



**Clayton Kiesling**  
Chair  
**Justin Bennett**  
Member  
**Lloyd "Red" Miller**  
Member

PO Box 430  
Clayton, NM 88415  
(575)374-8896  
(575)374-2763 Fax  
[www.unionnm.us](http://www.unionnm.us)

**Brandy Thompson**  
County Manager

**Stephen C. Ross**  
County Attorney

February 11, 2025

The Office of NEPA Policy and Compliance (GC-54)  
1000 Independence Avenue, S.W.  
Washington DC 20585

Re: Request for Cooperating Status for Union County, New Mexico Related to the National Environmental Policy Act Compliance for DOE-HQ-2024-0089-Potential Designation of the Southwestern Grid Connector National Interest Electric Transmission Corridor

Dear Sirs,

The purpose of this letter is to request that Union County, New Mexico be designated as a cooperating agency for drafting, analysis and completion with the Department of Energy for its analysis of the Southwestern Grid Connector National Interest Electric Transmission Corridor pursuant to the National Environmental Policy Act (NEPA).

NEPA applies to "every major Federal action significantly affecting the quality of the human environment." 42 U.S.C. § 4332(2)(c). The proposed decision for the potential designation of the Southwestern Grid Connector National Interest Electric Transmission Corridor is a major federal action because it will reduce land availability for grazing or planting, especially during the construction phase, with ongoing maintenance impact in the operation phase as well. It will have direct impacts on critical habitat for wildlife and native species. As well as, increased exposure to radiation from EMF (electromagnetic field) frequencies.

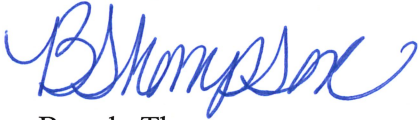
As part of the requirements for completion of an environmental analysis, the Council of Environmental Quality ("CEQ") regulations state that "a state or local agency of similar qualifications [one who has special expertise] may be a cooperating agency." 40 C.F.R. § 1501.8. The analysis of whether an entity is a "local government" and has "special expertise" is a matter of state law.

Union County is a local government with special expertise. By statute, this local government is charged with providing safety, preserving the health, promote the prosperity and improve the morals, order, comfort, and convenience of any county or its inhabitants. Given this statutory authorities, Union County certainly has the "special expertise" necessary to assist the federal agency in completing its required NEPA analysis.

We appreciate your consideration and look forward to participating as a cooperating agency as part of the NEPA process.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Thompson", with a stylized flourish at the end.

Brandy Thompson  
Union County Manager