

**Fw: Requested Data**  
Teresita Rodriguez to: Jose Soto

03/29/2011 09:00 AM

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Jose,

Last Friday I contacted Mr. Pagán, PREPA's consultant, to request the information identified as missing from their previous submittal. Attached you'll find the additional information submitted by Mr. Pagán.

----- Forwarded by Teresita Rodriguez/R2/USEPA/US on 03/29/2011 09:05 AM -----

From: Daniel Pagan <daniel\_paganrosa@yahoo.com>  
To: Teresita Rodriguez/R2/USEPA/US@EPA  
Date: 03/29/2011 08:52 AM  
Subject: Requested Data

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Dear Teresita:

Attached please find the supplemental information requested las Friday, for needed action.



Alternatives Considered.doc

**Alternatives Considered:**

Via Verde Project is geared and structured to provide the Puerto Rico Electric Power Authority (PREPA) with the required operational flexibility to dispatch the most efficient (higher heating value) power generating units, located on the northern part of the Island. This will be accomplished through the use of a Computer Algorithm that considers each unit rated capacity, individual fuel consumption and the type of fuel that fosters the lowest power generating costs in Puerto Rico. In addition, the Via Verde project will allow PREPA the effective utilization of the units located on the northern part of the Island, allowing a reduction in the transmission losses traditionally observed in PREPA's electric power transfer system.

Since Via Verde is geared to increase the operational flexibility associated with the power generating facilities located on the northern area of PR, -any project aimed to generate power at the Aguirre Power Plant is considered outside of the established project scope. In light of this, the former Gasoducto del Sur Project was not considered in the Alternative Analysis's included in Chapter # 4 of the Environmental Impact Statement (EIS) written for this project and approved by the Environmental Quality Board back on November 30, 2010.

As it may be recalled, the Gasoducto del Sur project showed a limited scope since it was geared to provide Natural Gas to the Combined Cycle Units located at the Aguirre Power Plant with a 592 MW operational capacity. On the other hand, Via Verde will be providing Natural Gas and increasing PREPA's operational capabilities to a total of 1,519 MW, or around 3 times more of the power generating units considered in the original Gasoducto del Sur Project.

Considering all of the above, the Gaseoducto del Sur was not included as one of the alternatives evaluated. Moreover, applicable regulations require that any project alternative to be considered as part of the Alternative Analysis in the EIS must be one that in fact can be implemented and is consistent with the scope of the project to be developed. Within the context of Vía Verde, the Gasoducto del Sur does not meet such criteria.

**Horizontal Directional Drill Technique Implementation:**

As indicated in Chapter # 5 of the EIS, strict operational and environmental procedures will be followed at the time the Horizontal Directional Drill (HDD) Technique will be utilized throughout the Via Verde Project. These efforts will consider among other things, the implementation of a FRAC-OUT Plan, as well as the direct supervision of a fully qualified Engineer who will be overseeing and supervising the entire HDD operations. These were conditions required by the Department of Natural and Environmental resources as well as the Environmental Quality Board, during the evaluation and approval process of the Via Verde EIS. The implementation of the FRAC-OUT Plan as well as the requirement of having a qualified engineer overseeing all HDD operations could be included as one of the conditions of the Joint Permit to be issued.

**Mitigation Plan:**

PREPA will be in a position to develop the required Mitigation Plan in accordance with applicable rules and regulations promulgated by the US Environmental Protection Agency (EPA). Said Plan will be prepared and further negotiated with the EPA, including other regulatory agencies with jurisdiction, once the requested JPA have being approved by the US Army Corp of Engineers (USACE). Based on the

experience related with the development of this important Plan, PREPA considers that it could be developed and presented for needed evaluation on or before 30 days after the approval of the JPA. Considering the above, the development of a Mitigation Plan could be included as one of the conditions of the required JPA.

**Project Right of Way:**

Via Verde Right of Way (RoW) as defined in the EIS as well as in the JPA considers three basic components defined as follows:

- Fifty (50) feet **Operation and Permanent RoW** where the pipeline will be buried. In this area, in particular within uplands, non deep rooted vegetation will be allowed to grow. In the case of Jurisdictional Areas, and once construction activities are completed, prevailing vegetation will be allowed to re-grow without any limitation, restoring the area to its original hydraulic and vegetative functions in a short period of time, (See Diagram included below)
- One hundred (100) feet **Construction RoW** to be utilized exclusively during the construction of the Via Verde project. Once construction activities are completed this area will be utilized as a Mitigation Area for the Planting of trees in uplands as required by the DNER. Within Jurisdictional Areas the RoW will be limited to 100 feet. After construction activities are completed, prevailing vegetation will be allowed to re-grow without any limitation, restoring the area to its original hydraulic and vegetative functions in a short period of time, (See Diagram included below)
- One Hundred and Fifty (150) feet **Maintenance RoW** which considers the above mentioned areas and provides an additional fifty (50) feet area of separation from any residential structures from the pipeline center line. Once construction activities are completed, it will be utilized as a Mitigation Area for the Planting of trees as required by the DNER. (See Diagram included below)

**Right of Way Diagram:**

