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First name: Joey

Last name: Smallwood

Organization:

Title:

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

To Whom It May Concern,

I am submitting this letter as a written request for recognition as an interested person in relation to the objection to the Department of Energy-National Nuclear Security Administration (NNSA) Electrical Power Upgrade Project (EPCU), as outlined in Draft Environmental Assessment (DOE/EA-2199).

1.Objector(s) of Interest:

I have an interest in the objection filed by myself, Joey Smallwood. I am an environmental scientist and GIS analyst.

2.Interest in the Objection and Specific Concerns:

My interest in this objection stems from research I have recently conducted in the area for my master's thesis. I am originally from Santa Fe, and I currently reside in Glorieta.

I am opposed to the transmission line proposal for the following reasons:

*Wildlife Habitat Loss: The project threatens many species already under stress from climate change, invasive species, and wildfires. Disturbing this fragile ecosystem during an extinction event coinciding with the driest two decades in over 1,200 years (Williams et al., 2022) should be avoided at all costs. The maps I created (please see Appendix A and Appendix B in attached Appendices) illustrate how new road construction would disrupt intact habitat cores and critical wildlife corridors, leaving the area vulnerable to invasive species and fragmentation.

*Piñon Jay Decline: The project's Wildlife Report (Appendix E) states that over 100 acres of piñon communities will be impacted. These ecosystems are vital for the keystone species Piñon Jay (*Gymnorhinus cyanocephalus*), which has already declined by 80% since the 1970s. This species is under review for Endangered Species Act listing (USFWS, 2023). Disturbing this habitat could have irreversible consequences for their survival. A 2022 Nest Habitat Model for *Gymnorhinus cyanocephalus* performed by Sadoti and Johnson found that the species is likely to nest throughout the project area (Appendix C). The species has been known to avoid nesting in thinned areas (Johnson et al., 2018), raising concerns that they would avoid the project area after completion.

*Cultural Significance: Multiple experts have highlighted the cultural significance of the project area, which has supported humans for over 10,000 years. The All Pueblo Council of Governors, a body representing 20 pueblos in New Mexico and Texas, passed resolution APCG 2021-13 in opposition to this project. In a press release on the resolution, the APCG stated that the area has high concentrations of cultural sites, including ceremonial kivas, ancient agricultural systems, petroglyphs and more (2022).

*Fire emission and risk: Disturbances from the project will increase fire risk by removing late-successional communities and leaving the land susceptible to invasive vegetation. This vegetation has been linked to higher fire danger, exacerbated by predicted warming temperatures (Dahl, 2023; Juang et al., 2022).

3.Substantive Formal Comment:

During the planning process, I submitted substantive formal comment on February 3, which addressed the above concerns in further depth. On October 25, I submitted a formal objection for the 36 CFR 219 planning period,

which once again discussed these matters in further detail. My participation can be verified through this submission to the USDA and the NNSA Los Alamos Field Office. Please note that I originally submitted comments from my Johns Hopkins University email (jsmallw6@jhu.edu), which will soon be deactivated.

Conclusion:

I hope this letter demonstrates the importance of reconsidering the proposed transmission line and prioritizing the protection of this fragile ecosystem. Thank you for considering my request to be recognized as an interested person. I recognize the necessity of meeting energy demands, but I strongly urge decision-makers to prioritize solutions that balance these needs with the preservation of our fragile ecosystems, cultural heritage, and the species that rely on these landscapes for survival. I look forward to further correspondence on this matter.

Sincerely,

Joey Smallwood
M.S., Environmental Science and Policy
Master's Certificate, Geographic Information Systems

References:

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