials into the setting that would reduce the setting's naturalness. Alternative 1 (overhead powerline) would be inconsistent with the management objectives of Semi-Primitive Motorized and Roaded Natural classifications." While the permanent access roads would be closed to motorized public access, it is anticipated that some increase in foot, equestrian, and ATV traffic may occur. Alternative 1 would be compatible with the ROS classifications of Rural [PR 267, p. 100].

The Final EA's assertion here related to Semi-Primitive Motorized (SPM) and Roaded Natural (RN) is in error because it does not indicate at what threshold compatible characteristics for SPM or RN ROS classifications would be exceeded. To determine appropriate ROS classifications, the U.S. Forest Service has recently incorporated the use of the November 2024 FS-1240a Recreation Opportunity Spectrum Technical Guide (ROS Tech Guide). It defines characteristics that inform on appropriate ROS settings and further confirms the Forest's findings related to this project.

The ROS Tech Guide provides an example of where a new transmission line corridor is being built in an area classified as Semi-Primitive Non-Motorized (SPNM). This example determines that the transmission line could not meet the SPNM classification, but could meet the SPM, RN, and Rural classifications. Therefore, the SPM classification could still be appropriate for transmission lines (p. 37).

The threshold for Rural Social Characteristics is "High interaction among users is common. Other people in constant view" (p. 48) and Physical Characteristics as "Altered landscapes with cultural emphasis, such as rural, pastoral, or agricultural. Administrative sites, historic complexes, and moderately developed resorts are typical." (p. 47). Analysis states that project will change ROS to Rural, however information in the analysis does not indicate how this determination was made.

Additionally, mitigations to relocate the Kel Fox Trail in response to public comments about a loss of recreation experiences in Alternative 1, and analyzed effects from Alternative 2, led to the analysis conclusion that both alternatives "[…] would not result in a net loss of any recreational opportunities" [PR 267, pp. 99, 112]. A determination was made that the impacts from activities in both Alternatives that would occur within desired Moderate SIOs would be compliant [PR 267, pp. 101, 113]. If the plan amendment for the acres of desired High SIO proposed to reduce the desired condition of those acres from High to Moderate, then the project may not have an impact on the ROS of SPM and RN, as Moderate SIOs are compatible with those ROS classifications.

The maps in Appendix A of the COF Forest Plan show that the project area appears to be identified as 'Suitable' for both permanent and temporary roads, and mechanized use and motorized trails [PR 4, pp. 265-268]. With the information provided in the analysis, it's unclear how a determination was made that project activities would be inconsistent with desired ROS classifications.

The record should be corrected to indicate that the above ground segment D to E contains Semi-Primitive Motorized and Roaded Natural ROS classifications that <u>are consistent</u> with desired ROS settings [PR 4, p. 104]. More information is needed to clarify why project activities are determined to be compatible with current desired ROS settings. The ROS Tech Guide, Appendix B, outlines Physical, Managerial, and Social Characteristics (pp 47-50) compatible with Semi Primitive Motorized.

Instruction – ROS Designation
Correct the Final EA through an erratum to indicate the above ground segment D to E contains Semi-Primitive Motorized, Roaded Natural, and Rural ROS classifications that are consistent with the selected Alternative. Provide more information to demonstrate this finding.

Scenery

Objection Issue: General Impacts

Objectors contend that above ground powerlines would be an eyesore to this community and its visitors, and that wires and poles would disrupt the viewshed. Above ground transmission lines are unsightly, negating the scenic byway of 179. The overhead sections of the powerline would introduce a permanent, intrusive fixture into the landscape, sacrificing the scenic protections designated in the Coconino National Forest (COF) Forest Plan for hundreds of acres in the project area. This loss of scenic integrity cannot be adequately mitigated. Wires hung on towers would have a deleterious effect on quality of life and the value of homes. [0057, 0083, 0086, 0093, 0100, 0175]

Response
The project's scenic impacts were addressed in several ways including fully assessing a complete underground alternative that would result in less scenic impact. The Final EA completed a full segment-by-segment analysis of scenic impacts for both alternatives, including design features to minimize scenic impacts, and completing simulations of the overhead line [PR 267, pp. 90-116]. Lastly, the Draft DN includes both overhead and underground segments to balance the effect of scenic impacts with costs, constructability, soil and water resources, and effects to other resources.

The Draft DN states that the "decision is based on a segment-by-segment balance of costs versus benefits of placing the transmission line overhead (Alternative 1) or underground (Alternative 2). [….] This decision represents a balance of these values for each segment of the proposed transmission line alignment" [PR 268, p. 9].

The Final EA and draft DN disclose that scenic impacts cannot be entirely mitigated and Scenic Integrity Objectives (SIOs) within the project boundaries will not be met in certain areas. The Draft DN 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.

SIOs are Land and Resource Management Plan components and plan direction. With the inclusion of a plan amendment, the Responsible Official is within the scope of regulations at 36 CFR 219. Additionally, the Final EA and Draft DN state that the desired SIO will continue to guide other management activities outside of this project, preserving the desired SIOs and plan direction for the area outside of this project's activities [PR 268, p. 11].

Regarding Scenic Road 179, the Draft DN identifies Alternative 2 as the selection for Segment B to C, where the proposed activities cross State Route (SR) 179. This decision also includes a mitigation which improves the desired scenic character of this section of SR 179 as an existing overhead transmission line in this location will be collocated underground with the Alternative 2 alignment [PR 268, p. 5]. The decision supports the scenic road classification of SR 179 for Segment B to C, stating, "The benefits of authorizing this segment as underground are to improve the scenic integrity of the viewshed seen by over 15,000 motorists each day as they drive past the southern boundary of VOC" [PR 268, p. 5].

The analysis discloses impacts related to the project crossing at Milepost 305.4 (Segment B to C) but does not address if there are any visual effects from the perspective traveling along the remainder of SR 179 from Segment D to E, which looks to parallel SR 179 at a distance to the west.

In the section of the Final EA, "Impacts on Recreation Viewers," the impacts from project activities to viewers along Segment D to E are analyzed in the context of the Kel Fox Trail users [PR 267, p. 106] but not from SR 179. The section "Impacts to Roadway Viewers" [PR 267, p. 109] also does not address Segment D to E. The record should clarify impacts to SR 179 viewsheds for Segments C to D and D to E, including potential impacts from project activities occurring in viewsheds along SR 179, as this is a scenic road with the All American Road designation.

Objectors contend that the project would have an effect on property values. The Final EA addresses property value and impacts to tourism in the Socioeconomics section, and the FONSI states the following finding:

"Analysis of potential impacts to property values of nearby homes in the Final EA concluded that there is no evidence that an overhead transmission line of this scope and scale would result in impacts to property values or tourism in the surrounding areas" [PR 268, p. 7].

See also Response in NEPA Section, Objection Issues: Effects-Property Values.

Instruction – General Impacts

Clarify impacts to SR 179 viewsheds for Segments C to D and D to E, including potential impacts from project activities in viewsheds along SR 179, as this is a scenic road with the All American Road designation.

Objection Issue: SIOs

Objectors contend the Forest justified the need to bury the line in some areas based on the need to follow SIOs updated in 2018, (including any subsequent amendments). However, objectors contend the Forest ignored these objectives in other scenic areas. This disregard for the SIOs specifically for this area of the Forest must be addressed. SIOs should represent the local communities' and visitors' scenic objectives. Objectors contend there is no clear rationale for undergrounding the line along the much-less travelled Beaverhead Flat Road rather than along Kel Fox Trail and the segment within the VOC. Objectors contend the decision fails to specify the guidelines that APS must follow in order to minimize scenic impacts for either above-ground or buried lines. Various mitigations, including non-specular lines and cables, darker or non-reflective insulators, and avoiding straight view lines were recommended but are not discussed in the decision.

Objectors contend that though the Forest has issued a FONSI, the Final EA acknowledges that above-ground powerline segments would harm scenic views, violating the COF's SIO over thousands of acres (Final EA, p. 100). The above-ground powerline in Segment D to E constitutes a significant impact to the scenic integrity of this area, 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 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 an above-ground powerline. In contrast, scenic impacts created by an underground powerline are visible only from nearby locations. [0131, 0197]

Response

Regarding project mitigations, the Draft DN states that mitigations are included in the decision: "The Selected Alternative would result in changes to the viewshed from those recreating along the Kel Fox Trail (segment D to E) or driving along Cornville Road (segments F to G and G to H). Scenic impacts from overhead portions of the transmission line in these areas would be mitigated through design features such as SR 2 (refer to the Best Management Practices and Conservation Measures section of the Final EA), which requires shiny features to be avoided for all facilities and that any visible structures are designed to conform with the USDAFS Built Environment Image Guide" [PR 268, p. 16].

The segment in which Kel Fox Trail (Segment D to E) is located includes the mitigation of rerouting Kel Fox Trail to minimize impacts of the proposed activities: "The re-route would move the trail away from the Alternative 1 ROW and from the collocated forest road onto a single-track trail, benefiting the recreational experience for trail users along most of the trail length" [PR 268, p. 7].

The Draft DN also includes mitigation which improves the desired scenic character of this section of SR 179 as an existing overhead transmission line in this location will be collocated underground with the Alternative 2 alignment [PR 268, p. 5]. The decision supports the scenic road classification of SR 179 for Segment B to C, stating "The benefits of authorizing this segment as underground are to improve the scenic integrity of the viewshed seen by over 15,000 motorists each day as they drive past the southern boundary of VOC" [PR 268, p. 5].

Project alternatives were designed to be collocated with existing infrastructure where deviations from the characteristic natural landscape are present; "Consistent with COF guidelines for special use (Forest Plan, FW-SpecUse-G-8), Project alternatives were sited in a manner that would reduce the potential for Project impacts in undisturbed areas by maximizing the use of existing utility and roadway corridors rather than creating a completely new corridor. Both Project alternatives generally follow the alignments of an existing overhead 69kV transmission line, the existing underground UES gas pipeline, and two existing roadways" [PR 267, p. 98].

Additional mitigations for visual resources [PR 267, pp. 35-36], and mitigations for recreation are included in the Final EA [PR 267, p. 37].

Objector contends "there is no clear rationale for undergrounding the line along the much-less travelled Beaverhead Flat Road rather than along Kel Fox Trail and the segment within the VOC." (Obj, 0131, p. 3). The Draft DN states that the "decision is based on a segment-by-segment balance of costs versus benefits of placing the transmission line overhead (Alternative 1) or underground (Alternative 2).[…] This decision represents a balance of these values for each segment of the proposed transmission line alignment" [PR 268, p. 9]. It was noted in the Draft DN and in the analysis that there were significant topographical differences in the segments, as well as cultural resources present.

Specifically in Segment D to E, the Draft DN indicates "authorization of Alternative 1 in this segment would result in substantially less impact to soils and vegetation" [PR 268, p. 6]. Rationale is also provided for choosing Alternative 1 (above ground) over Alternative 2 (below ground) in the segment along the southern boundary of the VOC (Segment C to D) in the Draft DN [PR 268, p. 9]. Rationale is provided for undergrounding the line along Beaverhead Flat Road due to the terrain, viewshed, and the low impacts to soils and watershed due to low erosion potential [PR 268, p. 8].

Rationale based on scenic resources is provided for choosing Alternative 2- an underground route- in Segment B to C and Segment E to F. The Draft DN states that the decision to bury the line underground from Segment E to F was issued because "this segment is of particular value for scenic integrity based on

the current unobstructed views and flat terrain, public comments for preserving the viewshed along this road, and given it is recommended as a scenic drive by the Sedona Tourism Bureau" [PR 268, p. 7]. The Draft DN identifies Alternative 2 as the selection for Segment B to C, where the proposed activities cross SR 179.

The Final EA states All-American Roads are part of the National Scenic Byways Program administered by the Federal Highway Administration (FHWA). Red Rock All-American Road (SR 179) was designated by the FHWA as having unique scenic and historic qualities that do not exist elsewhere in the U.S." [PR 267, p. 96]. In the section of the Final EA, "Impacts on Recreation Viewers," the impacts from project activities to viewers along Segment D to E are analyzed in the context of the Kel Fox Trail users [PR 267, p. 106] but not from SR 179. The section "Impacts to Roadway Viewers" [PR 267, p. 109] also does not address Segment D to E. The record should clarify potential impacts that may occur from project activities in viewsheds along SR 179, as this is a scenic road with the All American Road designation. See Instruction above.

Objection Issue: Effects

Objector suggests that over time the buried transmission line could be virtually invisible for recreational users of Kel Fox Trail and from the VOC. For maintenance, the buried line would have manholes for conduit access, but otherwise no long-term above-ground impact would be observed. However, the Final EA posits that the buried line will have a significantly larger permanent visual impact than the above ground line, which seems incorrect. [0131]

Response

Project analysis determines that "Due to the nature of trenching a continuous linear feature in the landscape, permanent impacts associated with the construction of Alternative 2 would be higher than Alternative 1. Alternative 2 would result in over double the permanent impacts compared to Alternative 1 (approximately 66.1 acres compared to 34.0 acres)" [PR 267, p. 113].

However, the analysis also states that both alternatives will have a cleared ROW of 40' wide that will be continuous linear features on the landscape [PR 267, p. 98]. The determination that Alternative 2 will have greater impacts than Alternative 1 seems to be based primarily on the comparison of project activities to the existing condition of the landscape (and existing infrastructure, primarily the existence of current overhead lines), and existing and desired scenic character [PR 267, pp. 96, 98, 99, 102, 109]. Alternative 2 would require a more open and maintained 40-foot-wide ROW whereas the overhead would include poles with large vegetation removed from the ROW. When nearby, the poles would be more impactful to scenery but from a landscape view, the linear ROW would have a larger impact for maintaining desired SIOs. Both alternatives have similar long-term impacts to scenery with the exception of the above ground infrastructure in Alternative 1. The Final EA provides this information [PR 267, pp. 98, 99, 113].

Scenic character is a metric used in the USFS SMS to understand a project's effects to scenery resources [USDA Forest Service 1995].

In the life of a Forest Plan, projects and management actions should maintain or enhance the desired SIO for an area, which are measurements of allowable deviations from desired scenic character. Analysis should be based on whether a project will achieve the desired SIO and desired scenic character. The analysis of comparison of project activities to existing infrastructure/existing conditions is appropriate for cumulative effects analysis.

Instruction – Effects

Clarify the effects to scenery determination that Alternative 2 will have more impacts than Alternative 1.

Objection Issue: New Information on Scenery

The Draft DN divides the transmission route into multiple segments. Prior documents had not covered, or minimally covered, any option that involved segmenting the route to apply different Alternatives by segment. This switching of facility types introduces riser poles and related infrastructure where underground cable transitions to aerial, or the reverse. Prior documents did not analyze what setbacks, and other criteria, should apply to those transitions. The Draft DN specifically recognizes that SIOs carry sufficient weight to require underground facilities to achieve those objectives, whereas prior documents had not indicated that SIOs would carry that level of decision-making weight. Decisions on routing should give the preservation of scenic views and achievement of SIOs an incremental benefit of the doubt. The aerial route over the saddle into VOC poses a particularly acute scenic risk. That new section of aerial must go underground to avoid possible scenic impairment. [0119, 0123]

Response

While both the Draft and Final EA mention transitions from above ground to underground infrastructure within Alternative 2, neither discloses details about the infrastructure, setbacks, or direct effects of these transitions. See excerpts of mentions of transitioning below:

> "*This overhead segment would be identical to Alternative 1 for 0.8 miles before transitioning underground and boring under SR 179*" [PR 109, p. 18].
>
> "*Alternative 2 would transition from overhead to underground east of SR 179, however, the existing 69kV transmission line would remain in place, including its crossing of SR 179*" [PR 267, p. 115].

While the determination and selection of a mix of Alternative 1 and Alternative 2 is appropriate and within the scope of the existing NEPA analysis, more information on transition infrastructure should be included in the analysis and effects disclosed. Currently transition infrastructure is part of the project record, but not documented in the Draft or Final EA.

Instruction – New Information on Scenery

Include information on transition infrastructure between affected Segments where the transmission line is installed undergrounded and then moved above-ground and vice versa.