

Caja del Rio Traditional Cultural Landscape

Electrical Power Capacity Upgrade Project

The Caja del Rio describes the region embedded within a vast living traditional cultural landscape inhabited, stewarded, and journeyed by our Pueblos and Tribes from time immemorial. Archaeological reaffirmations as early as 5,500 BC show Ancestral Pueblo relationship to the Caja del Rio, now home to thousands of traditional cultural properties, cultural resources, and sacred sites including ceremonial structures, petroglyphs, irrigation systems, and other resources. This sacred region is a testament to the unique living heritages of our Pueblos and Tribes maintained through story, song, prayer, pilgrimage, and many other traditional cultural activities today. Protection of the ecological and spiritual relationships, and traditional context and setting of this landscape is central to the longevity of Pueblo and Tribal cultural identity and remains a priority in legacy preservation efforts.

Challenges

Under existing management by the Santa Fe National Forest Service (SNFS) Espanola Ranger District, New Mexico State Land Office, and the Bureau of Land Management (BLM) Taos Field Office, the Caja del Rio continues to suffer long standing management deficiencies resulting in:

- Desecration and vandalism of cultural sites
- Misuse of off-highway vehicles
- Undeterred dumping of refuse
- Poaching
- Unregulated shooting
- Proposed infrastructure development that does not sufficiently protect resources

These challenges continue to cause serious unmitigated, cumulative, and irreversible impacts to cultural and natural resources. Many of the cultural resources in this region are undocumented and unaccounted for in agency decision-making, and therefore remain vulnerable and threatened to ongoing disturbance and destruction.

Electrical Power Capacity Upgrade Project

The proposal by the Department of Energy National Nuclear Security Administration (DOE NNSA) to construct and operate a ~14-mile, 115-kilovolt transmission line through the Caja del Rio traditional cultural landscape has raised significant Pueblo and Tribal cultural resource preservation concerns.

The purpose of the project is to provide LANL with a reliable and redundant electrical power supply to support mission programs and other activities conducted at its facilities. The transmission line would start at the Norton substation crossing ~2.5 miles on BLM land, span approximately ~8.6 miles along the Caja del Rio across SNFS lands, and end with ~3 miles across white rock canyon to end at the LANL substation on DOE/NNSA land.



March Updates

NEPA Environmental Assessment

The three agencies are currently conducting the environmental and cultural analysis in accordance with the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA). In November 2023, DOE NNSA published the project's draft Environmental Assessment (EA). Public comment was solicited and closed on February 20, 2024. The proposed timeline to finalize the EA is April 26, 2024.

Identified Pueblo and Tribal Concerns and Deficiencies:

- EA page length (207 pages) is in violation of the Fiscal Responsibility Act of 2023 directing agency-prepared environmental assessments not to exceed 75 pages
- No engagement with Tribes and public on Community or Tribal Benefits Plans
- Inadequate in its analysis and mitigation of indirect and cumulative impacts to Pueblo and Tribal cultural resources
- Bifurcation of the NEPA and NHPA processes
- Inadequate analysis of energy and siting alternatives including onsite renewable energy sources like wind and solar
- Several alternative routes not included as alternatives or adequately discussed
- DOE NNSA must analyze EPCU proposed alternatives in conjunction with the LANL SWEIS proposed alternatives to ensure consistency of power capacity needs and impacts

NHPA Section 106 Process

- NHPA Section 106 Consultation is not complete
- DOE NNSA is preparing a site tour on LANL property and EPCU proposed route for the Accord Pueblos
- There are three reports (LANL, USFS, BLM) on cultural resources and all three are expected to be finalized around the end of February or first week of March.
- The reports will be bundled and provided to NM SHPO with determination of effect recommendations for Section 106 NHPA consultation and to Tribes
- Proposed timeline to seek and obtain SHPO concurrence by April 19th

Please contact Sovereign Energy if you would like Tribal-specific recommendations on action items and next steps for this project or if your Tribe has any questions about federal energy-related projects impacting traditional cultural landscapes or Tribal interests.

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Caja del Rio Cultural Landscape Protection Approach

The All Pueblo Council of Governors has established via APCG Resolution 2021-13 support for the permanent protection of the Caja del Rio and urged the need for agencies to conduct a full environmental impact statement for the project in consultation with Pueblos.

