



Los Alamos Study Group

Nuclear Disarmament • Environmental Protection • Social Justice • Economic Sustainability

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Re: Scoping comments on the proposed Environmental Assessment (EA) for the National Nuclear Security Administration's (NNSA's) proposed Electrical Power Capacity Upgrade Project (EPCU) at Los Alamos National Laboratory (LANL) and the Santa Fe National Forest (SFNF)

Dear colleagues –

Please accept these scoping comments applying to the above EA, in addition to the oral scoping comments I provided at the May 6, 2021 virtual scoping meeting.

Please also reference and include this press release: [Third power line proposed for Los Alamos: environmental assessment process starting 12.5 mile 115 kV line would cross the relatively-unspoiled Caja del Rio portion of the Santa Fe National Forest, then the scenic Rio Grande canyon south of White Rock, NM, largely parallel to existing 115 kV line](#), Apr 19, 2021 as well as relevant portions of this one: [LANL releases 2021 "Site Sustainability Plan" for "rapidly changing and growing mission" ...Large increases in energy & resources use foreseen; risk of missing key efficiency targets "high";...Despite legal requirements, site plans, pit production plans not released to public or local governments; Largest project in NM history proceeds in near-total secrecy, local and state governments effectively silent](#), Feb 24, 2021.

The Department of the Interior (DOI) has been inappropriately omitted from this EA process, since the use of Bureau of Land Management (BLM) land is required. DOI may be in a position to assist with alternatives NNSA does not mention, and should be weighing possible new alternatives along with the ones presented (see below).

The Caja del Rio portion of the Santa Fe National Forest is a relatively unspoiled area largely free of structures, incised by deep canyons near White Rock Canyon, a notably scenic locale (*Albuquerque Journal* [photo](#); Los Alamos Study Group aerial [photo](#)) that “encompasses wide Indigenous landscapes and is a scenic gateway to northern New Mexico and which “has seen an increase in outdoor recreational use and...serves as a migration corridor for wildlife” (*Associated Press*). There will be archeological sites. The entire area, in its relatively unoccupied whole, is of significance to three cultures. Moving the proposed power line a little bit this way or that will not amend all of its significant environmental impacts.

With these prior comments and this background, these additional comments fall under three headings. Unless otherwise linked, references to specific slides in what follows refer to the [EPCU EA Scoping Meeting Presentation](#)) of May 6.

In the interest of time, we have omitted legal references.

1. NNSA and the USFS have eliminated too many alternatives, in part by presenting a purpose and need that pre-selects specific infrastructure outcomes.

NNSA assumes more electrical power must be imported to LANL and that peak electrical capacity must be increased. Yet there are other alternatives, including more on-site energy production (renewable, nuclear, and gas-fired), better energy efficiency and conservation, and energy storage to decrease peak loads. We are not in favor of all these alternatives but they are alternatives and some of them are reasonable.

For example, LANL has many square miles of vacant land, unusable for most other purposes, with high solar potential. It is possible that solar fields could be configured to enhance other environmental goals.

Energy storage, and the integration of storage into local grids, is a primary Department of Energy (DOE) objective.

An increased fraction of LANL's energy that is renewably generated will have important climate benefits, as LANL is the largest single consumer of "brown" power in the region. As mentioned in Feb. 24 press release and the LANL [FY21 Site Sustainability Plan](#) (p. 13), the Los Alamos Power Pool, which LANL shares with other users in Los Alamos County, has no current path to decarbonize its electrical supply beyond unspecified Power Purchase Agreements (PPAs). To obtain renewable PPAs LANL and LAC will be competing against other users. If LANL "greens" its power supply primarily through PPAs, it will be doing so by retarding that process for others.

Development of "micro" nuclear power is a specific LANL objective, as a LANL senior manager Kelly Beierschmidt said this week ([video](#)). Then-LANL Director Charles McMillan once spoke warmly to me of the possibility of integrating a local nuclear reactor into the LANL grid, asking if I could help promote that idea with the New Mexico Governor. We do not favor this alternative but it would be consistent with LANL's corporate purpose and programs.

As noted in the February 24 press release, LANL is failing to meet DOE energy, climate protection, and resource conservation goals. The proposed increase in electrical import capacity (both of the alternatives on slide 11) will *worsen* these environmental impacts and noncompliance issues. *Why should this be even reasonable, or acceptable?*

If the above on-site alternatives cannot bridge all of the projected energy and peak power gaps, they may ameliorate these gaps to a degree that changes the business cases and environmental impacts of import alternatives, thus changing the alternative or combination of alternatives ultimately selected.

One of LANL's two existing lines is [not expected](#) to reach physical capacity until calendar year 2026. That provides a lot of time to build on-site alternatives.

The LANL site is comprised entirely of ancestral Pueblo lands, which had very little permanent non-Pueblo presence as late as the 19th century. Pueblo Indian reservations, specifically San Ildefonso Pueblo, abut LANL and have suffered contamination as a result. The DOI, through the Bureau of Indian Affairs (BIA), assists these tribes. There should be a process of consultation at the Secretarial level with these sovereign tribes to see if there are renewable energy generation and import alternatives that would help meet NNSA's needs. The BLM, as another branch of DOI, should

withhold endorsement of its portion of the proposed new right of way (ROW) until that consultation has taken place.

Slide 12 pretends to offer advantages of the “preferred import alternative.” Actually, at least 6 out of 8 bulleted advantages also apply to the reconductoring alternative as well. None of the stated advantages apply with respect to on-site alternatives, i.e. with not importing more power at all.

The “new line” alternative appears to be preferred primarily because of the seventh bullet: “power availability and reliability during the construction phase.” How long need that phase be, for reconductoring only? We aren’t sure but we note that LANL has shown that it can operate with much of its workforce teleworking, drastically lowering demand. Demand is also lower overnight; some work could be done then. Historically LANL had a long Christmas holiday. In short, we are not convinced that the “preferred import alternative” is well-supported, especially given its significantly greater environmental impact over reconductoring.

The reconductoring alternative would also not require additional ROW and therefore would not require a Special Use Permit (SUP) or modification to the Santa Fe National Forest Plan (slide 9). The SFNF should not support the preferred, but poorly-justified, alternative.

The proposed 345 ft. ROW (slide 8) is shocking and much wider than the 100 ft construction and clearing requirement (slide 16). In fact, this ROW could accommodate a four-lane highway plus the two parallel power lines, if the alignments were the same.

The two alternatives presented in slide 11, and especially the preferred alternative proposed in slide 12 are simply the crudest and most damaging alternatives available.

2. NNSA is illegally segmenting the National Environmental Policy Act (NEPA) analysis of this project from a long list of connected projects, the impacts of which will be cumulative in the region.

The proposed project is part of a \$13 billion construction program proposed for LANL for the present decade ([“LANL officials detail potential building boom,” Albuquerque Journal, Aug 9, 2019](#)).

The primary driver of this expansion is the creation of a factory at LANL to produce nuclear weapons cores (“pits”) from plutonium -- a fissionable, pyrophoric metal that is one of the most toxic and dangerous materials used in any industry. This mission will involve the transportation, processing, casting, machining, and storage of tons of this material, with attendant nuclear waste production on a large scale.

This in turn is only part of the proposed expansion of LANL. As Beierschmidt said in the video linked above (at 1:10:25), “We’ve almost added an entire other national lab to the mission space of Los Alamos.” Much more is planned as his [slides](#) indicate, and the EPCU is necessary to enable this expansion.

As LANL’s [“Fiscal Year 2021 Site Sustainability Plan”](#) (SSP) states (p. 12), LANL aims to double its electrical energy use over the coming decade. The principle drivers of this increased demand are primarily ambitious, not-yet-approved high-performance computing projects, and secondarily the [Los Alamos Neutron Science Center](#) (LANSCE) and its perennially-proposed upgrade [MaRIE](#) (“Matter-Radiation Interactions in Extremes”). Both projects primarily serve LANL’s expanding nuclear weapons program and are designed to provide ever-more-accurate predictive capability for

nuclear weapons design and performance. Both projects will also increase LANL's consumption of water, for cooling.

These plans comprise the largest capital project in the history of New Mexico in dollar terms ([slide 21](#)), rivaling the cost of all three interstate highways put together. They far exceed the *total* cost of the Manhattan Project in New Mexico, in constant dollars.

Despite its scale and impact, no comprehensive environmental examination of the impact of these plans is planned or available. For a review of this issue please see "[Department of Energy concludes no rigorous environmental analyses needed for vast expansion of Los Alamos nuclear missions, including plutonium bomb core factory -- altogether, the largest project in the history of New Mexico](#)," Sep 1, 2020.

No comprehensive information regarding LANL's plans is available to the public, to local and state governments, or to the immediately affected tribes. We have obtained a few dated, incomplete elements of the missing context from Freedom of Information Act (FOIA) requests and other sources, including: the [LANL Comprehensive Site Plan](#) (slides, redacted); [LANL Future Land Acquisition & Development](#) (slides, redacted); [LANL Vision for Future Campus](#) (slides, redacted); [LANL Future Campus](#), video, Aug 27, 2019.

The lack of any comprehensive environmental analysis of LANL's expansion plans, of which the EPCU is an integral part, has been the subject of [numerous local government resolutions](#).

3. The Santa Fe National Forest should vigorously oppose the Special Use Permit required for this project and instead demand more careful review of the mission need, alternatives, and NEPA context for this EA.

The SFNF should have no part of this proposal unless and until NNSA has answered the serious questions above.

In conclusion, then, **we believe that NNSA should withdraw this proposed EA pending further review of its mission need and NEPA context.**

NNSA should also rescind its Sept. 2, 2020 [Amended Record of Decision](#) to continue operating LANL without a new Site-Wide Environmental Impact Statement (SWEIS).

These conclude our comments at this time. Thank you for your attention.

Greg Mello, Executive Director, Los Alamos Study Group