

September 18, 1998

Mr. Bruce Kaneshiro
Project Manager
c/o Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104

FRIENDS OF COBB MOUNTAIN COMMENTS ON THE GEYSERS PORTION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT RELATING TO PACIFIC GAS AND ELECTRIC COMPANY'S APPLICATION FOR AUTHORIZATION TO SELL CERTAIN GENERATING PLANTS AND RELATED ASSETS, APPLICATION NO. 98-01-008

[Begin Q1]

First of all, we believe that it was a mistake to fold the analytical treatment of The Geysers plants into one document with PGandE's fossil-fueled plants. The Lake County Board of Supervisors, the Lake County Air Quality Management District and Friends of Cobb Mountain all requested a separate document. The differences between The Geysers plants and the others, and the issues appertaining to them, are considerable, and as a consequence of the combination, several important issues have been lost and receive no treatment at all.

[End Q1]

[Begin Q2]

A number of these issues are discussed in the comments which have been submitted to you by the Lake County Air Quality Management District. There is no point in our outlining these issues here, but in representation of the occasionally impacted residential public in the Cobb and Anderson Spring areas we request that they be given full treatment in the Final EIR.

[End Q2]

[Begin Q3]

Another important cluster of issues surrounds aging of The Geysers power plants, the declining pressures in the steam field, and the inevitable and consequent progressive need for plant closures and abandonment. These are issues which you may deem to be beyond the scope of the EIR as they are matters that PGandE would have to deal with if the plants were not to be sold, but we believe that they are highly relevant to the consideration of a change of ownership because of consequences of which both the prospective buyers and the public should be informed through objective outside analysis. The impacts will be real, and they will be significant environmentally, economically and socially. For the protection of the public and of the environment, the Final EIR should provide guidelines and stipulations for their mitigation by prospective buyers.

[End Q3]

[Begin Q4]

The level of seismic activity presently induced by commercial operations in The Geysers field may increase substantially with the implementation of the now approved City of Santa Rosa Geysers waste water injection plan. This also you have apparently considered to be outside the scope of the EIR because the plan will go forward whether there is a new operator or whether PGandE retains ownership. Here again a proposed new ownership would be moving into a new and largely unknown situation with potentially significant consequences. Again, we believe that guidelines and stipulations for mitigation are called for for the protection of the public by the agency which is in fact the Public Utilities Commission.

[End Q4]

[Begin Q5]

An ambiguity of silence runs through the DEIR with regard to the possible eventuality of PGandE selling its Geysers facilities to several parties if a single buyer is not available. We raised this issue at the recent informational meeting regarding the DEIR at Cobb on September 2nd, and were assured that a new DEIR or an addendum to the present one would be prepared in order to address the numerous additional issues that would arise if multiple ownerships should be proposed. We ask that this be clearly stated in the Final EIR.

[End Q5]

Friends of Cobb Mountain appreciate the opportunity to participate in these proceedings and we ask that we be retained throughout as a party of interest.

Submitted by

/s/

Hamilton Hess
Vice Chairman

COMMUNITY AND ENVIRONMENTAL ORGANIZATIONS

Q. FRIENDS OF COBB MOUNTAIN

- Q1 Please see response to Comment I1.
- Q2 Comment noted. Please see responses to Comments H1 through H71.
- Q3 While the age of the Geysers units and declining pressure in the steam fields potentially leading to unit closures are legitimate areas of concern, they are beyond the scope of the EIR since these events will happen regardless of the ownership of the plants and will not be affected by the proposed divestiture. Therefore, the EIR does not include guidelines or criteria for mitigation of such occurrences by potential buyers. Note that the importation of additional wastewater for injection may reduce the rate of decline in steam pressure and delay the subsequent closure of some units. Please see the response to Comment B5 for more information on decommissioning requirements.
- Q4 The Santa Rosa Wastewater Modified Geysers Recharge Project is discussed in the DEIR in the Cumulative Impacts chapter, page 5-10, and its impacts in conjunction with divestiture are analyzed in the DEIR. Please note that while the City of Santa Rosa has certified the EIR for the project and has initiated design, the federal lead agency, the U.S. Army Corps of Engineers, has not approved the Record of Decision of the EIS. The impact of this additional water source would equally affect both the new owners, if the units are sold, and PG&E if the units are not sold, so it is not an effect of the divestiture project covered in this EIR. Therefore, the EIR does not include guidelines or criteria for use of this water. The environmental effects of the use of the water are assessed in the Santa Rosa environmental document.
- Q5 The DEIR clearly states in the Executive Summary (page S-5, second paragraph) and the Project Description (page 2-2, first full paragraph and bulleted items) that the proposed project entails the sale of power plants by PG&E in four packages: the Pittsburg and Contra Costa plants together (the Delta plants), the Potrero Power Plant, the Geysers units in Sonoma County, and the Geysers units in Lake County. This means that two buyers may be involved in the transfer of the Geysers Power Plant, and the DEIR addresses the potential impacts associated with two separate entities operating the power plants located in the Geysers geothermal field. The commenter is correct that, were the Geysers units to be sold to three or more operators, additional environmental effects could result. Under CEQA, if PG&E decided prior to project implementation to sell the Geysers units to three or more buyers, this EIR would have to be revisited. The CPUC would need to decide whether this EIR were sufficient for its purposes, or whether to prepare a Supplement to the EIR, an Addendum to the EIR, or a new EIR altogether. There is presently no indication that the project as defined in the DEIR has changed, or is reasonably likely to change.