

Border Ecology Project
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And

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November 26, 2003

Mrs. Ellen Russell
Office of Fossil Energy (FE-27)
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585-0119

**Subject: BLM/DOE Notice of Intent to Prepare EIS for Intergen and Sempra
Transmission Lines and Associated Power Plants**

Dear Mrs. Russell,

The Border Ecology Project (BEP) commends the U.S. Department of Energy (DOE) for its decision to prepare an Environment Impact Statement (EIS) for the transmission lines and Intergen and Sempra power projects in Mexicali, Mexico. The air quality along the border is generally poor, especially in urban areas, and water is in short supply and often a primary factor limiting future growth and development in the region. Use of environmentally sustainable power plant design elements to minimize air, water, and waste generation impacts is essential to avoid further environmental degradation in the region. The EIS process is an excellent vehicle for exploring these issues and identifying appropriate mitigation measures.

A large number of power projects have been proposed for the Arizona – Sonora region of the U.S.-Mexico border in recent years. It is imperative that these projects do not contribute to further environmental degradation in the region. It is BEP's position that there are a number of cost effective, off-the-shelf approaches available to minimize or eliminate air and water impacts from power plants, and that these approaches must be incorporated in new border power plant construction. Nevada is a good example of a state where these objectives are being put into practice. Virtually every new combined-cycle power plant recently built or under construction in Nevada is constructed to minimize air and virtually eliminate water impacts. Mexico is a world leader in the use of dry cooling in combined-cycle plants. We must incorporate these "best environmental practices" in new border power plants.

The October 30, 2003 Federal Register notice of intent to prepare an EIS summarized these environmentally sustainable approaches quite well in the following two paragraphs (p. 61798):

Alternative technologies: Grant one or both permits and corresponding right(s)-of-way to authorize transmission lines that connect to power plants that employ more efficient emissions controls and alternative cooling technologies, such as “dry cooling” or a combination of wet and dry cooling that will minimize environmental and health impacts in the United States.

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Mitigation measures: Grant one or both permits and corresponding right(s)-of-way to authorize transmission lines whose developers employ off-site mitigation measures to minimize environmental impacts in the United States. (For example, off-site mitigation could include off-sets, such as paving roads and retiring older automobiles.)

The BLM/DOE EIS process presents a unique opportunity to set a truly sustainable standard for power plants built in the border region. BEP will pay particular attention to the mitigation identified as appropriate in the draft EIS. We look forward to interacting with DOE on this landmark effort.

Sincerely,

Richard Kamp, Director