

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 31, 2011

Mr. Ramiro Villalvazo
Forest Supervisor
Eldorado National Forest
100 Forni Road
Placerville, California 95667

Subject: Draft Environmental Impact Statement for the Kirkwood Meadows Power Line Reliability Project, Amador, Alpine, and El Dorado Counties, California (CEQ# 20110094)

Dear Mr. Villalvazo:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Kirkwood Meadows Power Line Reliability Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA supports connecting the Kirkwood service area to the existing Pacific Gas & Electric transmission line near Salt Springs Reservoir. The shift from power generated with diesel-fired internal combustion engines to power provided by the grid will greatly reduce diesel particulate matter and greenhouse gas emissions within Kirkwood Valley.

We appreciate the efforts made by the Forest Service and the Kirkwood Meadows Public Utility District--including utilizing existing disturbance corridors to the greatest extent possible, and developing an environmentally preferable alternative in response to concerns raised by the public--to design a project that strives to limit environmental and cultural impacts.

Because the DEIS does not identify the preferred alternative, we have rated each alternative. Based on our review of the DEIS, we have rated the Proposed Action (Alternative 2) and the document as Environmental Concerns – Insufficient Information (EC-2) (see enclosed EPA Rating Definitions). We are concerned about the potential wetlands impacts associated with Alternative 2. Page 297 of the DEIS states that a formal delineation of Waters of the United States was conducted, verified by the Army Corps of Engineers, and “identified 23 federally regulated wetlands located adjacent to or crossed by the proposed project”; however, the nature and extent of impacts to such wetlands is unclear. The FEIS should describe any such impacts and discuss how the project would comply with Section 404 of the Clean Water Act.

The DEIS states that Alternative 3 was developed, in part, to avoid wetlands impacts. EPA recommends selecting Alternatives 3 and 4, which in combination, are described in the DEIS as the “environmentally superior alternative.” We have rated this combination as Lack of Objections (LO). Together, Alternatives 3 and 4 would avoid significant, permanent adverse impacts to 0.7 mile of the Carson-Mormon Emigrant Trail and temporary impacts to one emergent wetland, and would prevent potential impacts to buried cultural resources at Tragedy Springs Road.

Because it would continue to rely on diesel-fired internal combustion engines, a source of both greenhouse gas emissions and particulate matter, we have rated the No Action Alternative as Environmental Concerns.

We also recommend that the Forest Service describe in the FEIS the potential for the proposed action and the other alternatives to induce growth in Kirkwood Valley. Forest Service staff, in conversations with EPA, indicated that the Kirkwood Meadows transmission line will only support growth that has already been approved by the Kirkwood General Plan. This growth, however, should be treated as an indirect effect of approving the transmission line and evaluated for each alternative in the FEIS.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: CED-2). If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,

/s/

Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of the EPA Rating System