



April 8, 2011

Judith A. Enck
Administrator for EPA's Region 2 Office
290 Broadway
New York, New York 10007-1866

Dear Administrator:

We represent Casa Pueblo, a community-based organization with over 30 years of service contributing towards sustainable development in Puerto Rico in the areas of economic development, environmental protection, educational programs, and agriculture. Casa Pueblo has been nationally and internationally recognized, including through the award of a 2002 Goldman Prize, equivalent to an Environmental Nobel Prize, to its Director Dr. Alexis Massol-González. Our concern regarding the potential impact of a major natural gas pipeline proposal led us to assemble a Scientific and Technical Commission to study the potential environmental, social and economical impacts of the project. This Commission has now been studying this project for more than nine months.

In a recent letter signed by Carl Soderberg (Director of the EPA in Puerto Rico, April 1, 2011) directed to the US Army Corps of Engineers addressing the Vía Verde gas pipeline project; SAJ-2010-02881 (IP-EWG), the EPA endorses the project conditionally pending the supply of additional information.

The EPA analysis that endorses the Vía Verde project is supported by a number of arguments that contain errors, omissions, and a misguided investigation (refer to the last paragraph in page 1 and the first in page 2 of Soderberg's letter to USCOE).

1. It is completely wrong to say that the capacity of the Via Verde is 1,519 MW while the Aguirre Plant capacity is only 592 MW.
 - a. Whether omitted deliberately or by accident, the Aguirre plant has units 1 and 2 with a total capacity of 900 MW, in addition to two combined cycle units with a total capacity of 592 MW.

- b. These four units of the Aguirre plant are programmed by the PREPA to operate on natural gas with a capacity of 1,492 MW for 2014. For that reason, in terms of capacity the Aguirre plant can produce as much energy as the 3 northern plants combined and therefore, the construction of a 92-mile long gas pipeline is unnecessary.
2. The EPA is wrong in neglecting the fact that the PREPA is completing the final tests to operate units 5 and 6 of the Costa Sur plant with natural gas, representing a capacity of 820 MW. The EPA has failed to recognize that the other four units (1-4) of Costa Sur have an additional capacity of 270 MW and are scheduled to operate on natural gas in 2014.
3. The EPA is in its endorsement because in 2009 the 3 northern plants generated around 22% of Puerto Rico's energy while the Costa Sur power plant generated 24%. This implies that the Vía Verde project is of limited utility with monumentally destructive impacts to the water resources, wetlands, forests, and endangered species.
4. The EPA is entirely wrong endorsing the Via Verde project because the natural gas supplier, EcoElectrica, has already admitted to the FWS that they do not have the required natural gas send-out capacity, infrastructure, neither permits from FERC to supply gas to the three northern plants with a capacity of 1,519 MW. Giving an endorsement to the Vía Verde project without gas for the operation is absurd, negligent, and is suspicious.
5. The EPA is erroneous when citing information supplied by PREPA indicating that the northern power plants are more efficient. According to a 2009 report from PREPA, the Costa Sur and Aguirre plants have in average greater efficiency than the northern plants. In fact, Cambalache is the least efficient plant and is located in the north.
6. The EPA is inaccurate using the information supplied from PREPA to state that generating more energy in the south can destabilize the system causing frequent collapses of the Puerto Rican power-grid. This is absurd and false. Historically the south has generated from 75% to 80% of the total energy for the island and has done so with no major difficulties.
7. The EPA has failed to acknowledge that a number of prestigious engineers from the Department of Electrical Engineering at the University of Puerto Rico have determined that the savings expected from the Vía Verde project are about 1.2 cents per kWh which drastically contradicts the PREPA claims of savings of 12 to 22 cents per kWh.

Based on the information provided, we request an investigation into this endorsement and strongly request EPA to remove its conditional endorsement for the Via Verde project immediately.

Sincerely yours,



Dr. Alexis Massol-González, Director



Dr. Arturo Massol-Deyá, Biologist



Dr. Gerson Beauchamp, Electrical Engineer

cc: Congressman Luis Gutierrez (Enrique.Fernandez@mail.house.gov)
Sindulfo Castillo (Sindulfo.Castillo@usace.army.mil)