

**FPL Energy Response To  
CPAC and FPLLC Community Meeting Comments, Concerns and  
Questions (From CPAC Website)**

**PROJECT OVERVIEW**

*1.) Do you have any facilities in operation in the United States utilizing the same technology? If so, please identify by location and note any differences in technology to the currently proposed Rio Linda/Elverta plant.*

**Response:** FPL Energy owns and operates several combined cycle power plants similar to the RLEPP. However none of them are identical to what is being proposed for this location, as this project is being customized to meet the specific needs of this location. For example, we have an indoor combined cycle project in Virginia, but it utilizes smaller gas turbines and has a less strict noise requirement. Another operating project in Texas lacks the buildings that this project includes to address the noise and visual concerns. We currently have two indoor projects of about the same size as RLEPP under construction, one in Rhode Island and one in Southern California, both nonetheless different in several ways from the Rio Linda project. The Rhode Island project would be the most comparable to RLEPP, but it will not be completed until the Summer of 2002. The Southern California project will not be completed until early 2003.

*2) Who will utilize this electricity? Is it possible to guarantee that this community receives enough of this power so that it will not have to participate in rolling blackouts? If not, why not? If this is possible, it may make this area more commercially attractive due to the possibility of uninterrupted electricity.*

**Response:** The greater Sacramento area will benefit from the power produced from the RLEPP. Current legislation precludes direct service agreements between FPLE and Rio Linda customers. Recent CA legislation has eliminated customer choice in the state and as a result, Rio Linda customers are not able to by-pass their current electricity provider. Despite that, direct supply to Rio Linda by RLEPP would not in itself be sufficient to guarantee uninterrupted power supply. This is best done on a system wide basis as envisioned by the Sacramento Area Transmission Planning Group (SATPG)<sup>1</sup>.

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<sup>1</sup> Created under the regional planning umbrella of Western Regional Transmission Association (WRTA), SATPG was formed in early 1997 to find a long-term solution for load growth and system reliability for the greater Sacramento area. It is comprised of members from the area utilities including Western Area Power Administration (Western), Pacific Gas & Electric (PG&E), Sacramento Municipal Utility District (SMUD), Northern California Power Agency (NCPA), City of Roseville (COR), and the City of Lodi (Lodi). The CEC and California Independent System Operator (ISO) also attend SATPG meetings for coordination purposes.

Right now, under stressed conditions, local utilities avoid voltage collapse of the transmission system by curtailing power that is transmitted through the area transmission system. This is not a viable long-term solution given the increasing demand for power in the Sacramento area. After extensive studies, SATPG has concluded that new local generation or stronger system interconnection such as new 500-kV transmission lines would be essential for future load growth and system reliability. The power produced from the plant will help to address the problems of generation shortfall and decreasing reliability for the Sacramento area by placing new generation where it is needed most. The RLEPP will also provide upgrades to the local transmission system.

*3.) PG&E is anticipated to be the supplier of the natural gas needed for this power plant. PG&E is in bankruptcy. Is there currently a contract in place to supply the natural gas? If so, has it been confirmed by the Bankruptcy Court? If not, why not, and when is it anticipated that this will take place?*

**Response:** PG&E will provide gas transportation service to RLEPP from the PG&E City Gate. Gas supplies for RLEPP will be provided by FPLE and its affiliates. FPLE currently has offers for firm gas supply at the City Gate for over 150% of RLEPP requirements from existing gas suppliers on PG&E's gas transmission system.

The bankruptcy filing by PG&E has not affected PG&E's ability to serve new customers. The bankruptcy court is allowing PG&E to continue with its business with oversight. FPLE is currently negotiating a contract to have PG&E build a new pipeline to RLEPP. RLEPP and PG&E will enter into a standard form gas transportation service agreement provided for under existing PG&E transport service tariffs. The agreements will be in place prior to the start of construction of the RLEPP.

## AIR QUALITY

*1.) What number of air credits are required to be acquired for this project? Please list by category. What percentage of those credits is proposed to be acquired from outside of this Air Quality Management District?*

### **Response:**

FPLE estimates that the project will emit the following quantities of emissions:

NOX – 122 tons per year

Reactive Organic Gases (ROG) – 30 tons per year

PM10 – 94 tons per year

FPLE must provide a sufficient amount of emission reduction credits, or “ERCs,” to offset these emissions. The actual amount of ERCs provided by FPLE is greater than these totals. This is true primarily because the Sacramento Metropolitan AQMD applies “offset ratios” to ensure that the project will result in a net benefit in air quality. This offset ratio varies depending on the pollutant, and increases with the distance between the proposed project and the location where the ERCs will be generated. The offset ratio is 1.2:1 or 1.3:1 for ERCs generated at a location within a 15-mile radius of the RLEPP site. The offset ratio is 1.5:1 for ERCs generated at a location beyond a 15-mile radius, but within a 50-mile radius, of the RLEPP site. As a result of these ratios, FPLE must acquire from 20% to 50% more ERCs for each pollutant than the actual amount of pollutants that the proposed facility will emit.

The Sacramento Metropolitan AQMD is currently reviewing the package of ERCs acquired by FPLE to offset emissions at the facility. The exact amount of ERCs required for the facility will not be known until the Sacramento Metropolitan AQMD completes this review.

All of the ERCs submitted by FPLE are located within the Sacramento Valley Air Basin in Sacramento, Yolo, Sutter and Placer Counties. The Sacramento Metropolitan AQMD, the Yolo-Solano APCD, the Feather River AQMD, and the Placer County APCD manage this area. The Sacramento Metropolitan AQMD must approve the ERC package, including those ERCs originating outside of Sacramento County.

The percentage of ERCs originating within the Sacramento Metropolitan AQMD varies depending on the pollutant. Approximately 18% of the NO<sub>x</sub> ERCs submitted by FPLE to the Sacramento Metropolitan AQMD originate within Sacramento County. The percentages for ROG and PM10 are approximately 6% and 12%, respectively.

*2.) What percentage of credits are proposed to be from agricultural offsets?*

**Response:** Agriculture is the most prevalent industry closest to the site that has the potential for generating ERCs. As such, it is a significant source of ERCs. The percentage of ERCs attributable to agriculture varies depending on the pollutant involved, and is approximate until the package of ERCs is reviewed and approved by the Sacramento Metropolitan AQMD. At present, approximately 87%, 99% and 25% of the ERCs required will come from agricultural sources for, respectively, NOx, ROG and PM10.

*3.) Agricultural air credits related to rice burning have a finite life of a few years. What is proposed to replace those credits when they expire?*

**Response:** ERCs from reductions in agricultural burning involve a variety of crops, including reductions in rice straw burning. ERCs from reductions in rice straw burning result from permanent commitments by farmers to reduce or eliminate these emissions. Rice growers must also reduce the amount of rice stubble they burn in accordance with a schedule established by State law. This State law also provides that reductions in emissions required by the law are “bankable” for use as ERCs. In evaluating FPLE’s ERC package, the Sacramento Metropolitan AQMD must determine whether the ERCs meet Federal Clean Air Act requirements. The Federal Clean Air Act requires that the District find, among other things, that the ERCs are permanent. FPLE will be able to use ERCs from reductions in rice straw burning only if the Sacramento Metropolitan AQMD determines that the ERCs are permanent.

## BIOLOGICAL RESOURCES

*1.) If there is a need to offset habitat, is there a plan to do it within the community, i.e. at the Dry Creek or Ueda Parkway? If not, why not? If so, where?*

**Response:** There will be a need to offset habitat that is permanently lost. Replacement lands for the loss or degradation of habitat must be acceptable to the biologists at the CEC, Department of Fish and Game and U.S. Fish & Wildlife Services. Such land must be biologically suited to support the species that are affected by the project.

Presently, there are no established mitigation banks within Rio Linda/Elverta community that have “compensation credits” for the types of habitats that require mitigation. There are mitigation banks in Sacramento County and other nearby areas that may be available for mitigation for habitat impacted by the project. In addition to off-site mitigation, FPLE plans to provide for on-site creation of vernal pools at a ratio of 1:1 to mitigate for impacts to existing pools on the project site and Sorrento Road.

*2.) Have vernal pools been identified at this site by the Army Corps of Engineers or anyone else? If so, what will be done to either avoid disturbing them or mitigate the disturbance of these pools?*

**Response:** Yes the vernal pools have been identified at the site. The locations of vernal pools and wetlands on the site have been reviewed by the Army Corps of Engineers, US Fish & Wildlife and CEC in the SEPCO Project. The vernal pools were surveyed again for the RLEPP as outlined in the Protocol for Biological Surveys (AFC Volume 2). The particular mitigation measures are included in the Application for Certification (AFC) Section 5.3. Mitigation measures will include purchase of off-site habitat as well as creation of wetlands on site.

## CULTURAL RESOURCES

*1.) Have all the following potential historical sites been noted and any potential impacts been dealt with? If not, why not? If so, please show how.*

*Sorrento Road - gold field road  
Lukenbill House - more than 100 years old*

*Risse Home*

*Possible Indian Burial Ground at this site*

**Response:** Comments regarding the specific features mentioned in the question are as follows:

Sorrento Road - gold field road. There were no references to Sorrento Road or gold field road in the archival or literature research summarized in the AFC Section 5.16.

Lukenbill House - more than 100 years old. The Lukenbill house has not been evaluated. A cultural resource specialist will review the property.

Risse Home. This property was discussed in the AFC (AFC page 5.16-9) and in Response to Data Request #8.

Possible Indian Burial Ground at this site. There are no known cultural resource sites at the project site. Foster Wheeler Environmental (FPLE's consultant) requested a search of the Sacred Lands File at the Native American Heritage Commission (NAHC) to determine whether or not traditional cultural properties are located near the project facilities. The NAHC has responded that traditional cultural properties are not located near the project facilities. Please refer to AFC 5.16.1.5)

*2.) According to the Community Plan EIR from 1998, an archeological study has been done on the site. Has the potential of the presence of archeological artifacts been taken into account in locating the facility on the site?*

**Response:** Yes. The potential presence of archaeological artifacts has been evaluated. FPLE consultants have conducted surveys of the site and linear facilities and documented their findings in the AFC (Section 5.16). These surveys did not locate significant cultural resources the Project may affect.

*3.) Based on the potential that artifacts may be found, has there been an alternative construction timeline done to allow for study of those artifacts? If not, why not? If so, how much time is being allowed for archaeological study?*

**Response:** Please refer to AFC Section 5.16.3 for a discussion of mitigation measures to be implemented during construction. If buried cultural resources are encountered during construction, all activity will stop in the immediate vicinity of the find, until an archaeological specialist can evaluate it. If the specialist determines that the find is not significant, construction will proceed. If the specialist determines that the find is potentially significant and requires further evaluation, the CEC and State Historic Preservation Officer (SHPO) will be notified, and the specialist will prepare a plan for evaluating the find, in consultation with the CEC and SHPO. Should a significant find occur that has a major schedule impact, the impact will be evaluated and the schedule adjusted accordingly at such time.

*4.) If any artifacts are found as a result of the construction done at this power plant site, will the artifacts remain in the community for display/study purposes? If not, why not? If so, who will be designated to receive them? The schools? The Historical Society? Someone else?*

**Response:** A mitigation plan will be prepared and approved by the CEC that would ensure that any cultural resources found will be recovered, prepared for analysis and delivered for curation to a public repository or museum as directed by the regional archaeological information authorities. FPLE will have to defer to these authorities as to the place of the display or study of any cultural resources found.

## EFFICIENCY AND RELIABILITY

1.) *Shutdowns and startups cause more air pollution than normal operations. Is there a limit as to how many startups there can be in a year? If not, why not? If so, what is the penalty for exceeding that number?*

**Response:** The number of startups will vary, but is limited by the emissions limits imposed on the plant. For example, the maximum quarterly emissions allowed will include emissions from start-up and shutdown cycles as well as maximum operating conditions. Penalties for exceeding the emissions limits could include fines or suspension of permits or shut downs.

2.) *There are concerns about pollution seeping into the water, either from the septic system or from pollution seeping into the ground from the air, or from pollution falling onto the ground and being washed into the rivers, streams, etc. Have those been addressed? If not, why not? If so, please show how.*

**Response:** In Section 5.2.4.5 of the AFC, deposition was studied to determine whether the RLEPP would adversely affect fish and wildlife in Class I areas (e.g., National Parks and Wilderness Areas). The maximum-modeled concentration of nitrogen dioxide (NO<sub>2</sub>) and sulfur dioxide (SO<sub>2</sub>) were used to determine the maximum possible deposition of nitrogen or sulfur in any area, including non-Class I areas. The calculated maximum deposition rate was compared to United States Forest Service significance level for Class I areas. Because these significance levels are designed for Class I areas, they are the strictest available criteria. The maximum deposition rates are shown in the table are well below the USFS Class I significance levels. Given the conservative assumptions used in the estimates, even these small rates of deposition are unlikely to occur, and will not be sustained over long periods of time.

Pollutant	USFS Significance Level	Maximum Project Impact
Total Sulfur Deposition	5 kg/ha-yr	0.098 kg/ha-yr
Total Nitrogen Deposition	3 kg/ha-yr	0.52 kg/ha-yr

Notes:

kg/ha-yr = kilograms per hectare per year

USFS = U.S. Forest Service

Sanitary wastes will be directed to an on-site leach field designed to handle the sanitary wastes generated during project operation. The RLEPP will employ approximately 20 people during operation. Sanitary wastes from the Administration Building will be conveyed to an onsite septic tank and leaching field by buried sewer piping. The daily maximum amount of discharge to the septic system is approximately 2,400 gpd. A permit from Sacramento County Department of Health would be required for installation of the septic system to ensure proper design considerations. No adverse impacts to groundwater are

anticipated from the operation of the septic system.

## **ELECTROMAGNETIC FIELDS AND HEALTH EFFECTS**

*1.) Even though there have been no conclusive studies showing ill health effects from EMF, there is a perceived potential adverse health effect. Please address how this perception has been found to impact property values in any similar situation, for instance, proximity to high voltage lines or other power plants.*

**Response:** Any property value impacts from the perception of potential adverse public health effects due to proximity to high voltage lines would have already occurred in the site area. A large number of high voltage transmission lines converge on the SMUD and Western Area Power Administration substations just north of the project site. Some of these transmission lines cross the project site. Construction of the RLEPP at the proposed site will require a very short transmission line connection to the Elverta Substation, within and adjacent to the existing transmission lines.

For a discussion of EMF, please see response to Transmission Line Safety and System Engineering, below.

## FACILITY DESIGN

Flooding:

*1.) Even if the FEMA map shows that the proposed location of the facility on the site is not in the flood plain, there is localized flooding, as referenced in the Community Plan EIR of 1998. Is there going to be a detention basin for floodwaters? What other measures will be taken to ensure to "no net loss of storage" as called for with all development in this area?*

**Response:** All earthwork will be constructed using a balanced cut and fill below the flood elevation. Fill in the flood plain will be balanced by excavating soil from the flood plain. Grading activities will not block or diminish floodwater egress path in a way that would affect neighboring properties. Stormwater runoff will be collected by a surface drainage system and directed to natural drainages in the surrounding area. Sufficient detention will be designed so that storm water runoff rates will not exceed existing levels.

*2.) Any fencing, sound wall or berm may interrupt the flow of seasonal waters. Has this been taken into account?*

**Response:** All planned structures on the project site are accounted for in the design of the drainage system and grading activities.

*3.) Orientation of the facility cooling towers and other structures.*

*The southwest Delta breezes that occur in the summer are a significant source of cooling in this community. Has this been taken into account in the orientation of these towers and the rest of the facility? If not, why not?*

**Response:** The cooling tower orientation considered the prevailing wind patterns in the area. Noise, visual, and biological resources and existing transmission line locations were also considered in determining the orientation.

*4.) Has the orientation taken into account possible interference with bird migration? If not, why not?*

**Response:** The cooling towers will be approximately 56 feet high and are not expected to have any effect on bird migration. The transmission line route was oriented to take the shortest possible route to the Elverta substation and to be parallel and close to other transmission lines that cross the project site. Interference with bird migration will be minimized by this orientation.

*5.) In deciding which way to orient a line of towers, the two above issues argue for opposite orientations of a line of towers. If these issues were considered, how*

did you decide which was to prevail? If they were not considered, and they are to be considered at a future date, how would you reconcile the opposing issues?

**Response:** Please see response to 3 and 4 above.

6.) *Has the orientation of the facility taken into account any possible interference with air traffic from the Rio Linda airport, especially, but not limited to, crop dusters?*

**Response:** Please refer to response #7 below.

7.) *Do the towers affect cell tower/line of sight transmissions or airport communications? If so, has this been taken into account in the orientation of the facility?*

**Response:** Please refer to AFC Section 4.2.1, Aviation Safety. No impacts to aviation centers in the area are expected. Federal aviation authorities determine the need to evaluate potential concerns for development in and around aviation centers by requiring the filing of a Notice of Construction for structures with certain characteristics. Such notice is not required for either Rio Linda airport or Sacramento International airport based on the height of the facility and distances from the airports.

Gas pipeline:

1.) *Is the natural gas to be used for this facility commercial grade, or industrial grade?*

**Response:** Industrial grade.

2.) *Is the pipeline only big enough for currently proposed use, or also for possible expansion?*

**Response:** PG&E will own and operate the gas pipeline to the project site. The size of the pipeline to the facility will accommodate the expected requirements of the project. FPLE would have to defer to PG&E as to the pipeline's capability or expansion potential to serve other users.

3.) *Will this pipeline travel under or over the levee?*

**Response:** The pipeline will be bored under the Natomas East Main drainage levee.

## **GEOLOGY**

*1.) It is quite well known that California is susceptible to earthquakes. There are known fault lines throughout Northern California. Is this facility considered an essential public service? To what seismic standard is it proposed that the facility be built?*

**Response:** The RLEPP will be designed in conformance with California Building Code requirements for seismic zone 3, as well as any local requirements recommended by site-specific geotechnical studies. The RLEPP is not considered an essential public service, as would be fire service or a hospital. Accordingly, design features to meet the California Building Code's seismic requirements to assure structural integrity and public safety will be incorporated, but the potential for temporary disruption of service due to a major seismic event is possible.

*2.) In considering the geology of the area, has the possibility of ground vibration / settling / liquefaction been studied? If not, why not? If so, please address the possible effects of such occurrences, including damage to structures in the vicinity.*

**Response:** Yes. The geologic conditions at the site are known from drilling investigations that extended to approximately 100 feet below ground surface. Details of the exploration program and the foundation recommendations are included in Appendix G of the AFC. Appendix G provided a geotechnical report that considered the potential for various geologic hazards including ground shaking, settling and liquefaction and included recommendations for design. This report will be updated prior to CEC certification to ensure that the analysis is conducted using the most recent approved methodologies for the assessment of the potential geologic hazards.

## HAZARDOUS MATERIALS / INDUSTRIAL SAFETY & FIRE PROTECTION

*1.) Please address the potential release of gasses or other matter, especially with respect to the school downwind.*

**Response:** A health risk assessment, which evaluated the project emissions, has been performed to quantify whether, under worst-case conditions, the RLEPP will pose a risk to public health. The purpose was to identify whether the pollutants emitted could be characterized as potential human carcinogens or associated with other types of health effects. The analysis followed agency-approved procedures that are designed to be conservative (i.e. to overestimate impacts) in order to provide a margin of safety. The results of the analysis presented in Section 5.15 of the AFC show that impacts are well below levels that are considered significant. More recent modeling, which includes additional sensitive receptors, also concluded that impacts are well below significance levels.

*2.) What would the reaction of any gasses or other matter from this facility be with the Taylor fertilizer plant?*

**Response:** The project facility is approximately one mile north of the John Taylor Fertilizers Company that stores both anhydrous ammonia and aqueous ammonia. Because of the distance between these facilities, it is unlikely that any accident at either facility could cause a reaction at the other facility. The only plausible event that could affect both facilities at the same time is an earthquake. It is possible that an earthquake could cause a release of ammonia from both facilities. A Risk Management Plan (RMP) for handling ammonia at the facility will be prepared before start of operations. The RMP will include an ammonia hazard analysis, off-site consequence analysis, seismic assessment, emergency response plan, and training procedures. The RMP process will identify and propose adequate mitigation measures to reduce the risk to the lowest possible level.

*3.) Regarding transportation off-site of "sludge" and other hazardous materials - what will the frequency and tonnage be? What will the hours of transport be?*

**Response:** Approximately 2300 tons per year of solid waste from regenerate evaporation and dewatered clarifier solids will be generated from the zero liquid discharge system. This estimate is based on preliminary design information and certain water quality assumptions. This material is non-hazardous and can be safely disposed of at a Class III landfill. There are 3 Class III landfills within 50 miles of the project site that could accept this material. The sludge produced will be composed primarily of salts, silicates, and gypsum. Depending on market conditions these products may be sold for their recycle value for applications such as construction material, fillers, or recovery of valuable chemicals. The

sludge will be trucked away from the site at a rate of about one truck every two to three days. This frequency will allow for transportation during normal working hours.

*4.) There is no police / fire / EMT / hospital in the area for an acceptable response time to any industrial emergency. Please address how you intend to mitigate this.*

**Response:** The Sacramento Metropolitan Fire District (SMFD) serves the project area. The closest station is Station 116, located at the corner of Elwyn and Elverta Roads in Rio Linda, approximately 1.5 miles from the project site. Station 116 is a volunteer station and is not staffed on a 24 hour basis so, in the event of a fire or other emergency, this unit of volunteer fire fighters is normally joined by other paid and volunteer units, dispatched from other parts of the community as needed. The average response time to calls is 4 to 6 minutes throughout the service area. The response time to the project site is currently estimated at 6 minutes (Capt. D. Haverdy, SMFD, personal communication, 2000).

In addition, on site emergencies will be handled by plant personnel properly trained to use on-site fire protection and other equipment. On site fire protection systems include:

- Fire protection water system: dedicated 240,000 gallon portion of the 1.5 million gallon raw water/firewater storage tank; Two 100% fire pumps with capacities of 2,000 gpm each with a third pump that maintains pressure in the piping network; fire suppression equipment supplied by the piping network includes fire hydrants and sprinkler systems throughout the power plant site and buildings;
- Carbon dioxide fire suppression system for each combustion turbine that includes a CO<sub>2</sub> storage tank, CO<sub>2</sub> piping and nozzles, fire detection sensors, and a control system. The control system will automatically shut down the combustion turbine, turn off ventilation, close ventilation openings, release CO<sub>2</sub> upon detection, and confirm the existence of a fire.
- System of portable fire extinguishers of appropriate sizes and types located throughout the power plant site and buildings.

*5.) Is there a security plan proposed to deal with potential industrial terrorism at the facility?*

**Response:** The RLEPP facility will be in operation 7 days a week, 24 hours a day and plant operators will be on-site at all times. A security fence will enclose all project facilities.

6.) *What will the deposits of matter be onto pastures in the area? If any of this matter is toxic, will it affect the meat of any animals potentially grazing on this pasture?*

**Response:** The health risk assessment conducted for the project shows that there are no significant adverse public health impacts. A specific analysis of impacts to farm animals was not completed, but the analysis performed for humans is very conservative, shows extremely small impacts and can be considered a good indicator that impacts to farm animals would also be insignificant. –Also see AFC 5.2.4.5

7.) *Will the community be asked to participate in the annual inspection? If not, why not?*

**Response:** The timing, frequency, and scope of inspections by regulatory agencies are not within FPLE's control. Often these are unannounced, providing very little advance notice to allow for coordination with other parties. However, FPLE would not be opposed to occasional public visits to the plant. The arrangements for such visits could be part of future discussions with the community.

8.) *Will you be installing fire hydrants, and will the pressure be sufficient to fight fires in the towers (height)?*

**Response:** Yes, fire hydrants will be placed throughout the plant site. Please refer to the response below for potential fires in the towers.

9.) *Will you have equipment available to fight any fires (i.e., ladder trucks that can reach the top of the towers)?*

**Response:** Fire protection equipment to fight the potential fire risks for the RLEPP will be installed on site to provide the first response. This equipment will be capable of reaching the highest flammable structures on the site. In addition, RLEPP will also rely upon the fire protection capabilities of the local fire authorities to supplement the in-plant capabilities. (See also Response to #4 above.)

10.) *Currently only one access road is proposed. This road is subject to localized flooding on an annual basis. Furthermore, if there is a release of hazardous materials, that road may be impacted. Why don't you have another access, as was proposed for the former license for the site?*

**Response:** Levy improvements lowering the 100-year flood level will allow the access road to Sorrento to be used during flood conditions and eliminate the need for an alternative emergency access during flooding. Nevertheless, FPLE will propose to use the West 6<sup>th</sup> and U Street access as a secondary emergency access to the site.

11.) One of the water purveyors for the area uses hazardous materials. They have in place an automatic phone notification system for any hazmat incident. A propane purveyor in this County also has such a system. Do you propose, especially given the proximity to a school, to also have such a system? If not, why not?

**Response:** Prior to the delivery of any hazardous materials to the site, FPLE will submit a Risk Management Plan (RMP) to Sacramento County and CEC for review and approval. Among other things, the RMP will provide an emergency response plan that will include notification procedures. The particulars of the most efficient notification system will be finalized then. There should be opportunity for public input within the regulatory review process to include any additional concerns. In addition, the plant will be designed with several safety measures that provide early warning signals to plant personnel. For example, the aqueous ammonia storage system will be equipped with safety alarms, continuous tank level monitor, temperature gauge, and pressure monitor to provide operations personnel with early warning of potential problems.

*12.) What provision have you made, if any, for the possibility of a collapse of any structure that may hold matter that would be dispersed in such an event, such as a liquid or gas? For example, if a tank is holding water and it is ruptured for any reason, how would the water disperse? Would it affect any surrounding properties?*

**Response:** Please refer to AFC Section 5.12 for a discussion of containment for hazardous materials. Chemicals will be stored in chemical storage vessels and tanks specifically designed for their individual characteristics. Large quantity (bulk) chemicals will be stored outdoors in aboveground storage tanks manufactured of carbon steel. Spill containment curbs or dikes to contain the chemicals in the event of leaks or spills will be constructed around each of the major chemical storage areas. Aqueous ammonia and sulfuric acid tanks will each have secondary containment dikes capable of holding the tank volume plus the allowance for rainfall from a 25 year, 24 hour storm.

## LAND USE

1.) *The Rio Linda / Elverta CPAC believes that the current zoning agreement is not consistent with the proposed project. According to Sacramento County Planning Department staff and County Counsel, the reason this property had to be rezoned previously was to allow the installation of an ethanol facility. That facility is no longer proposed to be built on this site. If the zoning agreement was rescinded, the zoning would revert back to IR (Industrial Reserve), which, according to the County, would be a proper zoning for a public utility. One avenue for a rescission to take place is for the property owner to ask for it. What are you doing to get that zoning agreement rescinded?*

**Response:** The RLEPP is consistent with the limited M-2 uses allowed by Condition 1 of paragraph (b) of the existing Zoning Agreement. As explained in an opinion by County Counsel, the CEC approvals referenced in Condition 1 became enforceable through the Zoning Agreement only to the extent that they related to ethanol manufacturing. RLEPP will not include ethanol manufacturing; thus the referenced CEC approvals are not relevant to a zoning consistency review for the RLEPP. None of the conditions in paragraph (b) need to be changed to accommodate the RLEPP. Since the RLEPP is consistent with paragraph (b) as written, no rescission is necessary.

2.) *Does FPL own the property at the proposed site?*

**Response:** FPLE controls the property through an option agreement.

3.) *What is the difference between a municipal utility, a public utility and this project?*

**Response:** This project is privately owned and is not part of a municipal or public utility. A public utility generally designates an investor owned organization whose rates are set by a state agency. Public utility power plants have mostly been eliminated in California by deregulation under AB 1890. Municipal utilities still exist in California, and these often own or share ownership of power generation facilities.

4.) *What is the difference between a power plant and a cogeneration facility?*

**Response:** A cogeneration facility is a type of power plant in which direct use of a second energy stream, such as steam or cooling water, by a second on-site facility takes place.

## NOISE

*1.) The Sacramento County noise ordinance requires that the noise generated from this facility not exceed 45 dB and the application for this facility states that it will meet this requirement. In addition, it appears that state standards may be stricter. If this plant does exceed the required level, what will the compliance process be? Please address the complaint process, measurement process, mitigation required, and time allowed to address complaints or compliance problems. Is a fine required for violating the noise statutes? If a fine is required, who gets the money? Are there any other penalties? Also address if the plant will be required to shut down during this process. If it is not required to shut down, why not?*

**Response:** Noise was a primary consideration in the design and layout of the facility. Measures have been incorporated to achieve the County's noise standard. Modeling demonstrates that the plant will operate in compliance with the standard. The sound levels input into the noise model were obtained from measurements of similar equipment at other power plants. The design of proposed noise control measures is straightforward and well understood by design engineers. The modeled results are conservative because all the mechanisms that attenuate sound are not included in the calculations. Thus, actual noise levels should be a little less than the predicted levels.

In the event that the standard is exceeded, the owner will be given a reasonable period of time to make any required corrections to reduce noise levels. The CEC has the authority to shut the plant down if corrections are not made on the required schedule.

A compliance test will be conducted within 30 days of the plant going commercial and achieving full load operations. The test will be conducted over a 25-hour period. If the test results are acceptable, no further testing in the community will be performed unless plant noise levels increase for any reason. A noise complaint and resolution procedure will be in place to handle noise complaints. If necessary, additional noise monitoring may be conducted in the future to assist in resolving noise complaints. All of the data will be in the public record after the report is submitted to the CEC.

A noise complaint and resolution form was presented in the AFC (5.9.3). The form establishes a procedure for noise complaint investigation and resolution with the complainant. The community will be informed of the appropriate contacts during construction and operation to register noise complaints.

*2.) Have there been any studies done on the health effects of low frequency noise that may be generated by this plant? What about studies on effects on learning?*

**Response:** The noise modeling study performed for the FPL Rio Linda project predicted resulting noise levels across the audible frequency spectrum, including low-frequency noise. The predicted low-frequency levels were compared with values in the literature and were found to be below levels that would create a nuisance by being felt as vibrations or cause structural vibrations. Most studies related to health effects were performed on subjects using noise at much higher levels than will be experienced from this project. The threshold for infrasonic effects seems to occur at a sound pressure level of 120 dB (N. Broner, Journal of Sound and Vibration, Vol. 58, 1978, p. 483). Low frequency levels from the project will be on the order of 70 dB in the 31 Hz band at the nearest residence. Levels will be significantly lower at the nearest schools.

*3.) In estimating the noise level at the property line, was the prevailing wind taken into account?*

**Response:** The noise modeling was performed using the assumption that all receptors were downwind of the project. Thus, receptors who are upwind of the site will experience lower levels than those predicted.

*4.) Has the effect of noise, both audible and low frequency, been studied with respect to animals in the vicinity, both wild and domestic? If not, why not?*

**Response:** Most studies of the effects of noise on wildlife expose animals to very high levels of noise, such as from sonic booms or flyovers of jet aircraft at low levels. An important study commissioned by the EPA in 1971 provides a review of much of the literature available at the time (Effects of Noise on Wildlife and Other Animals, NTID300.5). No adverse effects at the low levels typically produced by power plants were noted in this review. In general, animals appear to be much less sensitive to noise than people.

## **PALEONTOLOGICAL RESOURCES**

No questions or comments at this time.

## **PUBLIC HEALTH**

*1.) This community has serious concerns about asthma and other COPD, colds, cancer and the possibility of low frequency noise causing learning difficulties (especially considering the proximity to Elwyn and Elverta Elementary School). Has there been a baseline health study? If not, why not? If so, have there been provisions made for follow-up studies?*

**Response:** A health risk assessment has been performed as outlined in AFC Section 5.15. The RLEPP will be fueled with clean burning natural gas to minimize potentially toxic air emissions. The maximum incremental cancer risk from project emissions is estimated to be 0.631 in one million, well below the significance level of 1.0 in one million. For sensitive receptors, the maximum chronic “total hazard index” (THI) is estimated to be 0.0061 and the maximum acute THI is estimated to be 0.035, both are well below the significance level of 1.0. Based on this evaluation using conservative assumptions, the RLEPP emissions are expected to pose no significant cancer or non-cancer health effects.

As demonstrated by the air quality analysis, criteria pollutant emissions from the RLEPP will not cause or contribute to violations of federal or state ambient air quality standards, which have been set at levels designed to protect public health. Therefore, no significant adverse health effects from criteria pollutant emissions are anticipated.

The transmission of energy through transmission line conductors produces an electromagnetic field that decreases in strength exponentially with distance away from the conductors. Based on the results of extensive research on this subject, the electromagnetic field strength expected at locations of potential, sustained public exposure does not present a health risk.

## **SOCIOECONOMICS**

1.) What is the evidence regarding the potential decline of residential property values in the proximity of a power plant facility similar to this one? If the evidence shows that property values are expected to decline for a period of time, what are you proposing to mitigate this for surrounding property owners?

**Response:** We are not aware of any conclusive evidence regarding the potential decline of residential property values in the proximity of a power plant. It is not possible to accurately predict future property values. However, we expect that current residential property values in the project vicinity have already accounted for the project site's industrial zoning and the existing industrial uses adjacent to the site. The proposed use is consistent with these site attributes.

Since its inception, the Sacramento County General Plan has designated the project site area for industrial uses. Since the early 1990s the site has been considered then approved for power plant use, in large part, due to the presence of two electric substations that allow for very short interconnection systems. As indicated in another response, a large number of high voltage transmission lines converge on the SMUD and Western Area Power Administration substations just north of the project site. Some of these high voltage towers are on the project site.

The site is located in an industrial area with adjacent land uses including; an automobile dismantling and salvage operations immediately to the south; an active railway line to the west; large microwave towers immediately to the north; and, further north, a gravel crushing business and SMUD and Western substation and maintenance facility.

2.) The question has already been asked about the orientation of the facility causing an interruption in the Delta breezes. A follow-up question would be regarding the heat and moisture generated by this facility. Would any of these issues, or any other effects of the facility, affect the microclimate in this area?

**Response:** Humidity and temperature of the surrounding area will not change because of the RLEPP. The air at the outlet of the cooling tower is humid, but the vapor dissipates quickly into the atmosphere and will not have an adverse meteorological impact on the area.

3.) *The previous project licensed for this site proposed to institute and pay for training for community residents so they could be hired to work at this plant once it becomes operational. Are you proposing a similar program? If not, why not?*

**Response:** Yes, although specific plans have not been completed. FPLE will continue discussions with labor and community members to determine training

programs that could be implemented to improve the skills of interested community residents for employment at the plant or other local industry.

*4.) In your presentation to the CPAC, you mentioned that the workers will be "shopping and dining downtown." Are you proposing to provide a north-south artery so that downtown can be easily accessed? If not, why not?*

**Response:** No, we are not proposing to provide a north-south artery. While we would not discourage employees from taking advantage of local shopping and dining opportunities in downtown Rio Linda, we estimate that most of the traffic leaving the site will travel west on Elverta Road, rather than east to Rio Linda or Elverta. (See Section 5.11 of the AFC.) It is also our understanding that the local community would prefer to route employee traffic away from the West 6<sup>th</sup> and U Street access. As such, we propose that the main access for all plant personnel will be through an extension of Sorrento Road from Elverta Road.

## SOILS

*1.) Ground liquefaction and settling have been addressed in a previous category. In preparing the site, it will be necessary to install underpinnings. Please address the effects of this installation, including the noise generated during installation, and the potential for the impact of the installation to collapse dry or water wells in the vicinity. Has anything been done to mitigate this potential problem?*

**Response:** Geotechnical work done on the site indicates that piling of any kind will not be needed. Indications are that a spread footing/ mat style foundations will be appropriate for major equipment foundations. However, work is currently in progress on arranging an updated and detailed geotechnical investigation that will include test borings at the exact locations of the equipment foundations. The results of this study will determine the final foundation plans.

## TRAFFIC & TRANSPORTATION

*An additional emergency access has been addressed in a previous category.*

*1.) Access to downtown has already been addressed. Have you done a traffic study to determine how traffic will flow - both during construction and when the plant is operational? If not, why not? If so, please show how it is anticipated that workers will travel, both to get to the job and to "shop and dine downtown."*

**Response:** The traffic impacts of the project have been evaluated both during construction and operation. (See Section 5.11 of the AFC.) The analysis was based on using the extension of Sorrento Road as the main access to and from the site. From Sorrento, access to downtown Rio Linda will be through Elverta or Elkhorn Boulevards. However, it is expected that the majority of traffic leaving the site will head west on Elverta Road.

*2.) West 6th Street was left off the map in the initial application. Has this been corrected?*

**Response:** West 6<sup>th</sup> Street has been reflected in maps submitted in the application.

*3.) West 6th Street is projected in the Community Plan to be a post-2010 artery. Please address the effect of this installation on this artery. If you put in the emergency access as previously addressed, will you be upgrading West 6th Street and U Street with features such as widening and improved drainage culverts?*

**Response:** No construction will occur on the road right-of-way dedication to the County on the east boundary of the project site. The West 6<sup>th</sup> and U Street access to the project site will be used as a secondary emergency access. No improvements to West 6<sup>th</sup> and U Street are proposed.

*4.) Increased humidity from this facility's emissions may also increase the frequency, duration, and volume/thickness of fog in the area. This area includes major routes for both auto and rail transport. Has this effect been analyzed? If not, why not? If so, please address mitigation, such as the possibility of Elverta Road requiring an overpass over the railroad tracks, the need for streetlights, or the need for a stoplight at the intersection of Elverta Road and East Levee Road.*

**Response:** Humidity and temperature of the surrounding area will not change because of the RLEPP. The air at the outlet of the cooling tower is humid, but the vapor dissipates quickly into the atmosphere and will not have an adverse meteorological impact on the area.

5.) This possible increase in fog may affect air travel, specifically, but not limited to that from the Rio Linda airport. Please address.

**Response:** Please refer to response to Question #4 above.

## TRANSMISSION LINE SAFETY & SYSTEM ENGINEERING

1.) *There are already radio and cell towers in the area that interfere with radio, television and telephone reception. This facility will double the amount of voltage in the transmission lines. Please address the cumulative effect on radio, television and other electrical appliance usage.*

**Response:** The voltage, electric and magnetic field strengths induced by high voltage transmission lines are provided in the EPRI “Transmission Line Reference Book - 345 kV and Above”, Second Edition (EPRI, 1987). The maximum electric field strength for a 230 kV line would be on the order of 1.32 kilovolts per meter (kV/m) to 1.70 kV/m. These values are the maximum, unperturbed fields calculated at 1 meter above the ground directly under the line and at the edge of the rights-of-way. For a typical 95-foot pole with 800-foot span, the maximum calculated magnetic field strength directly under the line and at the edge of the 60-foot right-of-way is 73 mg and 44 mg, respectively.

For the Rio Linda to Elverta substation 230 kV transmission line, the calculated maximum magnetic field strength at the edge of the right-of-way (estimated at 100 ft.) is 48.31 mG. At a distance of 500 ft. from the transmission line, the magnetic field strength is less than 1 mG. The calculations completed only consider the Rio Linda to Elverta transmission line and do not include impacts from the PG&E, SMUD and Western lines in the area.

While California does not have a regulatory limit for magnetic field strength, these values are well below the levels established by those states that do have regulatory limits. States with magnetic field regulations have limits ranging from 150 mG to 250 mG at the edge of the rights-of-way, depending on line voltage. Average values reported to the California Energy Commission (CEC), for 230 kV transmission lines licensed by the CEC, have been less than 100 mG (CEC 1992).

## VISUAL

1.) *According to the CEC, the height of the structures for this facility exceeds the current height allowed for this site, and a variance must be acquired. What has been done to obtain this variance?*

**Response:** The proposed structures are in compliance with the Code. As the County Planning Department recently stated in its submission to the Board of Supervisors for the agenda of August 29, 2001 ("County Board Submission"), the project "likely qualifies for the 'height exception' for towers and similar structures" under Section 301-21. (The Planning Department mistakenly cited the height exception provision, Section 301-21, as 301-20. Leighann Moffitt, of the County Planning Department, acknowledged that this was a typographical error and that the County has issued an addendum correcting the error.)

Code Section 301-21 provides an exception to building height limits for "towers," "roof structures" and "similar structures." Such a structure is exempt from the height requirement if it does not cover more than 15% of the area of the lot, or have a base greater than 1600 square feet. Stacks easily fit within the Code's definition of structures, which is "[a]nything constructed or erected which requires location on the ground or attached to something having location on the ground, but not including fences or walls used as fences." Code § 130-179. As the County recognized, "The 150 foot stacks are 20 feet in diameter and do not appear to exceed the 1600 square foot base requirement (at an estimated 630 square feet of total base area)." County Board Submission at 10.

Similarly, the transmission line towers associated with the project are "towers" or "structures," as defined in Code Section 130-179. The transmission line towers will be either lattice or single-shaft steel towers. See AFC page 3-45. The height of the transmission towers will be between 120 to 150 feet depending on terrain. The base of the transmission towers will be substantially less than the 1600 square foot limit and the towers will not cover more than 15% of the lot on which they are situated.

Thus, both the project's stacks and its related transmission line towers have no specific height limit, but may be constructed "to a height greater than the limit otherwise established within the zone." Code § 301-21.

2.) *In the initial application, it is anticipated that the plume could be as high as 1200 feet high. According to your presentation at the CPAC meeting, the design has been modified to reduce the height. Please explain what the new maximum height of the plume is anticipated to be and for what percentage of the time it is expected to be within 50% of that height.*

**Response:** FPLE proposes to use a plume abated cooling tower to reduce the potentially significant visual impacts from the water vapor plumes. The plume analysis for the revised design show that the plume abatement operation will

significantly reduce the plume formation. For example, during daytime hours with no fog present, plume heights greater than 400 meters will have occurrence of less than 1% vs more than 7% without the abatement. For the same ambient condition, none or smaller plumes (0-40 meters) will occur almost 99% of the time vs about 79% of the time without abatement.

3.) Please address the lighting plan and what steps are being taken to guarantee that no light will be emitted from the property onto neighboring properties, including direct and indirect light (such as a glow like that put off by urban areas).

**Response:** As described in AFC Section 5.10.2.3.3, project lighting will be restricted to areas required for safety and security, lighting will be directed on-site, lighting will be shielded from public view, and non-glare fixtures and use of switches, sensors, and timers, to minimize the time that lights are on will be specified. These measures should substantially reduce the off-site visibility of project lighting. Off-site visibility of lighting will be further reduced by the landscape plantings that will provide additional screening of any lighting associated with the project's lower elements. With these measures, lighting associated with the project will not pose a hazard or adversely affect day or nighttime views toward the site.

4.) It has been indicated that landscaping is anticipated to be an important part of the visual impact of this facility. It has been indicated that the planting will include redwood trees. Will it also include bushes to fill in spaces until the trees get tall? Is there a landscape maintenance plan? If not, why not? If so, does it include an irrigation system so that the landscaping remains healthy? If not, why not?

**Response:** The landscape plan has been submitted as part of the CEC process and is available for public review and comments. The landscape plan includes shrubs as well as trees. FPLE is open to public input on the vegetation desired by the community and will incorporate them into the landscape plan with regulatory agency concurrence. A landscape maintenance plan will be developed at a future date. It will include an irrigation system.

## WASTE

*1.) Hazardous materials have already been addressed in a previous category. Additional waste that could be generated includes that which is to be diverted into the septic system and which may have other adverse affects on the vicinity. The local water table in this area is quite shallow. This facility is projected to generate 2400 gallons per day to be diverted into the septic system. How will this affect any wells in this vicinity? Are there provisions made to install monitoring wells in the vicinity?*

**Response:** Sanitary wastes will be directed to an on-site leach field designed to handle the sanitary wastes generated during project operation. The RLEPP will employ approximately 20 people during operation. Sanitary wastes from the Administration Building will be conveyed to an onsite septic tank and leaching field by buried sewer piping. The daily maximum amount of discharge to the septic system is approximately 2,400 gpd. A permit from Sacramento County Department of Health would be required for installation of the septic system to ensure proper design considerations. No adverse impacts to groundwater are anticipated from the operation of the septic system

*2.) How will the heat generated affect the vicinity? Could it create an inversion layer in the vicinity?*

**Response:** Humidity and temperature of the surrounding area will not change because of the RLEPP. The air at the outlet of the cooling tower is humid, but the vapor dissipates quickly into the atmosphere and will not have an adverse meteorological impact on the area. Stack gases are dispersed over a very wide area and likewise will have no meteorological impact.

*4.) Has any effect on wildlife in the area of any waste generated in the vicinity been considered? If not, why not? If so, what may those effects be?*

**Response:** The analysis of the potential impacts of waste generated from the facility shows that there are no significant adverse public health impacts. A specific analysis of impacts to wildlife was not completed, but the analysis performed for humans is very conservative, shows extremely small impacts and can be considered a good indicator that impacts to wildlife would also be insignificant. Please refer to AFC Section 5.13, Waste Management for a discussion of hazardous and non-hazardous waste handling during construction and operation.

## WATER QUALITY

1.) *It has been proposed that if any wells are dewatered, FPL will pay to have a new well dug. In addition, it has been offered by FPL to pay a sum to offset the additional amount of energy needed to pump water a greater distance to the surface. For what radius from the site is it contemplated that this will be done?*

**Response:** No radius has been set. Any mitigation proposed for potential well interference will be based on a case-by-case basis.

2.) *Installation of the facility requires that underpinnings be driven deep into the earth. Has the depth of these pilings taken into account the depth of the aquifers underneath? If not, why not?*

**Response:** Geotechnical work done on the site to date indicates that a spread footing / mat style foundations will be appropriate for major equipment foundations. Piling of any type is not anticipated to be needed. Work is currently in progress on arranging a detailed geotechnical investigation that will include test borings at the exact locations of the equipment foundations. The results of this study will determine the final foundation plans, but sufficient work has been done on this site, including work done for the SEPCO project, to anticipate that piling of any kind will not be needed.

3.) *If the underpinnings puncture into the lower of the two aquifers, what provision has been made to maintain the integrity of this aquifer?*

**Response:** Underpinnings are not likely to be required.

4.) *FPL has already stated that it is prepared to compensate people whose wells are dewatered, and the question as to how large an area this will apply to has already been addressed in another category. Recognizing that time is of the essence when a well is dewatered, what will the procedure be to compensate these people?*

**Response:** The procedures for documentation and mitigation for affected local wells will be finalized during the licensing process and prior to any permit approval by CEC to allow for inputs from all parties. Such plan will ensure that any required mitigation occur with the least amount of inconvenience to the affected well owner.

## ALTERNATIVE SITES

*1.) In evaluating alternative sites, please explain the criteria used for evaluation.*

**Response:** The proposed site was selected because it has the attributes that are important in siting power plants. It is located within a load center that needs the power and voltage support for system reliability; it is located adjacent to existing transmission lines and near to the Elverta substation; it is large enough to provide an undeveloped buffer; it is an industrial site with zoning that allows use for energy generation; and it is a site that was previously reviewed and approved by the CEC for location of a power plant.

The proposed project site has been previously considered for development as a power generation facility and has been certified by the CEC for that purpose. During the SEPCO certification process, a large number of sites (more than 70) were evaluated to determine if location of the facility at another site might reduce or eliminate potential environmental impacts. CEC Staff concluded that, although several sites were preferable to the proposed site in certain aspects, proposed mitigation measures reduced project impacts to a level of insignificance and none of the alternative sites were recommended in lieu of the proposed site.

The RLEPP has many of the same attributes as the SEPCO power project previously proposed for the site and approved by the CEC. When compared to SEPCO, however, RLEPP would have fewer impacts to several resources. For example, RLEPP would not include the hazardous materials in the proposed ethanol facility. RLEPP would also result in less land permanently disturbed. RLEPP would avoid the potential traffic and air impacts associated with the several rice straw delivery trucks for the ethanol plant that would have been entering and leaving the site on a daily basis. Considering the large number of sites analyzed by SEPCO and the CEC and the comparatively fewer potential impacts of the RLEPP, no other site is likely to provide any significant advantages over the current site.

*2.) Has McClellan Park been evaluated as an alternative? Is FPL aware that there will be sufficient treated water available that will otherwise be flushed down the creek? That there is a gas pipeline into that site? That there is already a generating facility at that site and that there are therefore already transmission lines at that site? That there is a rail line available to transport hazardous or waste materials? That there is a haz mat crew on site that is equipped to deal with any emergency up to and including a nuclear incident? That there are air credits available exclusively for the use of businesses sited at the Park? That there is a proposal to limit the availability of these credits to exclude FPL?*

**Response:** Yes, FPLE has evaluated McClellan Park as an alternative site. While additional information is still being compiled, our investigations thus far

suggest that it does not provide any benefits over the current site. The volume of treated water that may be available is not sufficient for the RLEPP requirements. The existing gas line would require significant upgrades to supply the RLEPP. Similarly, transmission interconnection would be more expensive. Both transmission and gas interconnections would require new linear facilities through residential areas. The presence of a rail line provides no additional benefits. The RLEPP will generate insignificant amounts of hazardous waste materials. The ability to use air credits designated for McClellan is uncertain.

Three sites within McClellan Park of about 50 acres in size have been identified by representatives of McClellan Park as potentially available for future development. All of these sites have been designated for other uses such as warehousing and light industrial use in the McClellan Draft Final Reuse Plan developed by the Air Force, County, and other stakeholders. All of these sites are contaminated by hazardous waste and are part of one or more “operable units” in the ongoing remediation program. Land transfers to private entities have been blocked by the inability of the Air Force to grant indemnification for existing hazardous waste on the sites.

*3.) Has the industrial park approximately five miles north of the Rio Linda/Elverta site (just up Highway 99) been evaluated? Since it is in a different county, there are probably air credits available that are not available at the current proposed site. It has the proper zoning. It is also close to surface (river) water.*

**Response:** Several of the sites studied as alternatives in SEPCO case are in Sutter County. The Calpine plant in Sutter County recently went into commercial operation. That project’s siting in Sutter has already increased the load flow in that part of the grid. The siting of the RLEPP closer to the Sacramento area grid fills a power void in the area, particularly the north side of Sacramento County.

*4.) Have any sites in the Woodland area been evaluated? Since the gas pipeline has to go through there anyway, it would allow for a much shorter pipeline. Also, since it is a different county, there may be air credits available. There may be better availability of water as well.*

**Response:** No Woodland sites have been evaluated. As indicated above, the site was selected based on a set of criteria that were all considered on balance. Another site might appear more attractive based on only one of the siting criteria. However, sites are not selected based on a single criteria. Several factors are considered with the final selection based on balancing the various site attributes and appropriate mitigation measures. For example, while the gas interconnection would be shorter in this area, the more remote location is much farther from the Sacramento load center and would result in long transmission lines. Lengthy transmission lines are undesirable from visual and biological impacts perspectives. Lengthy lines also result in losses in electric transmission

efficiencies. The Woodland area is in the same air basin as the RLEPP site. Availability of credits for a site in Woodland would be similar to the current site.