December \_\_\_, 2023

By email to: [EPCUEA@nnsa.doe.gov](mailto:EPCUEA@nnsa.doe.gov)

Kristen M. Dors

NNSA Los Alamos Field Office

Attn: EPCU Project NEPA

3747 West Jemez Road

Los Alamos, NM 87544

Re: Request for Extension of Public Comment Period for Proposed

**LANL Electrical Power Capacity Upgrade Project Environmental Assessment to March 17, 2024**

(DOE/EA 2199, LA-UR-23-32753, November 2023)

Dear Ms Dors:

I am particularly concerned about the release of the proposed Electrical Power Capacity Upgrade (EPCU) Upgrade Project Environmental Assessment (EA) for a thirty (30) day comment period during the winter holidays and with public comments due on

January 17th during the New Mexico 2024 Legislative Session.

I am concerned that the flawed scoping process for the EA was done over 2 ½ years ago. Since that time the public has shown significant interest in the proposed EPCU Project, which has the potential to adversely impact ecological and cultural resources on the Caja del Rio Plateau, the White Rock Canyon of the Rio Grande, and the landscape of the Pajarito Plateau with laydown areas, new roads, and 70 foot tall structures to carry the 115 kiloVolt (kV) line a distance of nearly 15 miles, among others.

Many Pueblos and Traditional Communities have raised broad concerns in opposition to the EPCU Project.

While I understand that LANL may run out of electrical access in 2027, the draft EA does not address the steps LANL and the Department of Energy (DOE), a federal agency in charge of energy conservation, have taken to implement conservation measures as an alternative to the EPCU Project.

The draft EA recommends amendment to the 2022 Santa Fe National Forest Land Management Plan, a recently finalized document with extraordinary public participation and comment. The amendment would allow issuance of a special use permit to construct and operate the power line infrastructure outside some of the designated or existing utility corridors. LANL is also requesting a new right-of-way on the Caja del Rio from the Bureau of Land Management.

In the alternative and because the LANL draft Site-Wide Environmental Impact Statement (SWEIS) is over five years late (it should have been completed in 2018) for public review and comment, the draft EA should be incorporated into the draft SWEIS. Further, the LANL budget grew significantly from $2.66 billion (2018) to $5.15 billion (proposed 2024). During these five years, many changes have been made without the necessary public input through the National Environmental Policy Act (NEPA) public processes.

In conclusion, the draft EA must be put on hold until the draft LANL SWEIS NEPA processes are completed. It is a disservice to the public that with increased resources DOE/NNSA/LANL did not prioritize completing a draft SWEIS with the draft EA incorporated into it by now.

Thank you for your careful consideration of my comments.

Sincerely,