

US EPA ARCHIVE DOCUMENT



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

June 3, 2013

Mr. John Boccio/Ms. Lorraine Gerchas
CPUC/USDA Forest Service
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, California 91301

Subject: Second Draft Supplemental Environmental Impact Report/Environmental Impact Statement for the Tehachapi Renewable Transmission Project, Kern, San Bernardino, and Los Angeles Counties, CA (CEQ # 20130095)

Dear Mr. Boccio and Ms. Gerchas

The U.S. Environmental Protection Agency has reviewed the second DSEIR/DSEIS for the Tehachapi Renewable Transmission Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The second DSEIR/DSEIS provides a limited, though thorough, analysis of the impacts of implementing the Federal Aviation Administration's requirements for the installation of 2,248 transmission line marker balls, installation of obstruction lighting on ninety transmission line towers, and a reduction in height of 21 structures. The EPA supports the Project purpose to provide adequate transmission capacity for renewable energy sources.

We have rated the second DSEIS as LO, Lack of Objections (see attached "Summary of the EPA Rating System"). Below are recommendations to further mitigate the impacts of the Modified Project and clarify the document.

According to the DSEIS, the obstruction lighting that would be included in the Modified Project would be powered by a solar energy system. The EPA supports this approach. The EPA is aware, however, that solar power systems may be vulnerable to vandalism. We recommend that the SFEIS discuss the extent to which vandalism of the solar power system could result in the release of new contaminants into the environment (e.g. battery lead dispersion due to bullet strikes). The DSEIS states that a separate monitoring and communications system may be needed to provide continuous status monitoring and notification in the event of a light malfunction. The EPA recommends that the FEIS and Record of Decision include a commitment by Southern California Edison to integrate such a system into the

lighting devices to alert SCE to the need for maintenance or replacement of lights.

Section ES.2.3. of the DSEIS indicates that final engineering has been completed for various portions of the Project; however, section ES.5.2 states that, “once final design is completed and the Area of Potential Effects has been defined fully, additional surveys and evaluations may be necessary” regarding cultural resources. The EPA recommends that the FEIS clarify whether or not the final engineering design has been completed for the Modified Project.

The EPA encourages SCE to work with the US Fish and Wildlife Service, California Department of Fish and Wildlife and the FAA to ensure that the design of the transmission line would be in compliance with current standards and practices that reduce the potential for raptor fatalities and avian collisions with towers and transmission lines.

We appreciate the opportunity to review this second DSEIS and are available to discuss our comments. Please send a hard copy of the FEIS to this office when it is officially filed with EPA’s new electronic EIS submittal tool: *e*-NEPA. If you have any questions, please contact me at (415) 972-3521, or contact Scott Sysum, the lead reviewer for this project, at (415) 972-3742 or sysum.scott@epa.gov.

Sincerely,

/s/

Kathleen Martyn Goforth, Manager
Environmental Review Office (CED-2)

Enclosure:
(1) Summary of EPA Rating Definitions