

Laura Ellen Walton

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November 13, 2024

Michiko Martin, Objection Reviewing Officer
USDA Forest Service
333 Broadway Blvd SE
Albuquerque, NM 87102

Re: Interested Person Request regarding the Associated Plan Amendment to the Santa Fe National Forest's Land Management.

Dear Objection Reviewing Officer Michiko Martin,

I respectfully request status as an interested person regarding the Associated Plan Amendment as per 36 CFR 219.57 in order to participate in any resolution meetings between objectors and the Forest Service.

My interest is in objections raised by myself, some of which were not raised by other objectors in the process, and others which were.

First, I specifically raised the concern that alternatives and need for the project were not properly researched or vetted by Forest Service, NNSA, LANL or DOE. The problems I cited were lack of concerted effort on the parts of LANL and Los Alamos County (LAPP) in conservation, equipment maintenance and upgrading, on-site energy production, and on-site energy storage.

Second the Final LANL EPCU EA relies on statements of need that are historically unfounded and continually contradicted. LANL has constantly contradicted itself in its own publications regarding power usage and peak demand growth. Peak demand has never come anywhere close to LANL projections, and these projections have been made since the 1990's.

In addition, new information has arisen since the publication of the draft EA and the Forest Service Draft Notice of Decision. This regards the 2024 LAPP agreement with the Foxtail Flats/BESS project. The Los Alamos County DPU has stated on its website that the combined peak load of the LAPP is 90 MW, that LAPP will be selling the excess power, that the existing transmission lines will be used to carry the power, and that the project will ultimately produce 170 MW, which is more than enough to supply the daytime load for the LAPP.

Third, the EIS should have been produced in lieu of the EA. New information has arisen since publication of the final EA regarding the decision of a federal judge in South Carolina that the

DOE violated terms of NEPA by failing to produce a nationwide EIS for its selection of two sites for the production of plutonium weapons cores (pits). In addition, LANL failed to produce its updated sitewide EIS to include the expanded pit production. These failures indicate that the LANL EPCU EA is flawed from the start with major DOE planning documents missing.

Finally, my comments to the Forest Service regarding the environmental injustice and violation of the 2022 Santa Fe National Forest Service Land Management Plan with the proposed Amendment are relevant specifically to the actions of the Forest Service that contradict its stated vision and goals.

Tribal leaders were not fully consulted from the start of planning for the LANL EPCU EA and yet the Forest Service made full efforts to include tribal leaders in the process of the 2022 Land Management Plan. These agendas were happening simultaneously, and it makes no sense that the Forest Service which stands for environmental justice in its Land Management Plan turned face and stood against environmental justice in the preparation and acceptance of the final EA.

My objections to the Forest Service were submitted and recognized as received during the objections period for the Forest Service Draft Notice of Decision, FONSI and plan to amend the 2022 Santa Fe National Forest Service Land Management Plan regarding the proposed LANL Electrical Power Capacity Upgrade Project (LANL EPCU).

I also submitted public comment via email to EPCUEA@nnsa.doe.gov on February 19, 2024 regarding the LANL EPCU draft EA. This comment on the draft EA contains arguments and citations which support those I sent to the Forest Service on October 27, 2024.

Thank you for considering my request for status as an interested person regarding the Associated Plan Amendment.

Respectfully,

Laura Ellen Walton

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