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

August 27, 2007

Steve Tuggle
Natural Resources Manager
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Drive
Folsom, CA 95630-4710

Subject: Supplemental Draft Environmental Impact Statement (SDEIS) for Sacramento Area Voltage Support Project, California (CEQ Number: 20070284).

Dear Mr. Tuggle:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. This letter provides a summary of EPA's concerns. Our detailed comments are enclosed.

EPA reviewed the Draft EIS (DEIS) for the proposed Sacramento Area Voltage Support Project, and provided comments to the Western Area Power Administration (WAPA) on December 26, 2002. EPA also reviewed the Final EIS (FEIS) and provided comments to the Western Area Power Administration on October 20, 2003. In response to our comments, Western Area Power Administration provided additional information on measures to address air quality, wetlands impacts, and threatened and endangered species. The FEIS also clarified the coordination that would occur between WAPA and appropriate agencies in both planning and construction phases to assure the minimization of environmental impacts. We commend WAPA for its incorporation of construction emissions mitigation measures into the proposed project.

EPA has reviewed the additional information provided in the SDEIS and has concerns regarding potential impacts to air quality, water resources, and biological resources from the proposed alternatives. Due to these concerns, we have rated this SDEIS as EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We recommend WAPA select a Preferred Alternative with the least environmental impacts. Specifically, we are concerned about potential impacts to air quality and aquatic resources from the Proposed Alternatives. Based on our review we recommend choosing Alternative A1, A2,

A4, or A5 as the Preferred Alternative because they would have the least impacts to air quality and aquatic resources. We further recommend limiting operating periods and fencing sensitive resources, such as vernal pools, during construction.

We appreciate the opportunity to review this SDEIS, and we are available to discuss our recommendations. Please send two copies of the Supplemental Final EIS (SFEIS) to the address above (mail code: CMD-2) when it becomes available. If you have questions, please contact me at 415-972-3846, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/s/

Nova Blazej, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Summary of the EPA Rating System
Detailed Comments

cc: Robert Eckart, Bureau of Reclamation
Michael Jewell, US Army Corps of Engineers

EPA DETAILED COMMENTS ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR SACRAMENTO AREA VOLTAGE SUPPORT, CA, AUGUST 27, 2007.

Alternatives

Based on our review we note that Alternatives A1, A2, A4, and A5 appear to have the least environmental impacts, and Alternatives B, and C have comparatively greater air quality and aquatic impacts. While each of the Proposed Alternatives impact environmental resources, A1, A2, A4, and A5 Alternatives have the least environmental impacts as compared to the other alternatives. Alternative A3 could have significant environmental impacts due to right-of-way (ROW) crossings potentially affecting 9.2 acres of vernal pools. Further, this alternative has the potential to impact wetlands due to the installation of 6 structures in wetland areas (Table 3-4). The SDEIS identifies Alternative C as the alternative with the highest construction emissions based on the length of transmission lines and number of access roads (pg. 4-9). The SDEIS also identifies Alternative B as the alternative that would cross over 29.6 acres of wetlands and have the greatest direct impacts, permanently affecting 3.4 acres of wetlands (pg. 4-114). By comparison, Alternatives A1, A2, A4 and A5 have considerably fewer impacts to the environment. Due to current losses of wetlands and poor air quality in the Sacramento Area, we recommend against Alternatives B and C.

Recommendation:

EPA recommends that the Western Area Power Administration (WAPA) select one of the aforementioned "A" Alternatives as the Preferred Alternative. If WAPA concludes that Alternative A3, B or C is the Preferred Alternative, we recommend that the SFEIS identify the Environmentally Preferred Alternative, as well as the basis for the selection of the Preferred Alternative.

Water Resources

The proposed project could adversely affect jurisdictional waters and wetlands by crossing sensitive watersheds, such as the Cosumnes River. While WAPA commits to coordination with the U.S. Army Corps of Engineers and Regional Water Quality Control Board, if construction would occur within jurisdictional waters or wetlands (pg. 3-30, Environmental Protection Measure #98), impacts from each of the Proposed Alternatives to aquatic resources and waters of the U.S. should be included in the SFEIS.

Recommendations:

- The SFEIS should include information on the impacts of each of the proposed alternatives to aquatic resources. While this information was included in the previous FEIS (Table 4-1, pg. 4-3 FEIS), it is not included in the current document. We recommend that this information be displayed in a comparative, tabular format. In addition to this table, the text of the SFEIS should also detail potential impacts to wetlands. For instance, describe the potential effects of culverts, access roads, and new ROWs.

- We recommend that WAPA commit to conduct detailed wetland surveys and wetland delineations upon selection of the preferred alternative and include this information in the SFEIS.

Biological Resources

Vernal pool habitats are important in the Central valley of California because they sustain plants and animals that have adapted to survive specifically in these habitats (pg. 4-14 and 4-15). The list of Environmental Protection Measures for biological resources does not appear to include seasonal or limited operating periods or protective fencing as means to avoid and minimize adverse impacts to such sensitive biological resources (pg. 3-24).

Recommendation:

We recommend WAPA limit operating periods and fence sensitive resources such as vernal pools and to include these procedures in SFEIS Environmental Protection Measures.

Air Quality

The project is located in a nonattainment area for particulate matter less than 10 microns in diameter (PM_{10}). Additionally, the SDEIS states that air monitoring data currently shows that the project area is consistently in violation of air quality standards (pg. 4-5). Major construction, earth clearing, grading and traffic will occur due to the proposed action (pg. 4-5).

On October 17, 2006, EPA issued a final rule establishing changes to the $PM_{2.5}$ and PM_{10} National Ambient Air Quality Standard (NAAQS), which was effective on December 18, 2006 (See 71 FR 61144). In this final rule, a new 24-hour standard for $PM_{2.5}$ of 35 micrograms per cubic meter (35 $\mu g/m^3$) replaces the old standard of 65 $\mu g/m^3$, and the annual PM_{10} standard of 50 $\mu g/m^3$ has been revoked. The PM_{10} 24-hour standard of 150 $\mu g/m^3$ has been retained. Conformity for the new 24-hour $PM_{2.5}$ standard of 35 $\mu g/m^3$ does not apply until one year after the effective date of nonattainment designations. While this is not currently the case for the project area, EPA believes that it is appropriate for the FEIS to address the newly amended "fine" particulate matter standard ($PM_{2.5}$).

Recommendation:

For disclosure purposes, we recommend the SFEIS include a discussion of the implications of the amended $PM_{2.5}$ standards with respect to the execution of this project. The SFEIS should make the appropriate changes concerning the NAAQS $PM_{2.5}$ regulation and its new 24 hour standard, which was lowered to 35 $\mu g/m^3$. EPA recognizes the serious health effects that "fine" particulates can cause, and, therefore, urges project proponents to reduce particulate emissions to the greatest extent possible. This is primarily important where management actions could affect sensitive receptors such as children and the elderly.