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

February 22, 2008

John Dalton
Bureau of Land Management
California Desert District Office
22835 Calle San Juan de los Lagos
Moreno Valley, CA 92553

Subject: Final Environmental Impact Statement (FEIS) for the Truckhaven Geothermal Leasing Area, Imperial County, California (CEQ #20080033)

Dear Mr. Dalton:

The U.S. 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 our NEPA Review authority under Section 309 of the Clean Air Act (CAA).

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Bureau of Land Management (BLM) on April 30, 2007. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) because of concerns with air quality impacts, impacts on the Ocotillo Wells State Vehicular Recreation Area (OWSVRA), the estimation of geothermal capacity within the Reasonably Foreseeable Development (RFD) Scenario, and water supply. While EPA supports the development of geothermal energy as a renewable energy source, based on our review of the FEIS, EPA continues to have concerns about specific aspects of the proposed project.

We appreciate the efforts of the BLM and its consultants to respond to our comments on the DEIS. We note that the FEIS includes a comprehensive analysis of the potential impacts of the proposed project on air quality, including air emissions estimates from well drilling, construction, and personally owned vehicles (POV). Other sources of particulate matter, such as agriculture, recreational vehicles, or natural sources, however, were not quantified within the FEIS. We remain concerned that the proposed project might impact the OWSVRA to a greater degree than described within the FEIS, and we continue to recommend that BLM discuss off-highway vehicle (OHV) usage and emissions from OHVs and other sources in greater detail within the subsequent environmental review process. We encourage the BLM to work closely with staff at the OWSVRA to minimize and mitigate any adverse impacts during the construction and operation of the Truckhaven GLA. We also encourage BLM to work with the proponents of

the proposed Sunrise Powerlink Project to minimize particulate emissions, should construction associated with the Truckhaven project and the Sunrise Powerlink project coincide.

We also remain concerned that the RFD scenario (50 megawatts) may underestimate the geothermal capacity within the Truckhaven GLA, resulting in the mischaracterization of environmental impacts. In response to our concerns, BLM states that information related to signed power sales agreements on federal, state, or private land is considered proprietary by the proponents and utility companies and does not discuss the issue further. The FEIS notes, however, that if lands are leased to multiple parties, BLM would require them to enter into a unitization agreement, and unitization should reduce the overall impacts to a given area. We also remain concerned about the potential impacts of the proposed project on groundwater and nearby water resources, such as the Salton Sea. We encourage BLM to address these issues in greater detail within the subsequent environmental review process.

We appreciate the opportunity to review the FEIS for the Truckhaven GLA project. When the Record of Decision is signed, please send one copy to the address above (mail code: CED-2). If you have any questions regarding our comments, please contact Nova Blazej, Manager, Environmental Review Office (415) 972-3846 or Ann McPherson, the lead reviewer for this project. Ann can be reached at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,

/s/

Nova Blazej, Manager
Environmental Review Office