

USFS Must Delay Its Decision-Making for the Electrical Power Capacity Upgrade (EPCU) Project Until the LANL Final Site-Wide Environmental Impact Statement Record of Decision is Issued

By Joni Arends, Concerned Citizens for Nuclear Safety, Lead Objector
In response to issuance of draft LANL SWEIS on January 10, 2025

To the USFS Decision-Makers Kristin Bail and Shaun Sanchez:

I've done a preliminary review of the energy portions in the more than 1,000 page Los Alamos National Laboratory (LANL) draft Site-Wide Environmental Impact Statement (SWEIS). I found that the Department of Energy (DOE), National Nuclear Security Administration (NNSA) and LANL have existing and new plans for 512 megawatts (MW) of electricity (some from PNM and some from solar arrays and battery storage).

Existing and New Plans include:

- * 159 MW of solar photovoltaic arrays located on nine LANL sites, ranging from 11 to 245 acres, for a total of 795 acres. "Of these 925 acres, up to 795 acres are proposed for installation of up to 159 megawatts of solar photovoltaic arrays across the site."

<https://www.govinfo.gov/content/pkg/FR-2025-01-10/pdf/2025-00265.pdf> LANL states these arrays may not be constructed in the 15 years from 2024 – 2032, and LANL may only construct half, or 79.4 MW. Vol. 2, p. 584 of the draft LANL SWEIS pdf.

- * 10 MW solar PV array. (Summary, p. S.9 and Vol. 2 pp. 580-581).

- * 170 MW – Foxtail Flats Solar + Battery Energy Storage System

- * 173 MW – EPCU Project

Total: 512 MW

LANL has not provided detailed information about where the energy will be used. We know from February 2024 presentations to the Los Alamos County Board of Public Utilities and Los Alamos County Council that “excess” energy generated by the Foxtail Flats Solar + BESS will be sold to Mercuria and Sandia/Kirtland.

Preliminary Recommendation: The DOE/NNSA/LANL Electrical Power Capacity Upgrade (EPCU) Project and draft DOE/NNSA/LANL SWEIS are inextricably linked and should remain so. The USFS must delay its decision-making processes until the EPCU Project Environmental Assessment has been withdrawn by DOE/NNSA/LANL. The EPCU Project must be fully and transparently addressed in the LANL SWEIS public review and comment processes through the issuance of the Record of Decision (ROD). The USFS would then have a clearer picture of the links between EPCU and the LANL SWEIS analyses.

Other Energy Comments: There are contradictory statements in the draft SWEIS. For example, LANL states: “Depending on the degree of implementation of some renewable energy projects, there could be an **overall decrease** in the electricity use and air emissions associated with the Modernized Operations Alternative.” [Emphasis added.] p. S-11.

In contrast, LANL states: “Although most operations associated with the Expanded Operations Alternative would be similar to existing operations at LANL, there would be **notable increases**

annual electricity and water requirements.” But LANL does not state by how much. [Emphasis added.] p. S-12.

Recall Ellen Walton’s informed comments about how LANL and the County’s power needs have remained consistent for over 25 years. She made those comments in her written submittals and during the January 7, 2025 USFS virtual Teams meeting. Additional examples below:

See Table S.3-3: Summary of Consequences Related to Infrastructure states: Electricity – average annual peak demand (MW) for existing capacity of 116.0 MW; with a Baseline Average (2017 – 2022) of 70.0 MW average. Under the No-Action Alternative, the average is 86.7 MW, with 111.4 MW monthly peak. Under the Modernized Operations, the average is 92 MW, with 132 MW monthly peak. Under the Expanded Operations Alternative, the average is 110 MW, with 171 MW monthly peak. p. S-27.

Compare the estimated 110 MW average under the Expanded Operations Alternative to the 2008 *Final Site-Wide EIS for Continued Operation of Los Alamos National Laboratory, Los Alamos, New Mexico (2008 Final SWEIS)*, which estimated the projected impacts for energy would be “a peak demand of 113 megawatts.” p. S-42. The actual impacts and performance changes (1999 to 2005) for the “average peak load demand: 68.8 megawatts, with a peak of 70.9 megawatts in 2001 and 2003.” *Id.*

Further, LANL’s 2008 SWEIS assessment stated: “Annual electricity usage at LANL remained **below** the levels projected in the 1999 SWEIS. Electrical usage has not exceeded the annual 963,000 megawatt-hour system capacity or the physical transmission capability (thermal rating) of 110 megawatt.” [Emphasis added.] *Id.*

Under the 2008 *Final SWEIS*, Expanded Operations Alternative (Preferred Alternative) Table S-5, the peak load would be “144 megawatts total (124 megawatts for LANL); 96 percent of system capacity.” p. S-77 (p. 93 of pdf).

Preliminary Conclusion. DOE/NNSA/LANL have not demonstrated a need for the proposed Electrical Power Capacity Upgrade (EPCU) Project. LANL power demand has remained consistent for more than 25 years. It is appropriate for the USFS to delay its decision-making until the LANL Final Site-Wide Environmental Impact Statement public review and comment process is completed and a Record of Decision is issued.

Of interest: Alternatives to the EPCU Project exist. For example, in “The Past 100 Years” entry in the *Santa Fe New Mexican* for October 9, 1973:

LOS ALAMOS, N.M. – Scientists here think they have an alternative to the ultra-highvoltage (UHV) transmission lines that will have to web the coal-rich West to meet the electricity demands of cities in the next few decades.

The alternative is an underground electrical pipeline based on new technology of superconductors.