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Comments: In helping spearhead the Caja del Rio Coalition as well as having worked on the Santa Fe National Forests Plan Caja del Rio Wildlife and Cultural Special Management Area, EarthKeepers 360 has a vested interest in protecting the cultural, spiritual, ecological and historical values of the Caja del Rio. I've attached two letters on behalf of the coalition, including our responses to the Draft EA. I want to highlight various portions of this comment that the USFS must reconsider.
For example, the EPCU Project will have significant adverse impacts on El Camino Real de Tierra Adentro National Historic Trail (NHT), which Congress designated in 2000 pursuant to the National Trails System Act of 1968, as amended in 1978.NHTs are extended trails that follow the original routes of historically significant trails or roads, with the purpose of identifying and protecting the historic quality of the route and its remnants and artifacts. To qualify, a trail had to be: A route established by historic use; significant to the entire Nation as a result of that use; and possessing significant potential for recreational use or historic interest by the public due to historic interpretation and appreciation. The proposed transmission line will perpendicularly cross the El Camino Real de Tierra Adentro NHT. This intersection "would impact one of the oldest sections of El Camino Real de Tierra Adentro, which was utilized from 1598-1610 before the capital was moved from Ohkay Owingeh to Santa Fe." The draft EA does not reflect any participation by or contributions from the NPS, despite the fact that El Camino Real de Tierra Adentro NHT is jointly administered by the two agencies, "who then collaborate with the Mexican government on trail management spanning the border."186 The BLM and the NPS completed a Comprehensive Management Plan and Final Environmental Impact Statement for El Camino Real de Tierra Adentro NHT in April 2004. The NNSA must ensure the participation and input of the NPS. To protect the values of national historic trails, the Forest Plan includes the following guideline: "Management activities in NHT corridors should be consistent with or make progress toward achieving scenic integrity objectives of high or very high within the foreground of the trail (up to .5 miles either side) or within the identical trail viewshed - the landscape area visible from the trail based on topography." The cultural and natural landscape is a fundamental resource of the NHT and important to the trail's interpretive stories. Scenic and historic viewsheds are considered an important contributing factor to a positive visitor experience. To implement the EPCU Project, NNSA proposes to amend the Forest Plan by adding an exception to this guideline as follows: "except within the S/N Transmission Line Utility Corridor Management Area." This proposed amendment to the Forest Plan would create an arbitrary exception to the NHT guideline intended to protect the viewshed and scenic integrity. Adopting this amendment would undermine many years of management work intended to protect this irreplaceable cultural resource. The SFNF should reject the proposed amendment and uphold the integrity of the El Camino Real de Tierra Adentro NHT.

From a defense perspective, the project is also problematic. First, this project creates a non-secured powered source that is miles from the actual labs and vulnerable to attack. Recent power outages at LANL as a result of a lighting storm impacting the Norton substation (ironically the same this line will connect to) highlight this vulnerability. Further, as the project notes, "LANL is a DOE/NNSA national laboratory whose primary mission is to solve national security challenges." The National Intelligence Council has found that "climate change will increasingly exacerbate risks to U.S. national security interests as the physical impacts increase and geopolitical tensions mount about how to respond to the challenge." Further, the U.S. Defense Department recognizes that climate change is a "threat multiplier" because it exacerbates existing environmental stresses and security risks. In a 2021 Department of Defense report, Secretary of Defense Lloyd Austin said that almost everything the U.S. Defense Department (DOD) does to defend the American people is jeopardized by climate change-the department's strategies, plans, capabilities, missions, and equipment-and the risks are growing, especially since the world is not on track to meet its Paris Agreement goals. To address the climate and biodiversity crises, in 2021 the President Biden Administration established a national goal of conserving 30 percent of our lands and waters by 2030, known as the America the Beautiful Initiative. The Caja has been identified as an important

landscape worthy of preservation and conservation to implement the initiative. The Climate Atlas, a mapping and analysis tool developed to evaluate which lands offer the best opportunities to store carbon and support biodiversity, states that "due to its high ecological stability and climate resilience, parts of Caja del Rio are among the top 20% of unprotected BLM and Forest Service lands with the highest conservation value in the lower 48 U.S. states."
The EPCU Project will not address the national security risk posed by climate change. According to PNM, the Norton Substation that would provide power to LANL's proposed transmission line is currently running off of 60% non-renewable energy, with a majority of power coming from natural gas and coal generated in the four corners area. Speaking to the climate impacts of fossil fuel production in the four corners, a study done by NASA and the University of Michigan highlighted that "one small 'hot spot' in the U.S. Southwest is responsible for producing the largest concentration of the greenhouse gas methane seen over the United States -- more than triple a standard ground-based estimate."

Moreover, as noted above, America's forests are a key climate solution, absorbing carbon dioxide equivalent to more than 10% of U.S. annual GHG emissions.252 Yet, the climate effect of this project will not just be felt by utilizing even more fossil fuel resources, but also by reducing the amount of forest land to sequester carbon. The draft EA proposes the broad removal of countless forest trees and vegetation in the project area through the creation and expansion of ROWs, the creation of new and temporary roads, the development of construction staging areas, and the installation of massive transmission towers. In doing so, this project will negatively impact the forests of the Caja and their ability to sequester carbon. Accordingly, it is deeply troubling and ironic that while the Department of Defense has recognized climate as one of the largest risks to U.S. national security, the very federal agencies charged with upholding U.S. national security are now proposing a project that will further exacerbate climate change.

Further, by proposing to develop a key power source and unsecured transmission line for LANL on easily accessed public lands, NNSA also creates additional national security risks compared to developing more secure energy sources onsite. NNSA's proposed action runs counter to LANL's publicly stated mission of developing "reliable, secure, and sustainable carbon-neutral energy solutions for the nation." Additionally, as identified in the draft EA, severe weather events, including high winds, thunderstorms, heat waves, and intense cold periods, are the principal contributors to power outages. The Caja frequently experiences these events, and adding a redundant power line in the same general location as the existing transmission lines does little to alleviate the risks posed by severe weather events to the power grid.

Speaking to the problems of LANL's proposal, various local leaders living in communities around the Caja recently noted, "a major purpose of national security should be to safeguard the diverse cultural values and sacred landscapes that make us who we are today. Permanently protecting the Caja is not some distant or abstract issue; it's a very personal and local issue that affects all of us who call Santa Fe and Northern New Mexico home. It is time to unite across New Mexico's diverse cultures and communities to permanently protect this amazing cultural and natural landscape before it's too late." To meet the broader mission of national security, NNSA and LANL should not be proposing to develop and dissect the Caja, but actively working to protect the Caja for its many unique ecological, climate, and national security benefits.
Finally, NNSA has failed to consider the reasonable alternative of generating solar energy onsite. In the EA, LANL asserts :

> "solar energy is not a viable option because it would require a significant land area (approximately 400 to 500 acres). The scale at which a facility would need to be built would not make up for the electrical power shortfall (LANL 2016; van de Ven et al. 2021). Intermittency of solar generation is not compatible with LANL's demand pattern without significant grid support. Future plans exist for energy generation via a PV system on approximately 55 acres within DOE/NNSA-managed lands; however, this system would not be of the extent and scale needed to meet the purpose and need for the project."

But according to DOE, LANL spans almost 40 square miles of DOE-owned property and has almost 900 individual facilities and 8.4 million square feet in buildings.291 Given the size of LANL's property, for LANL to say solar is not a viable option based on land constraints is simply ridiculous. Moreover, LANL would not need to create a large solar array requiring "400 to 500 acres" because with over 8.4 million square feet in buildings, there is plenty of opportunity for LANL to create solar power on the roofs of these buildings as well as over parking lots. Along these lines, LANL has admitted that it has "exceptional solar resource available at the Laboratory," and "the Laboratory could support a number of roof mounted PV installations."

While LANL prides itself on being a world innovation leader on energy security and "developing new ideas for reliable, secure, and sustainable carbon-neutral energy solutions for the nation,"294 the truth of the matter is that the City of Santa Fe and State of New Mexico296 have been more innovative leaders when it comes to generating onsite solar and battery storage for their government buildings, parking lots, and facilities. The draft EA fails to even consider roof-mounted solar installations and lacks analysis of the impacts of modernizing LANL buildings by installing energy saving technologies and developing onsite solar for the hundreds of LANL buildings.

LANL also fails to analyze and consider the impacts of how updating and removing these buildings from the current energy grid could free-up additional power for current and future projects and make the redundant line unnecessary. Further, by modernizing existing facilities and alleviating pressure on the grid, LANL would not need to rely on solar battery power for certain projects and could tap into traditional power sources for projects that require such. Investing in energy saving technologies and developing onsite solar projects for buildings, parking lots, and facilities throughout LANL's 8.4 million square feet of buildings would not only alleviate pressure on the existing energy grid for LANL and Los Alamos County, but would also create local jobs sustaining the economies of northern New Mexico and help LANL implement the President's executive order by updating and modernizing federal buildings.

Second, given that some of the power from the proposed LANL transmission line will be going to Los Alamos County, Los Alamos County should also develop more solar and accomplish itsrenewable energy goals. The local community has demonstrated strong support for this initiative.

In 2013, the Los Alamos Board of Public Utilities (BPU) "adopted a broad goal of being a 'carbon neutral electric provider by 2040,'" based on surveys reflecting that 70 percent of customers were willing to pay more on their electric bills for renewable energy.297 "Adoption of this goal by the BPU was in direct response to its customers, and to migrate away from carbon-producing energy sources."298 By utilizing a transmission line fueled by the Norton Substation that is powered by over 60% with fossil fuels and non-renewable energy, Los Alamos County continues to support projects that are not aligned with their customers or overall energy goals. While the County's portfolio includes 30% renewable energy sources, the remainder is "coal-fired electric generation."299 Given the predicted power supply needs of the County and the Lab, the County should develop renewables and incentivize private homeowners and businesses to use solar and renewable energy to alleviate pressure on the current grid. Rather than damage public lands, water, wildlife and cultural and sacred landscapes in Santa Fe County with the proposed transmission project, it is time for LANL and Los Alamos County to be creative and innovative by modernizing their existing facilities, incentivizing renewable energy for homeowners and businesses, and creating their own renewable energy sources.

Third, the EA fails to explore opportunities for LANL and Los Alamos County to genuinely partner with neighboring Tribes to provide renewable energy to LANL and the County. LANL and Los Alamos County could work to create equitable, fair, and transparent partnerships with various surrounding Pueblos to develop renewable energy sources.

Finally, NNSA's draft EA is flawed because it fails to analyze a comprehensive approach to energy alternatives. The draft EA quickly dismisses various individual alternatives, but the analysis fails to consider how various individual alternatives, if embraced together, could provide necessary power. NNSA should consider the sum of these various alternatives. For example, can LANL modernize its

facilities with onsite solar generation, update existing facilities for energy saving, develop a smaller onsite solar array or multiple arrays, develop a microgrid, partner with neighboring Tribes for renewable energy development, and begin the process of reconductoring existing lines in a way that ensures reliable power to the County and LANL? The last publicly available comprehensive feasibility study of renewable energy for LANL was done in 2008.300 This study is incredibly outdated in terms of both its analysis of renewable technologies as well as available federal and state incentives.

The simple reality is the NNSA and the USFS failed to consider not only a range of alternatives, but the sum of the alternatives in meeting the power needs of LANL. Developing onsite solar, retrofitting facilities for energy productivity, working with Los Alamos County to reduce power use from the grid and incentive renewables in the county, reconductoring existing lines, considering alternative routes and paying to area Pueblos for potential routes through any mutually agreed upon Pueblo lands, working with neighboring Pueblos to develop agreements for solar generation on neighboring Tribal lands and eliminating failing programs that use electricity from LANL's mission are all solutions that will avoid the need to run a line over the Caja del Rio.