FINDING OF NO SIGNIFICANT IMPACT

San Diego Gas & Electric Company
FE Docket PP-68-2

On January 12, 1981, the Department of Energy (DOE) issued Presidential Permit PP-68 to San Diego Gas & Electric Company (SDG&E) authorizing it to construct, operate, maintain, and connect a 230,000-volt (230-kV) electric transmission line across the United States border with Mexico. The transmission line extends from SDG&E's Miguel Substation, located approximately 10 miles north of the U.S.-Mexican border, to Tijuana, Mexico, where it interconnects with similar facilities at the Tijuana Substation owned by Comision Federal de Electricidad, the national electric utility of Mexico. On November 8, 1982, in Order PP-68-1, DOE amended Presidential Permit PP-68 by authorizing SDG&E to add a second set of conductors to the transmission towers authorized in the original Presidential permit, but to continue to operate the six conductors as a single circuit; i.e., a "twinned" circuit.

On February 8, 2001, SDG&E filed an application with DOE's Office of Fossil Energy (FE) to further amend Presidential Permit PP-68 to authorize it to make certain changes to the existing cross-border transmission line to provide for the connection of the 510-megawatt (MW) Otay Mesa Generating Project LLC (OMGP), a merchant powerplant being developed 1.5 miles north of the U.S. border with Mexico.

In a separate but related proceeding, the owners of OMGP applied to the California Energy Commission (CEC) for a Certification (Docket No. 99-AFC-5) to build and operate the proposed powerplant. As part of its proceeding, the CEC conducted a thorough analysis of the environmental impacts associated with the construction and operation of OMGP. DOE has reviewed the CEC's environmental analysis and concurs both with its findings and with the mitigation measures required by the CEC in granting a Certification to OMGP. Accordingly, DOE has incorporated, utilized, and summarized the information and conclusions contained in the CEC analysis herein.

In order to connect OMGP to the existing international transmission facilities, SDG&E proposes to construct a 5-acre switchyard within the fenced boundary of the new powerplant and to construct approximately 0.1 miles of new 230-kV transmission line extending from the new switchyard to interconnect with the previously permitted Miguel-Tijuana transmission line. From the point where OGMP would be connected to the existing international transmission line north to SDG&E's Miguel Substation (a distance of approximately 9 miles), SDG&E proposes to reconductor the existing facilities by adding an additional conductor to each existing conductor (bundling; i.e., 12 total conductors versus the 6 that currently exist) and to operate the bundled facilities as two circuits. The 1.5-mile portion of SDG&E's Miguel-Tijuana international transmission line south of the OMGP will remain unchanged.

Prior to issuing or amending a Presidential permit, DOE must evaluate the environmental impacts of the proposed federal action and reasonable alternatives pursuant to the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321, et. seq.). In compliance with NEPA, DOE has prepared an Environmental Assessment (EA; DOE/EA-1383) entitled, "*Amendment of Presidential Permit (PP-68), San Diego Gas & Electric Company for Interconnection of Otay Mesa Generating Project to Miguel-Tijuana 230-kV Transmission Line,*" for the federal action of authorizing the upgrading of the existing transmission facilities.

During preparation of the EA, DOE consulted with the California State Clearinghouse, the State's single point of contact. These consultations resulted in one comment from the California Department of Toxic Substances Control which was general in nature and addressed the need to include identification of current or historic releases of hazardous wastes, potentially contaminated sites within the project area, and mechanisms for investigation or remediation of these sites. These comments have previously been responded to in SDG&E's Application for Certification to the CEC prepared for the OMGP (99-AFC-5). Reconductoring of the existing transmission line is not expected to involve any below-ground excavation and only minor, temporary disturbance of surface soils. Thus the potential for disturbing contaminated sites, if present, is non-existent.

DOE considered two alternatives: the proposed action and the "no action" alternative. Under the no action alternative, the existing Miguel-Tijuana 230-kV transmission line would not be reconductored and the 0.1-mile transmission extension from the OMGP switchyard to the existing Miguel-Tijuana line would not be constructed. The environmental impacts of both the proposed action and the no action alternative are addressed the EA, which is available upon request.

Conclusion

Based on the information contained in the EA, DOE has determined that amendment of Presidential Permit PP-68 for the proposed action would not constitute a major federal action significantly affecting the quality of the human environment and, therefore, does not require preparation of an environmental impact statement.

Environmental Consequences of the Proposed Action

The project study area is located on the Otay Mesa in southwestern San Diego County. The area is further described as being located in the south central portion of the Peninsular Ranges Physiographic Province. The Peninsular Ranges extend from the Los Angeles Basin southward nearly 800 miles, well beyond the international border. DOE prepared a Final EIS prior to authorizing construction of the existing SDG&E Miguel-Tijuana transmission line in the Presidential Permit PP-68 proceeding. That document described the existing route as being in an area where "several rugged mountain ranges dominate…[and]…include San Miguel Mountain, Jamul Mountains, and San Ysidro Mountains." The existing transmission line is at elevations between 250 and 700 feet.

Air Quality Impacts

- Impacts due to construction of two new lattice steel support structures (required for construction of the 0.1-mile long 230-kV transmission line extending from the new substation) and reconductoring the existing support structures will be minor, short in duration and local in nature (e.g., fugitive dust along roadways, exhaust emissions from construction vehicles and worker vehicles). Construction workers will be instructed to properly maintain vehicle and equipment engines to control exhaust emissions and to apply water daily on active construction surfaces to suppress dust.

- Air emissions from the operation of OMGP were evaluated in the CEC proceeding. The CEC concluded in its Decision that the applicant has secured all required emission offsets to fully mitigate impacts from the project in accordance with the San Diego County Air Pollution District's rules on new source review, and a Prevention of Significant Deterioration permit for the plant was issued. The conditions which the CEC included with its Decision ensured that the OMGP would not result in any direct, indirect, or cumulative significant impacts to air quality.

Geology, Soils, and Seismicity

- Grading will be required at the Otay Mesa switchyard and at the two new tower foundation areas. Grading operations and drainage control at the switchyard will meet County of San Diego requirements. Appropriate erosion control measures will be utilized, and no impacts due to induced landslides are expected.

- The switchyard and new towers will conform to the Uniform Building Code and California Building Code seismic zone factor for the site. Reconductoring the existing transmission line will not reduce its ability to withstand seismic shaking.

- The CEC concluded in its proceeding that the powerplant would not create significant soil and water erosion impacts, and DOE agrees with that conclusion.

Vegetation

- Limited clearing of vegetation, grading, and implementation of drainage and landscaping will occur at the site of the switchyard. Approximately 5 acres of non-native grassland will be permanently removed. For the reconductoring activity, access to the 6 pull sites will be via existing unvegetated roads and much of the area at each existing tower is already disturbed. Preconstruction surveys will be performed to determine the presence of sensitive plants, animals or habitats at the proposed disturbance areas and disturbance footprints will be modified to avoid direct impacts.

- Disturbances to grasslands around pull sites should become substantially reestablished in one growing season.

- The powerplant will require clearing of 46 acres of non-native grassland; an additional 11.2 would be disturbed for the wastewater line right-of-way. Mitigation of the loss of coastal sage scrub is required in the CEC ruling. The conclusions reached herein are predicated upon that mitigation being implemented.

Cultural Resources Impacts

- No Indian Reservations or other lands owned by Native American groups are located in the project area. No archaeological sites have been identified within the footprint of the switchyard. Of three sites located in the vicinity of the powerplant and switchyard, two were found to be not significant under National Register of Historic Places and California Register criteria. The third site does appear to contain qualities that would make it eligible to be listed on the National Register of Historic Places under criterion D. However, this site is located south of a southwest trending drainage which bisects the southeast corner of the powerplant site, and no ground-disturbing activity associated with the substation or transmission facilities will affect the site.

- Previous surveys conducted during the preparation of the EIS for construction of the original Miguel-Tijuana transmission line project identified 20 cultural resource sites within or immediately adjacent to the corridor. The evaluation and treatment of these sites were accomplished pursuant to DOE's responsibilities under section 106 of the National Historic Preservation Act which requires federal agencies to consult with the State Historic Preservation Officer and the Advisory Council on Historic Preservation. Five sites at or near the reconductoring pull sites were determined to have the potential to be adversely affected. However, a site testing program concluded that anticipated potential impacts at each potentially affected site were not significant because the sites contained only insignificant lithic scatters. Therefore, no significant impacts on cultural resources are expected.

- Based on a literature search conducted during the CEC proceeding, one site in the vicinity of the powerplant is considered a significant cultural resource and was recommended by the CEC staff for avoidance during plant construction.

- No paleontological sites were found during recent field surveys conducted during the CEC proceeding. Therefore, no impacts on paleontological resources are expected.

Land Resources Impacts

- New construction will consist of two lattice steel transmission towers in a 0.1 miles corridor. Land use along the new corridor is designated for industrial development.

- Approximately 9 miles of existing transmission line will be reconductored by bundling; the corridor width will remain unchanged and land use will remain as described in the previous EIS: government, residential, industrial, commercial, and education.

- The proposed project will not traverse any established recreation resource areas.

Water Resources/Aquatic Ecology/Floodplains and Wetlands Impacts

- Construction of the switchyard and new transmission interconnection is not expected to have any impact on aquatic ecology or wetlands.

- No streams will be crossed by the proposed 0.1 miles of new transmission. Pull sites for the reconductoring of the existing Miguel-Tijuana transmission line will be located on upland, disturbed areas to avoid waters of the U.S. and associated sensitive habitats. Surface water within the project study area is not expected to change as a result of constructing the power line.

- A tower along the existing Miguel-Tijuana transmission line is located in the 100-year floodplain for the Otay River. Special precautions will be taken in order to avoid impacts to sensitive habitat. Reconductoring activities will not affect storm water runoff, flow duration, or water quality. No new project related structures will be constructed in the 100-year floodplain area and will not directly impact any jurisdictional wetland areas.

- Use of air-cooled condensers by OMGP will greatly reduce process water requirements compared to similar plants that use water for cooling. The Otay Water District estimates that the OMGP's requirements for water represent an insignificant increase (about 1%) in demand on water supplies.

- Wastewater discharged from OMGP represents no more and 0.1% of the volume of wastewater currently treated by the Point Loma Wastewater Treatment Plant via the existing main sewer system. The City of San Diego has indicated that the OMGP wastewater characteristics are within acceptable limits.

Wildlife Impacts

- Critical habitat does exist in the OMGP project study area. The CEC decision required the owners to commit to several mitigation measures for protected species which are state and federally listed endangered and threatened species known to occur in the project area. On November 22, 2000, the U.S. Fish and Wildlife Service issued a Biological Opinion which concluded that the OMGP and the associated transmission work would not jeopardize any threatened or endangered species known to exist within the project area.

- Raptors are knows to build nests on transmission towers. Reconductoring of the existing transmission line has the potential to temporarily impact raptors that perch or nest on towers. SDG&E will limit such impacts by not reconductoring during nesting season.

- Bird strikes could occur at the Otay River Valley. SDG&E previously installed orange balls along portions of the transmission line to primarily warn low flying aircraft but these

balls also function to make the line more visible to birds. By doubling the conductors along the existing Miguel-Tijuana transmission line the conductors will be more visible to birds, therefore, the potential for bird collisions is expected to be reduced.

Secondary Environmental Concerns

- The switchyard construction will contribute to a perceptible lessening in visual quality. The switchyard will be painted with neutral, earth tone, and gray colors and will be landscaped to comply with County guidelines.

- Operation of the transmission line will produce electric and magnetic fields (EMF). There are no residences in the immediate vicinity of the new switchyard and access is limited thereby reducing exposure. Reconductoring of the Miguel-Tijuana transmission line will not materially change EMF along the existing corridor. However, SDG&E will follow guidelines of the California Public Utilities Commission for no/low-cost field-reduction.

- Construction of the powerplant and switchyard, and reconductoring of the existing transmission line, are likely to have a minor impact on transportation and noise. These impacts are expected to be local to the project area and to be short-term. The applicant has committed to improvements of four intersections in the vicinity of the powerplant.

- With regard to environmental justice, there are no residents living within the area of the switchyard or along the 0.1 miles of new transmission corridor. Reconductoring the Miguel-Tijuana transmission line would have no disproportionately high and adverse impacts on minority or low-income residents. Likewise, construction of the powerplant does not expose minority or low-income populations to disproportionate impacts.

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