

October 28, 2024

Reviewing Official  
Michiko Martin, Regional Forester  
333 Broadway Blvd SE  
Albuquerque, NM 87102

By email: [objections-southwestern-regional-office@usda.gov](mailto:objections-southwestern-regional-office@usda.gov)

**Proposed LANL Electrical Power Capacity Upgrade Project (LANL EPCU)  
Objections Based on New Information**

Dear Ms Martin:

I object to the acceptance of only an EA for this major project for two reasons:

1. Not disclosing and including all reasonable alternatives in the Draft Environmental Assessment (EA)
2. The size and complexity of the project, and the cultural and environmental destruction that would result from the project are too great for a simple EA

The draft EA must be withdrawn and a full draft Environmental Impact Statement (EIS) must be prepared and issued for review and comment by the public. This draft EIS must include all viable alternatives.

The Department of Energy(DOE), the National Nuclear Security Administration (NNSA) and Los Alamos National Laboratory (LANL) did not disclose that there were ongoing negotiations for a workable alternative to the LANL EPCU Project—the Foxtail Flats Solar and Battery Energy Storage System (Foxtail Flats/BESS). This alternative was not considered in the draft EA as required by NEPA despite the fact that this alternative would be far less disruptive to environmental resources, cultural resources, and to people living in the area around the Caja del Rio. This area is sacred to the Pueblo people who live in the area and is a wildlife corridor.

The Foxtail Flats/BESS Project will provide all the energy LANL needs, and won't require the environmental and cultural destruction that building the new transmission lines, establishing a 100-foot wide utility Right of Way and establishing multiple construction staging areas would do because it would use already-existing PNM transmission lines. Best of all, the project is now already underway.

Yet the three agencies neglected to tell the public about this alternative by not including it in the EA as an alternative despite this alternative being less destructive and less expensive. This is new information.

In addition, the environmental and cultural disruption and destruction that the EA's preferred alternative (the LANL EPCU Project) would cause were always and continue to be so great, and the

area and its cultural and physical resources are so important, that a simple EA was *always* insufficient to address this project.

**The draft EA must be withdrawn as its process is fatally flawed.** Despite knowing about the Foxtail Flats/BESS Project before, throughout, and after the public comment period, the three agencies (DOE, LANL, and NNSA) seemingly purposely did not disclose this project. It was not included as an alternative in the EA and thus was never considered as an alternative to the LANL EPCU Project.

And not only should the draft EA be withdrawn and a draft EIS prepared instead, **but the draft decision allowing a Special Use Permit** to install new power poles, establish a 100-foot wide utility Right of Way (ROW) and create temporary staging areas for construction equipment **must be withdrawn as well.**

***In summary,*** the Foxtail Flats/ BESS project is underway, yet DOE, NNSA, and LANL **omitted it from consideration as an alternative to the LANL EPCU Project,** even though it is a viable alternative under NEPA. **This has caused the EA to be fatally flawed.**

**DOE/NNSA have failed to demonstrate the need for the 173 Megawatt LANL EPCU Project** to install new electrical line infrastructure to cross the Caja del Rio sacred area, the Rio Grande and the Pajarito Plateau since there is already a project underway that will provide the power that LANL wants and that will be far less destructive in every way than the LANL EPCU Project.

Thank you for your consideration of my comments.

Sincerely,  
Deborah Reade

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates that might have been present.