PUBLIC SCOPING REPORT

PROPOSED BASELOAD POWER PLANT

Prepared for the

Rural Utilities Service

Associated Electric Cooperative, Inc.

November 2005

Burns & McDonnell
SINCE 1898

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Prepared for:

Rural Utilities Service

Prepared by:

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Kansas City, Missouri

38370

December 2005

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1.0 INTRODUCTION

Associated Electric Cooperative Inc., (AECI) a generation and transmission cooperative, 2814 South Golden, Springfield, MO 65801 is in the process of development of alternative approaches to address a deficit in electric generation capacity that has been forecast through the electric system planning process. One of the alternatives being evaluated is the construction of a new 660 megawatt (MW) coal-fired power plant. Two alternative sites have been identified through a Site Selection Study and are located in central and northwestern Missouri. The Norborne site is located approximately four miles west of Norborne, Missouri on the north side of Highway DD and the Forbes Site, which is located just south of Highway 159 and adjacent to the Missouri River, approximately two miles from Big Lake, Missouri. The schedule developed by AECI would place the facility in commercial operation by 2011. Other alternatives to be considered in an Environmental Impact Statement (EIS) include no action, purchased power, load management, renewable energy sources, distributed generation and alternative site locations. AECI has also requested and evaluated proposals from other utilities or companies that may be able to provide the necessary capacity.

An environmental review process under the National Environmental Policy Act (NEPA) is necessary for approval of the new coal-fired power plant should it be chosen by AECI as the preferred alternative for meeting their deficit in generation capacity. Because of the complexity and scale of the project, an EIS will be prepared by the Rural Utilities Service (RUS) to meet NEPA requirements (40 CFR 1501.4). The RUS will be the lead federal agency for the EIS review process. The United States Army Corp of Engineers (USACE) will be a cooperating agency in the NEPA process.

AECI has pursued the consideration and evaluation of the proposed new coal-fired power plant in accordance with RUS bulletin 1794A-603 (*Scoping Guide for RUS Funded Projects Requiring Environmental Assessments with Scoping and Environmental Impact Statements*). AECI contacted the RUS to determine the project's classification pursuant to RUS Environmental Policies and Procedures (7 CFR Part 1794). A meeting was conducted with the RUS in November 2004. AECI prepared an Alternative Evaluation Report (including a Site Selection Study and Macro-Corridor Study). This Report was submitted to RUS in August 2005. These same documents were distributed to various agencies both federal and state for review. This

report was also made available for public review prior to the public scoping meeting and at the following locations:

Cameron Public Library
312 N. Chestnut St.
Cameron, MO 64429
Phone: 816/632-2311

Carrollton Public Library
1 N. Folger St.
Carrollton, MO 64633
Phone: 660/542-0183

Concordia Library
709 S. Main St.
Concordia, MO 64020
Phone: 660/463-2277

Norborne Public Library
109 E. Second St.
Norborne, MO 64668
Phone: 660-593-3514

Hale Library & Museum
321 Main St.
Hale, MO 64643
Phone: 660/565-2617

Robertson Memorial Library
19 W. 20th St.
Higginsville, MO 64037
Phone: 660/584-2880

Mid-Continent Public Library
Kearney Branch
100 S. Platte-Clay Way
Kearney, MO 64060-7640
Phone: 816/628-5055

Lexington Library
1008 Main St.
Lexington, MO 64067
Phone: 660/259-3071

Macon Public Library
210 N. Rutherford St.
Macon, MO 63552
Phone: 660/385-3314

Marshall Public Library
214 N. Lafayette
Marshall, MO 65340
Phone: 660/886-3391

Maryville Public Library
509 N. Main St.
Maryville, MO 64468
Phone: 660/582-5281

DeKalb County Public Library
105 N. Polk St.
Maysville, MO 64469
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Little Dixie Regional Library
111 N. 4th St.
Moberly, MO 65270
Phone: 660/263-4426

Mound City Public Library
205 E. 6th St.
Mound City, MO 64470
Phone: 660/442-5700

Oregon Public Library
103 S. Washington St.
Oregon, MO 64473
Phone: 660/446-3586

Ray County Library
215 E. Lexington St.
Richmond, MO 64085
Phone: 816/776-5104

Dulany Memorial Library
501 S. Broadway
Salisbury, MO 65281

Rolling Hills Consolidated Library: Savannah
514 W. Main St.

Phone: 660/388-5712

Savannah, MO 64485
Phone: 816/324-4569

Boonslick Regional Library
Sedalia Branch
219 W. 3rd St.
Sedalia, MO 65301
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Sedalia Public Library
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Carnegie Library
316 Massachusetts St.
St. Joseph, MO 64504
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Downtown Library
927 Felix St.
St. Joseph, MO 64501
Phone: 816/232-7729

East Hills Library
502 N. Woodbine Road, Suite A
St. Joseph, MO 64506
Phone: 816/236-2136

Rolling Hills Consolidated Library: Eastside
1904 N. Belt Highway
St. Joseph, MO 64506
Phone: 816/232-5479

Washington Park Library
1821 N. Third St.
St. Joseph, MO 64505
Phone: 816/232-2052

Sweet Springs Public Library
217 Turner St.
Sweet Springs, MO 65351
Phone: 660/335-4314

Boonslick Regional Library
950 E. Main St.
Warsaw, MO 65355
Phone: 660/438-5211

Mid-Continent Public Library
Excelsior Springs Branch
1460 Kearney Road
Excelsior Springs, MO 64024-1746
Phone: 816/630-6721

A Notice of Intent (NOI) to hold a public scoping meeting and prepare an EIS was published by the RUS in the Federal Register on August 10, 2005. A copy of the NOI is included in Appendix A.

Four public scoping meetings were conducted in August 2005, one near each of the two primary alternative site locations identified for the new coal-fired power plant and two near the proposed transmission line corridors. The public was notified by advertisements in the local newspapers. Copies of the news releases and newspaper ads are included in Appendix B.

2.0 INTERAGENCY MEETING

2.1 INTERAGENCY SCOPING MEETING

An agency introductory meeting was conducted during the public comment period to introduce the project. The meeting was held in Sedalia, Missouri on the morning of August 23, 2005 at the Missouri State Fairgrounds.

2.2 WRITTEN AGENCY COMMENTS

RUS sent a letter, dated August 10, 2005, to various federal and state agencies (letters are on file with RUS). The letter provided a brief project description, information about the agency scoping meeting, a CD of the Alternatives Evaluation Corridor Study and Site Selection Study, as well as contact information for agency comments.

Comments were received from the Natural Resource Conservation Service (NRCS), September 20, 2005. The NRCS provided information regarding prime farmland and requested that form AD-1006 be completed and submitted. The US Fish and Wildlife Service responded on September 28, 2005 with information regarding possible sensitive wildlife and plant species in the area and request for an assessment of the impact to wildlife and plant species in the area. The Missouri Department of Natural Resources, State Historic Preservation Office commented on August 22, 2005, concerning the potential for the presence of archaeological sites near and within the proposed site areas. The United States Environmental Protection Agency (EPA) provided comments October 26, 2005 concerning air emissions, wetlands, and cumulative effects. The Missouri Department of Transportation responded on September 23, 2005 with comments on potential road impacts in the vicinity of the proposed power plant sites. The USACE responded on September 23, 2005, requesting cooperating agency status. A copy of the RUS letter, the mailing list and written agency comments are included in Appendix C.

3.0 PUBLIC SCOPING

The public scoping meetings for the project involved the following components:

- Providing project information to the public
- Notification of Public Scoping Meetings
- Conducting the public scoping meetings; and
- Collecting/reviewing public comments.

Additional public involvement consisted of addressing the public through individual member coop meetings, telephone conversations, and media releases. Additional project information is available on AECI's web page (www.aeci.org).

3.1 GOALS AND OBJECTIVES

The goal of a public scoping meeting is to solicit comments and encourage participation in accordance with RUS guidelines. The objectives of RUS and AECI are to establish a clear and open dialogue with the public and provide a forum and process for opportunity to identify and define the scope of issues to be addressed in the EIS.

3.2 NOTIFICATION PROCESS

A Notice of Intent (NOI) to hold public scoping meetings and to prepare an EIS was published by the RUS in the Federal Register on August 10, 2005, (Volume 70, Number 153, pp. 46472-46474). A Notice of Extension of Public Scoping Comment Period was published by the RUS in the Federal Register on September 30, 2005, (Volume 70, Number 189, pp. 57252-57253). A copy of the NOI and the Notice of Extension are included in Appendix A.

Four public scoping meetings were conducted in August 2005, one near each of the two primary alternative site locations identified for the new coal-fired power plant and two near the proposed transmission line corridors. The public was notified by a series of advertisements in 26 local newspapers located in the surrounding areas of alternative sites and transmission line macro-corridors. Copies of the newspaper notices and proof of publication are included in Appendix B.

3.3 PUBLIC SCOPING MEETINGS

The public scoping meetings were held near each of the alternative power plant sites and two of the transmission line macro-corridors as part of the scoping process. These scoping meetings were conducted as described below:

- Monday, August 22, 2005, 4 p.m. -7:30 p.m., T.J. Hall Community Center, Oregon, Missouri
- Tuesday, August 23, 2005, 4 p.m. -7:30 p.m., Missouri Electric Cooperatives Building, State Fair Grounds, Sedalia, Missouri
- Wednesday, August 24, 2005, 4 p.m. -7:30 p.m., Knights of Columbus Building, Salisbury, Missouri
- Thursday, August 25, 2005, 4 p.m. -7:30 p.m., Goppert Community Building, Norborne, Missouri

The scoping meetings were set up on an open house format during the first 2 hours and featured a series of information stations. The opportunity for an open discussion period was provided at each meeting. Open discussions occurred at the Oregon and Norborne meetings. There was no interest for such discussion by the public at Sedalia and Salisbury.

During the open house, each station was staffed by AECI representatives who could explain relevant aspects of the project and answer questions. In addition, RUS representatives were present. Fact sheets and other informational handouts were available and a comment form was provided for attendees to complete.

Copies of public open house materials and photographs of the meetings are included in Appendix D. The information content at each station is described below.

Welcome - RUS

People were asked to sign in, given a comment form to provide written comments, and a RUS representative was present to welcome the public and answer any questions concerning the role RUS has in the decision making process.

AECI

General information about AECI including various handouts about coal-fired power plants, were distributed. The forecast deficit in AECI's generating capacity was described at this station. Employment related questions were answered by representatives from AECI.

Alternatives

A three-step process for determining the chosen alternative technology was summarized at this station. Each of the alternative generation technologies considered were discussed.

Siting

A seven-step process that was undertaken to ultimately arrive at the two primary alternative sites was described at this station. Analysis maps that contributed to the siting process were available for viewing.

Transmission Line Corridors

A description of the Transmission Line Routing Process was provided along with maps of the proposed transmission line corridors. People were encouraged to view the maps to determine if their property was located within or near the corridors.

Proposed Power Plant

A conceptual site arrangement of both alternative sites, superimposed on an aerial of the site, was available at this station. In addition, maps of the proposed railroad corridors were provided for people to determine if their property was located within or near the railroad corridors.

Environment

The Environment station listed the environmental factors considered in the siting of the power plant and also what would be analyzed in the EIS. This station included an outline of the NEPA process.

Public Involvement

Tables, chairs and writing materials were provided at each scoping meeting to enable participants to complete the comment forms and submit them at the venue. A box was provided for return of completed comment forms. Those that chose not to complete comment forms were allowed until

October 28, 2005 to return the comment forms to RUS and / or AECI. In addition, a timeline of the NEPA process and information on how to get involved in the process was provided.

Attendance

Based on the sign in sheets, the Oregon scoping meeting was attended by 79 people, Sedalia scoping meeting by 21 people, Salisbury scoping meeting by 9 people and Norborne scoping meeting by 132 people. Various individuals at the meeting locations declined to sign in and are therefore not accounted for in the attendance figures.

3.4 PUBLIC COMMENTS

Over 92 responses and 325 comments were received during the scoping comment period that ended September 28, 2005. An additional 30 responses and 101 comments were received during the extension of the scoping comment period that ended October 28, 2005. Public comments were received in the form of direct letters mailed to AECI and the RUS, emails, verbal comments, and completed comment forms. All comments were entered into a database for analysis and summary. A summary report of this data base is included in Appendix E. All original completed public comment forms and sign-in sheets are on file with the RUS.

3.4.1 Summary of Comments by Category

Air

A total of 42 comments were received on air issues. Eighteen comments express concern regarding the emissions from the proposed power plant; six comments were related to impacts to health from the emissions. The remaining comments involved concerns about various pollutants (i.e. particulate matter, nitrogen oxides, sulfur dioxide, and carbon dioxide), emission trading, hazardous air pollutants, and ash dust.

Aesthetics

A total of 15 comments were received concerning visual impacts from the transmission lines and facility buildings

Cultural Resources

A total of five comments were received on cultural resources. Comments included questions about historic buildings and bridges and potential archeological and historic sites.

Economics

There were 51 comments related to economics. Employment (12 comments) and land values (12 comments) were the major topics. This included giving local people priority on the jobs created and the decrease in property values around the power plant. Other comments included impacts to recreation and tourism in the Forbes site area; taxes and revenue benefits to the county; and the increase in population during construction, as well as, the decrease once the plant is in commercial operation.

Farmlands

A total of 16 comments were received on farmland. The majority of the comments pertained to the conversion of farmland to industrial uses such as power plants.

Geology

There were five comments received expressing concern about the geology, particularly impacts to soils, erosion, and sinkholes.

Health & Safety

A total of 19 comments were received on health and safety. The majority of the comments pertained to effects of the pollutants from the plant on local and area residents, higher health risks for the public, and amplification of health problems for specific individuals.

Mercury

There were 34 comments received expressing concern about mercury. Sixteen of the comments pertained to emissions and 13 comments were related to health issues. The remaining comments were about waste disposal, fish contamination, and coal cleaning.

Purpose, Need and Alternatives

A total of 28 comments were received on purpose and need for the facility, 12 comments were received pertaining to use of alternative technologies, and 8 comments were received concerning the siting analysis.

Recreation

There were 19 comments received expressing concern about potential impacts to recreation. The majority of the comments were from the Forbes site are regarding impacts to the Big Lake State Park and Squaw Creek National Wildlife Refuge.

Transmission

A total of eight comments were received on transmission. The majority of the comments pertained to electromagnetic fields.

Transportation

A total of 18 comments were received on transportation. The majority of the comments pertained to increased traffic in the area around the power plant, especially during flooding that is frequent to the area. Other comments express concern over railroad traffic, noise from the railcars, and impacts to local roads.

Waste

There were nine comments regarding waste, five concerned hazardous waste from the landfill.

Water Resources

A total of 70 comments on water issues were received. Almost half (37 comments) of the comments, express concern regarding water supply from groundwater withdrawal and how that withdrawal would impact local wells. Also of major concern is the potential impact from building in a floodplain and on wetlands. The remaining comments concerned contamination, wastewater, hydrology, pollution, stormwater, barge traffic, and quality.

Wildlife

A total of 43 comments were received regarding impacts to wildlife. The majority were concerns for wildlife near the Forbes site, specifically wildlife in the parks and wildlife refuges in the area and bald eagles. Another concern was what impact the power plant and transmission lines would have on bird migration.

Other

There were 15 comments received expressing concern about noise pollution from operation of the plant and increased train and automobile traffic. Other comments concerned lighting, land use, odors, and cumulative effects.

Comments Not Considered for the EIS

There were several comments that identified issues that are beyond the scope of the EIS. The comments included:

- Concerns of AECI and their dealings with county commissioners
- Issues of conducting a county-wide vote on allowing a power plant in their county
- Use of eminent domain to obtain property

4.0 PROJECT STATUS

The RUS will prepare an EIS to assess the potential impacts associated with the Norborne and Forbes site alternatives. It is anticipated the EIS will also assess no action, purchased power, load management, renewable energy sources, distributed generation and alternative site locations. Preparation of the EIS is anticipated to begin in the 4th quarter of 2005 and would then be completed near the end of 2007.

The EIS process will include the preparation of a Draft EIS that will be available for a 45-day public review and comment period. The Final EIS will address comments received on the Draft EIS. The Final EIS will be available for a 30-day review and comment period after which the RUS will prepare a Record of Decision (ROD). Notices announcing the availability of the Draft and Final EIS and the ROD will be published in the Federal Register and in local newspapers.

Any final action by RUS related to the proposed project will be subject to , and contingent upon, compliance will all relevant federal, state and local environmental laws and regulations and completion of the environmental review requirements as prescribed in the RUS Environmental Polices and Procedures (7 CFR Part 1794).

If you have any questions or desire additional information, please feel free to contact the following:

Stephanie A. Strength
USDA, Rural Development
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570

Telephone: 202-720-0468
Email: Stephanie.strength@wdc.usda.gov

Appendices

Appendix A Notice of Intent & Notice of Extension

Notice of Intent

SUMMARY: In accordance with the Paperwork Reduction Act of 1995 and Office of Management and Budget (OMB) regulations at 5 CFR part 1320, this notice announces the intent of the Cooperative State Research, Education, and Extension Service (CSREES) to request approval for an extension of the currently approved information collection for the CSREES proposal review process.

DATES: Written comments on this notice must be received by October 11, 2005, to be assured of consideration. Comments received after that date will be considered to the extent practicable.

ADDRESSES: You may submit comments, by any of the following methods: Mail: CSREES, USDA, STOP 2216, 1400 Independence Avenue, SW., Washington, DC 20250–2216; Hand Delivery/Courier: 800 9th Street, SW., Waterfront Centre, Room 4217, Washington, DC 20024; Fax: 202–720–0857; or e-mail: *jhitchcock@csrees.usda.gov.*

FOR FURTHER INFORMATION CONTACT: Jason Hitchcock, (202) 720–4343.

SUPPLEMENTARY INFORMATION:

Title: CSREES Proposal Review Process.

OMB Number: 0524–0041.

Expiration Date of Current Approval: 06/30/2006.

Type of Request: Intent to seek approval for the revision of a currently approved information collection for three years.

Abstract: CSREES is responsible for performing a review of proposals submitted to CSREES competitive award programs in accordance with section 103(a) of the Agricultural Research, Extension, and Education Reform Act of 1998, 7 U.S.C. 7613(a). Reviews are undertaken to ensure that projects supported by CSREES are of high quality and are consistent with the goals and requirements of the funding program.

Proposals submitted to CSREES undergo a programmatic evaluation to determine worthiness of Federal support. The evaluations consist of a peer panel review and may also entail an assessment by Federal employees and mail-in (ad-hoc) reviews.

Need and Use of the Information: The information collected from the evaluations is used to support CSREES grant programs. CSREES uses the results of each proposal evaluation to determine whether a proposal should be declined or recommended for award. When CSREES has rendered a decision, copies of reviews, excluding the names of the reviewers and summaries of review panel deliberations, if any, are provided to the submitting Project Director.

Given the highly technical nature of many of these proposals, the quality of the peer review greatly depends on the appropriate matching of the subject matter of the proposal with the technical expertise of the potential reviewer. In order to obtain this information, an electronic questionnaire is used to collect information about potential panel and ad-hoc reviewers. If the reviewer is already in our database, the questionnaire asks potential reviewers to update their basic biographical information including address, contact information, professional expertise, and their availability to review for CSREES in the future. New reviewers are prompted to complete the questionnaire. This information has been invaluable in the CSREES review process, which has been recognized by the grantee and grantor community for its quality.

The applications and associated materials made available to reviewers, as well as the discussions that take place during panel review meetings are strictly confidential and are not to be disclosed to or discussed with anyone who has not officially been designated to participate in the review process. While each panelist certifies when preparing a review that they do not have a conflict of interest with a particular application and will maintain its confidentiality in the Peer Review System, CSREES collects a certification of the panelist intent at the time of the panel review proceedings to emphasize and reinforce confidentiality not only of applications and reviews but also panel discussions. On the Conflict of Interest and Confidentiality Certification Form, the panelists affirm they understand the conflict of interest guidelines and will not be involved in the review of the application(s) where a conflict exists. Panelists also affirm their intent to maintain the confidentiality of the panel process and not disclose to another individual any information related to the peer review or use any information for personal benefit.

Estimate of Burden: CSREES estimates that anywhere from one hour to twenty hours may be required to review a proposal. Approximately five hours are required to review an average proposal. Each proposal receives an average of four reviews, accounting for an annual burden of 20 hours per proposal. CSREES estimates it receives 4,600 proposals each year. The total annual burden in reviewing proposals is 92,000 hours. CSREES estimates that the potential reviewer questionnaire takes 10 minutes to complete. The database consists of approximately 50,000 reviewers. The total annual burden on reviewers completing the questionnaire is 8,330 hours. CSREES estimates that the potential Conflict of Interest and Confidentiality Certification Form takes 10 minutes to complete. The agency has approximately 1,000 panelists each year. The total annual burden of the certification form is 167 hours. The total annual burden of these components of the entire review process is 100,497 hours.

Comments: Comments are invited on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility; (b) the accuracy of the Agency estimate of the burden of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

All responses to this notice will be summarized and included in the request to OMB for approval. All comments will become a matter of public record.

Done in Washington, DC, this 1st day of August, 2005.

Merle D. Pierson,

Deputy Under Secretary, Research, Education, and Economics.

[FR Doc. 05–15768 Filed 8–9–05; 8:45 am]

BILLING CODE 3410–22–P

DEPARTMENT OF AGRICULTURE

Rural Utilities Service

Associated Electric Cooperative, Inc.; Notice of Intent To Hold Public Scoping Meetings and Prepare an Environmental Impact Statement

AGENCY: Rural Utilities Service, USDA.

ACTION: Notice of intent to hold public scoping meetings and prepare an environmental impact statement (EIS).

SUMMARY: The Rural Utilities Service (RUS) intends to hold public scoping meetings and prepare an environmental impact statement (EIS) in connection with possible impacts related to a project proposed by Associated Electric Cooperative, Inc. (AECI), with headquarters in Springfield, Missouri. The proposal consists of the construction and operation of a nominal 660 megawatt coal-based electrical

generating plant and associated transmission facilities. A proposed and an alternate site both near the Missouri River in the northwest quadrant of Missouri have been identified by AECI. AECI is requesting RUS to provide financing for the proposed project.

DATES: RUS will conduct four public scoping meetings in an open-house format followed by a discussion period: August 22, 2005, Oregon, Missouri, at T.J. Hall Community Center, 104 S. Main; August 23, 2005, Sedalia, Missouri, at Missouri Electric Cooperatives Building, State Fair Grounds, 2503 W. 16th St.; August 24, 2005, Salisbury, Missouri, at Knights of Columbus Building, 311 E. Patterson Ave.; August 25, 2005, Norborne, Missouri, at Goppert Community Building, 201 S. Pine. The open house will be held from 4–6 p.m. with the discussion period from 6:30–7:30 p.m.

A Site Selection Study and Macro Corridor Study Report, prepared by Associated Electric Cooperative, will be presented at the public scoping meeting. The Report is available for public review at RUS at the address provided in this notice, at Associated Electric Cooperative, 2814 S. Golden, Springfield, Missouri 65807 and at:

Cameron Public Library
312 N. Chestnut St.
Cameron, MO 64429
Phone: 816/632–2311

Concordia Library
709 S. Main St.
Concordia, MO 64020
Phone: 660/463–2277

Hale Library & Museum
321 Main St.
Hale, MO 64643
Phone: 660/565–2617

Mid-Continent Public Library, Kearney Branch
100 S. Platte-Clay Way
Kearney, MO 64060–7640
Phone: 816/628–5055

Macon Public Library
210 N. Rutherford St.
Macon, MO 63552
Phone: 660/385–3314

Carrollton Public Library
1 N. Folger St.
Carrollton, MO 64633
Phone: 660/542–0183

Mid-Continent Public Library, Excelsior Springs Branch
1460 Kearney Road
Excelsior Springs, MO 64024–1746
Phone: 816/630–6721

Robertson Memorial Library
19 W. 20th St.
Higginsville, MO 64037
Phone: 660/584–2880

Lexington Library
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DeKalb County Public Library
201 N. Polk St.
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Mound City Public Library
205 E. 6th St.
Mound City, MO 64470
Phone: 660/442–5700

Ray County Library
219 S. College St.
Richmond, MO 64085
Phone: 816/470–3291

Rolling Hills Consolidated Library: Savannah
514 W. Main St.
Savannah, MO 64485
Phone: 816/324–4569

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1904 N. Belt Highway
St. Joseph, MO 64506
Phone: 816/232–5479

Sweet Springs Public Library
323 Spring St.
Sweet Springs, MO 65351
Phone: 660/335–4314

Norborne Public Library
109 East 2nd Street
Norborne, MO 64668
Voice: 816/594–3514

FOR FURTHER INFORMATION CONTACT: Stephanie Strength, Environmental Protection Specialist, RUS, Engineering and Environmental Staff, 1400 Independence Avenue, SW., Stop 1571, Washington, DC 20250–1571, telephone: (202) 720–0468 or e-mail: *stephanie.strength@usda.gov*, or Charles Means, Senior Regulatory Policy Analyst, Associated Electric Cooperative, Inc., P.O. Box 754, Springfield, Missouri 65801 or e-mail: *cmeans@aeci.org*.

SUPPLEMENTARY INFORMATION: AECI proposes to construct and operate a nominal 660-megawatt coal-based electric generating facility at one of two sites in northwest Missouri. Its proposed site is just west of Norborne, Missouri, in Carroll County. The alternate site is west of Big Lake, Missouri, along the Missouri River and just south of U.S. Highway 159 in Holt County. Fuel will be supplied to the plant at either site by rail; competing rail options will be evaluated.

Construction of the project at either site will require the construction of new transmission facilities. Substation upgrades and approximately 135 miles of 345-kV transmission line would be required to connect the new plant to AECI's transmission system. For the proposed Norborne site, one line would go east to the existing Thomas Hill Substation, and one line would go south to Sedalia and then to a new substation in eastern Benton County. For the Holt County site, a double circuit 345-kV line would be required from the plant to the Fairport Substation in DeKalb County and a single circuit 345-kV line from the Fairport Substation to a new substation near Orrick, Missouri, in southwest Ray County. AECI's schedule calls for these facilities to be in commercial operation by May 2011.

Alternatives to be considered by RUS include no action, purchased power, renewable energy sources, distributed generation, and alternative site locations. Comments regarding the proposed project may be submitted (orally or in writing) at the public scoping meetings or in writing no later than September 26, 2005 to RUS at the address provided in this notice.

RUS will use input provided by government agencies, private organizations, and the public in the preparation of a Draft EIS. The Draft EIS will be available for review and comment for 45 days. A Final EIS will then be prepared that considers all comments received. The Final EIS will be available for review and comment for 30 days. Following the 30-day comment period, RUS will prepare a Record of Decision (ROD). Notices announcing the availability of the Draft and Final EIS and the ROD will be published in the **Federal Register** and in local newspapers.

Any final action by RUS related to the proposed project will be subject to, and contingent upon, compliance with all relevant Federal, State and local environmental laws and regulations and completion of the environmental review requirements as prescribed in the RUS Environmental Policies and Procedures (7 CFR part 1794).

Dated: August 4, 2005.

Glendon D. Deal,

Director, Engineering and Environmental Staff, Water and Environmental Programs, Rural Utilities Service.

[FR Doc. 05–15766 Filed 8–9–05; 8:45 am]

BILLING CODE 3410–15–P

ANTITRUST MODERNIZATION COMMISSION

Request for Public Comment

AGENCY: Antitrust Modernization Commission.

ACTION: Request for public comment.

SUMMARY: The Antitrust Modernization Commission requests comments from the public regarding specific questions relating to the issues selected for Commission study.

DATES: Comments are due by September 30, 2005.

ADDRESSES: By electronic mail: *comments@amc.gov*. By mail: Antitrust Modernization Commission, Attn: Public Comments, 1120 G Street, NW., Suite 810, Washington, DC 20005.

FOR FURTHER INFORMATION CONTACT: Andrew J. Heimert, Executive Director & General Counsel, Antitrust Modernization Commission. Telephone: (202) 233–0701; e-mail: *info@amc.gov*. Internet: *http://www.amc.gov*.

SUPPLEMENTARY INFORMATION: The Antitrust Modernization Commission was established to ''examine whether the need exists to modernize the antitrust laws and to identify and study related issues.'' Antitrust Modernization Commission Act of 2002, Pub. L. 107–273, § 11053, 116 Stat. 1856. In conducting its review of the antitrust laws, the Commission is required to ''solicit the views of all parties concerned with the operation of the antitrust laws.'' *Id.* By this request for comments, the Commission seeks to provide a full opportunity for interested members of the public to provide input regarding certain issues selected for Commission study. From time to time, the Commission may issue additional requests for comment on issues selected for study.

Comments should be submitted in written form. Comments should identify the topic to which it relates. Comments need not address every question within the topic. Comments exceeding 1500 words should include a brief (less than 250 word) summary. Commenters may submit additional background materials (such as articles, data, or other information) relating to the topic by separate attachment.

Comments should identify the person or organization submitting the comments. If comments are submitted by an organization, the submission should identify a contact person within the organization. Comments should include the following contact information for the submitter: an address, telephone number, and e-mail address (if available). Comments submitted to the Commission will be made available to the public in accordance with federal laws.

Comments may be submitted either in hard copy or electronic form. Electronic submissions may be sent by electronic mail to *comments@amc.gov*. Comments submitted in hard copy should be delivered to the address specified above, and should enclose, if possible, a CD–ROM or a 3½-inch computer diskette containing an electronic copy of the comment. The Commission prefers to receive electronic documents (whether by e-mail or on CD–ROM/diskette) in portable document format (.pdf), but also will accept comments in Microsoft Word format.

The AMC has issued this request for comments pursuant to its authorizing statute and the Federal Advisory Committee Act. Antitrust Modernization Commission Act of 2002, Pub. L. 107–273, § 11053, 116 Stat. 1758, 1856; Federal Advisory Committee Act, 5 U.S.C. App., § 10(a)(3).

Topic for Comment

The Commission requests comment on the following topic.

Criminal Remedies

1. In setting corporate fines for criminal Sherman Act violations, should there be a means for differentiation based on differences in the severity or culpability of the behavior?

A. Do the Sentencing Guidelines provide an adequate method of distinguishing between violations with differing degrees of culpability? For example, should the Sentencing Guidelines provide distinctions between different types of antitrust crimes (*e.g.*, price fixing versus monopolization)?

B. The Sentencing Guidelines use 20% of the volume of commerce affected as the starting point for computation of corporate antitrust fines. See United States Sentencing Commission, Guidelines Manual § 2R1.1 (2004). Does the volume of commerce provide an adequate measure for setting fines? If not, what other measure(s) or methods would provide a more appropriate way for the Guidelines to establish fine levels?

2. The Sherman Act provides for a maximum fine of $100 million (or, previously, $10 million). The government may seek criminal fines in excess of that maximum pursuant to 18 U.S.C. 3571(d).

A. Should ''twice the gross gain or twice the gross loss'' as provided in Section 3571(d) be calculated based on the gain or loss from all coconspirator sales or on only the defendant's sales?

B. Should fines above the statutory maximum, and thus limited by Section 3571(d), be based on 20% of gross sales as provided for in the Sentencing Guidelines, as they are for fines below the statutory maximum, or should they be calculated differently? If differently, how should they be calculated?

Dated: August 4, 2005.

By direction of the Antitrust Modernization Commission.

Andrew J. Heimert,

Executive Director & General Counsel, Antitrust Modernization Commission.

[FR Doc. 05–15806 Filed 8–9–05; 8:45 am]

BILLING CODE 6820–YM–P

DEPARTMENT OF COMMERCE

Foreign–Trade Zones Board

(Docket 37–2005)

Foreign–Trade Zone 123 Denver, Colorado, Application For Subzone, the Eastman Kodak Company, (X–ray film, Color Paper, Digital Media, Inkjet Paper, and Entertainment Imaging), Windsor, Colorado

An application has been submitted to the Foreign–Trade Zones Board (the Board) by the City and County of

Notice of Extension

documentation, project work plan and timeline, social impacts, evaluation and monitoring, equipment description, budget justification, budget requirements, financial feasibility, and appendices. The project narrative should provide a clear description of the work to be undertaken and how it will be accomplished. It should address the technical approach work plan under criteria 2 listed in Section 5. The project narrative is limited to a total of 10 pages excluding cover page, budget justification, budget, appendices and financial documentation.

c. Detailed Financial Information. Detailed financial information is requested to assess the potential and the capability of the applicant. Financial information remains confidential. The financial information should provide a general overview of historical financial performance, projections (Pro Forma), and cash flow statements. Standard principles should be used for developing the required financial information. Strong applications have benefited from the use of a certified accountant to develop this information. Applicants should refer to the Technology Marketing Unit's Web site for the financial information templates, as well as an example *http://www.fpl.fs.fed.us/tmu* (under Woody Biomass Grants).

d. Full-Application Delivery. Full applications must be postmarked by March 1, 2006, and received no later than 5 p.m. Central Standard Time on March 8, 2006, by the Technology Marketing Unit at the Forest Products Laboratory. Hand-delivered, e-mail, or fax applications shall not be accepted. No exceptions allowed. Please send pre-applications to the address listed in the **ADDRESSES** section of this notice.

8. Appendices. The following information must be included in the appendix of the pre-application and the full-application package:

a. Letter of Support and Biomass Availability From Local USDA Forest Service District Ranger or Forest Supervisor: This letter must describe the status of National Environmental Policy Act (NEPA), acres, timeframes, available volumes, and opportunities for applicant to access these volumes.

b. Letters of Support From Partners, Individuals, or Organizations: Letters of support should be included in an appendix and are intended to display the degree of collaboration occurring between the different entities engaged in the project. These letters must include commitments of cash or in-kind services from all partners and must support the amounts listed in the budget. Each letter of support should be limited to one page in length.

c. Key Personnel Qualifications: Qualifications of the project manager should be included in an appendix. Qualifications are limited to two pages in length and should contain the following: resume, biographical sketch, references, and demonstrated ability to manage the grant.

Dated: September 26, 2005.

Kent P. Connaughton,

Associate Deputy Chief, State and Private Forestry.

[FR Doc. 05–19546 Filed 9–29–05; 8:45 am]

BILLING CODE 3410–11–P

DEPARTMENT OF AGRICULTURE

Rural Utilities Service

Associated Electric Cooperative, Inc.; Notice of Extension of Public Scoping Comment Period

AGENCY: Rural Utilities Service, USDA.

ACTION: Notice of extension of public scoping comment period.

SUMMARY: Upon request the Rural Utilities Service (RUS) agrees to extend the public scoping comment period by 30 days prior to the preparation of an environmental impact statement (EIS) in connection to a project proposed by Associated Electric Cooperative, Inc. (AECI), with headquarters in Springfield, Missouri. A previous notice was published in the **Federal Register** on August 10, 2005 announcing RUS's intent to prepare an EIS and to hold public scoping meetings. The proposal consists of the construction and operation of a nominal 660 megawatt coal-based electrical generating plant and associated transmission facilities. A proposed and an alternate site both near the Missouri River in the northwest quadrant of Missouri have been identified by AECI. AECI is requesting RUS to provide financing for the proposal.

DATES: Send comments to RUS, at the address listed below on or before October 28, 2005.

A Site Selection Study and Macro Corridor Study Report, prepared by Associated Electric Cooperative, is available for public review on the RUS Web site *http://www.usda.gov/rus/water/ees/eis.htm*, at Associated Electric Cooperative offices at, 2814 S. Golden, Springfield, Missouri 65807, and at the following public repositories:

Cameron Public Library, 312 N. Chestnut St., Cameron, MO 64429, Phone 816/632–2311.

Concordia Library, 709 S. Main St., Concordia, MO 64020, Phone: 660/463–2277.

Hale Library & Museum, 321 Main St., Hale, MO 64643, Phone: 660/565–2617.

Mid-Continent Public Library, Kearney Branch, 100 S. Platte-Clay Way, Kearney, MO 64060–7640, Phone: 816/628–5055.

Macon Public Library, 210 N. Rutherford St., Macon, MO 63552, Phone: 660/385–3314.

Maryville Public Library, 509 N. Main St., Maryville, MO 64468, Phone 660/582–5281.

Little Dixie Regional Library, 111 N. 4th St., Moberly, MO 65270, Phone: 660/263–4426.

Oregon Public Library, 103 S. Washington St., Oregon, MO 64473, Phone: 660/446–3586.

Dulany Memorial Library, 501 S. Broadway, Salisbury, MO 65281, Phone: 660/388–5712.

Carrollton Public Library, 1 N. Folger St., Carrollton, MO 64633, Phone: 660/542–0183.

Mid-Continent Public Library, Excelsior Springs Branch, 1460 Kearney Road, Excelsior Springs, MO 64024–1746, Phone: 816/630–6721

Robertson Memorial Library, 19 W. 20th St., Higginsville, MO 64037, Phone: 660/584–2880.

Lexington Library, 1008 Main St., Lexington, MO 64067, Phone: 660/259–3071.

Marshall Public Library, 214 N. Lafayette, Marshall, MO 65340, Phone: 660/886–3391.

DeKalb County Public Library, 201 N. Polk St., Maysville, MO 64469, Phone: 816/449–5695.

Mound City Public Library, 205 E. 6th St., Mound City, MO 64470, Phone: 660/442–5700.

Ray County Library, 219 S. College St., Richmond, MO 64085, Phone: 816/470–3291.

Rolling Hills Consolidated Library, Savannah, 514 W. Main St., Savannah, MO 64485, Phone: 816/324–4569.

Boonslick Regional Library Sedalia Branch 219 W. 3rd St., Sedalia, MO 65301, Phone: 660/827–7323.

Carnegie Library 316 Massachusetts St., St. Joseph, MO 64504, Phone: 816/238–0526.

East Hills Library 502 N. Woodbine Road, Suite A, St. Joseph, MO 64506, Phone: 816/236–2136.

Washington Park Library 1821 N. Third St., St. Joseph, MO 64505, Phone: 816/232–2052.

Boonslick Regional Library 950 E. Main St., Warsaw, MO 65355, Phone: 660/438–5211.

Sedalia Public Library 311 W. Third St., Sedalia, MO 65301, Phone: 660/826–1314.

Downtown Library 927 Felix St., St. Joseph, MO 64501, Phone: 816/232–7729.

Rolling Hills Consolidated Library: Eastside 1904 N. Belt Highway, St. Joseph, MO 64506, Phone: 816/232–5479.

Sweet Springs Public Library 323 Spring St., Sweet Springs, MO 65351, Phone: 660/335–4314.

Norborne Public Library 109 East 2nd Street, Norborne, MO 64668, Voice: (816) 594–3514.

FOR FURTHER INFORMATION CONTACT: Stephanie Strength, Environmental Protection Specialist, RUS, Engineering

and Environmental Staff, 1400 Independence Avenue, SW., Stop 1571, Washington, DC 20250–1571, telephone: (202) 720–0468 or email: *stephanie.strength@usda.gov,* or Charles Means, Senior Regulatory Policy Analyst, Associated Electric Cooperative, Inc., P.O. Box 754, Springfield, Missouri 65801 or email: *cmeans@aeci.org.*

SUPPLEMENTARY INFORMATION: AECI proposes to construct and operate a nominal 660-megawatt coal-based electric generating facility at one of two sites in northwest Missouri. Its proposed site is just west of Norborne, Missouri, in Carroll County. The alternative site is west of Big Lake Missouri, along the Missouri River and just south of U.S. Highway 159 in Holt County. Fuel will be supplied to the plant at either site by rail; competing rail options will be evaluated. Construction of the project at either site will require the construction of new transmission facilities. Substation upgrades and approximately 135 miles of 345-kV transmission line would be required to connect the new plant to AECI's transmission system. For the proposed Norborne site, one line would go east to the existing Thomas Hill Substation, and one line would go south to Sedalia and then to a new substation in eastern Benton County. For the Holt County site, a double circuit 345-kV line would be required from the plant to the Fairport Substation in DeKalb County and a single circuit 345–kV line from the Fairport Substation to a new substation near Orrick, Missouri, in southwest Ray County. AECI's schedule calls for these facilities to be in commercial operation by May 2011.

Alternatives to be considered by RUS include no action, purchased power, renewable energy sources, distributed generation, and alternative site locations.

Four public scoping meetings in an open-house format followed by a discussion period were held: August 22, 2005, Oregon, Missouri, at T.J. Hall Community Center, 104 S. Main; August 23, 2005, Sedalia, Missouri at Missouri Electric Cooperatives Building, State Fair Grounds, 2503 W. 16th St.; August 24, 2005, Salisbury, Missouri at Knights of Columbus Building, 311 E. Patterson Ave.; August 25, 2005, Norborne, Missouri, at Goppert Community Building, 201 S. Pine.

RUS will use input provided by government agencies, private organizations, and the public in the preparation of a Draft EIS. The Draft EIS will be available for review and comment for 45 days. A Final EIS will then be prepared that considers all comments received. The Final EIS will be available for review and comment for 30 days. Following the 30-day comment period, RUS will prepare a Record of Decision (ROD). Notices announcing the availability of the Draft and Final EIS and the ROD will be published in the **Federal Register** and in local newspapers.

Any final action by RUS related to the proposed project will be subject to, and contingent upon, compliance with all relevant Federal, State and local environmental laws and regulations and completion of the environmental review requirements as prescribed in the RUS Environmental Policies and Procedures (7 CFR Part 1794).

Dated: September 23, 2005.

Mark S. Plank,

Acting Director, Engineering and Environmental Staff, Water and Environmental Programs, Rural Utilities Service.

[FR Doc. 05–19578 Filed 9–29–05; 8:45 am]

BILLING CODE 3410–15–M

COMMITTEE FOR PURCHASE FROM PEOPLE WHO ARE BLIND OR SEVERELY DISABLED

Procurement List; Proposed Additions and Deletions

AGENCY: Committee for Purchase From People Who Are Blind Or Severely Disabled.

ACTION: Proposed additions to and deletions from Procurement List.

SUMMARY: The Committee is proposing to add to the Procurement List a product and services to be furnished by nonprofit agencies employing persons who are blind or have other severe disabilities, and to delete services previously furnished by such agencies.

Comments Must Be Received On Or Before: October 30, 2005.

ADDRESS: Committee for Purchase From People Who Are Blind or Severely Disabled, Jefferson Plaza 2, Suite 10800, 1421 Jefferson Davis Highway, Arlington, Virginia 22202–3259.

FOR FURTHER INFORMATION OR TO SUBMIT COMMENTS CONTACT: Sheryl D. Kennerly, Telephone: (703) 603–7740, Fax: (703) 603–0655, or e-mail *SKennerly@jwod.gov*.

SUPPLEMENTARY INFORMATION: This notice is published pursuant to 41 U.S.C. 47(a)(2) and 41 CFR 51–2.3. Its purpose is to provide interested persons an opportunity to submit comments on the proposed actions.

Additions

If the Committee approves the proposed additions, the entities of the Federal Government identified in this notice for each product or service will be required to procure the product and services listed below from nonprofit agencies employing persons who are blind or have other severe disabilities.

Regulatory Flexibility Act Certification

I certify that the following action will not have a significant impact on a substantial number of small entities. The major factors considered for this certification were:

1. If approved, the action will not result in any additional reporting, recordkeeping or other compliance requirements for small entities other than the small organizations that will furnish the product and services to the Government.

2. If approved, the action will result in authorizing small entities to furnish the product and services to the Government.

3. There are no known regulatory alternatives which would accomplish the objectives of the Javits-Wagner-O'Day Act (41 U.S.C. 46–48c) in connection with the product and services proposed for addition to the Procurement List.

Comments on this certification are invited. Commenters should identify the statement(s) underlying the certification on which they are providing additional information.

End of Certification

The following products and services are proposed for addition to Procurement List for production by the nonprofit agencies listed:

Product

Mat, Floor Rubber
NSN: 2540–01–298–8449—61″ x 36″
fabricated mat, reinforced with steel wire
NPA: Hope Haven, Inc., Rock Valley, Iowa
Contracting Activity: Defense Supply Center Columbus, Columbus, Ohio

Services

Service Type/Location: Appliance Cleaning Service, Department of Homeland Security, National Records Center, 150 Space Center Loop, Lee's Summit, Missouri
NPA: Independence and Blue Springs Industries, Inc., Independence, Missouri
Contracting Activity: DHS—Burlington Contracting Office, South Burlington, Vermont

Service Type/Location: Custodial, Warehousing, Shelf Stocking, Defense Commissary Agency, Hurlburt Field Commissary, Fort Walton Beach, Florida
NPA: Brevard Achievement Center, Inc., Rockledge, Florida

Appendix B Newspaper Notices & News Releases

News Releases and Ad

July 13, 2005 | Public meetings scheduled on proposed power plant

Contact : Nancy Southworth
Email : nsouthworth@aeci.org
Phone : 417.885.9246

Meetings in late August will be an opportunity for the public to provide input regarding Associated Electric Cooperative Inc.'s proposed power plant project.

The U.S. Department of Agriculture's Rural Utilities Service (RUS) will hold public scoping meetings Aug. 22 at the T.J. Hall Community Center, 104 S. Main, Oregon, Mo., and Aug. 25 at the Goppert Community Building, 201 S. Pine St., Norborne, Mo., to gather public input on the development of an Environmental Impact Statement for the project.

In April, AECI announced plans to build a 660-megawatt coal-based power plant to meet growing electricity demand among its member-owners: six generation and transmission cooperatives that serve 51 local distribution cooperatives in Missouri, southeast Iowa and northeast Oklahoma. The proposed plant site is near Norborne, Mo., in Carroll County. The alternate site is near Big Lake, Mo., in Holt County. During the meetings, attendees will have the opportunity to learn more about AECI and the project and provide comments to RUS.

RUS hosts public scoping meetings as part of a process that evaluates alternatives and impacts of the proposed project. Based on public comments received at these meetings and studies by AECI, RUS will issue an Environmental Impact Statement.

To learn more about the power plant project, visit AECI's Web site, www.aeci.org.

Associated Electric Cooperative Inc. is owned by and provides wholesale power to six regional and 51 local electric cooperative systems in Missouri, northeast Oklahoma and southeast Iowa that serve more than 800,000 customers. AECI's mission is to provide an economical and reliable power supply and support services to its members with the vision of being the nation's lowest-cost wholesale power supplier. AECI is a Touchstone Energy Cooperative.

Released: 13 July 2005

August 10, 2005 | Public meetings scheduled on proposed power plant

Contact : Nancy Southworth
Email : nsouthworth@aeci.org
Phone : 417.885.9246

Upcoming meetings will be an opportunity for the public to provide input regarding Associated Electric Cooperative Inc.'s proposed power plant project. The U.S. Department of Agriculture's Rural Utilities Service (RUS) is holding the scoping meetings to gather public input on the development of an Environmental Impact Statement for the project.

RUS will hold four meetings in an open-house format followed by a discussion period: Aug. 22 at the T.J. Hall Community Center, 104 S. Main, Oregon, Mo.; Aug. 23 at the Missouri Electric Cooperatives Building, State Fair Grounds, 2503 W. 16th St., Sedalia, Mo.; Aug. 24 at the Knights of Columbus Building, 311 E. Patterson Ave., Salisbury, Mo.; and Aug. 25 at the Goppert Community Building, 201 S. Pine St., Norborne, Mo. Each meeting's open house will be held from 4 to 6 p.m. with the discussion period from 6:30 to 7:30 p.m.

At the public meetings an Alternatives Report, which includes a Site Selection Study, Macro Corridor Study and Alternatives Study prepared by AECI on the coal-based project, will be available. The report is also available at public libraries in the area (see attached list) and on AECI's Web site: www.aeci.org.

In April, AECI announced plans to build a 660-megawatt coal-based power plant to meet growing electricity demand among its member-owners: six generation and transmission cooperatives that serve 51 local distribution cooperatives in Missouri, southeast Iowa and northeast Oklahoma. The proposed plant site is near Norborne, Mo., in Carroll County. The alternate site is near Big Lake, Mo., in Holt County. During the meetings, attendees will have the opportunity to learn more about AECI and the project and provide comments to RUS.

RUS hosts public scoping meetings to invite any affected federal, state and local agencies and other interested persons to comment on the scope, alternatives and significant issues to be analyzed in-depth in the Environmental Impact Statement. Public participation is an integral component of the environmental review process for federal actions. Public participation will be especially important during the scoping phase of AECI's proposal. This input will be used in preparing an Environmental Impact Statement.

To learn more about the public meetings and the power plant project, visit AECI's Web site, www.aeci.org.

Associated Electric Cooperative Inc. is owned by and provides wholesale power to six regional and 51 local electric cooperative systems in Missouri, northeast Oklahoma and southeast Iowa that serve more than 800,000 customers. AECI's mission is to provide an economical and reliable power supply and support services to its members with the vision of being the nation's lowest-cost wholesale power supplier. AECI is a Touchstone Energy Cooperative.

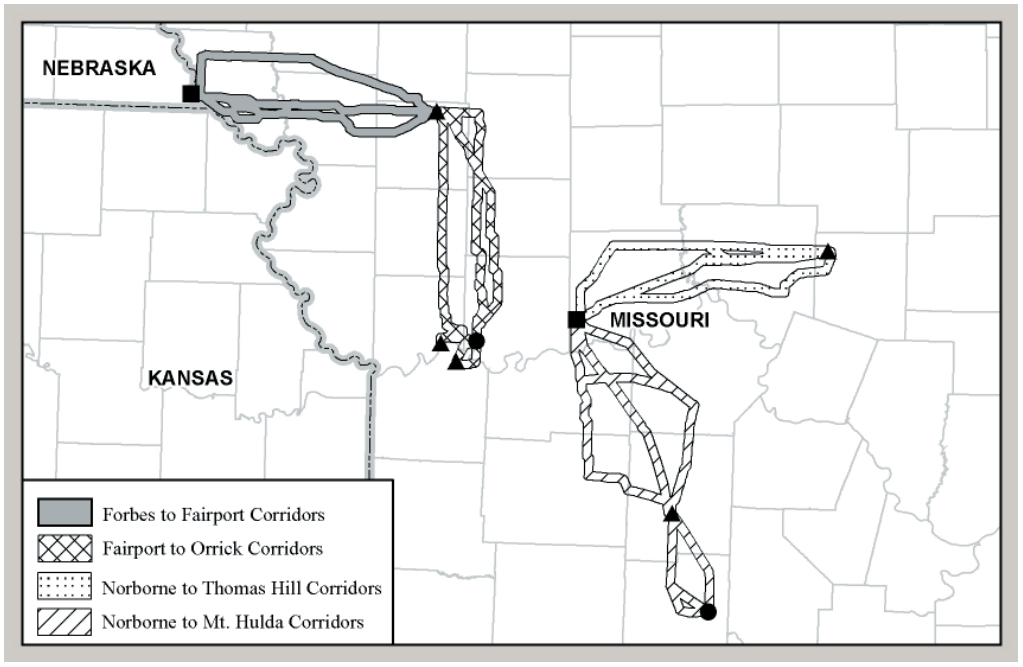
Released: 10 August 2005

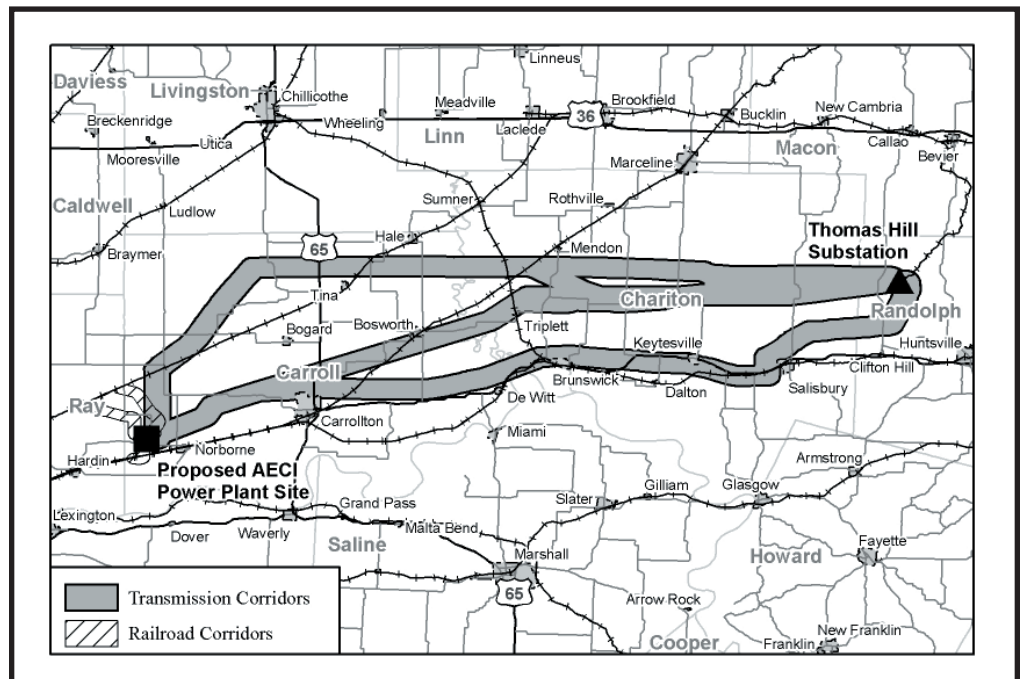
Public meetings scheduled on proposed power plant

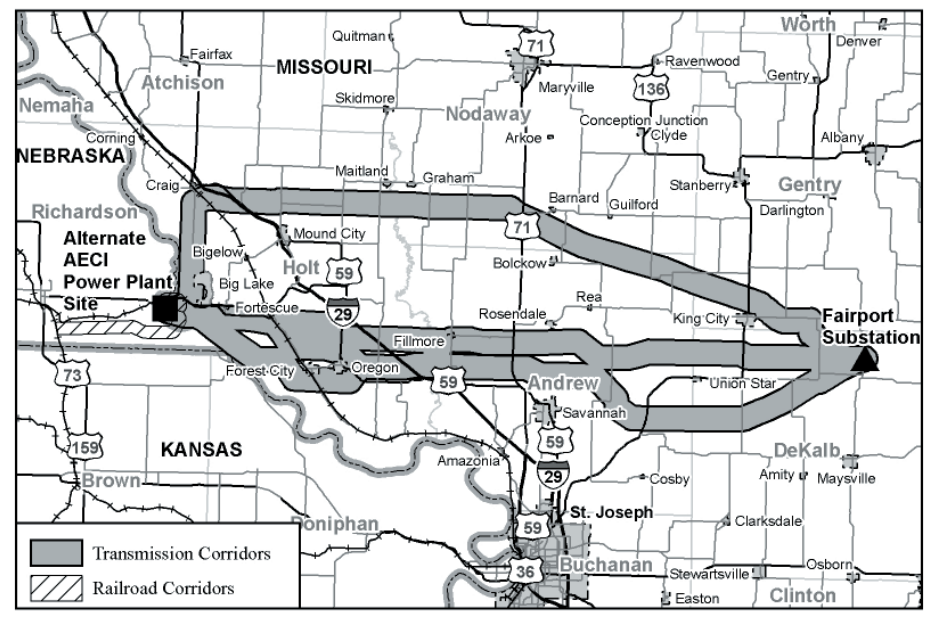
Learn more about AECI and the project and provide comments to RUS.

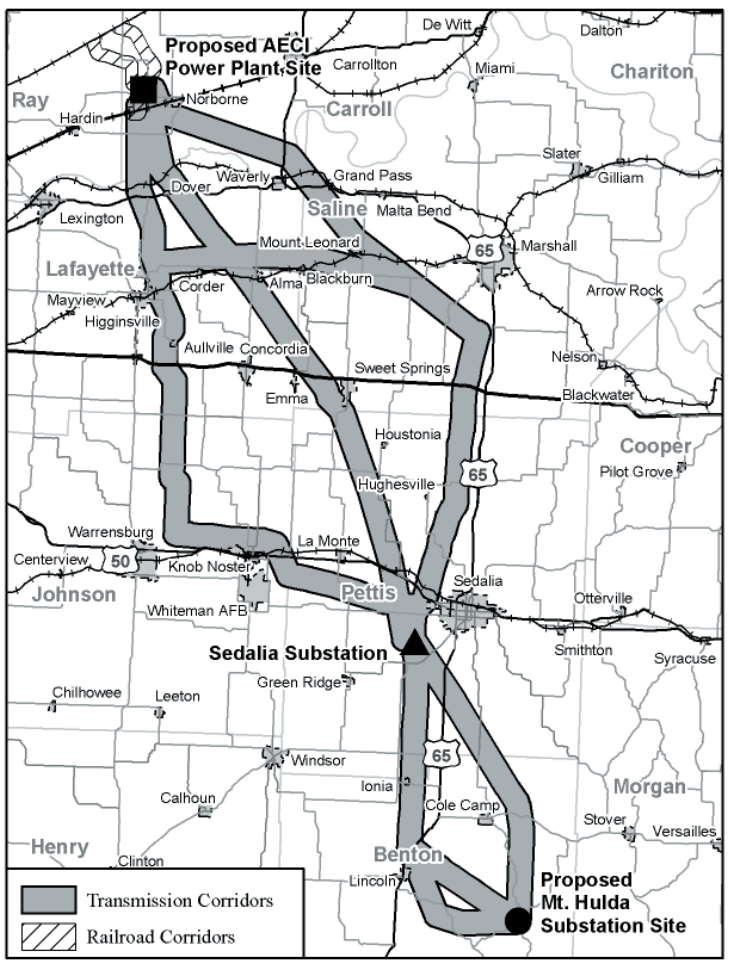
Associated Electric Cooperative Inc. plans to build a 660-megawatt coal-based power plant to meet growing electricity demand among its members. The proposed plant site is near Norborne, Mo., in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

The U.S. Department of Agriculture's Rural Utilities Service (RUS) will hold public scoping meetings to gather public input on the development of an Environmental Impact Statement for the project. AECI is requesting RUS to provide financing for the proposed project.



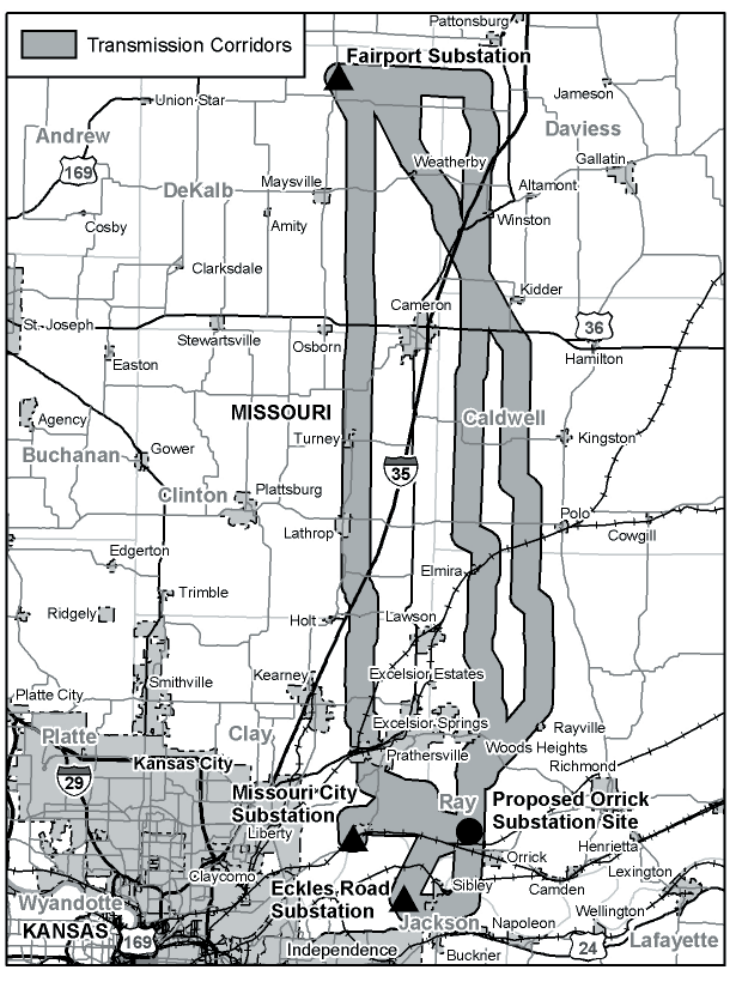






Proposed AECI power plant site

Alternate AECI power plant site



Meetings schedule:

All meetings will begin at 4 p.m. with an open house, followed by a discussion period.

August 22:
T.J. Hall Community Center
104 S. Main
Oregon, Mo.

August 23:
Missouri Electric Cooperatives
Building, State Fair Grounds
2503 W. 16th St.
Sedalia, Mo.

August 24:
Knights of Columbus Building
311 E. Patterson Ave.
Salisbury, Mo.

August 25:
Goppert Community Building
201 S. Pine St.
Norborne, Mo.

For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Please refer to the legal/classified section of this paper for more information regarding the public scoping meetings.

Affidavits

(Space above for recording information)

AFFIDAVIT OF PUBLICATION

Date: August 8, 2005

STYLE OF CASE: Department of Agriculture

STATE OF MISSOURI)
ss.
COUNTY OF BOONE)

Jennifer Plourde, having been duly sworn on oath, state that he/she is an agent for the attached list of Missouri Newspapers, of general circulation in the counties where they are located and have been admitted to the post office as periodicals class matter in the cities of publication and have been published regularly and consecutively for a period of three years, and have lists of bonafide subscribers, voluntarily engaged as such who have paid or agreed to pay a stated price for subscription for a definite period of time, and that such newspapers have complied with the provisions of Section 493.050, Revised Statutes of Missouri, 2000, as amended; and that the notice, a copy of which is hereto attached, was published in said newspapers one time week of

July 26-28, 2005, specific dates on attached invoice, a part of this affidavit.

Signed Jennifer Plourde
Jennifer Plourde

Subscribed and sworn to before me on this 8th day of August, 2005.

Constance L Whitney
Notary Public -- Constance L. Whitney

My commission expires January 13, 2007.

Publication fee: $ 18,952.60

CONSTANCE L. WHITNEY
Notary Public-Notary Seal
State of Missouri
Boone County
My Commission Expires Jan 13, 2007

(Space above for recording information)

AFFIDAVIT OF PUBLICATION

Date: 8-3-05

STATE OF MISSOURI)
) ss.
COUNTY OF CARROLL)

I, Frank Mercer, being duly sworn according to law, state that I am the Publisher of the *Norborne Democrat,* a weekly newspaper of general circulation in the County of Carroll, State of Missouri, where located; which newspaper has been admitted to the Post Office as periodical class matter in the City of Norborne, Missouri, the city of publication; which newspaper has been published regularly and consecutively for a period of three years and has a list of bona fide subscribers, voluntarily engaged as such who have paid or agreed to pay a stated price for a subscription for a definite period of time, and that such newspaper has complied with the provisions of Section 493.050, Revised Statutes of Missouri 2000, and Section 59.310, Revised Statutes of Missouri 2000. The affixed notice appeared in said newspaper in the following consecutive issues:

First Insertion: Vol. 105 No. 30 Dated 7-28 , 20 05
Second Insertion: Vol.____ No.____ Dated____ , 20____
Third Insertion: Vol.____ No.____ Dated____ , 20____
Fourth Insertion: Vol.____ No.____ Dated____ , 20____
Fifth Insertion: Vol.____ No.____ Dated____ , 20____

Frank W. Mercer, Publisher

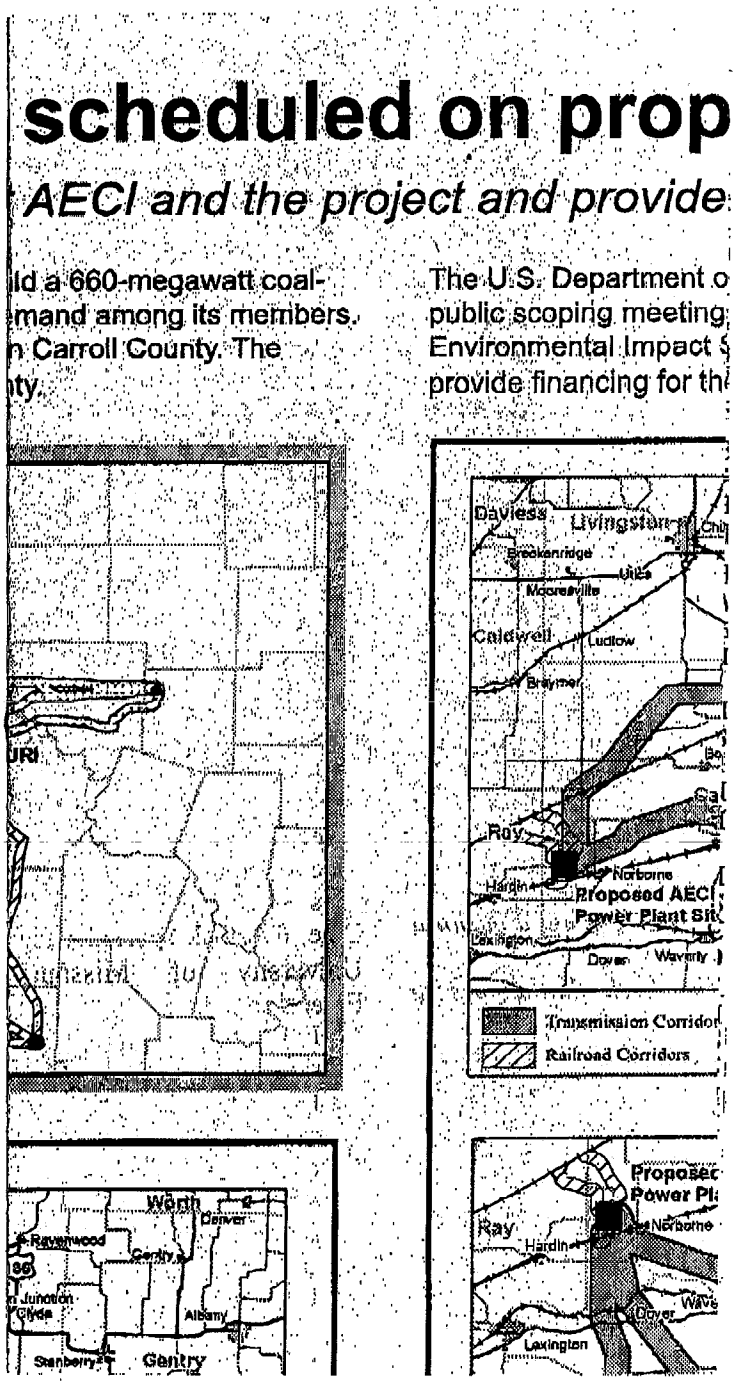
Subscribed and sworn to before me on this 3rd day of August , 20 05

Marla G. Bultmann, Notary Public

NOTARY PUBLIC NOTARY MARLA G BULTMANN SEAL STATE OF MISSOURI

MARLA G. BULTMANN
NOTARY PUBLIC-STATE OF MISSOURI
NOTARY SEAL
CARROLL COUNTY
MY COMMISSION EXPIRES FEB 21, 2008

My Commission Expires_____



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AFFIDAVIT OF PUBLICATION

Date: 8-3-05

STATE OF MISSOURI)
ss.
COUNTY OF CARROLL)

I, Frank Mercer, being duly sworn according to law, state that I am the Publisher of the *Carrollton Democrat*, a twice weekly newspaper of general circulation in the County of Carroll, State of Missouri, where located; which newspaper has been admitted to the Post Office as periodical class matter in the City of Carrollton, Missouri, the city of publication; which newspaper has been published regularly and consecutively for a period of three years and has a list of bona fide subscribers, voluntarily engaged as such who have paid or agreed to pay a stated price for a subscription for a definite period of time, and that such newspaper has complied with the provisions of Section 493.050, Revised Statutes of Missouri 2000, and Section 59.310, Revised Statutes of Missouri 2000. The affixed notice appeared in said newspaper in the following consecutive issues:

First Insertion: Vol. 125 No. 9 Dated 7-29, 20 05
Second Insertion: Vol. ____ No. ____ Dated ____, 20 ____
Third Insertion: Vol. ____ No. ____ Dated ____, 20 ____
Fourth Insertion: Vol. ____ No. ____ Dated ____, 20 ____
Fifth Insertion: Vol. ____ No. ____ Dated ____, 20 ____

Frank W. Mercer, Publisher

Subscribed and sworn to before me on this 3rd day of August, 20 05.

Marla G. Bultmann, Notary Public

NOTARY PUBLIC NOTARY MARLA G BULTMANN SEAL STATE OF MISSOURI

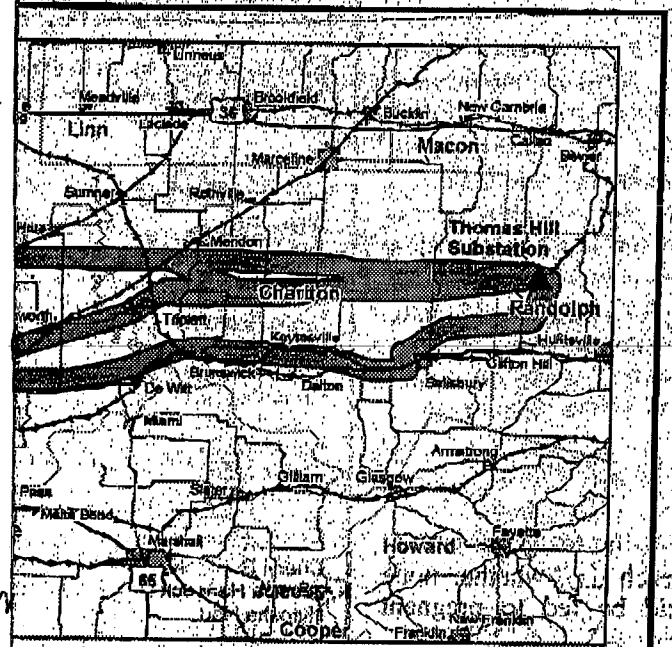
MARLA G. BULTMANN
NOTARY PUBLIC-STATE OF MISSOURI
NOTARY SEAL
CARROLL COUNTY
MY COMMISSION EXPIRES FEB 21, 2006

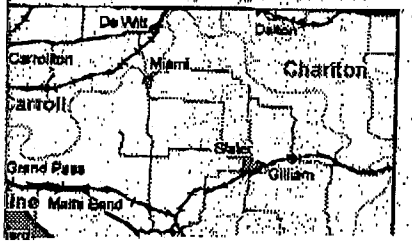
My Commission Expires _____

...nizations, and the public in the preparation of a Draft EIS. The Final EIS will then be prepared that considers all comments ...or 30 days. Following the 30-day comment period, RUS will ...ability of the Draft and Final EIS and the ROD will be published

...ject to, and contingent upon, compliance with all relevant ...mpletion of the environmental review requirements as prescribed ...4).

...culture's Rural Utilities Service (RUS) will hold ...ather public input on the development of an ...ment for the project. AECI is requesting RUS to ...posed project.





Proposed AECI power plant site

PUBLISHER'S AFFIDAVIT

STATE OF MISSOURI)
COUNTY OF CARROLL)

Cindy Thompson, being duly sworn, states that she is the editor of the Hale Horizons, a weekly newspaper published in Hale, Carroll County, Missouri; that said newspaper is a newspaper of general circulation in said County, that said newspaper has been admitted to the post office in said City as second class matter, and has been published in said City regularly and consecutively for more than three years prior to the first publication of the notice herein mentioned; that said newspaper has a list of bona fide subscribers voluntarily engaged as such who have paid or agreed to pay a stated price for a subscription, for a definite period of time and that said newspaper has fully complied with the terms of Section 493.050, Revised Statutes of Missouri, 1949. Affiant further states that the advertisement hereto attached was published in said paper

for 1 weeks consecutively on the same day of each week, as follows:

1st Insertion, No. 19, 3 day of August, 2005.

2nd Insertion, No. ____, ____ day of _____, 20____.

3rd Insertion, No. ____, ____ day of _____, 20____.

4th Insertion, No. ____, ____ day of _____, 20____.

5th Insertion, No. ____, ____ day of _____, 20____.

6th Insertion, No. ____, ____ day of _____, 20____.

7th Insertion, No. ____, ____ day of _____, 20____.

8th Insertion, No. ____, ____ day of _____, 20____.

Cynthia Thompson
Editor

Subscribed and sworn to before me this 8th day of August, 2005.

My term as Notary Public expires 8-13-08

Patricia F. Potter
Notary Public - State Of Missouri
Carroll County
My Commission Expires: _____

Patricia F. Potter
Notary Public

Recorded _____

_____

_____ Probate

Appendix C Agency Comment Letters

Copy of Letter to Agencies and List of Agencies Contacted

United States Department of Agriculture
Rural Development

August 10, 2005

Natural Resource Conservation Service
Missouri State Office
Parkade Center, Suite 250
601 Business Loop 70 West
Columbia, Missouri 65203-2546

Dear Participant:

The Rural Utilities Service (RUS) is preparing an Environmental Impact Statement (EIS) in connection with a proposal by Associated Electric Cooperative, Inc. (AECI) of Springfield, Missouri. AECI proposes to construct a 660 MW coal-based power plant and associated electrical transmission facilities. Initial alternative evaluation and site selection studies have located the proposed power plant site at two sites in northwestern Missouri-Carroll County near Norborne, Missouri, and an alternative site in southwest Holt County, near Big Lake, Missouri. AECI is requesting RUS to provide financial assistance for the construction of this proposal.

In accordance with RUS' environmental regulations, 7 CFR 1794, Environmental Policies and Procedures, RUS will be the lead agency for preparing the EIS. As part of the scoping process and prior to any public scoping meetings, RUS is distributing and making available specific planning documents prepared by AECI for review and comment by Federal, State and local agencies and the public. Enclosed is a compact disk that contains the Alternatives Analysis, Macro-Corridor and Site Selection Studies in both Microsoft Word and Adobe Acrobat portable document file (pdf) formats. Copies of the documents are also available on RUS' website at: http://www.usda.gov/rus.water/ees/eis.htm.

Additionally, you are invited to an interagency meeting hosted by RUS on Tuesday, August 23, 2005 at 10:00 a.m. The meeting will be held at in Sedalia, Missouri at the Missouri Electric Cooperatives Building, Missouri State Fairgrounds, located at 2503 W. 16th Street. RUS and AECI representatives will be at this meeting to solicit and accept your comments and answer questions regarding the proposal.

Please address any written comments by September 26, 2005, to Ms. Stephanie A. Strength, Rural Utilities Service, Engineering and Environmental Staff, 1400 Independence Avenue, SW, Stop 1571, Washington, D.C. 20250-1571 or E-mail: stephanie.strength@usda.gov.

Sincerely,

GLENDON D. DEAL
Director, Engineering and Environmental Staff
Rural Utilities Service

Enclosure

Title	Firstname	Lastname	Position	Company1	Company2	Address1	Address2	Address3	City	State	Zip
Col.	Michael A.	Rossi	District Engineer	U.S. Army Corps of Engineers	Kansas City District	601 East 12th Street			Kansas City	MO	64106
Mr.	Jim	Gulliford	Administrator	U.S. Environmental Protection Agency	Region 7	901 N. 5th Street			Kansas City	KS	66101
Mr.	Gerald M.	Jones	Assistant Manager	U.S. Department of Energy	Office of Kansas City Site Operations	2000 E 95th Street		P.O. Box 410202	Kansas City	MO	64131-3202
Mr.	Charlie	Scott	Field Supervisor	U.S. Fish and Wildlife Service	Columbia Ecological Services Field Office	101 Park DeVille Drive, Suite A			Columbia	MO	65203-0007
Mr.	George	Hendon	Division Manager	Federal Aviation Administration	Airports Division ACE-600	901 Locust			Kansas City	MO	64106-2325
Mr.	Dick	Hainje	Regional Director	Federal Emergency Management Agency	Region VII - Kansas City	2323 Grand Boulevard, Suite 900			Kansas City	MO	64108-2670
Mr.	Randy	Moore	Regional Forester	USDA Forest Service	Eastern Region - R9	626 East Wisconsin Ave.			Milwaukee	WI	53202
Ms.	Macie L.	Houston	Regional Director	U.S. Department of Housing and Urban Development	Kansas City Regional Office	400 State Avenue, Room 200			Kansas City	KS	66101-2406
Mr.	Fred	Ferrell	Director	Missouri Department of Agriculture		1616 Missouri Boulevard		P.O. Box 630	Jefferson City	MO	65102
Mr.	John	Hoskins	Director	Missouri Department of Conservation	Administrative Office	2901 W. Truman Blvd.		P.O. Box 180, 65102	Jefferson City	MO	65109
Mr.	Gregory A.	Steinhoff	Director	Missouri Department of Economic Development		301 West High Street		P.O. Box 1157	Jefferson City	MO	65102
Mr.	Ronald M.	Reynolds	Director	State Emergency Management Agency		2302 Militia Drive		P.O. Box 116, 65102	Jefferson City	MO	65101
Mr.	Dolye	Childers	Director	Missouri Department of Natural Resources		P.O. Box 176			Jefferson City	MO	65102
Mr.	Mark	Miles	Director	Missouri Department of Natural Resources	State Historic Preservation Office	P.O. Box 176			Jefferson City	MO	65102
Mr.	Pete	Rahn	Director	Missouri Department of Transportation	Central Office	105 W. Capitol Avenue			Jefferson City	MO	65102
Ms.	Nancy	Thomson	Executive Director	Northwest Missouri Regional Council of Governments		114 West Third Street			Maryville	MO	64468
Mr.	Randy	Railsback	Executive Director	Green Hills Regional Planning Commission		1104 Main Street		P.O. Box 28	Trenton	MO	64683
Mr.	Laryy	Atkins	Presiding Commissioner	Andrew County	County Courthouse	P.O. Box 206			Savannah	MO	64485-0206
Mr.	Rodney	Meyer	Presiding Commissioner	Benton County	County Courthouse	P.O. Box 1238			Warsaw	MO	65355-1238
Mr.	Raymond	Hartley	Presiding Commissioner	Caldwell County	County Courthouse	P.O. Box 67			Kingston	MO	64650-0067
Mr.	Nelson	Heil	Presiding Commissioner	Carroll County	County Courthouse	8 S. Main Suite 6			Carrollton	MO	64633-1680
Mr.	Larry	Peters	Presiding Commissioner	Chariton County	County Courthouse	306 S Cherry			Keytesville	MO	65261
	Carol	McCaslin	Presiding Commissioner	Clay County	Planning & Zoning	234 W. Shrader, Suite C			Liberty	MO	64068
Mr.	Mark	Hoover	Presiding Commissioner	Clinton County	County Courthouse	P.O. Box 245			Plattsburg	MO	64477-0245
Mr.	David	Tolen	Presiding Commissioner	Daviess County	County Courthouse	102 North Main Street			Gallatin	MO	64640-1152
Mr.	David (Dick)	Lippold	Presiding Commissioner	Dekalb County	County Courthouse	P.O. Box 248			Maysville	MO	64469-0248
Mr.	Ronnie	Mercer	Presiding Commissioner	Gentry County	County Courthouse	200 W. Clay Street			Albany	MO	64402-1604
Mr.	Wayne	Voltmer	Presiding Commissioner	Holt County	County Courthouse	P.O. Box 437			Oregon	MO	64473-0437
Ms.	Katheryn	Shields	County Executive	Jackson County	County Courthouse	303 W. Walnut			Independence	MO	64050
Mr.	William	Brenner	Presiding Commissioner	Johnson County	County Courthouse	300 N. Holden Street			Warrensburg	MO	64093-1708
Mr.	James	Strodtman	Presiding Commissioner	Lafayette County	County Courthouse	1001 Main Street			Lexington	MO	64067-1344
Mr.	Lester	Keith	Presiding Commissioner	Nodaway County	County Courthouse	P.O. Box 218			Maryville	MO	64468-0218
Mr.	Rusty	Kahrs	Presiding Commissioner	Pettis County	County Courthouse	415 South Ohio			Sedalia	MO	65301-4435
Mr.	Jim	Myles	Presiding Commissioner	Randolph County	County Courthouse	110 South Main Street			Huntsville	MO	65259-1009
Mr.	Jeff	Adams	Presiding Commissioner	Ray County	County Courthouse	100 West Main Street			Richmond	MO	64085-1755
Ms.	Becky	Plattner	Presiding Commissioner	Saline County	County Courthouse	101 E Arrow Street			Marshall	MO	65340-2124
Mr.	Ronald	Bell	Refuge Manager	Squaw Creek National Wildlife Refuge		P.O. Box 158			Mound City	MO	64470
Mr.	John	Guthrie	Refuge Manager	Swan Lake National Wildlife Refuge		16194 Swan Lake Ave.			Sumner	MO	64681
Mr.	Bill	Ely	Board of Supervisors	Richardson	County Courthouse	1700 Stone Street			Falls City	NE	68335
Mrs.	Leslie	Holloway		Missouri Farm Bureau		P.O. Box 658			Jefferson City	MO	65102
		Interested Party		U.S. Geological Survey	Missouri District Office	USGS Building	1400 Independence Rd		Rolla	MO	65401
		Interested Party		U.S. Department of Interior	Bureau of Indian Affairs	Main Interior Building MS 2340	1849 C. Street, NW		Washington	DC	20204
		Interested Party		Natural Resource Conservation Service	Missouri State Office	Parkade Center, Suite 250	601 Business Loop 70 West		Columbia	MO	65203-2546
		Interested Party		Missouri Federal Assistance Clearinghouse	Office of Administration	Truman State Office Building, Room 840	301 West High Street	P.O. Box 809	Jefferson City	MO	65102

Agency Responses

SEP -2 2005

AUG 30 2005

Matt Blunt, Governor • Doyle Childers, Director

STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

August 22, 2005

Stephanie A. Strength
Engineering & Environmental Staff
Rural Utilities Service
1400 Independence Avenue, SW
Washington, DC 20250

Re: AECI Coal-Based Power Plant & Transmission Lines (RUS) Holt & Carroll Counties, Missouri

Dear Ms. Strength:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR part 800, which require identification and evaluation of cultural resources.

We have reviewed the information provided concerning the above referenced project. We have determined that there is a moderate to high potential for the presence of archaeological sites near and within the area of the Norborne and Forbes proposed project areas, as indicated by the topographic location, and that an archaeological survey should be conducted. This survey should be completed prior to the initiation of project-related construction activities.

A list of independent archaeological contractors who can perform such services is available through the Department of Natural Resources, Division of Administrative Support. The list can be obtained by calling (573) 751-0958 and requesting the "archaeological contractors list." Note that any 36 CFR Part 61 qualified archaeologist may perform an archaeological survey. If you choose a contractor not on the list, please be certain to include his or her curriculum vitae in the report. We would appreciate two (2) copies of the archaeological survey report when it is finished so we may complete the review and comment process.

If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call Ms. Deel at 573/751-7862. Please be sure to include the SHPO Log Number **(019-HO-05)** on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy
State Historic Preservation Officer

c Bob Quigle, RUS

United States Department of Agriculture

USDA

NRCS Natural Resources Conservation Service

3915 Oakland Avenue, Suite 103, St. Joseph, MO. 64506

September 20, 2005

Ms. Stephanie A. Strength
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, DC. 20250-1571

Dear Ms. Strength;

This letter is in response Mr. Glendon D. Deal's letter to the Natural Resources Conservation Service, (Missouri); dated August 10, 2005. Mr. Deal's letter invited comments regarding the proposed power plant site near Norborne, Missouri; and alternate site near Big Lake, Missouri. A copy of his letter is enclosed. The following are my comments:

1. Background Information-In 1981, the U.S. Congress passed the Farmland Protection Policy Act (FPPA) which directs USDA through NRCS to provide technical assistance to Federal agencies, and State and local governments or organizations that desire to develop programs or policies to limit the conversion of productive farmlands to non-agricultural uses.

2. The Goal of FPPA- is to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of important farmland to nonagricultural uses. More information can be found at http://www.nrcs.usda.gov/programs/fppa/index.html. Form AD-1006 is enclosed.

3. Potential Wetlands-The NRCS County Hydric soil lists can be obtained at the county NRCS field office. Hydric soils are soils that show properties of long term saturation, and have a high probability of being classified as a wetland. The Hydric soil list is available on the web at http://www.nrcs.usda.gov/technical/efotg/. Wetlands are critical to the ecosystem, and have numerous benefits. NRCS, under the Secretary of Agriculture, has responsibility for the Wetland Reserve Program. The Wetland Reserve Program is a voluntary program which places 30 year and perpetual easements on marginal crop ground for the specific purpose of restoring those lands back to wetlands. These are restricted deed easements which require the landowner to maintain the functions and values of the wetland for the specified time period of the easement. There is a Wetland Reserve Program easement within the area proposed for the Norborne power plant site. Any development in the easement area, which would potentially impact the functions and values of the wetland easement, would be a concern to our agency. Additional information on the Wetland Reserve Program can be found at http://www.nrcs.usda.gov/programs/wrp/index.html.

3915 Oakland Avenue, Suite 103, St. Joseph, MO. 64506

4. Erosion Considerations-If your project includes trenching, or construction activity that would destroy grass or vegetative cover, we recommend special attention be given to areas subject to soil erosion caused by rain and water flow. Even though most trenches are narrow, soil erosion can still be a significant hazard on slopes greater than 2 percent. I recommend vegetative cover be promptly reestablished on all disturbed areas The Critical Area Planting standard from our Field Office Technical Guide can be accessed at http://www.nrcs.usda.gov/technical/efotg/.

5. Conservation Structures- such as: terraces, diversions, underground drain tiles, grade stabilization structures, grassed waterways: If the project construction causes any damage to soil and water conservation practices or structures, they should be promptly repaired.

6. Endangered Species- Certain trees and forest habitats are critical to the Indiana Bat. To obtain detailed information regarding threatened and endangered species in Missouri, please contact the Missouri Department of Conservation, 2901 W. Truman Blvd, P.O Box 180, Jefferson City, MO. Phone- 573-751-4115.

If you have any questions, please call me at 816-232-6555 ext. 138.

Sincerely,

David K. Kacirek

David K. Kacirek
Area Resource Soil Scientist

Enclosure

cc: David V. Johnson, District Conservationist, Carrollton, MO
Ronnie J. Owen, District Conservationist, Rock Port, MO
Patricia L. Hufford, Area Conservationist, St. Joseph, MO
Dennis K. Potter, State Soil Scientist, Columbia, MO
Doug L. Helmers, Wetland Team Leader, Chillicothe, MO

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request	
Name of Project	Federal Agency Involved	
Proposed Land Use	County and State	
PART II *(To be completed by NRCS)*	Date Request Received By NRCS	Person Completing Form:

Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)*	YES ☐	NO ☐	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %	
Name of Land Evaluation System Used	Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS	

PART III *(To be completed by Federal Agency)*	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly				
B. Total Acres To Be Converted Indirectly				
C. Total Acres In Site				
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide Important or Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)				

PART VI *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*	**Maximum Points**	Site A	Site B	Site C	Site D
1. Area In Non-urban Use	(15)				
2. Perimeter In Non-urban Use	(10)				
3. Percent Of Site Being Farmed	(20)				
4. Protection Provided By State and Local Government	(20)				
5. Distance From Urban Built-up Area	(15)				
6. Distance To Urban Support Services	(15)				
7. Size Of Present Farm Unit Compared To Average	(10)				
8. Creation Of Non-farmable Farmland	(10)				
9. Availability Of Farm Support Services	(5)				
10. On-Farm Investments	(20)				
11. Effects Of Conversion On Farm Support Services	(10)				
12. Compatibility With Existing Agricultural Use	(10)				
TOTAL SITE ASSESSMENT POINTS	160				
PART VII *(To be completed by Federal Agency)*					
Relative Value Of Farmland *(From Part V)*	100				
Total Site Assessment *(From Part VI above or local site assessment)*	160				
TOTAL POINTS *(Total of above 2 lines)*	260				

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES ☐ NO ☐

Reason For Selection:

Name of Federal agency representative completing this form:	Date:

(See Instructions on reverse side)

Form AD-1006 (03-02)

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006.

Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s)of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)

Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days. In the event NRCS fails to complete a response within the required period, the agency may proceed as thought the site were not farmland.)

Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.

Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form.

Step 7 - The Federal agency involved in the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA and the agency's internal policies.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County And State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities) that will cause a direct conversion.

Part VI: Do not complete Part VI if a State or Local site assessment is used.

Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, powerline and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.

Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, FPPA suggests the agency consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites).

In rating alternative sites, Federal agencies shall consider each of the criteria and assign points within the limits established in the FPPA rule. Sites most suitable for protection under these criteria will receive the highest total scores, and sites least suitable, the lowest scores.

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, adjust the site assessment points to a base of 160.
Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

USDA Rural Development

United States Department of Agriculture
Rural Development

COPY

August 10, 2005

Natural Resource Conservation Service
Missouri State Office
Parkade Center, Suite 250
601 Business Loop 70 West
Columbia, Missouri 65203-2546

Dear Participant:

The Rural Utilities Service (RUS) is preparing an Environmental Impact Statement (EIS) in connection with a proposal by Associated Electric Cooperative, Inc. (AECI) of Springfield, Missouri. AECI proposes to construct a 660 MW coal-based power plant and associated electrical transmission facilities. Initial alternative evaluation and site selection studies have located the proposed power plant site at two sites in northwestern Missouri-Carroll County near Norborne, Missouri, and an alternative site in southwest Holt County, near Big Lake, Missouri. AECI is requesting RUS to provide financial assistance for the construction of this proposal.

In accordance with RUS' environmental regulations, 7 CFR 1794, Environmental Policies and Procedures, RUS will be the lead agency for preparing the EIS. As part of the scoping process and prior to any public scoping meetings, RUS is distributing and making available specific planning documents prepared by AECI for review and comment by Federal, State and local agencies and the public. Enclosed is a compact disk that contains the Alternatives Analysis, Macro-Corridor and Site Selection Studies in both Microsoft Word and Adobe Acrobat portable document file (pdf) formats. Copies of the documents are also available on RUS' website at: http://www.usda.gov/rus.water/ees/eis.htm.

Additionally, you are invited to an interagency meeting hosted by RUS on Tuesday, August 23, 2005 at 10:00 a.m. The meeting will be held at in Sedalia, Missouri at the Missouri Electric Cooperatives Building, Missouri State Fairgrounds, located at 2503 W. 16th Street. RUS and AECI representatives will be at this meeting to solicit and accept your comments and answer questions regarding the proposal.

Please address any written comments by September 26, 2005, to Ms. Stephanie A. Strength, Rural Utilities Service, Engineering and Environmental Staff, 1400 Independence Avenue, SW, Stop 1571, Washington, D.C. 20250-1571 or E-mail: stephanie.strength@usda.gov.

Sincerely,

GLENDON D. DEAL
Director, Engineering and Environmental Staff
Rural Utilities Service

Enclosure

Missouri Department of Transportation

MoDOT

105 West Capitol Avenue
P.O. Box 270
Jefferson City, MO 65102
(573) 751-2551
Fax (573) 751-6555
www.modot.org

Pete K. Rahn, Director

September 23, 2005

Ms. Stephanie A. Strength
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW
Stop 1571
Washington, D.C. 20250-1571

Dear Ms. Strength:

SUBJECT: Proposed Missouri power plant

This is in reply to your August 5, 2005 letter regarding the proposal by Associated Electric Cooperative, Inc. (AECI) of Springfield, Missouri to construct a coal-based power plant at either a site near Norborne (Carroll County) or else near Big Lake (Holt County). We have reviewed the planning documents you provided and have the following comments.

Norborne Site

Our North Central District Office offered the following comments:

Generally, the largest impact to MoDOT will be the construction traffic using the MoDOT system to get to the site. Your planning documents indicate that 1,000 construction workers plus 75 trucks delivering materials will be accessing the site each day. Missouri Route DD will need work in order to hold up under the proposed construction traffic for several years.

Once constructed and during normal operations, 135 employees plus the trucking of flyash, gypsum, lime and ammonia will travel to and from the power plant. MoDOT will need to assess the impacts to our system caused by this traffic. What will be the frequency of the long-term trucking of these materials?

For our assessment of the proposed at-grade rail crossings at Missouri Route DD and either Missouri Route AA or else Missouri Route JJ, we shall need to know the frequency and duration of trains crossing at these locations. We also need clarification about the rail crossing at Missouri Route DD because the planning documents indicate an at-grade crossing, yet a consultant working on a Request for Proposal contacted our staff about specifics for a rail grade separation there.

Access to the proposed substation at the northeast corner of Missouri Routes DD and JJ will require a MoDOT permit. Any additional access points or changes in access points from Missouri Route DD to the plant will also require MoDOT permits.

Our MoDOT District Office in Macon will be the point of contact for the Norborne site. Please contact Mr. Dan Niec, District Engineer, North Central District, Missouri Department of Transportation, 902 North Missouri Street, P.O. Box 8, Macon, MO 63552. The telephone number there is (660) 385-3176; the fax is (660) 385-4195.

Big Lake Site

Our Northwest District Office offered the following comments:

Interstate Access: To construct a power plant at the Big Lake Site will require truck-delivered materials (almost everything used for the construction of the power plant) to be shipped on Interstate 29 and exited at either the southerly U. S. Route 59 interchange or the Missouri Route H interchange near the Honey Creek Wildlife area. From either of these interstate access points, it will be a 15-mile trip on cold mix routes to the project site. The roads will not support the heavy volume of heavy truck traffic and MoDOT will have to upgrade the roads with a minimum of four inches (4") new base and 10 inches of asphalt just to make them usable for the construction period. Depending on the origin of the materials, truck traffic may also originate in Kansas, cross the U. S. Route 159 Missouri River Bridge and then use Missouri Route T to access the site. That route is approximately 28 miles long.

Rail Crossing: The Burlington Northern-Santa Fe (BNSF) Railroad would be the rail carrier of choice to deliver the coal to the plant. Based on the generating capacity, the plant will probably use a minimum of two trains per week in the start-up mode. The BNSF track has a single high-speed main track that passes within three (3) miles of the site. A siding, nearly 1.75 miles long, might have to be constructed parallel to the main track, and a loop spur track will have to be constructed to the power plant facility which will require an at-grade crossing with Missouri Route T in Holt County. We believe that since this power plant project will be a benefit for the railroad, they likely will not object to the at-grade crossing which they will construct, own, operate and maintain forever. All MoDOT will need to do is provide the permit and negotiate the agreement. The railroad will likely build it all.

Rail Siding: In the vicinity of the power plant, the BNSF track right of way is bounded by Missouri Route T on the west and by the Riverbreaks State Forest on the east. Some additional care will be required to build a siding in this narrow corridor, if the BNSF chooses to do so.

Bridges: There are several small bridge structures on Missouri Route T, Missouri Route 111, and U.S. Route 159. It might be necessary to schedule some or all of these structures for expensive improvements to carry the numerous heavy trucks.

Worker access from St. Joseph on Missouri Route T: During construction of the power plant and during the life of the facility, many of the workers will likely come from the St. Joseph area. The most direct access to the power plant will be westerly from St. Joseph on Missouri Route T to where it dead ends in Nodaway. At Nodaway, the workers will have to use a gravel county road for a distance of five (5) miles to reconnect with Missouri Route T at the intersection of Missouri Route T and Missouri Route U. From this intersection, it is approximately five (5) additional miles to the power plant. The disposition of the five-mile portion of the gravel county road might have to be addressed, just to provide access for the workers to the power plant.

General roadway infrastructure: There are four roadway corridors that provide access to the proposed site. Most of the roads that comprise the existing roadway infrastructure are two-lane, low-volume, cold mix routes. In most cases the roads consist of two ten-foot (10') or two eleven-foot (11') lanes with no shoulders. This infrastructure is substandard and unsuitable to accommodate the large trucks and an increased volume of traffic. MoDOT suggests that the proponents, in coordination with MoDOT, designate a single corridor to be used by the trucks and other construction vehicles so MoDOT does not have to rebuild an excessive amount of the existing roadway network.

The Northwest District's concerns are similar to those of the North Central District in that the local roads are cold mix and would not withstand increased truck traffic without some type of rehabilitation to accommodate the additional traffic. The Northwest District suggests a designated truck route from Interstate 29 to the Big Lake facility be selected. Innovative Financing Funds might be used to make the necessary improvements on the truck route. Railroad crossing improvements would also need to be included in the rehabilitation, depending upon the site selection for the plant and the selection of the truck route.

Our MoDOT District Office in St. Joseph will be the point of contact for the Big Lake site. Please contact Mr. Don Wichern, District Engineer, Northwest District, Missouri Department of Transportation, 3602 North Belt Highway, P.O. Box 287, St. Joseph, MO 64502. The telephone number there is (816) 387-2350; the fax is (816) 387-2359.

Summary

Our concerns can be summarized as follows:

Existing state routes to the proposed sites are low-volume, cold mix roadways. We shall need to consider upgrading these facilities, including roadway bridges, and perhaps even non-MoDOT roadways to handle the construction traffic and the operations traffic. The identification of a specific route(s) for construction and operations access is recommended in coordination with the appropriate MoDOT District Office to help us all focus our needs and resources.

We shall need clarification of the types of rail crossings being proposed across MoDOT roadways. The type of crossings being proposed should be tied to the frequency and duration of trains accessing the power plant sites. Coordination among AECI, MoDOT and the appropriate railroad companies is recommended to establish concepts and responsibilities in this issue.

Permits will need to be acquired from the appropriate MoDOT District Office for any access desired to the MoDOT system.

MoDOT also is interested in discussing the availability of cinders from the power plant for use on the roads of our system regardless of whether the site chosen is in our North Central District or our Northwest District. We would consider a contract between AECI and MoDOT for the cinder material that MoDOT could use on the roads.

We assume that we shall be able to work with you to address these issues during the course of the preparation of the National Environmental Policy Act (NEPA) documents for the proposal and also subsequent to that site selection and approval.

Please provide our District Office contacts noted above and our Central Office with NEPA documents as they are prepared. We shall review those during the public comment period and offer any comments that we might have. Our Central Office contact is Mr. Mark Kross, Environmental Process and Policy Specialist, Design Division-Environmental Section, Missouri Department of Transportation, P.O. Box 270, Jefferson City, MO 65102. Please address any parcels to Mr. Kross at MoDOT, 1320 Trail Creek Drive, Jefferson City, MO 65109.

Sincerely,

Pete K. Rahn
Director

msk-dc

cc: Don Wichern-1
Dan Niec-2
Kathy Harvey-de

DEPARTMENT OF THE ARMY
KANSAS CITY DISTRICT, CORPS OF ENGINEERS
700 FEDERAL BUILDING
KANSAS CITY, MISSOURI 64106-2896

REPLY TO
ATTENTION OF:

September 23, 2005

Regulatory Branch
(200502430)

Ms. Stephanie A. Strength
U.S. Department of Agriculture
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Ave., SW, Stop 1571
Washington, DC 20250-1571

Dear Ms. Strength:

As requested by your agency in a letter dated August 5, 2005, the Kansas City District's Regulatory Branch has reviewed an Alternatives Report, dated August 2005, prepared by Associated Electric Cooperative of Springfield, Missouri, for a proposed baseload power plant. Our review of the Report for the proposed 660 MW coal-based power plant and associated electrical transmission facilities did not identify any significant issues, at this time, which are related to our program responsibilities. We appreciate the opportunity to comment on the proposed project and look forward to continued participation in the NEPA process during preparation of an Environmental Impact Statement for the proposal.

If you have any questions or issues you would like to discuss regarding this matter, please feel free to write me at the address above or to call/e-mail me at 816-983-3656, (FAX 816-426-2321), or e-mail Robert.j.smith@nwk02.usace.army.mil.

Sincerely,

Robert J. Smith
Special Projects Manager
Regulatory Branch

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Columbia Ecological Services Field Office
101 Park DeVille Drive, Suite A
Columbia, Missouri 65203-0057
Phone: (573) 234-2132 Fax: (573) 234-2181

September 28, 2005

Ms. Stephanie Strength
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, D.C.. 20025-1571

Dear Ms. Strength:

Please refer to the August 10, 2005, Federal Register notice announcing the Rural Utilities Service's (RUS) intent to prepare an Environmental Impact Statement regarding a proposal to construct and operate a 660 megawatt, coal-based electrical generating plant and associated transmission facilities. The applicant, Associated Electric Cooperative, Inc. (AECI), is requesting the RUS to provide financing for the project that will service AECI's customers in Missouri. The U.S. Fish and Wildlife Service (Service) has reviewed that Notice, and materials (i.e., *Alternatives Report, Proposed Baseload Power Plant, AEC, Inc., August 2005*) provided at a August 23, 2005, interagency meeting in Sedalia, and offers the following scoping comments pursuant to the National Environmental Policy Act (42 U.S.C. 4321-4327), the Endangered Species Act (16 U.S.C. 1531 et seq.) and Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.).

General Comments

The Alternatives Report identifies 5 critical elements for a desirable facility location: land area, water source, rail access, not a Class 1 area and nonattainment (air quality) areas. The facility will require a minimum of 1,200 - 1,500 (generally level) acres, ideally outside a floodplain. AECI representatives indicated that acreage is necessary to accommodate the proposed facilities, as well as potential future development. The EIS should, to the extent possible, address not only the proposed facilities, but potential at any site for future development, as indicated. This should include potential cumulative effects to water (both supply and discharge), air (including air modeling information), traffic, transmission facilities, etc., resulting from additional future development at the proposed sites.

There are two proposed sites: the preferred site at Norborne, and the alternate site at Forbes. While both sites appear to be viable options, the Service has significant concerns

with the Forbes site that should be thoroughly addressed in the EIS if RUS decides to retain this alternative. As noted throughout the document, the Forbes sites is located near Squaw Creek National Wildlife Refuge, a major migratory stopover for waterfowl with peaks exceeding 0.5 million birds. At times those birds can also be accompanied by some of the largest concentrations of wintering bald eagles in the Midwest. Numerous other species of migratory songbirds, as well as state and federally listed species use the Missouri River corridor, the surrounding state parks, state wildlife conservation areas, and Corps of Engineers wildlife mitigation lands as breeding, migration, and overwintering habitat. Construction and operation of the proposed facility and associated supply and transmission facilities has the potential to significantly affect surrounding fish and wildlife resources, as well as recreational opportunities associated with those resources.

The Forbes site, albeit protected by a federal levee, nonetheless is solidly within the floodplain of the Missouri River. The Corps has recently recalculated flood flow frequencies for the Missouri River (http://www.mvr.usace.army.mil/pdw/pdf/Flow Frequency/Documents/FinalReport/default.asp), and that information should be used in evaluating the potential for flooding at the site, and potential impacts to the designated floodway. Furthermore, the ash disposal facility would be located in a less than ideal site, subject to a catastrophic flood, and built using fill in a floodplain with a high water table, adjacent to wetlands. Should AECI carry this location forward, the EIS should address the measures used to ensure the integrity of the disposal facility, as well and monitoring requirements to detect problems (i.e., leaks) should any develop. Over the last twenty years, the federal government, in partnership with the states and localities, have recognized the need to restore some of the historic functions of the Missouri River floodplain, and documented such restoration as an effective tool to help minimize floodstages and reduce flood damages to private property. The proposed project at the Forbes site could be at odds with those goals, and potentially foreclose future opportunities to restore a portion of the Missouri River system.

The Alternatives Report indicates the plant will need a water supply of approximately 5,600 gallons per minute (gpm). The EIS should comprehensively address hydrologic effects of the project to the surrounding areas, including water resources for the local community, hunt clubs, center pivot irrigation systems, Mallard Marsh, Big Lake State Park, and area wetlands. For example, when the Service installed a small pump on our Squaw Creek NWR, pumping approximately 2,500 gpm from the aquifer, adversely affected 2 homeowners about 1 mile away in the town of Bigelow. Fortunately rural water was completed several years ago, but the volume of water needed for the proposed project demands a rigorous analysis of potential effects to local hydrology.

For both the Forbes and the Norborne sites the EIS should include a detailed description and evaluation of all work needed for the facilities and transmission corridors, including any additional tree clearing, land clearing, river crossings, etc., as well as measures to reduce effects to fish and wildlife (e.g., measures to reduce bird strikes on transmission lines). As those details are developed the Service can offer specific recommendations, as appropriate, to avoid or minimize effects to fish, wildlife, or federally listed species. The

list included in the Alternative Report noted the species of concern that may occur in and along the proposed project corridors.

While the Service appreciates the difficulty of predicting future development, we believe it is important to include a cumulative impact analysis. As noted earlier, AECI hopes to locate the proposed facility at a site that could also accommodate additional development in the future. We have been told by other power interests that several new facilities may likely be needed along the lower Missouri River over the next decade. The Service requests that the EIS address the cumulative effects of the proposed facility as well as additional facilities in the same area, using the same water sources, and having similar, adjacent, or overlapping areas of effects, particularly for air impacts.

Specific Comments

Table 6-1 (page 6-8) – This table should be revised to reflect the information presented on Page 6-64 for the Forbes Site "These areas consist of palustrine emergent (approximately 50 acres), palustrine forested (approximately 130 acres) and palustrine scrub/shrub (approximately 70 acres) wetlands, totaling approximately 250 acres of wetlands present on the site." The current table is incomplete. In addition, in Missouri many farmed wetlands have not been mapped as part of the NWI so those figures may be conservative.

Page 6-55 "For residents living in Big Lake, the plant will be visible but not the dominant feature due to the distance from the site." The Alternatives Report may have underestimated the visual effect of the proposed facility at the Forbes site. The 125 feet high stack at the ethanol plant in Craig is clearly visible at Squaw Creek NWR, 10 miles away. The 600-foot tower and associated facility will likely have a large presence at the rural Forbes site.

Figure 6-23 – Historically, bald eagles nested at Big Lake, which appears to be in the larger area delineated on the map. Please check with the Missouri Department of Conservation for the most recent information on nest activity at that site.

Page 6-69 – The Federal Highways Administration recently completed an EIS on replacing the Highway 159 Bridge. That document contains a cultural resources study of much of the area along the highway to Big Lake.

Conclusion

In accordance with Appendix II of the Council on Environmental Quality's Regulations for Implementation of NEPA (50 CFR, Part 1500), the U.S. Fish and Wildlife Service has special expertise pertaining to fish and wildlife impacts associated with NEPA actions. We believe that construction of the proposed power plant at the alternate Forbes site would have significant impacts on important fish and wildlife resources. We are especially concerned with the direct and in-direct effects of a power plant at this location on Squaw Creek National Wildlife Refuge, a fish and wildlife resource of national

significance. The Service considers the Forbes site as the most environmentally damaging alternative currently being evaluated. Therefore, the Service recommends that RUS either delete the Forbes alternative from consideration in the EIS or adopt early in the NEPA process the Norborne site or another environmentally acceptable site as the preferred alternative.

Thank you for the opportunity to review the proposed project. Please add this office to your mailing list for this project. If you have questions regarding our comments, please contact Ms. Jane Ledwin, 573.234.2132, extension 109.

Sincerely,

Charles M. Scott
Field Supervisor

cc: Squaw Creek NWR, Mound City, MO (Bell)
Swan Lake NWR, Sumner, MO (Guthrie)
GIFO, USFWS, Grand Island, NE

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

OCT 2 6 2005

NOV - 3 2005

Stephanie A Strength
Rural Utilities
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, D.C. 20250-1571

Dear Ms. Strength:

Re: Associated Electric Cooperative, Inc. proposed 660 MW coal-based power plant and associated electric transmission facilities in Carol County or Holt County, Missouri

Per your request, the Environmental Protection Agency (EPA) has reviewed the Alternatives Analysis, Macro-Corridor, and Site Selection studies for the Associated Electric Cooperative, Inc. (AECI) proposed coal based power plant in Missouri and associated electric transmission facilities as referenced above. Through our evaluation and experience with other proposed power plants in the Region, the three most significant issues related to coal based power plants are air quality, wetlands, and cumulative impacts.

Power plants are the largest emitters of air pollutants in the United States. Even with the newly proposed controls, power plants will have significant air emissions including volatile organic compounds (VOC), sulfur dioxide (SO_2), nitrogen oxides (NOx), and particulate matter (PM). Therefore, we recommend completing a thorough emissions accounting and air quality modeling analysis of the project including fugitive emissions from haul roads and storage piles. In addition to these criteria pollutants, mercury also represents a significant issue of public concern and scientific debate, therefore, we recommend evaluating mercury impacts at various scales (local and deposition area). Please see the attached air quality comments for more information.

The proposed power plant has the potential to impact wetlands. Although wetland impact criteria were used to determine the location of the plant, minimizing impact seemed to take precedence over avoidance. Please see the detailed wetland comments as attached.

Cumulative impacts are the third most significant issue related to power plants. We recommend that cumulative impacts analysis be done to identify the potential for significant impacts to transportation facilities, including railways and roadways, air pollution (locally and downwind), and wetlands. This analysis should consider other existing and reasonably foreseeable future projects within the area of this proposed plant's influence.

Thank you for considering our comments early in the environmental analysis process. Please contact Kim Johnson at (913) 551-7975 if you have any questions or concerns regarding this letter.

Sincerely,

Joseph E. Cothern
NEPA Team Leader
Environmental Services Division

cc: Kyra Morre, MDNR
Jane Ledwin, USFWS
Ms. Sandra Keo, Chairperson, Sac & Fox Nation in Kansas and Missouri

DETAILED COMMENTS

Associated Electric Cooperative, Inc.
Proposed Coal-based power plant and transmission facilities
Carol County or Holt County, Missouri

1. Air Quality - EPA requests an opportunity to review the air construction permit application which outlines the proposed air pollution controls and potential air emission limits for this project. This application will be submitted to the Air Pollution Control Program at the Missouri Department of Natural Resources and must be in compliance with the Clean Air Act.

2. Air Quality - We recommend including an evaluation of mercury impacts in your environmental analysis. A new plant will increase mercury emissions in the immediate project area, and will be additive with emissions from other existing and future sources in a larger impact area. We also recommend addressing the possibility of a mercury hot spot and any potential impact to human health and the environment. On October 21, 2005 EPA issued a notice of proposed rulemaking to reconsider certain aspects of the final Clean Air Mercury Rule (CAMR), (70 FR 28606) which was published on May 18, 2005. Due to the uncertainty of the applicable mercury regulations for coal-fired power plants, we recommend using the most current regulations at the time of your analysis.

3. Air Quality - We recommend that you work with the Missouri air permitting authorities to fully assess potential ozone impacts. Although project proximity to ozone non-attainment areas was used as criteria for site selection, the project will result in significant increases in emissions of ozone precursors and the potential exists for transport of these emissions to the Kansas City ozone maintenance area and the St. Louis ozone non-attainment area.

4. Airports - The reference to FAA Part 17 on page 197 should be changed to FAA Part 77. Part 17 is "Procedures for Protests and Contract Disputes." Part 77 is "Objects Affecting Navigable Airspace." Part 77 protects public use airports that have at least one runway which is 3200' long or greater. The Part 77 Reference can be found at CFR Title 14, Part 77, see the following web page: http://www.gpoaccess.gov/ecfr/

5. Drinking Water - We recommend that you contact Missouri Department of Natural Resources, Public Drinking Water Program at (573) 751-5331 for information concerning public water system requirements. The project proposes development of a well field in the Missouri River alluvium to provide water for operations, including an option to use this source for potable drinking water. It should be noted that by providing drinking water, the facility may be classified as a public water system and subject to regulation by the state of Missouri as such. The state of Missouri, Department of Natural Resources, has permitting, design, construction, treatment, testing, and operational requirements, which would be applicable in this circumstance. An evaluation would be required to determine the classification of the water source. Depending on the vulnerability of the wells to infiltration of surface water, the facility might be classified as "ground water

under the direct influence of surface water". If so, more stringent treatment and monitoring requirements would apply, in order to meet standards for drinking water safety.

6. River Crossings - Please contact Roger Wiebusch at the U.S. Coast Guard, (Suite 8.104E, 1222 Spruce Street, St. Louis, MO 63103) at (314) 539-3900, ext. 2378 to determine permit requirements for potential construction of a bridge over the Missouri River.

7. Wetlands - Part 6.0 Siting Alternatives – The AECI indicated that one of the critical elements in the siting process was locating a plant "outside of floodplains." (This is consistent with Executive Order 11988, dated May 24, 1977, which requires the consideration of alternatives to avoid adverse effects and incompatible development in floodplains.) However, at 6.1, page 66, the Report indicates that all 8 sites under consideration were located within a floodplain. Granted, the Report presents 3 criteria (i.e., cost of developing site in hilly terrain, the benefit-cost of transporting water, and the protection of visual landscapes) that apparently were used to eliminate any non-floodplain sites. Unfortunately, the Report provides no information that would serve as an examination of these criteria relative to any non-floodplain sites. Further, the reader is given a glimpse of the weighting assigned only to the first criteria, specifically a small 4% of all screening factors (see Table 6-2 on page 71). No weighting was provided for the other two criteria. EPA urges USDA to reconcile conflicting information about selecting floodplain sites within the context of the project's objective and with the Executive Order which urges agencies to avoid them. In particular, the project proponents should be made aware of Clean Water Act Section 404 Guidelines for Specification of Disposal Sites for Dredged or Fill Material (The Guidelines), which affect the selection of site alternatives. The requirements are provided in the The Guidelines at section 230.10 (a)(3), which have the effect of regulation, state that "where the activity associated with a discharge which is proposed for a special aquatic site (e.g., wetlands) does not require access or proximity to or siting within the special aquatic site in question to fulfill its basic purpose (i.e., is not "water dependent"), practicable alternatives that do not involve special aquatic sites are presumed to be available, unless clearly demonstrated otherwise." EPA does not consider a coal-fired power plant to be a water dependent activity; thus, a practicable alternative that is less environmentally damaging, e.g., non-wetland floodplain site or an upland site with no wetlands is presumed to exist. In addition, AECI should be aware that increased costs of alternatives, or an unwillingness to pursue practicable alternatives do not render such alternatives impracticable.

8. Wetlands - Table 6-1, page 68 – The table contains a number of cells with no information provided. Of the information that is presented, it is unclear how impacts shown in the table (e.g., Norborne potential wetlands = 7 acres) compare to impacts identified in the narrative (e.g., Norborne site wetlands = 18.25). We recommend that the table be completed, and that the narrative be used to explain any differences in available resources and known or expected impacts to those resources.

9. Wetlands - Table 6-1, page 68 – To ensure that complete information is provided for purposes of comparison, we recommend that the "Floodplains" row consistently indicate the amount of fill that would be expected for elevating a facility out of the floodplain.

10. Wetlands - 6.2 Identification of Proposed Sites, p. 66 – Given the lack of information provided in the assessment comparing the 8 sites (see comments above for Table 6.1), we do not believe that the conclusion, "None of the eight siting areas resulted in a location that was clearly above and beyond the other sites ..." is made with sufficient justification.

11. Wetlands - The Report indicates in numerous locations (pages 89, 97, 99) that the proposed project would result in numerous stream crossings. To ensure that aquatic life migration is maintained throughout area stream systems for any final site that is selected, we recommend that any crossings (e.g., bridges, culverts, etc.) be designed to pass bank-full discharges, and be set (i.e., culverts) at or slightly below grade so as to present no barriers to aquatic life.

12. Wetlands - Part 6.3.2.5.4, page 121 – The Report indicates that impacts to wetlands "must either be avoided or be mitigated...." We recommend that this language be corrected as follows: "must be avoided, or where not practicable to avoid, they must be mitigated...." In other words, avoidance of impacts, where practicable, is a requirement, not an option.

13. Wetlands - The Report is broken down into impacts examined at potential plant sites and in transmission line corridors. EPA recommends that impacts be aggregated into a summary table that would allow for a valuable comparison between project alternatives.

14. Wetlands - Part 6.3.3, page 134 – Although it may be premature to have included natural resources (e.g., streams, wetlands) mitigation costs into the project, the project proponent should be aware that such costs should be factored into the development costs.

15. Fish and Wildlife - To address potential impacts to Threatened and Endangered Species in the project area, please contact Charlie Scott at the Ecological Services office, U.S. Fish and Wildlife, 101 Park DeVille Drive, Suite A, in Columbia, MO 65203-0057. His phone number is 573-234-2132. Impacts to sensitive ecosystems could be analyzed through a local mercury deposition analysis. A similar evaluation was included in the environmental analysis done by the Corps of Engineers, St. Louis District, for the Holcim, Inc. Clean Water Act Section 404 permit.

16. Government to Government Coordination - Please contact Ms. Sandra Keo, Chairperson of the Sac & Fox Nation in Kansas and Missouri, Phone: 785/742-7471, to discuss the potential impacts of the power plant, both on the community and the environment, depending on the proximity of power plant (Forbes location) to the Sac and Fox Indian Reservation and their residents. Also please include a discussion of how the tribe can be more involved with decision making and mitigation of these potential impacts.

Appendix D Public Open House Stations, Handouts & Photographs of Meetings

Public Open House Stations

STATION 1

WELCOME

United States Department of Agriculture

Rural Utilities Service (RUS)

Public Scoping Meeting for a Proposed Coal-Based Power Plant

- Registration
- Comment Sheets
- Open House 4 - 6 p.m.
- Discussions 6:30 - 7:30 p.m.

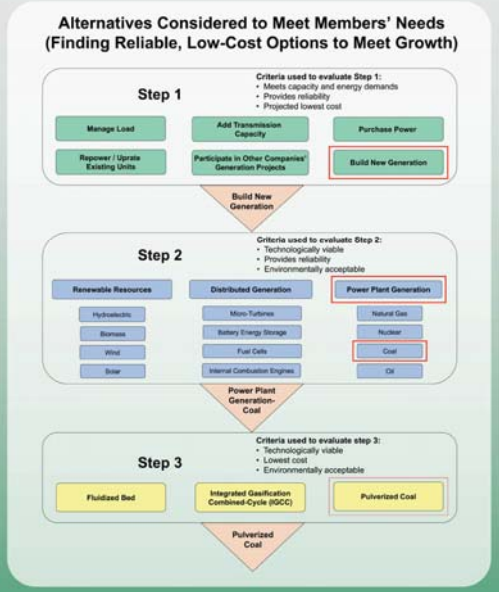
STATION 2


aeci
Associated Electric Cooperative Inc.
Springfield, Missouri
Your Touchstone Energy® Partner
aeci Power Plant Sites
Need for Project
Coal is affordable
Coal is increasingly clean
Coal is important to Missouri
Coal is essential
Coal is affordable
Coal is a fuel for the future
Coal is important to rural consumers
Building for tomorrow's energy needs

STATION 3

ALTERNATIVES

Alternatives Considered To Meet The Increasing Demand For Electricity



Alternative Technologies Considered

STATION 4

SITING

Site Selection Process

Step 1 – Identified scope of project
- Select site location for 660-MW coal-based power plant

Step 2 – Identified potential siting regions
- Established evaluation criteria
  - Favorable air quality
  - Available water resources
  - Proximity to rail for fuel transport
- Previous siting studies identified potential siting regions
  - Northwest Region
  - West Central Region
  - Southeast Region
- Need for power in Northwest or West Central quadrant of state

Step 3 – Identified potential siting areas within siting regions
- Reviewed siting areas in the Northwest and West Central regions
  - 8 siting areas reviewed and evaluated for current project
    - Northwest Region: West Forbes and East Forbes
    - West Central Region: West Oxbow, East Oxbow, South Hardin, East Ray, Southwest Norborne, and West Carrollton

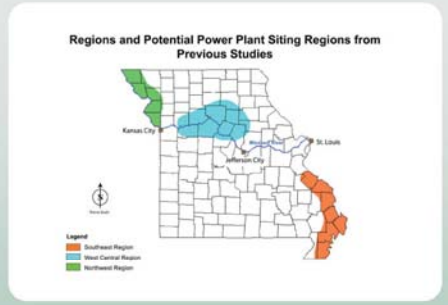
Step 4 – Identified potential sites
- Narrowed search to actual sites with available options to purchase
- Located two sites, one in northwest region and second in west central region
  - Forbes and Norborne sites

Step 5 – Performed field reconnaissance
- Obtained first-hand knowledge of present land use, recent changes that were not apparent on published topographic maps, residential density, agricultural use, access, drainage, ecological and geological observable conditions, and characteristics of the source rivers

Step 6 – Evaluated each site for advantages and disadvantages
- Established criteria designed to minimize adverse impacts to the environment, surrounding areas, and overall project viability
  - Criteria included air quality, fuel supply, transmission, water supply, environmental, and others

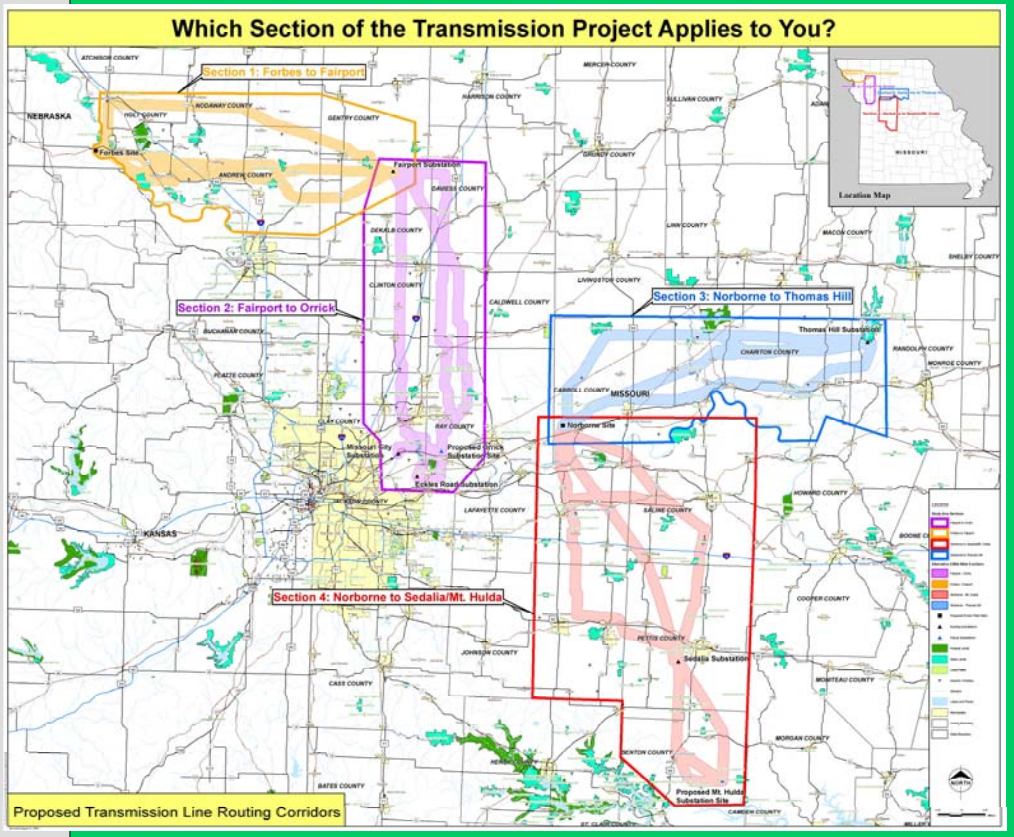
Step 7 – Selection of the best site
- Norborne selected as proposed site and Forbes as alternate

Siting Evaluation



STATION 5

TRANSMISSION LINE CORRIDORS



RUS / AECI Transmission Line Routing Process

TODAY

Review 2-Mile-Wide Macro-Corridors
- Collect available data on existing resources and constraints in the area
- Avoid areas, such as cities / towns, airports, and federal / state lands

Offer Your Comments and Input in Scoping Meetings
- Document concerns with the macro-corridors and transmission-related issues to be addressed in the Draft Environmental Impact Statement (EIS)

WHAT COMES NEXT?

FALL 2005
AECI Reduces the Macro-Corridors to ¼-Mile-Wide Routes
- Use the public input from scoping meetings and other data collected
- Identify proposed and alternate routes within the macro-corridor boundaries for each transmission section
- Submit routes to RUS for review

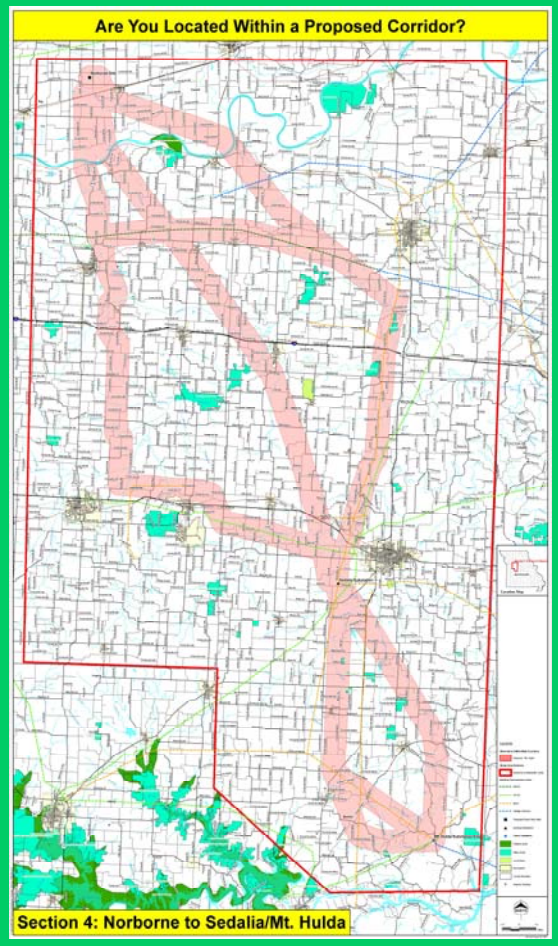
SUMMER 2006
RUS Prepares the Draft EIS
- Includes detailed description of the routes
- Identifies the RUS proposed and alternate routes for each section

FALL 2006
RUS Gathers Public Input on Draft EIS and Routes
- Documents concerns with routes and issues addressed in the EIS
- Makes adjustments to routes based on public comment

SPRING 2007
RUS Finalizes Routes and EIS

STATION 5a

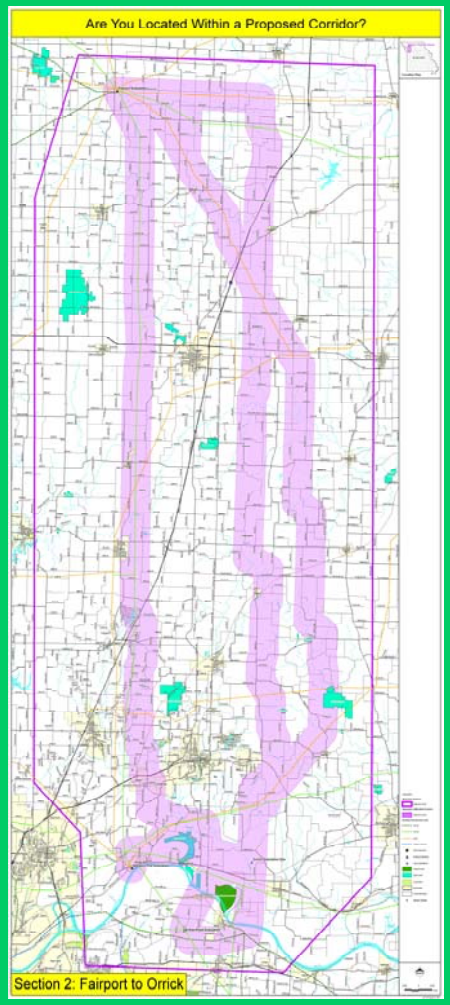
TRANSMISSION LINE CORRIDORS

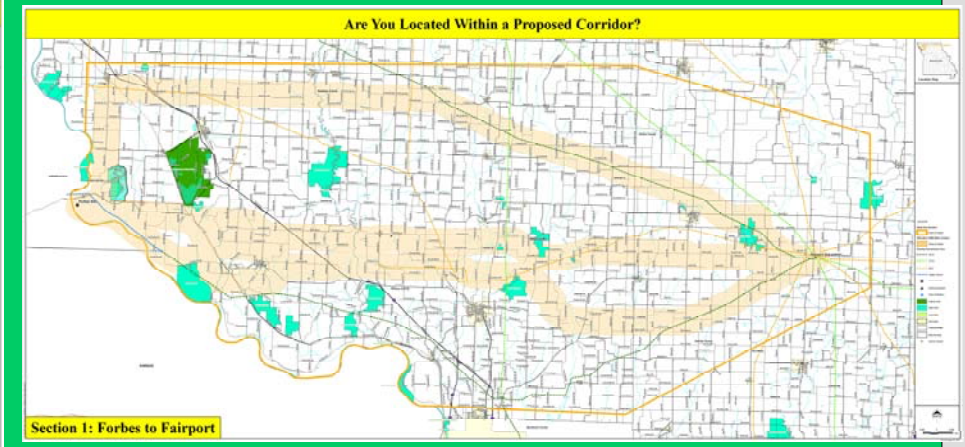


Norborne & Salisbury Meetings

STATION 5b

TRANSMISSION LINE CORRIDORS

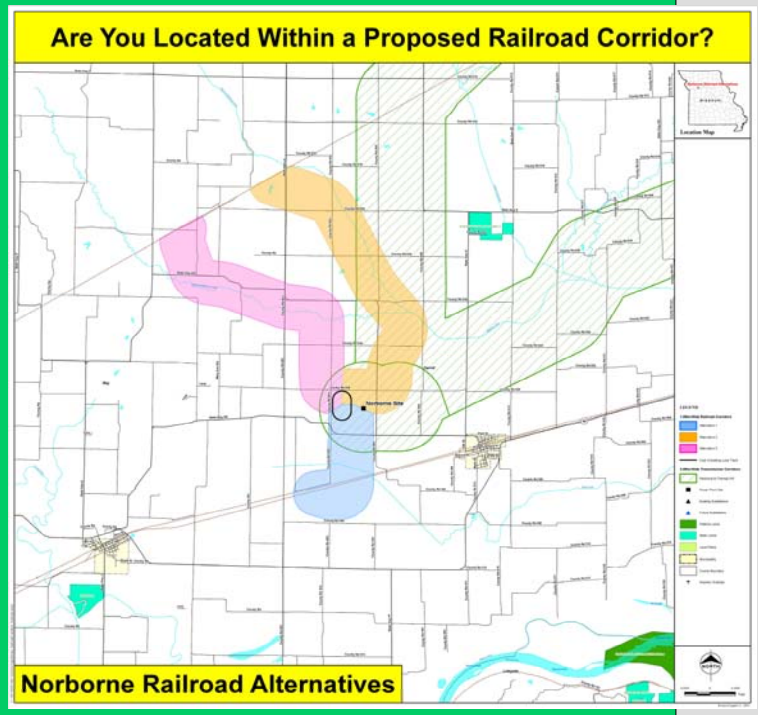




Oregon & Sedalia Meetings

STATION 6a

PROPOSED POWER PLANT

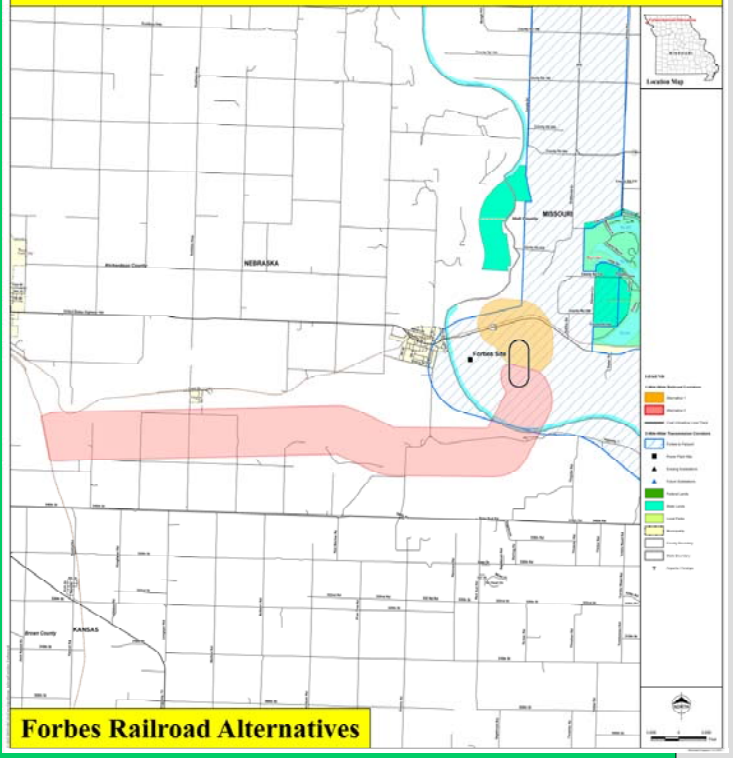


Norborne Meeting

STATION 6b

PROPOSED POWER PLANT

Are You Located Within a Proposed Railroad Corridor?



Forbes Railroad Alternatives

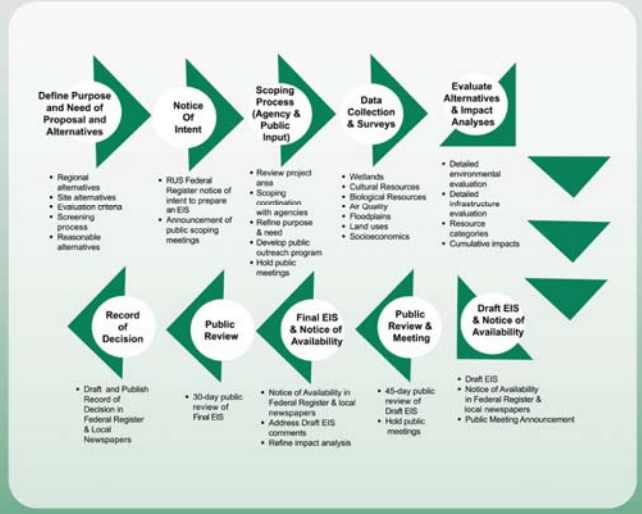
Oregon Meeting

STATION 7

ENVIRONMENT

Environmental Factors Considered

National Environmental Policy Act Environmental Impact Statement (EIS) Process



STATION 8

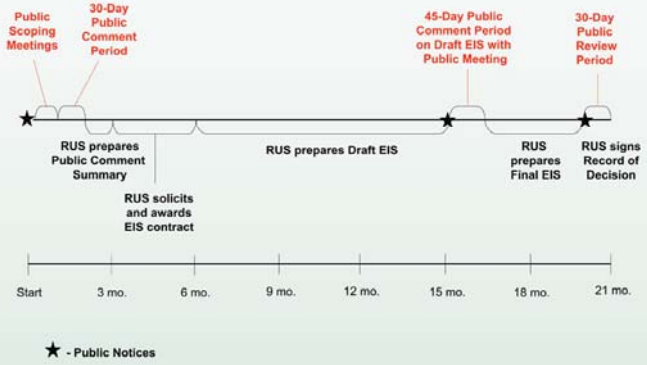
How to Get Involved

✓ Visit AECI and/or RUS websites for more information:
http://www.usda.gov/rus/water/ees/eis.htm
http://www.aeci.org

✓ Contact AECI and/or RUS:
RUS – Stephanie Strength, 202-720-0468
AECI – Nancy Southworth, 417-885-9246

✓ Submit your comments on the provided sheets tonight by mail or email to RUS within the next 30 days

Estimated Timeline of Public Input Opportunities for Environmental Impact Statement (EIS)



Handouts

Building for tomorrow's energy needs

Protecting local water supply

Associated Electric Cooperative Inc. is proceeding with plans to build a coal-based generating plant to meet members' growing energy needs.

The proposed site is northwest of Norborne in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

Construction of the 660-megawatt unit is scheduled to begin in 2007, with operation to begin in 2011. For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Water necessary for electricity production

Sufficient water supply is a key component of the new power plant. Water is used in various systems, including scrubber operation, ash processing, dust suppression, cooling tower makeup and boiler makeup water.

Associated Electric Cooperative Inc. has reviewed available water sources and anticipates that sufficient quantities will be available from the Missouri River alluvial aquifer, which extends close to the plant site.

Protecting river habitat

AECI's new plant will use cooling towers and a retention pond to ensure cooling water has returned to ambient temperature before it's released back to the Missouri River. In most instances, cooling water leaving the plant is actually cleaner than it was when drawn from the initial source.

Protecting local wells

A study will be conducted to determine whether providing water for the power plant will have any negative effects on existing wells in the area.

The study will include a test well and monitoring wells to determine drawdown and capacities available; water testing to determine quality; and a determination of the number and location of wells needed. Results from the test wells will help determine how best to protect neighbors' wells.

Protecting water quality

Several precautions are taken to protect ground water quality. During construction, runoff from the site will be controlled and addressed in accordance with the land disturbance permit obtained from the Missouri Department of Natural Resources. Controls may include sediment control ponds, silt fences and straw bales to prevent soil erosion.

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A Touchstone Energy® Cooperative

Building for tomorrow's energy needs

Protecting local water supply, *continued*

Once the plant is operational, all site runoff will be controlled in accordance with the National Pollutant Discharge Elimination System (NPDES). Runoff that includes suspended solids, such as from the coal yard, will be processed in a treatment facility and will meet applicable federal and state discharge limitations before being released through a pipeline into the Missouri River.

Another system will be permitted to control storm-water runoff from the site, such as from parking lots and roads. A storm-water retention basin is an example of storm-water control.

For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

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Building for tomorrow's energy needs

Employment opportunities

Associated Electric Cooperative Inc. is proceeding with plans to build a coal-based generating plant to meet members' growing energy needs.

The proposed site is northwest of Norborne in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

Construction of the 660-megawatt unit is scheduled to begin in 2007, with operation to begin in 2011. For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Bring good jobs to the local community

AECI estimates 137 full-time jobs at the finished power plant will create an annual payroll of $10 million to $12 million with average yearly salaries of $57,000 plus a competitive benefits package. With the plant expected to be operational in 2011, most full-time positions for power plant operations will not be filled before 2010.

Of the 137 jobs:

- four will require four-year degrees (engineers);
- 22 will have requirements that prefer four-year degrees but work experience will be a significant factor;
- and 111 jobs will focus on vocational skills and work experience, no degree required.

In addition, during construction of the plant, about 900 people will be working on site. Payroll during construction is projected to be about $400 million.

Job opportunities

Most AECI employees live and work in the communities where the cooperative's operations are located. At Thomas Hill Energy Center, AECI's power plant in Randolph County, most of the workforce is native to the area. Of 253 employees, 135 live in Randolph County.

Most applicants for jobs at AECI's power plants are local residents too. Last August, 50 percent of 533 applicants for jobs at Thomas Hill Energy Center lived in Randolph County, for example. From those, Associated hired 10 people for the entry-level positions; five of those new hires (50 percent) are from Randolph County. About 40 percent are from two counties adjacent to the plant.

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Employment opportunities, *continued*

Workforce training and educational opportunities

AECI provides in-house technical training and an education assistance program to employees wanting to improve their skills and advance. For example, many employees at AECI's existing facilities were hired into entry-level jobs, educated and trained while working at the plants and then progressed to high-level vocational and supervisory jobs.

Quality jobs and employee longevity

At just 4 percent in 2004, AECI's overall employee turnover rate is extremely low for its part-time and full-time employees. At the Thomas Hill Energy Center, the turnover rate was 3 percent in 2004. AECI's overall turnover rate, which includes retirements, voluntary resignations and terminations for part- and full-time positions, has been 4 or 5 percent for the past five years.

If temporary positions are included for a direct comparison with the national turnover rate, Associated's rate is 12 percent for all locations and includes temporary positions through its summer student employment program. The average rate in the United States was 37.7 percent in 2004 and 36.2 percent in 2003. Associated's rate is better than the nation's lowest separation rate in 2004, which was 15 percent for the state and federal government sector.

AECI and its employees also benefit from the longevity of its employees, which average 15.5 years of service for all locations. At AECI's Thomas Hill Energy Center, the average years of service is more than 18 years.

For more information about employment opportunities and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

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A Touchstone Energy® Cooperative

Building for tomorrow's energy needs

Benefits to the community

Associated Electric Cooperative Inc. is proceeding with plans to build a coal-based generating plant to meet members' growing energy needs.

The proposed site is northwest of Norborne in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

Construction of the 660-megawatt unit is scheduled to begin in 2007, with operation to begin in 2011. For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Bring good jobs to the local community

AECI estimates 137 full-time jobs at the finished power plant will create an annual payroll of $10 million to $12 million with average yearly salaries of $57,000 plus a competitive benefits package. With the plant expected to be operational in 2011, most full-time positions for power plant operations will not be filled before 2010.

Most AECI employees live and work in the communities where the cooperative's operations are located. At Thomas Hill Energy Center, AECI's power plant in Randolph County, most of the workforce is native to the area. Of 253 employees, 135 live in Randolph County.

In addition, during construction of the plant, about 900 people will be working on site. Payroll during construction is projected to be about $400 million.

Workforce training and educational opportunities

AECI provides in-house technical training and an education assistance program to employees wanting to improve their skills and advance. For example many employees at AECI's existing facilities were hired into entry-level jobs, educated and trained while working at the plants and then progressed to high-level vocational and supervisory jobs.

Money for schools and other county projects

AECI will make 20 annual payments to Carroll County, a total grant of $14.5 million. After 20 years, the plant will be taxable.

The structure of the agreement between Carroll County and AECI allows for annual payments to the county to begin in 2007, when construction is expected to start.

Carroll County and its taxing jurisdictions will determine, in accordance with Missouri statutes, how the payments will be apportioned. Schools, which receive a large percentage of county taxes, will receive a large percentage of these payments.

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A Touchstone Energy® Cooperative

Building for tomorrow's energy needs

Benefits to the community, *continued*

Improve the region's energy supply

Maintaining the economic health of any region is dependent on having reliable, low-cost electricity.

AECI is building a new generating unit to provide low-cost, wholesale power to its member systems: six generation and transmission cooperatives that serve 51 local distribution cooperatives.

Central Missouri, Co-Mo, Farmers', Howard, Macon, Platte-Clay and West Central electric cooperatives distribute electricity generated by AECI to parts of rural Missouri in Carroll County and surrounding counties, including Saline, Lafayette, Ray, Caldwell, Livingston and Chariton. Ultimately, these seven rural electric cooperatives serve 99,763 member-owners in north- and west-central Missouri.

Protect the environment

AECI's new power plant will be one of the cleanest coal-based power plants in the country at the time it's built.

The plant will use the best available emissions control technology to meet all air quality standards from the Environmental Protection Agency and Missouri Department of Natural Resources. These standards are established to protect human health within a significant margin of safety.

Bring a good neighbor to the community

AECI has a reputation as a good corporate citizen, community partner and employer in the communities where the cooperative's operations are located. This fact is supported by the number and quality of applicants it receives, its low employee turnover rate and the longevity of its employees.

Whether partnering with local schools, donating to local charities or volunteering for community events, AECI and its employees are committed to the communities they serve.

For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Associated Electric Cooperative, Inc.

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A Touchstone Energy® Cooperative

Building for tomorrow's energy needs

The cooperative difference

Associated Electric Cooperative Inc. is proceeding with plans to build a coal-based generating plant to meet members' growing energy needs.

The proposed site is northwest of Norborne in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

Construction of the 660-megawatt unit is scheduled to begin in 2007, with operation to begin in 2011. For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Co-ops are owned by those they serve

Rural electric cooperatives are unique among electric utilities. Cooperatives are not-for-profit businesses, established by local residents to provide at-cost electric service and governed by a board of directors democratically elected from the membership. In a cooperative, the customers are the owners.

Built to deliver electricity to rural America

Today, more than 900 electric cooperatives serve 37 million Americans in 47 states. Electric cooperatives cover 75 percent of the nation's landmass, making all electric cooperatives partners in America's largest electric utility system.

Operated to benefit members, not to make profits

Cooperatives are operated for the benefit of those using their services, not to make profits. An electric cooperative's net earnings beyond expenses and reserves do not belong to the utility; they belong to the individual member-owners of the cooperative. These margins must either be used to improve or maintain operations or be distributed to the cooperative's member-owners in the form of capital credit refunds.

Guided by seven principles

In addition to this unique business structure, all cooperatives are guided by seven principles that reflect the best interests of their member-owners: voluntary and open membership; democratic member control; members' economic participation; autonomy and independence; education, training and information; cooperation among cooperatives; and concern for community.

For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

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A Touchstone Energy® Cooperative

Building for tomorrow's energy needs

Protecting human health and the environment

Associated Electric Cooperative Inc. is proceeding with plans to build a coal-based generating plant to meet members' growing energy needs.

The proposed site is northwest of Norborne in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

Construction of the 660-megawatt unit is scheduled to begin in 2007, with operation to begin in 2011. For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Emissions standards protect human health

AECI's new power plant will be one of the cleanest coal-based power plants in the country at the time it's built.

The plant will use the best available emissions control technology to meet all air quality standards from the Environmental Protection Agency and Missouri Department of Natural Resources. These standards are established to protect human health within a significant margin of safety.

Technology controls emissions

Modern technology allows coal-based power plants to generate more electricity while reducing emissions. AECI will use various equipment and methods to remove byproducts created by producing energy from coal:

- Selective catalytic reduction equipment to reduce nitrogen oxides emissions;
- A flue gas desulfurization unit (scrubber) to remove sulfur dioxides, which are naturally lower in the western coal this unit will use;
- Carbon injection, one of the more proven options for mercury removal, is the most likely control technology for this plant;
- A bag house, composed of hundreds of large filter bags, that captures mercury and particulates (tiny particles); and a
- Continuous emissions monitoring system that measures and records the constituents of the flue gas to ensure they meet requirements of air permits and helps ensure accurate operation of the environmental equipment.

Commitment to environmental responsibility

AECI has always been environmentally responsible, and the cooperative has a strong history of meeting its environmental commitments while continuing to meet members' needs for low and stable electricity rates.

continued on back

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Building for tomorrow's energy needs

Protecting human health and the environment, *continued*

The cooperative has spent more than $600 million to improve air quality. Since 1994 AECI has reduced its sulfur dioxide emissions rate more than 90 percent and its nitrogen oxides emissions rate more than 80 percent during the summer months when nitrogen oxides contribute to smog formation.

Improving air quality a national trend

Nationally, America's air quality is better now than it has been in decades. Emissions of pollutants regulated by federal clean air laws established to protect human health are down 54 percent since 1970 — even though use of coal to generate electricity has more than tripled. Utilities have invested more than $50 billion in new technologies to improve the environmental performance of their plants.

Environmental improvements will continue

AECI will further reduce air emissions to meet new standards set by the Clean Air Interstate Rule (CAIR) and Clean Air Mercury Rule (CAMR), both issued by the EPA in March 2005.

CAIR will lower national sulfur dioxide emissions another 70 percent and nitrogen oxides emissions another 60 percent below 2003 levels.

Although U.S. power plants contribute less than 1 percent of total global mercury emissions, under CAMR utilities will reduce mercury emissions by nearly 70 percent from 1999 levels. This marks the first time the United States, or any other country, has regulated mercury emissions from power plants.

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Associated Electric Cooperative Inc.

AECI will be the lowest-cost wholesale power supplier.

Cooperatives are member-governed

Rural electric cooperatives are unique among electric utilities. Cooperatives are not-for-profit businesses, established by local residents to provide at-cost electric service and governed by a board of directors democratically elected from the membership. In a cooperative, the members are the owners.

Business owners, ranchers, manufacturers, school teachers, homeowners … they're all owners of their local electric cooperative.

More than 37 million Americans are served by about 900 electric cooperatives in 47 states, making all electric cooperatives partners in America's largest electric utility system.

Cooperatives are guided by seven principles that reflect the best interests of their member-owners: voluntary and open membership; democratic member control; members' economic participation; autonomy and independence; education, training and information; cooperation among cooperatives; and concern for community.

Electric cooperatives serve about 12 percent of total electric customers in the United States and deliver 10 percent of the total kilowatt-hours sold in the nation each year.

Associated Electric Cooperative Inc.

AECI is owned by and provides wholesale power to six regional and 51 local electric cooperative systems in Missouri, northeast Oklahoma and southeast Iowa that serve more than 800,000 customers.

AECI is financially strong and flexible, enabling it to continue to serve its member systems reliably and economically. AECI is one of a few wholesale power producers in the nation with bond ratings of AA by Standard & Poor's and Fitch Ratings Ltd. and A1 by Moody's Investors Service.

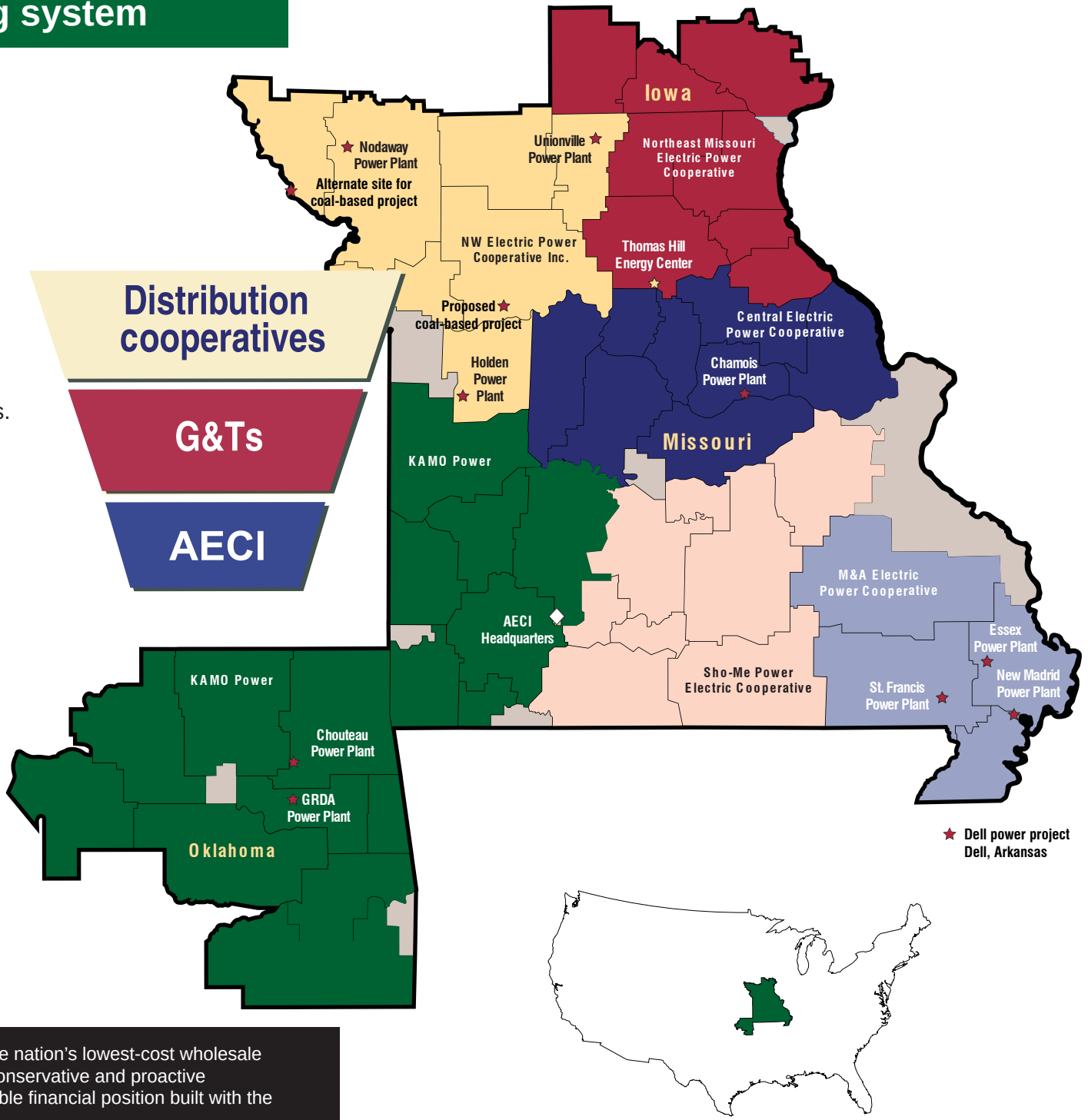
Associated Electric Cooperative Inc.'s mission is to provide an economical and reliable power supply and support services to its members with the vision of being the nation's lowest-cost wholesale power supplier.

Three tiers form strong system

The top tier of the three-tiered system is made up of 51 local distribution cooperatives that provide electric service directly to consumer-members, including businesses, farms and households.

At the second level of the system are the six regional cooperatives, known as G&Ts, that transmit power from AECI to the 51 local distribution cooperatives.

In 1961 the six G&Ts joined to form AECI, the system's third tier, to take care of generation, power procurement and high-voltage transmission.



AECI has consistently remained among the nation's lowest-cost wholesale power suppliers due to careful planning, conservative and proactive management of risk and a strong and flexible financial position built with the support of its member-owners.

AECI's generating and transmission resources provide reliable, low-cost energy

AECI has a diversified mix of generation resources to supply reliable, economical electricity to member systems. AECI's resources include baseload generation supplied by two coal-based plants producing low-cost, around-the-clock power; intermediate generation provided by two efficient, low-emissions combined-cycle natural gas plants; and four peaking plants that provide power when demand rises to peak levels on cold winter or hot summer days. Another power supply resource, although more expensive, is available to member systems through AECI's green power program.

AECI's diverse, flexible power sources

	MW capacity
AECI's coal-based power plants include:	
New Madrid Power Plant*	1,200
Thomas Hill Energy Center	1,153
AECI's gas-based power plants include:	
Chouteau Power Plant	522
Essex Power Plant	107
Holden Power Plant	321
Nodaway Power Plant	182
St. Francis Power Plant	501
AECI also owns oil-based generators at Unionville Power Plant	45
AECI dispatches these coal-based units:	
KAMO Power's portion of Grand River Dam Authority's Unit 2	198
Central Electric Power Cooperative's Chamois Power Plant	68
AECI's contracted power sources include:	
Southwestern Power Administration for hydroelectric peaking power	478
Other purchased capacity	34

**The city of New Madrid owns the 600-megawatt Unit 1, which is operated by AECI under terms of an agreement with the city.*

AECI's coal-based units are the foundation for providing low-cost energy to member systems. The cooperative's owned and contracted coal-based resources are about 50 percent of capacity but produce about 85 percent of AECI's energy.

Transmission grid ensures reliability

The strong, integrated transmission system owned by AECI and its member systems includes substations and 9,092 miles of line — enough to travel between Washington, D.C., and San Francisco, Calif., more than four times. This system enables AECI to reliably serve members and transact power purchases and sales for the benefit of its owners.

AECI and its member systems built their transmission grid by forming strategic alliances with neighboring utilities. That tradition remains as AECI continues to invest in its transmission system in a changing industry.

Coal is essential to quality of life

Nationally, more than half the electricity that heats our homes, lights our schools and powers our businesses comes from coal.

America has a 250-year supply of coal, and electricity from this domestic resource lessens our reliance on foreign fuel supplies.

Coal is more affordable for families and businesses …

On average, producing electricity from coal costs less than half the cost of producing electricity from other traditional fuels.

Residents in Missouri, Iowa and Oklahoma benefit from low electricity prices largely because of coal. According to the U.S. Department of Energy, retail electricity prices are 15 percent below the national average in the 30 states, including Missouri, Oklahoma and Iowa, that use coal as their primary energy resource. In comparison, the other 20 states' average retail electricity rate exceeds the national average by 21 percent.

Coal is increasingly clean …

Utilities have invested more than $50 billion in new technologies to increase efficiency and achieve emissions reductions at coal-based power plants. This industrywide effort has produced the cleanest air Americans have breathed during the last 35 years.

According to the Environmental Protection Agency, total emissions of six principal pollutants regulated to protect human health dropped 54 percent since 1970. At the same time, use of coal to generate electricity has increased more than 200 percent.

Coal is a fuel for the future …

As electricity demand increases, coal-based power plants will continue to generate more electricity while reducing emissions with advanced technologies. With coal, Americans don't have to choose between clean air and affordable energy.

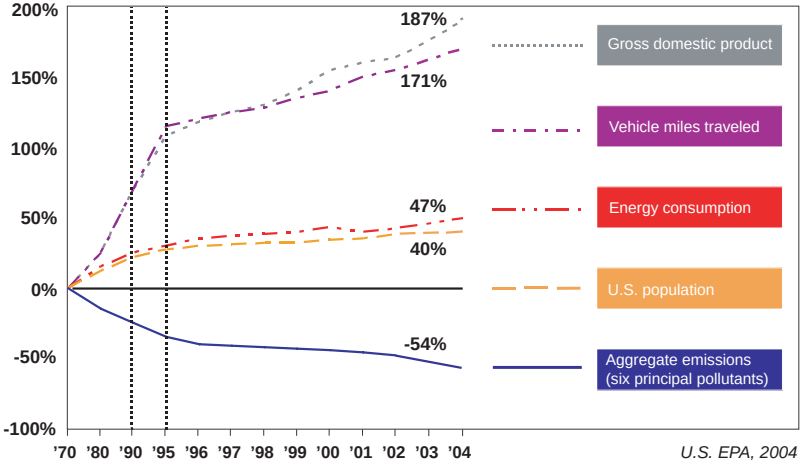
Coal continues to be a fuel of choice for electricity generation because it is domestically abundant, affordable and increasingly clean through technology.

Environmental commitment

Associated Electric Cooperative Inc. has improved air quality, spending more than $600 million since 1994 to reduce emissions. The cooperative has reduced its systemwide sulfur dioxide emissions rate by 90 percent since 1994, when it converted its coal units to burn 100 percent low-sulfur coal. This conversion, costing $200 million plus $342 million to close its high-sulfur coal mine in Missouri, benefited the environment and cut fuel costs for members.

AECI also has reduced its nitrogen oxides emissions rate more than 80 percent during the summer months when NO_x contributes to ozone formation. AECI installed selective catalytic reduction equipment at New Madrid Power Plant at a cost of $100 million and annual operating and maintenance costs of about $8 million. At Thomas Hill Energy Center, AECI modified air systems on all three units for a total cost of $8.3 million to reduce NO_x emissions.

Comparison of growth areas and emissions



Total emissions of the six air pollutants related to protecting human health have dropped 54 percent since 1970. During the same time, the use of coal to generate electricity has increased more than 200 percent.

AECI has always been environmentally responsible, and the cooperative has a strong history of meeting its environmental commitments while continuing to meet members' needs for low and stable electricity rates.

Coal fuels low-cost energy

New Madrid Power Plant

AECI employs about 200 people at New Madrid Power Plant, which is comprised of two 600-megawatt, coal-based electric generating units totaling 1,200 megawatts. Unit 1 was constructed in 1972; Unit 2 completed in 1977.

Each unit burns about 7,000 tons a day of low-sulfur coal, which travels 1,235 miles from Wyoming to New Madrid by rail. A coal train is a set of 115 cars, each holding about 121 tons of coal, totaling 13,900 tons.

Located in southeast Missouri, the plant and its grounds span 250 acres on the inland side of the Mississippi River and 272 acres on the river side of the levee. Its turbine room alone covers 1.07 acres.

AECI carefully manages water runoff from coal stockpiles, diverting it to treatment ponds where it's tested for purity before it's released.

AECI received the 2000 international "Project of the Year" award, which recognized the cooperative as an industry leader for installing new technology to reduce emissions. New Madrid Unit 2 was the first coal-based application in the world operating with 93 percent removal of nitrogen oxides with selective catalytic reduction equipment, said "Power" magazine in presenting the award.

Thomas Hill Energy Center

Thomas Hill Energy Center is comprised of three electrical generating units, built from 1966 to 1982 and totaling 1,153 megawatts, plus a coal mine that is actively being reclaimed after closing in 1993.

AECI employs about 240 people at the power plant, located north of Moberly, Mo. The plant has received national recognition for its efficiency and successful conversion to low-sulfur coal that significantly reduced sulfur dioxide emissions.

Low-sulfur coal for Thomas Hill's generating units travels 968 miles, taking about three days, from the Powder River Basin of Wyoming. Conveyor belts transport the coal to a crushing machine to ensure the right size for burning. Along the route dust suppression systems capture and recycle coal dust created in the process of crushing and transporting it.

Thomas Hill Lake was built to help cool equipment at the power plant, but the public benefits from its 1.5 billion gallons of water too. Swimming, fishing and boating are popular on the lake that also serves as a 5,000-acre wildlife refuge.

Thomas Hill's tallest chimney is 620 feet high and consists of 3,546 cubic yards of concrete. It is 53 feet wide at the bottom with walls 26 inches thick. It tapers to 37 feet across with walls 9 inches thick at the top. The inside of the chimney is lined with more than one million bricks.

AECI's combined-cycle units among most efficient with low emissions

Recognized nationally for low emissions and efficient performance, AECI's Chouteau and St. Francis power plants are combined-cycle, natural gas-based plants.

These plants have greater efficiency than simple-cycle combustion turbine units because of heat-recovery steam generators (HRSGs) that capture exhaust heat to power a steam turbine. In contrast, hot exhaust from a simple-cycle gas turbine is vented to the atmosphere.

Chouteau Power Plant

Chouteau Power Plant has two units providing a total of 522 megawatts of energy to member systems. In operation since July 2000, the plant is located in northeastern Oklahoma on 22 acres inside an industrial park. Because the plant is highly automated, only about 20 skilled employees are needed to operate and maintain it.

Chouteau Power Plant is powered by two 176-megawatt Model V84.3A gas turbines and a 170-MW steam turbine. Operating at full load, the units burn 86 million cubic feet of natural gas per day.

At Chouteau, for example, exhaust heat enters the HRSG, or boiler, at about 1,085 degrees Fahrenheit. As it moves through the structure, the exhaust heats tubes of water to create steam to power the steam turbine, which turns the generator to produce electricity. Afterward, the exhaust is vented from the stack at about 200 degrees.

This heat-recovery system increases the efficiency of a combined-cycle unit to 58 percent, compared with 33 percent efficiency of a simple-cycle plant.

St. Francis Power Plant

AECI and Duke Energy Trading and Marketing LLC developed a partnership in 1997 to build the St. Francis plant and jointly market its production. The 245-MW Unit 1 was dedicated in 1999, followed by the 256-MW Unit 2 in 2001.

St. Francis Power Plant received the "Year 2000 Powerplant Award," given annually by "Power" magazine, for its "innovation in economical power delivery and use of state-of-the-art emissions control and information systems technology to decrease the environmental impact of power generation."

Peaking generation provides flexibility

AECI's peaking power plants are fueled with oil or natural gas and can be started and stopped more quickly than coal-based units, thus affording more flexibility and making these excellent systems for responding to members' peak electrical demands on hot summer days or cold winter nights.

Essex Power Plant

The Essex Power Plant, located on five acres in southeast Missouri, came on line in 1999. Its 107-megawatt, simple-cycle combustion turbine is basically a jet engine, fueled by natural gas, that can be started and stopped quickly for peak power needs.

Holden Power Plant

Located north of Holden, Mo., this low-emissions plant has three simple-cycle units fueled by natural gas with the capability to burn fuel oil as a backup. Each simple-cycle unit is guaranteed at 91 megawatts; however, the output of the units can be boosted to 107 megawatts with the injection of water in the combustion process. The plant, which has a total output of 321 megawatts, went on line in 2002.

Nodaway Power Plant

The Nodaway Power Plant, located on a 100-acre site south of Maryville, Mo., has two 91-megawatt units that came on line in 1999. Each generating unit at Nodaway is about 40 feet wide and 140 feet long. The exhaust stack is 50 feet high. Together, the combustion turbines and the related electric substation occupy about six acres.

Unionville Power Plant

Unionville Power Plant is comprised of two 1977 General Electric, 22.5-megawatt, simple-cycle, oil-based units with a total peaking capacity of 45 megawatts.

AECI diversified its generation mix, building 1,633 megawatts of gas-based generation in four years. These resources, which provide intermediate and peaking power, have enabled the cooperative to meet members' growing load demand.

AECI offers renewable energy

Renewable hydropower from the Southwestern Power Administration has been an important contributor to AECI's energy mix since its incorporation. Because hydropower can be brought on line quickly, it is a valuable resource for periods of highest demand. Hydropower also is a low-cost, emissions-free source of electricity.

AECI also has offered a green energy program since April 1, 2003, to its six owner G&Ts, which provide the green power to their member distribution cooperatives. Those cooperatives offer the green power, which has included energy from wind and biomass resources, to their member-owners for a monthly premium added to their regular electric bill.

Chamois Power Plant

At Central Electric Power Cooperative's Chamois Power Plant, staff has successfully experimented with organic fuels such as walnut shells and shelled corn to produce biomass energy for AECI's green power program. The size of the 68-megawatt plant and the setup of its fuel system make it possible to burn different fuels.

Building for tomorrow's energy needs

As the U.S. economy becomes more energy intensive, utilities must constantly plan for new resources to keep up with rising electricity demand. According to the U.S. Department of Energy, Americans will consume nearly 50 percent more electricity by 2025.

Energy sales to AECI's member systems are projected to grow 2.8 percent a year through 2014. That amounts to a total increase of 28 percent.

AECI has announced proposed and alternate sites for a coal-based power plant to help meet this demand. The proposed site is in Carroll County, near Norborne, Mo., and the alternate site is in Holt County, near Big Lake, Mo. The plant, estimated to generate 660 megawatts, would use low-sulfur coal and the best available emissions control technology. It will be AECI's cleanest, most efficient coal-based power plant to date and one of the cleanest coal-based power plants in the country at the time it's built.

AECI also has purchased a partially constructed, combined-cycle natural gas plant near Dell, Ark., to help meet members' growing electricity needs. Expected to be operating in 2007, this plant will add another highly efficient, low-emissions asset to AECI's generating resource mix.

Dell Power Plant

Access to affordable electricity is extremely important to all Americans, particularly those with lower or fixed incomes because electricity is a larger percentage of their monthly costs.

Vision

AECI will be the lowest-cost wholesale power supplier.

Mission

AECI's mission is to provide
an economical and reliable power supply
and support services to its members.

Critical strategic objectives

Work safely to ensure an accident-free workplace.

Develop and maintain effective strategic relationships.

Be financially strong and flexible.

Develop, motivate and reward employees who excel.

Influence sound environmental policy development.

Proactively identify and manage the risks in our business.

For more information, visit www.aeci.org

Associated Electric Cooperative Inc.

2814 S. Golden Ave., P.O. Box 754, Springfield, MO 65801
(417) 881-1204, FAX (417) 885-9252, Web site: www.aeci.org
Equal Opportunity Employer M/F/D/V

Your Touchstone Energy® Partner

Touchstone Energy is a national alliance of local, consumer-owned electric cooperatives providing high standards of service to customers large and small. More than 600 Touchstone Energy cooperatives in 44 states are delivering energy and energy solutions to more than 22 million customers every day. Touchstone Energy cooperatives serve their members with integrity, accountability, innovation and a longstanding commitment to communities.

Associated Electric Cooperative Inc.

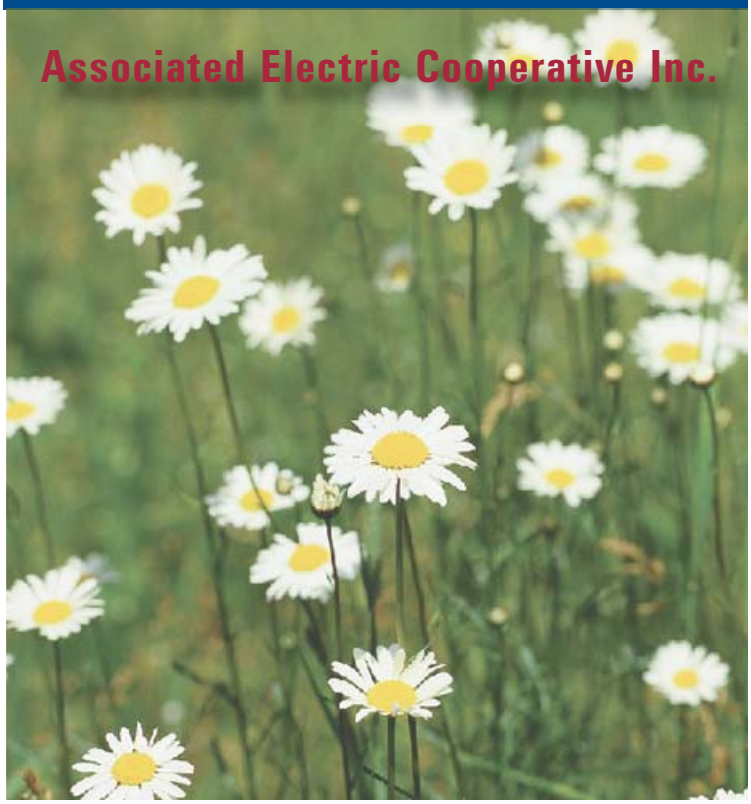
R-80105-3.5k

Associated Electric Cooperative Inc.
2814 S. Golden Ave., P.O. Box 754, Springfield, MO 65801
417-881-1204, FAX 417-885-9252, Web site: www.aeci.org

An important update:

Building for tomorrow's energy needs

Associated Electric Cooperative Inc.



Which would you choose?

Affordable electricity or a healthy environment?
More jobs today or cleaner air tomorrow?
Energy you can depend on or energy you can afford?

The answer, of course, is that you don't have to choose. All of these things – affordable and reliable energy, a clean environment and good jobs — are vital to healthy, growing communities.

That's why Associated Electric Cooperative Inc. has been preparing to meet the energy needs of future generations by researching power supply options and developing a plan to continue providing low-cost electricity to its member-owners: six generation and transmission cooperatives that serve 51 local distribution cooperatives. This three-tiered cooperative system ultimately serves more than 800,000 families, homes and businesses.

Building for tomorrow's energy needs

AECI's strategy allows the cooperative to maintain low wholesale energy rates and reliable service for its member-owners while continuing to reduce air emissions and protect the environment. There are several key elements to the strategy, and each plays an important role in meeting the energy needs and desires of rural Missouri's families, businesses and communities.

Adding new generating facilities: As the U.S. economy becomes more energy intensive, utilities must constantly plan for new resources to keep up with rising electricity demand. Energy sales to AECI's member systems are projected to grow 2.8 percent per year through 2014. That amounts to a total increase of 28 percent.

AECI has announced proposed and alternate sites for a coal-based power plant to help meet this demand. The proposed site is northwest of Norborne, Mo., in Carroll County, and the alternate site is in Holt County, near Big Lake, Mo. The new plant will generate about 660 megawatts. It will use low-sulfur coal and the best available emissions control technology, making it

AECI's cleanest, most efficient coal-based power plant to date and one of the cleanest coal-based power plants in the country at the time it's built.

AECI also has purchased a partially constructed, combined-cycle natural gas plant to help meet members' growing electricity needs. Expected to be operating in 2007, this plant will add another highly efficient, low-emissions asset to AECI's already diverse generating resource mix.

Adding these new generating resources prevents AECI from having to buy power on the open market and strengthens the cooperative's ability to keep energy prices in check. This building plan allows AECI to keep energy prices stable and affordable for members for the long term.

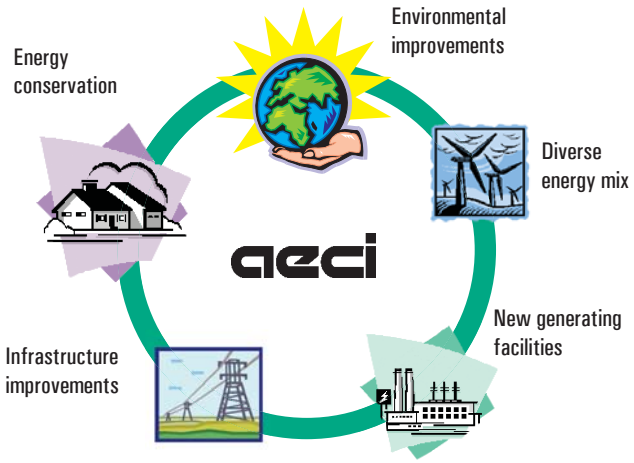
Continued commitment to environmental responsibility: AECI has spent more than $600 million to improve air quality. Since 1994 AECI has reduced its sulfur dioxide (SO_2) emissions rate more than 90 percent and its nitrogen oxides (NO_x) emissions rate more than 80 percent during the summer months when nitrogen oxides contribute to smog formation.

These environmental improvements are part of an industrywide effort that has produced the cleanest air Americans have breathed during the last 35 years.

According to the Environmental Protection Agency, total emissions of six principal pollutants regulated to protect human health dropped 54 percent between 1970 and 2004. This number includes a 30 percent reduction in nitrogen oxides, 51 percent reduction in sulfur dioxides and an 80 percent reduction in fine particulates (PM_{10}).

These drastic improvements are even more impressive when considering that during the same timeframe the U.S. population grew 40 percent; total energy consumption increased 47 percent; the country's gross domestic product, a measure of total economic output, grew 187 percent; and the use of coal to generate electricity increased more than 200 percent.

New government regulations and constantly improving technologies will result in even cleaner air in the



future. In March 2005, the EPA announced its Clean Air Interstate Rule (CAIR). When fully implemented, CAIR will reduce SO_2 emissions in 28 eastern states, including Missouri, by more than 70 percent and NO_x emissions by more than 60 percent from 2003 levels. Because SO_2 and NO_x contribute to fine particulate formation, dramatic emissions reductions achieved through CAIR also will result in continued reduction of fine particulate emissions from U.S. power plants.

In conjunction with reducing emissions of SO_2 and NO_x, AECI also will comply with EPA's Clean Air Mercury Rule issued in March 2005. Although U.S. power plants contribute less than 1 percent of total global mercury emissions, the new rule requires utilities to reduce mercury emissions by nearly 70 percent from 1999 levels and marks the first time the United States, or any other country, has regulated mercury emissions from power plants.

AECI has a plan in place to meet or exceed these new emissions reductions. The cooperative will invest about $600 million in capital costs by 2018 to further modify its existing coal-based plants with emissions-reduction technology.

These tougher air standards will affect municipalities, cooperatives and manufacturers alike. While power plants represent a small percentage of overall air emissions, everyone must do their part to keep improving the air quality in the United States.

Job creation and affordable electricity benefit Missouri's economy. Businesses and residents across Missouri and the Midwest benefit from low electricity prices largely because of coal. According to the U.S. Department of Energy, Missouri uses coal to generate 83 percent of its electricity. As a result, Missouri's retail electricity rates are the 14th lowest in the country and 19 percent below the national average.

This pattern holds true throughout the country. Retail electricity prices are 15 percent below the national average in the 30 states that use coal as their primary energy resource. In comparison, the other 20 states' average retail electricity rate exceeds the national average by 21 percent.

Access to affordable electricity is extremely important to all Americans, particularly those with lower or fixed incomes because electricity is a larger percentage of their monthly costs. A 2004 survey of AECI's member systems revealed 50 percent of respondents live in households earning $40,000 or less per year, and 30 percent are age 65 or older. Of those members age 65 or older, 38 percent earn annual incomes of less than $20,000.

AECI's new coal-based power plant will help keep energy prices stable and affordable for rural Missouri's electric cooperative members. Coal is less expensive and less volatile in price than other fuels and is in abundant supply. Industry experts estimate a 250-year supply right here in the United States.

Constructing a new power plant also will have several direct, local economic benefits. AECI estimates the new coal-based plant will create about 900 construction jobs during peak activity and $400 million in direct payroll.

Another 137 full-time positions at the finished plant will create a projected payroll of $10 million to $12 million and average yearly salaries of $57,000 plus a competitive benefits package. In addition to creating jobs, AECI will make grant payments to the hosting county totaling $14.5 million.

Offering a diverse energy mix to members: AECI's generating resources include renewable and coal- and gas-based resources to meet members' energy needs.

• AECI's coal-based generating resources are the foundation for providing low-cost energy to member systems. The cooperative's owned and contracted coal-based facilities make up 53 percent of total generating capacity but produce about 85 percent of AECI's energy. This fact leads to wholesale power rates among the lowest in the country.

• Renewable hydropower from the Southwestern Power Administration has been an important contributor to AECI's energy mix since its incorporation. Because hydropower can be brought on line quickly, it is a valuable resource for periods of highest demand. Hydropower also is a low-cost, emissions-free source of electricity.

• Between 1999 and 2002 AECI constructed 1,633 MW of natural gas-based generation to meet members' intermediate and peak electricity needs. AECI's intermediate generating resources include 1,023 MW of efficient, low-emissions combined-cycle natural gas-based power plants.

• Green power also is available to all 51 local distribution cooperatives in the AECI system through AECI's green

power purchasing program. The program was started in April 2003, and energy has come from both wind and biomass resources.

Supporting energy conservation at the distribution level: In the three-tiered system of electric cooperatives that includes AECI, local distribution cooperatives take the lead in helping their customers conserve energy and save on electricity costs. Local distribution cooperatives offer energy efficiency services and incentive programs that include energy efficiency loan programs, home energy audits and rebates for members who purchase and install energy efficient appliances.

AECI supports the conservation efforts of its member systems and helps them provide energy audits for large industrial and commercial customers.

While we can't depend solely on energy conservation to meet the energy and environmental needs of the next few years, these efforts are an important part of a long-term balanced approach.

Infrastructure improvements ensure reliability. Another element of AECI's approach involves infrastructure improvements to strengthen the overall reliability of its system and network. The generation and transmission of electricity involves a network of power plants, substations and transmission lines. With time and use, this infrastructure needs rejuvenation — just like the streets, highways and bridges.

AECI and its six owner generation and transmission cooperatives continue to invest in their transmission system. In addition to investing in transmission for new generation projects, AECI and its six owner generation and transmission cooperatives forecast spending more than $360 million for transmission improvements and upgrades through 2011. This investment assures that AECI will continue to operate one of the most reliable networks in the country.

Why this approach makes good sense

Putting all the elements of this approach into place will cost up to $1.7 billion. While this is a significant amount, the upfront investment will provide greater long-term assurance of wholesale price stability for the three-tiered cooperative system and major improvements in air quality.

As electricity demand rises both nationally and here at home, AECI will continue working to keep energy prices stable and affordable for the long term. This will be done while reducing air emissions, protecting the environment, improving efficiency and delivering a reliable energy supply to its member-owners.

What happens next?

The process of building a power plant involves many regulatory checks and balances, and the public will have several opportunities to participate in the process, including input on the federal Environmental Impact Statement and on the construction, solid waste and wastewater permits from the Missouri Department of Natural Resources.

If you have any questions, comments or concerns, please visit AECI's Web site at **www.aeci.org**, or request to be added to our direct contacts list. Once you have all the facts, we're convinced you will agree that our proposed approach is the most sensible way to meet the energy, economic and environmental needs of rural Missouri, now and in the future.

aeci
Associated Electric Cooperative, Inc.
P.O. Box 754, Springfield, MO 65801
417-881-1204

A Touchstone Energy® Cooperative

System facts

March 2005

Associated Electric Cooperative Inc.

is owned by and provides wholesale power to six regional and 51 local electric cooperative systems in Missouri, northeast Oklahoma and southeast Iowa that serve more than 800,000 customers.

P.O. Box 754 • Springfield, MO 65801-0754
(417) 881-1204 • fax (417) 885-9252 • www.aeci.org

Your Touchstone Energy® Partner

Associated Electric Cooperative Inc.

Baseload generation

New Madrid Power Plant *— New Madrid, Mo.*
Unit 1 — 1972 Brown-Boveri turbine
Net capacity 600 MW
Coal burn rate 7,000 tons/day
Unit 2 — 1977 Brown-Boveri turbine
Net capacity 600 MW
Coal burn rate 7,000 tons/day

Thomas Hill Energy Center *—*
Clifton Hill, Mo.
Unit 1 — 1966 General Electric turbine
Net capacity 180 MW
Coal burn rate 2,325 tons/day
Unit 2 — 1969 Westinghouse turbine
Net capacity 303 MW
Coal burn rate 3,478 tons/day
Unit 3 — 1982 Westinghouse turbine
Net capacity 670 MW
Coal burn rate 8,660 tons/day

Intermediate generation

***Chouteau Power Plant** — Pryor, Okla.*
Units 1 and 2 — 2000 Siemens Westinghouse combined-cycle, gas-based units
Two gas turbines, net capacity 176 MW each
One steam turbine, 170 MW
Operated by Siemens Westinghouse

***St. Francis Power Plant** — Glennonville, Mo.*
Unit 1 — 1999 Siemens Westinghouse combined-cycle, gas-based unit
Net capacity 245 MW
Operated by Siemens Westinghouse
Unit 2 — 2001 Siemens Westinghouse combined-cycle, gas-based unit
Net capacity 256 MW
Operated by Siemens Westinghouse

Peaking generation

***Essex Power Plant** — Idalia, Mo.*
Unit 1 — 1999 Siemens Westinghouse simple-cycle, gas-based unit
Net capacity 107 MW

Holden Power Plant *— Holden, Mo.*
Units 1, 2 and 3 — 2002 Siemens Westinghouse simple-cycle, dual-fuel (gas and oil) units
Net capacity of each is 107 MW

Nodaway Power Plant *— Maryville, Mo.*
Units 1 and 2 — 1999 Siemens Westinghouse simple-cycle, gas-based units
Net capacity of each is 91 MW

Unionville Power Plant
Units 1 and 2 — 1977 General Electric, 22.5-MW simple-cycle, oil-based units

Electricity from coal ...

Essential
Affordable
Increasingly clean

AECI's coal-based generation is essential to providing economical rates to member systems. In 2004, AECI's contracted and owned coal-based generation was 53 percent of capacity but produced 85 percent of the energy.

2004 power sources

Power plants	*MW capacity*
Chouteau Power Plant	*522*
Essex Power Plant	*107*
Holden Power Plant	*321*
New Madrid Power Plant	*1,200*
Nodaway Power Plant	*182*
St. Francis Power Plant	*501*
Thomas Hill Energy Center	*1,153*
Unionville Power Plant	*45*
Subtotal	*4,031*
Contract sources	
Batesville, Miss.	*274*
Capacity sold to other utilities	*(150)*
Chamois Power Plant	*68*
KAMO-GRDA Unit 2	*198*
Other purchased capacity	*34*
SPA hydropower peak	*478*
Subtotal	*902*
Total	*4,933*

Vision/Mission/Strategic objectives

AECI will be the lowest-cost wholesale power supplier.

AECI's mission is to provide an economical and reliable power supply and support services to its members.

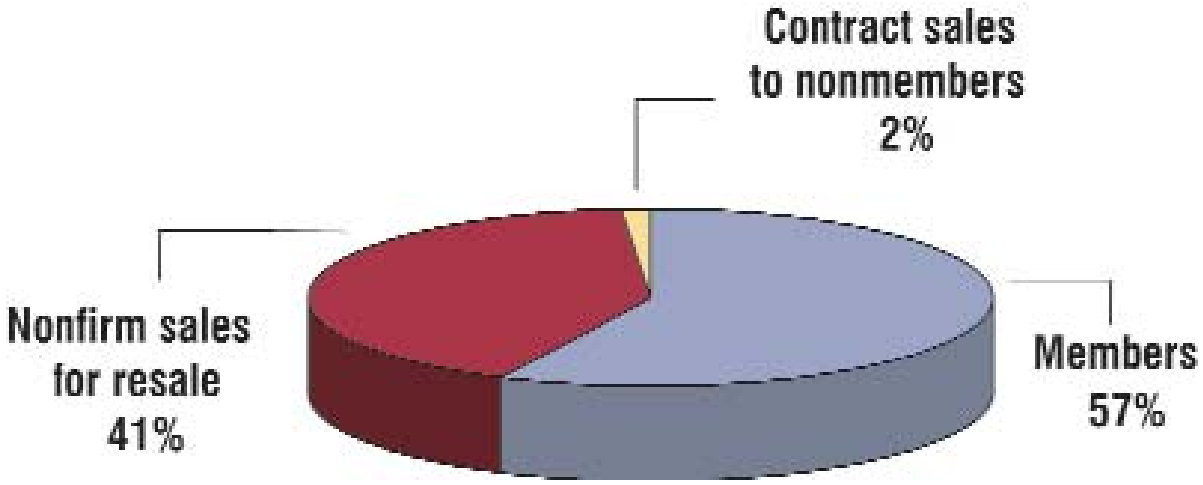
- *Work safely to ensure an accident-free workplace.*
- *Develop and maintain effective strategic relationships.*
- *Be financially strong and flexible.*
- *Develop, motivate and reward employees who excel.*
- *Influence sound environmental policy development.*
- *Proactively identify and manage the risks in our business.*

2004 financial highlights

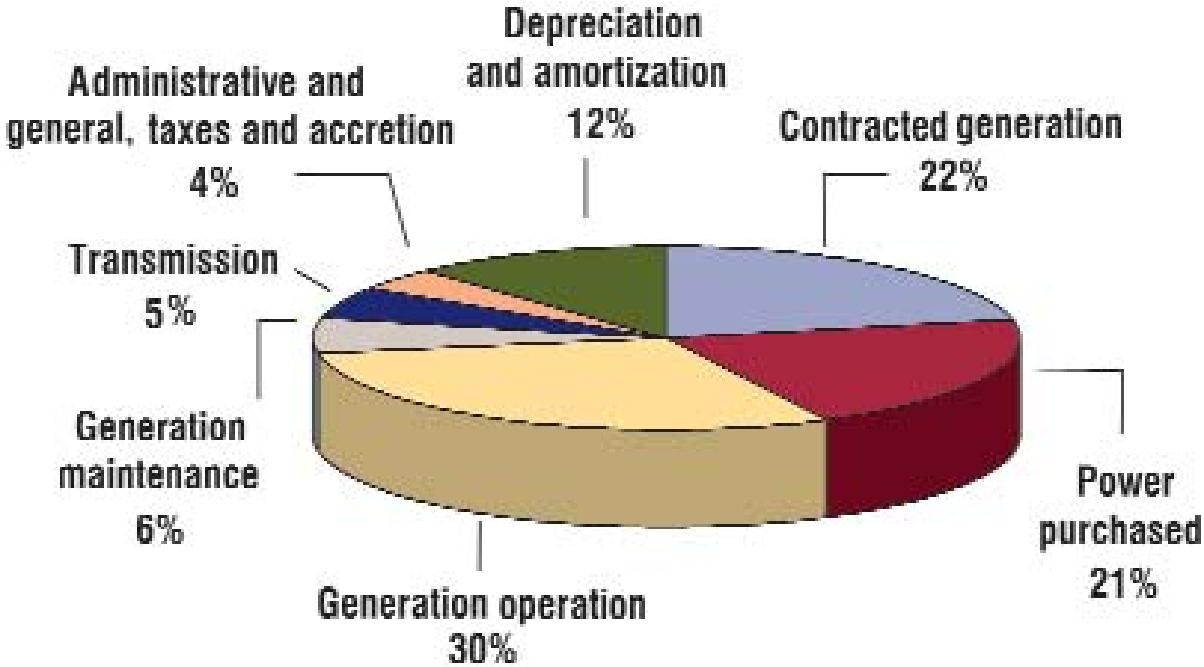
(in thousands)

Operating revenue	*$ 797,612*
Net nonoperating income	*$ 21,251*
Operating expenses	*$ 742,799*
Interest expense	*$ 58,471*
Net margin	*$ 17,593*
Investment in facilities	*$ 2,039,739*
Long-term debt	*$ 842,817*
Total assets	*$ 1,494,258*

Operating revenue



Operating expenses



2004 statistical highlights

Member peak demand (MW)	
Winter (Dec. 22, 2004)	*3,584*
Summer (Aug. 21, 2003)	*3,708*
Member load factor (percent)	*51.4*
Member load growth (percent)	
Energy	*2.0*
Demand	*(0.8)*
Revenue from members (mills per kWh)	*28.34*
Full-time employees (as of Dec. 31, 2004)	*597*
Headquarters	*159**
New Madrid Power Plant	*194*
Thomas Hill Energy Center	*244*

** Includes protective services staff at New Madrid and Thomas Hill power plants*

Associated has 99 interconnections and 20 interconnection agreements, as well as 76 interchange agreements with investor-owned and municipal utilities, electric cooperatives and power marketing firms.

Transmission lines owned by AECI and its six G&T owners:

69-kV— 6,460 miles
138-kV— 223 miles
161-kV— 1,705 miles
345-kV — 658 miles
500-kV — 46 miles

2004 operating statistics

Gross generation	*18,875,400 MWh[1]*
Net generation	*17,994,783 MWh[1]*
Coal burned	*8.9 million tons[2]*
Coal units' availability factor	*82.40 percent[2]*
(Percentage of time units are available to generate electricity, whether or not actually in operation)	
Forced-outage rate	*3.8 percent[2]*
Industry average is 4.7 percent.	
Capacity factor	*76.6 percent[2]*
Actual generation as a percentage of full-load capacity	
Coal units' net heat rate	*10,257 Btu/kWh[2]*
Fuel, operations and maintenance	*20.23 mills/kWh*

[1]Includes AECI's owned coal- and gas-based units

[2] Thomas Hill and New Madrid coal-based plants only. In 2004, these plants produced 15.2 million megawatt-hours.

Associated Electric Cooperative Inc.

James J. Jura, CEO and general manager

Headquarters (417) 881-1204

Accounting & Finance — Michael M. Miller
Business and Technical Services — Patrick L. Mills
Engineering and Operations — Gary L. Fulks
Human Resources — David P. Stump
Member Services and Corporate Communications — Keith E. Hartner
Power Production — Duane D. Highley

New Madrid Power Plant (573) 643-2211

W. David Evans, plant manager

Thomas Hill Energy Center

Mining Division (660) 261-4221
Power Division (660) 261-4211
Thomas I. Watkins, plant manager

Board of directors

O.B. Clark, president
Harold E. Jordan, vice president
R. Layne Morrill, secretary
Charles C. Baile, treasurer
Douglas H. Aeilts
J. Chris Cariker
John K. Davis
Jerry W. Divin
John C. Farris
Emery O. Geisendorfer Jr.
Don R. McQuitty
Donald W. Shaw

Proposed Coal-based Power Plant Project Fact Sheet

Associated Electric Cooperative Inc. (AECI) proposes to build a coal-based power plant to meet growing electricity demand among its members. The proposed plant site is near Norborne, Missouri, in Carroll County. The alternate site is near Big Lake, Missouri, in Holt County.

Quick Facts

- Power plant will use low-sulfur coal
- Anticipated operation by 2011
- AECI's investment in project about $1 billion
- Approximately 900 construction jobs with payroll estimated at $400 million
- 137 new full-time jobs with annual payroll of $10 to $12 million
- Water supply will be from Missouri River alluvial aquifer
- Project will require new transmission lines and railroad corridors

Environmental Safeguards

Air

- Best Available Control Technology will be implemented
- Emissions will comply with all applicable federal and state standards

Water

- Sufficient quantities are available from the Missouri River alluvial aquifer
- Well study will be performed to determine whether plant affects neighbors' wells
- Plant will have cooling towers to minimize water use

Solid Waste

- On-site utility waste landfill will be designed to meet all applicable federal and state standards

Noise

- AECI will specify strict sound level requirements for equipment
- Buffer around facility for sound attenuation

For more information about the project, please contact the following:

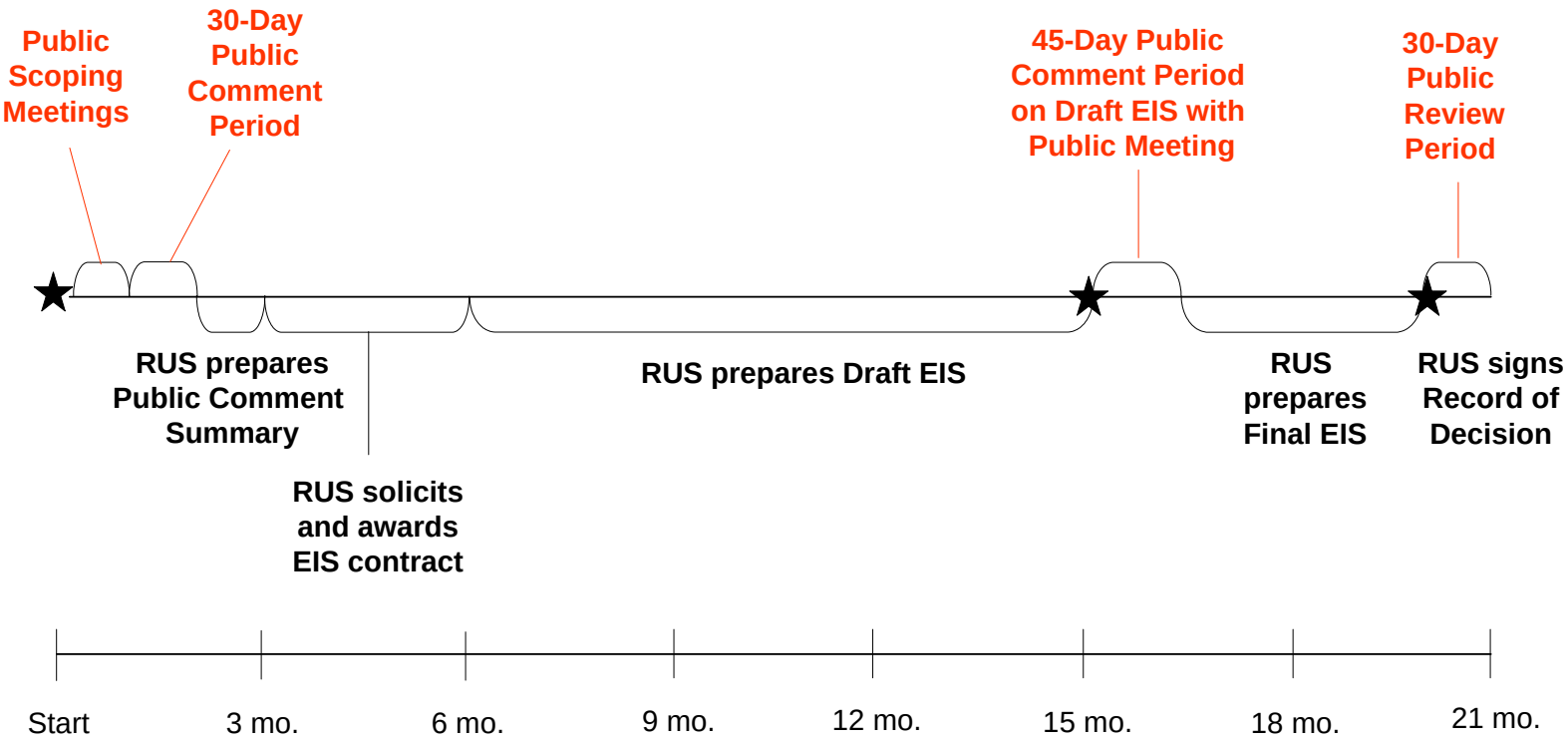
Rural Utilities Service	Stephanie Strength	202-720-0468
AECI	Nancy Southworth	417-885-9246

Visit AECI and/or RUS websites:
http://www.usda.gov/rus/water/ees/eis.htm
http://www.aeci.org

For information about the RUS Environmental Impact Statement, see other side.

Public participation is an integral part of the environmental review process. Below is an estimated timeline of the environmental impact statement (EIS) process indicating the opportunities for the public to provide input.

Estimated Timeline of Public Input Opportunities for Environmental Impact Statement (EIS)



★ - Public Notices

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Sedalia, Missouri/August 23, 2005

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Photographs of Meetings

Photographs of Public Meetings


WELCOME


Are You Located Within a Proposed Corridor?


PROPOSED POWER PLANT


ALTERNATIVES

Appendix E Public Comment Summary

Air Comments

Comment #	Comments	Issue	EIS Relevance
8,15,16,20,24,35,82,85,104,105,106,118,122	Put [emissions] out into the surrounding countryside.	Emissions - General	Standard comment will be addressed through the EIS process
42	Why is it OK to pollute air that is currently not very polluted?		
42	Use and storage of ammonia, anhydrous ammonia, and chlorine.		Comments will be addressed through the EIS process
3	Release of emissions is unhealthy and damages our air quality		Comments will be addressed through the EIS process
12	Plants generate acid rain chemical, emit air-borne mercury, exacerbate smog and contribute to global climate change.		Comments will be addressed through the EIS process
31	What effect will the air pollutants and fallout, even while being monitored from this plant, going to have over a period of time on our grain that will be converted into food for humans and or animals?		Will be addressed generally in the EIS
31	How many pounds of accumulated fallout can our environment, land, ponds, rivers and air take before it is considered unsafe?		Will be addressed generally in the EIS
21	What is the air quality for the cities nearest the sites, i.e. Omaha, Kansas City, St. Joseph, and how does that compare with the air quality in the local vicinity?		Comments will be addressed through the EIS process
21	Why is Squaw Creek National Wildlife Refuge not considered a class I area by the government?		Comments will be addressed through the EIS process
12,25,42	Rise in local children's asthma.	Health	Comments will be addressed through the EIS process
17,23,96	Coal burning power plants generate acid rain chemicals, emit air-borne mercury, exacerbate smog and contribute to global climate change ….. are linked to asthma, long disease, developmental delays and birth defects.		Comments will be addressed through the EIS process
96	Increase in health problem among people living in and several miles around the site.		Comments will be addressed through the EIS process
3,14,32	Particulate content of the air.	Particulate Matter	Comments will be addressed through the EIS process

Air Comments

Comment #	Comments	Issue	EIS Relevance
60	Hazard that will be release from the smokestacks.		Comments will be addressed through the EIS process
3	Particulate matter from fly ash will settle into fertile soil and work into the food chain.		Comments will be addressed through the EIS process
19,34	With our air quality already affected by Exide Battery plant, Golden Triangle Ethanol plant and diesel fuel, chemicals and fertilizers used by farmers wouldn't that dirty our air and water even more?	Quality	Comments will be addressed through the EIS process
118	Although project proximity to ozone nonattainment areas was used as criteria for site selection, the project will result in significant increases in emissions of ozone precursors and the potential exists for transport of these emissions to the Kansas City ozone maintenance area and the St. Louis ozone non-attainment area.		Comments will be addressed through the EIS process
107	The exhaust is released high enough that it dissipates in the atmosphere, no air quality issues here.		Noted
3,14	Do NOx emissions vary by seasons?	Nitrogen Oxides	Comments will be addressed through the EIS process
2	How will this emission and waste affect surrounding communities and lakes		Comments will be addressed through the EIS process
2	How will this emission and waste affect surrounding communities and lakes	Sulfur Dioxide	Comments will be addressed through the EIS process
3	Do SO2 emissions vary by seasons?		Comments will be addressed through the EIS process
2	How will this emission and waste affect surrounding communities and lakes	Carbon Dioxide	Comments will be addressed through the EIS process
2	Would there be emissions trading in order to look like the power plant is not polluting the area?	Emissions Trading	Comments will be addressed through the EIS process

Air Comments

Comment #	Comments	Issue	EIS Relevance
2,38,	Radioactive material will be admitted into the environment.	HAPs	Comments will be addressed through the EIS process
42	Will anhydrous ammonia or chlorine gas be used or stored on site?		Comments will be addressed through the EIS process
42	How will waste ash be controlled to prevent it from becoming air borne?	Ash Dust	Comments will be addressed through the EIS process

Aesthetics Comments

Comment #	Comments	Issue	EIS Relevance
30,35,50	Do not wish to live in sight of transmission corridors.	Visual	Noted
41	Land should be untouched by these destructive and unsightly power poles and lines.		Noted
60	Don't want to look at the monstrosity and all that will be included, moved to country to escape city lights, noise and pollution.		Noted
10,115	Big, loud, bright, smelly building that would be an eyesore and a detriment to the environment.		Noted
10	Would take Big Lake from a peaceful, friendly lake community and turn it into an environmentally dead area.		Comments will be addressed through the EIS process
12,17,23	Possibility of miles of unsightly power lines and related transmission stations is of serious concern.		Comments will be addressed through the EIS process
24,33	Ruin the view from Big Lake.		Comments will be addressed through the EIS process
36	A 662-foot smokestack would be visible from any point at Big Lake State Park or Squaw Creek Refuge creating a major unsightly visual intrusion on the landscape.		Comments will be addressed through the EIS process
83	Would like to see a heading in the EIS for aesthetics.		Comments will be addressed through the EIS process
92	the 125 feet high stack at the ethanol plant in Craig is clearly visible at Squaw creek NWR, 10 miles away. The 600-foot tower and associated facility will likely have a large presence at the rural Forbes Site		Comments will be addressed through the EIS process

Cultural Comments

Comment #	Comments	Issue	EIS Relevance
46	Destruction of numerous historical civil war redoubts and trenches located in transmission corridor	General	Comments will be addressed through the EIS process
90	SHPO determined that there is a moderate to high potential for the presence of archaeological sites near and within the site areas		Comments will be addressed through the EIS process
92	The FHWA recently completed an EIS on replacing the Highway 159 Bridge and that document contains a cultural resources study of much of the area along the highway to Big Lake.		Comments will be addressed through the EIS process
64	Human ashes spread on Norborne property proposed for plant site.		Noted
42	Transmission lines would harm historic quality of farm - 80 yr old farm house being restored and an older notched and pegged barn built by the son of the original settler.	Historic Building	Comments will be addressed through the EIS process

Economic Comments

Comment #	Comments	Issue	EIS Relevance
20,26,107,112	Job availability.	Employment	Comments will be addressed through the EIS process
72	Jobs for people in the local vicinity.		Comments will be addressed through the EIS process
8	Majority of workers necessary for plant operations and construction would come from outside the area with minimal job availability for local citizens.		Comments will be addressed through the EIS process
3	Jobs for people in nearby counties and towns.		Noted
10,11,57	No benefit to the area, in jobs or commerce, that would come out of the power plant.		Comments will be addressed through the EIS process
22	Major economic benefit to the entire are by providing long term, high paying jobs.		Comments will be addressed through the EIS process
3,21,24,232,48,82, 101,110	Devaluation of property.	Land Values	Comments will be addressed through the EIS process
27	Property values will greatly decrease with railroad or transmission line on or close to home and farmland.		Comments will be addressed through the EIS process
93	Have you ever tried to find housing in communities near power plant, the property values are always much higher than before the plant was built.		Noted
58	Farmers be given a business value for land and loss of future years of production.		Comments will be addressed through the EIS process
107	property values have increase significantly, not decrease and the wage scale of the construction worker as well as permanent employees is pretty good.		Noted
12,104,105	Better plan that would protect our wildlife and the thousands of tourist that visit the refuge.	Tourism/Recreation	Noted
20	What effect will building this plant have on future tourism and how will it affect promoting our rare loess hills?		Comments will be addressed through the EIS process
21	What will be the economic impact on hunting and fishing and other recreational activities in our area?		Comments will be addressed through the EIS process

Economic Comments

Comment #	Comments	Issue	EIS Relevance
21	Economic impact on parks, wildlife refuge, and conservation areas.		Comments will be addressed through the EIS process
59,74	No property taxes for our schools and county for 24 years.	Tax Base / Revenues	Noted
64	Tax dollars - won't see a dime put into the community that will benefit anyone.		Comments will be addressed through the EIS process
22	County could use significant increase in the tax base, resulting extra revenues - more funds available for public projects and lower taxes for everyone else in the county.		Noted
72	The taxes and jobs will be great for the community.		Noted
24	Will tax payers pay for the construction of the plant?		Comments will be addressed through the EIS process
82	No appreciable population gain because of jobs offered, rather large number already committed to moving should project be built.	Population	Noted
3	Decline in population after power plants are built.		Comments will be addressed through the EIS process
42	Disruption of farming/ranching activities causing economic losses.	Local Economy	Comments will be addressed through the EIS process
20	What economic effect do power plants have on a town's economy, specifically what businesses were there before and are there now?		Comments will be addressed through the EIS process
42,51,106	Stress on services, crime, etc.	Construction Workers	Comments will be addressed through the EIS process
48,88	Potential for additional students from construction.	Schools	Comments will be addressed through the EIS process
22	Additional students would be very helpful in improving the efficiency of the schools.		Noted

Economic Comments

Comment #	Comments	Issue	EIS Relevance
39, 58,122	Relocation of farm families -traumatic to individuals and possibly have a large impact on other businesses in the area.	Relocations	Comments will be addressed through the EIS process
21	What kind and how bad will the economic damage be to our crops?	Crop Damage	Comments will be addressed through the EIS process
21	Economic impact for EMS and fire department for disaster plans.	Safety	Comments will be addressed through the EIS process

Farmland Comments

Comment #	Comments	Issue	EIS Relevance
3,8,9,25,55	Land taken out of production.	General	Comments will be addressed through the EIS process
27	Valuable farmland sacrificed for transmission lines and railroad.		
32,49,58,122	Consumption of valuable farmland and impact on local agricultural economy.		Comments will be addressed through the EIS process
38,52	Why can't such a plant be built on land that is not suitable for farming?		
43,53	Farmland Protection Act impacts.		Comments will be addressed through the EIS process
91	Transmission lines and poles could keep us from making complete circles if not properly placed or avoided.	Center Pivot Irrigation	Comments will be addressed through the EIS process
53	If the project construction causes any damage to soil and water conservation practices or structures (i.e. terraces, diversions, underground drain tiles, grade stabilization structures, grassed waterways) they should be promptly repaired.	Conservation Structures	Comments will be addressed through the EIS process

Geology Comments

Comment #	Comments	Issue	EIS Relevance
20,63	Where will the fill come from to raise the bottomland to build the plant?	Soils	Comments will be addressed through the EIS process
61	Concerns about fill dirt being taken from nearby Missouri River Bluffs known internationally as Loess Mounds and geologically significant.	General	Comments will be addressed through the EIS process
53	NRCS recommends special attention be given to areas subject to soil erosion caused by rain and water flow.	Soil Erosion	Comments will be addressed through the EIS process
39	Groundwater pumping for a project of this magnitude can produce new sinkholes.	Sinkholes	Comments will be addressed through the EIS process

Health and Safety Comments

Comment #	Comments	Issue	EIS Relevance
3,8,24,35,39,41,48,54,93,110,113	Real health risk to most citizens for many years in the future.	Health - General	Comments will be addressed through the EIS process
8,21	No studies done on prevalence of asthmatic, aged, and disabled population in and around the plant site.		Noted
8	AECI's assumptions regarding health effects are unfounded in light of current scientific and medical data in this respect.		Comments will be addressed through the EIS process
101	What kind of health issues will arise from the power plant?		Comments will be addressed through the EIS process
42,48	What safety measure will be required to protect the community and will there be on-going monitoring and precautions taken to ensure the safety of the community?	Safety - General	Comments will be addressed through the EIS process
3	Does local fire department have resources and manpower to cover a fire at the plant?		Comments will be addressed through the EIS process
46,118	Hazardous towers and cables to a grass airplane landing strip.	Aircraft	Comments will be addressed through the EIS process
46	Designated USAF A-10 low altitude, high-speed training and MOA on transmission line corridor.		Comments will be addressed through the EIS process

Mercury Comments

Comment #	Comments	Issue	EIS Relevance
12,14,26,38,42,57, 58,62,104,105,118	What steps will be taken to protect community from mercury? Will BACT be used?	Emissions	Comments will be addressed through the EIS process
3,55	This area already receiving fair share of mercury emission from nearby plants.		Noted
2	Provide estimated mercury pollution and how that estimate was made including the plus or minus correction level.		Comments will be addressed through the EIS process
2	Provide estimate what % mercury will be released through smokestack and at other points in combustion process or through the disposal of combustion waste.		Comments will be addressed through the EIS process
2	Provide a study of how mercury will impact the area downwind of site.		Comments will be addressed through the EIS process
17	Missouri River on EPA's water quality 303d list for mercury contamination.		Comments will be addressed through the EIS process
2,6,7,17,23,28,104 ,105	Effects on children exposed during pregnancy causing learning disabilities, attention deficits and motor delays.	Health	Comments will be addressed through the EIS process
12	Coal-burning power plants are major contributors to particulate matter associated with asthma, lung disease, heart disease and premature death.		Comments will be addressed through the EIS process
5, 6,106	Health issues regarding mercury		Comments will be addressed through the EIS process
2,3	Women and their fetuses will be at greater risk because of mercury concentration in fish.		Comments will be addressed through the EIS process
2	Groundwater and soil contamination from mercury in ash that will be disposed of in landfill.	Waste Disposal	Comments will be addressed through the EIS process
2, 25	Pollution of ponds and streams with mercury and ash.	Fish Contamination	Comments will be addressed through the EIS process

Mercury Comments

Comment #	Comments	Issue	EIS Relevance
2	Will coal cleaning be done and if so how much mercury and other chemicals will be released with this process?	Coal Cleaning	Comments will be addressed through the EIS process

Purpose & Need & Alternatives Comments

Comment #	Comments	Issue	EIS Relevance
12,17,23,103,117	Incentives to reduce use, install solar generation, and generating power by using wind, water, and solar energy.	Alternative Technologies	Comments will be addressed through the EIS process
42	Use of integrated gasification combined cycle technology.		Comments will be addressed through the EIS process
56	New electric plants burn ethanol - benefit farm economy, clean burning, and should be built closer to end user.		Noted
3	Would ethanol or wind efficiency be a more viable solution?		Comments will be addressed through the EIS process
2	Consider technologies such as carbon injection, fuel switching, and increase efficiency of electricity production or use.		Comments will be addressed through the EIS process
104, 105	Lower energy consumption through energy efficiency, combined with research and development of clean renewable energy sources.		Comments will be addressed through the EIS process
8,39	Inconsistencies in reported power production capabilities and skewed to reflect immediate need where no such need is evident in this region of the state.	Purpose and Need	Comments will be addressed through the EIS process
8	AECI can easily meet and exceed its generation needs beyond the forecast date without proposed project by adding capacity to existing baseload plants for significantly less cost and capital outlays.		Comments will be addressed through the EIS process
8	Operational costs of coal-fired unit, its related hazardous waste management/disposal, air quality controls, fuel delivery; fuel preparation and ongoing maintenance consideration do not bring the proposed project into a reasonable cost benefit relationship.		Comments will be addressed through the EIS process
8	Put the cart before the horse - did not include full consideration for the long term environmental and economic impacts to proposed site area.		Comments will be addressed through the EIS process
8	78% of load requirements not in Carroll County or this region.		Comments will be addressed through the EIS process
8	Projected growth rate of 2.6% is unrealistic.		Comments will be addressed through the EIS process

Purpose & Need & Alternatives Comments

Comment #	Comments	Issue	EIS Relevance
8	No significant need for additional energy in this region of the state.		Comments will be addressed through the EIS process
8	Proposed plant is not necessary under current or projected regional market requirement.		Comments will be addressed through the EIS process
24	Is it true that non of the power generated by the plant will be used in the vicinity?		Comments will be addressed through the EIS process
20,118	How was the point system used for ranking the sites and why wasn't wildlife concerns given a higher priority?	Site Selection	Comments will be addressed through the EIS process
87	Need better explanation of why alternate site chosen is in a floodplain.		Comments will be addressed through the EIS process
118	EPA urges USDA to reconcile conflicting information about selecting floodplain sites within the context of the project's objective and with the Executive Order which urges agencies to avoid them.		Comments will be addressed through the EIS process
118	We [EPA] do not believe that the conclusion, "None of the eight siting areas resulted in a location that was clearly above and beyond the other site…" is made with sufficient justification.		Comments will be addressed through the EIS process
118	EPA does not consider a coal-fired power plant to be a water dependent activity; thus, a practicable alternative that is less environmentally damaging, e.g., non-wetland floodplain site or an upland site with no wetlands is presumed to exist.		Comments will be addressed through the EIS process

Recreation Comments

Comment #	Comments	Issue	EIS Relevance
101	Keep water level of Big Lake at an adequate depth for recreation and wildlife.	State Park & Wildlife Refuges	Comments will be addressed through the EIS process
11	Would be overshadowed by the sound, the lights, the pollution, the truck traffic.		Comments will be addressed through the EIS process
97	Primary concern would be to keep them [Squaw Creek National Wildlife Refuge and Bob Brown's Conservation Area] environmentally safe to be enjoyed by future generations.		Comments will be addressed through the EIS process
31	How will this [Project] affect camping and lake water, fishing and of course the view to people who are trying to get away from the noise and pollution and just want to see country at it's best?		Comments will be addressed through the EIS process
6,50,54,61,62,79,80,85, 92,101,106	Impacts to Squaw Creek National Wildlife Refuge		Comments will be addressed through the
24	DEVASTATING to the Big Lake Area!		Noted

20,24,45,84,102	What effect will building this plant, in the heart of a recreational area, have on the recreational economy?	General	Comments will be addressed through the EIS process

Transmission Comments

Comment #	Comments	Issue	EIS Relevance
32,42,60	Concerns about electromagnetic fields caused by high-power electric lines and their impacts.	Electromagnetic Fields	Comments will be addressed through the EIS process
46	Detrimental effects of long-term exposure to EMR and EMI on wildlife and humans.		Comments will be addressed through the EIS process
1,101,121	Transmission lines and poles could cause bird collisions.	Electrocutions	Comments will be addressed through the EIS process
1	Transmission lines and poles could cause bird electrocution.	Bird Collisions	Comments will be addressed through the EIS process

Transportation Comments

Comment #	Comments	Issue	EIS Relevance
11,26,42,9,119	Damage to area and county roads during construction.	Traffic	Comments will be addressed through the EIS process
58	Affect of construction workers on traffic.		Comments will be addressed through the EIS process
9	Construction traffic during times of harvest and planting, farm equipment take up the whole road when moving from field to field.		Comments will be addressed through the EIS process
97,118,119	Potential damage from increased traffic crossing of existing railroads by construction traffic.	Railroad	Comments will be addressed through the EIS process
55	Potential impact to response times for emergency response vehicles because of trains crossing rural roads.		Comments will be addressed through the EIS process
58	Use of overhead bridges at road crossings.		Comments will be addressed through the EIS process
9,38,55,58	Highways 10 and E flood on a regular basis and are impassable. Little country roads not able to support major traffic during flooding.	Road Flooding	Comments will be addressed through the EIS process
42	Construction traffic noise.	Noise	Comments will be addressed through the EIS process
119	Endanger children walking to school and playing.	General	Comments will be addressed through the EIS process
119	Roads not built to level of traffic and weight.		Comments will be addressed through the EIS process

Waste Comments

Comment #	Comments	Issue	EIS Relevance
2,38	Toxic waste in landfill.	Hazardous	Comments will be addressed through the EIS process
39	Toxic waste, including arsenic, mercury and lead, would be landfilled in the floodplain and leach into the groundwater.		Comments will be addressed through the EIS process
8	Fly-ash is not considered hazardous material in Missouri making Missouri regulation inconsistent with federal provisions invalid under the Supremacy Clause of US Constitution.		Comments will be addressed through the EIS process
2, 57,97	How will combustion-waste be disposed of that will pose minimal public health or ecological risks?	Disposal	Comments will be addressed through the EIS process
2	Will any remanufactures be done at the plant causing further emissions?	Remanufactures	Comments will be addressed through the EIS process

Water Resource Comments

Comment #	Comments	Issue	EIS Relevance
9,12,17,23,25,32,48,49,52,55,73,74,82	Depletion of groundwater shared by area wells.	Withdrawal	Comments will be addressed through the EIS process
26,38,51,52,55,58,61,71,97,106,107,111,112,116,118	Local wells run dry.	Supply	Comments will be addressed through the EIS process
27	No rural water available in Carroll County for residents.		
39	What is AECI's planned remedy if private wells go dry?		Comments will be addressed through the EIS process
33	water supply being taken away from our lake to support this plant		Comments will be addressed through the EIS process
21,32,92,118	Degradation of wetlands.	Wetlands	Comments will be addressed through the EIS process
11,101	Wetlands would be drained by the water pulled to operate the plant.		Comments will be addressed through the EIS process
53,61	Contamination of sensitive wetland ecosystems on public and privately owned acres, many in the Wetlands Reserve Program.		Comments will be addressed through the EIS process
53	There is a Wetland Reserve Program easement within the area proposed for the Norborne power plant site. Development in the easement area would potentially impact the functions and values of the wetland easement and would be a concern to the NRCS.		Comments will be addressed through the EIS process
3,42,55	Increase in flooding on neighboring farms from raising of plant elevation in floodplain.	Floodplains	Comments will be addressed through the EIS process
	Potential increase in spring flooding from water releasing on the upper Missouri River lakes and impact on the plant site.		Comments will be addressed through the EIS process
3	Flooding of landfill complicating the quality of water supply.		Comments will be addressed through the EIS process
20	Why does Kansas law disallow mercury-pollutant containment in the floodplain?		

Water Resource Comments

Comment #	Comments	Issue	EIS Relevance
21,101	What are ramifications of building in a floodplain?		Comments will be addressed through the EIS process
61	Alteration of nature and damage potential of future floods to the surrounding area from placing large amount of fill in the floodplain.		Comments will be addressed through the EIS process
92	The Corps recently recalculated flood flow frequencies for the Missouri River and that information should be used in evaluating the potential for flooding at the site and potential impacts to the designated floodway.		Comments will be addressed through the EIS process
92	The EIS should address the measures used to ensure the integrity of the disposal facility, as well as monitoring requirements to detect problems (i.e., leaks) should any develop.		Comments will be addressed through the EIS process
42	Contaminated because of excessive water use.	Contamination	
12,17,23,55	Groundwater contamination from landfill and potential waste remediation in the future.		Comments will be addressed through the EIS process
28	Heat pollution will also take its toll on the river's biota.	Discharge	Comments will be addressed through the EIS process
63	Consider taking fill from the bottom of Big Lake and then when plant is built, returning the cooled, cooling water to the lake.		Noted
92, 36	The EIS should comprehensively address hydrologic effects of the project to the surrounding areas, including water resources for the local community, hunt clubs, center pivot irrigation system, Mallard Marsh, Big Lake State Park, and area wetlands.	Hydrology	Comments will be addressed through the EIS process
21, 42	How will run-off be controlled during construction?	Stormwater	Comments will be addressed through the EIS process
43	Contamination from stormwater run-off.		Comments will be addressed through the EIS process
42	Pollution of community's groundwater and wells.	Wastewater	Comments will be addressed through the EIS process

Water Resource Comments

Comment #	Comments	Issue	EIS Relevance
39	How many treatment systems will be subject to NPDES effluent guidelines? Who is going to monitor these effluents, and where will they be discharged? Will these systems be covered?		Comments will be addressed through the EIS process
87	The proposed project at the Forbes site could be at odds with federal, state, and localities that have established goals to restore some of the historic functions of the Missouri River floodplain, and potentially foreclose future opportunities to restore a portion of the Missouri River system.	Floodplain Siting	Comments will be addressed through the EIS process
58	Pumping water from Missouri River cause water level to fall too low for permitting barge traffic on the river.	Barge Traffic	Comments will be addressed through the EIS process
39, 42	How will additional burden to Mo River - pollution, heated water, drain on water resources affect the river?	Water Pollution - General	Comments will be addressed through the EIS process
39	The aquifer's water quality should be determined - it is very hard water and may require pretreatment.	Quality	Comments will be addressed through the EIS process

Wildlife Comments

Comment #	Comments	Issue	EIS Relevance
12,24,32,33,51,82, 101	Displacement of wildlife.	General	Comments will be addressed through the EIS process
31	How will the fallout and air quality affect all these animals that use the water and land as a main source of survival?		Comments will be addressed through the EIS process
45	Transmission line would deter wildlife from their natural flyway.		Comments will be addressed through the EIS process
92	Construction and Operation of the proposed facility and associated supply and transmission facilities has the potential to significantly affect surrounding fish and wildlife resources, as well as recreational opportunities associated with those resources.		Comments will be addressed through the EIS process
92	The EIS should include a detailed description and evaluation of all work needed for the facilities and transmission corridors, including any additional tree clearing, land clearing, river crossings, etc, as well as measures to reduce effects to fish and wildlife (e.g., measures to reduce bird strikes on transmission lines).		Comments will be addressed through the EIS process
30	Just south of our residential area is four Missouri Conservation sites devoted to the preservation of the endangered Missouri Prairie Chicken -- transmission line corridors in Sedalia area.		Comments will be addressed through the EIS process
6,46,97,102,121	Disruption of migratory bird flyway.	Bird Migration	Comments will be addressed through the EIS process
21	What are the impediments of the bird migration through area by power lines and smokestack?		Comments will be addressed through the EIS process
24, 36,104,105	Hazardous maze of transmission lines across on the major migratory bird flyways in North America inflicting needless high mortality losses to migratory birds and eagles in direct contrast to purpose of the refuge.		Comments will be addressed through the EIS process
21,76,89,95,118	Impact on Pallid Sturgeon and the Missouri River.	T&E Species	Comments will be addressed through the EIS process
	Missouri River Ecosystem: Prospects for Recovery documents the decline of native fish species in the river of which 2/3 of the species are rare, threatened, or endangered. The documents point out it is time to work on the recovery of the river, instead this project stresses the ecosystem further.		Comments will be addressed through the EIS process

Wildlife Comments

Comment #	Comments	Issue	EIS Relevance
30, 76	Preservation of the endangered Missouri Prairie Chicken at Missouri Conservation sites		Comments will be addressed through the EIS process
53	Certain trees and forest habitats are critical to the Indiana Bat in Missouri.		Comments will be addressed through the EIS process
58,92	Concern should be given to effect on fish and other wildlife using river due to discharge water temperatures.	Fish	Comments will be addressed through the EIS process
28	Mercury contamination from consumption of fish, advisories issued at federal and state level.		Comments will be addressed through the EIS process
11	Would contaminate fish by the emissions and cease being a resource for the birds.		Comments will be addressed through the EIS process
3,92,104,105	Migrating bald eagles have been spotted on the site.	Bald Eagles	Comments will be addressed through the EIS process
11,20	What effect will the increased noise level have on wildlife?	Noise	Comments will be addressed through the EIS process
20	What effect will the increased lighting level have on wildlife?	Lighting	Comments will be addressed through the EIS process

Other Comments

Comment #	Comments	Issue	EIS Relevance
32,42,50,95,97,106,112	The plant, trains, coal unloading, and traffic will all contribute to reducing the quality of life in the community.	Noise	Comments will be addressed through the EIS process
42	Noisy construction and operation must be limited to business hours.		Comments will be addressed through the EIS process
58	Livestock will be less productive and spook easily, causing more disruption to farming production.		Comments will be addressed through the EIS process
10,11	Would drive away wildlife.		Comments will be addressed through the EIS process
36,82	Terrain is flat permitting sounds to transmit over long distance, especially after dark. Would be especially annoying at night during the peak attendance summer months.		Comments will be addressed through the
107, 111	Noise or lights not an issue, current train traffic makes more noise that plant would and everyone is used to that.		Comments will be addressed through the EIS process
24	How much noise pollution will it generate?		Comments will be addressed through the EIS process
11,42,95,97,106	Light pollution can weaken human immune response, impact cattle health and growth, and potentially impair crop growth.	Lighting	Comments will be addressed through the EIS process
36	The light glow created by the lighting at the plant and the continual flicker of lights on the smoke stack would become the dominant night sky feature in the area severely degrading the view of the night sky that is uniquely important to the recreational users of this area.		Comments will be addressed through the EIS process
93	For those concerned about light pollution, take a look around the rural homes and most have night security lights. Isn't that light pollution?		Noted
24	How much light pollution will the plant put out?		Comments will be addressed through the EIS process
4,27,67,94	Release of air- or water-borne pollutants, contaminating air, soil, and water?	Environmental - General	Comments will be addressed through the EIS process

Other Comments

Comment #	Comments	Issue	EIS Relevance
95	Negative affect include health, pollution, environmental impact, water and fish, sinking property values, possible learning problems in children.		Comments will be addressed through the EIS process
8	Mercury and radioactive material inherent in the coal supply have cumulative effects upon exposure.	Cumulative Effects	Comments will be addressed through the EIS process
92	Include potential cumulative effects to water (both supply and discharge), air (including air modeling information), traffic, transmission facilities, tic., resulting from additional future development at the proposed sites.		Comments will be addressed through the EIS process
118	Cumulative impacts are the third most significant issue related to power plants. EPA recommends that cumulative impacts analysis be done to identify the potential for significant impacts to transportation facilities, including railways and roadways, air pollution (locally and downwind), and wetlands. This analysis should consider other existing and reasonably foreseeable future projects within the area of the proposed plant's influence.		Comments will be addressed through the EIS process
42,111	How will foul odors be prevented from escaping into the air?	Odors	Comments will be addressed through the EIS process
24	Will the smell of sulfur permeate the surrounding wetland and residential lake property area?		Comments will be addressed through the EIS process
60	Like to put a runway on property for small aircraft access - transmission line may be in way.	Future Land Use	Noted
46	Obstruct or inhibit plans to build another, larger lake - transmission line corridor.		Noted
47a	Concerns about transmission line in the Westmoreland area of relatively new homes and private lakes and impact on new and future development in that area.		Comments will be addressed through the EIS process
58	Carroll County has an ordinance for no landfills.	Land Use	Comments will be addressed through the EIS process
24	How many land acres will the plant occupy?		Comments will be addressed through the EIS process

Other Comments

Comment #	Comments	Issue	EIS Relevance
3	What happens to the plant when out of commission? Will it become a superfund site or be expanded for future units?	Life span of plant	Comments will be addressed through the EIS process
42	How often will monitoring be done to assure the plant is complying with all permits?	Environmental Permitting	Comments will be addressed through the EIS process
118	Include a discussion of how the tribe [Sac and Fox] can be more involved with decision making and mitigation of potential impacts.	Native American consultation	Comments will be addressed through the EIS process

15 Aug 05

Re: Associated Electric Cooperative, 660 megawatt electrical generator and 345-kV transmission line in northwest Missouri.

When available, please send me a copy of the DEIS. My interest is with transmission line-associated collisions and electrocutions. Meanwhile, please send me a copy of the site selection study and macro corridor study report.

Thank you.

Chris Spies

C.G. Spies
P.O. Box 171
Pequabuck, CT 06781-0171

Enclosed are several comments/questions that have been turned in by concerned citizens in regard to the proposed coal burning power plant in Holt County, Oregon, MO.

Please include them in the Study. Thank you.

- Hot Spots -

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Provide estimated mercury pollution at the proposed power plant and how that estimate was made, including the plus or minus correction level.

The form and amount of mercury emitted will depend on a number of things which should be factored in, including the amount of mercury in the coal, the type of boiler, and the type of stack controls installed on the boilers.

Provide estimate of what % of mercury will be released through the smokestack and what % will be released at other points in the combustion process or through the disposal of combustion waste (scrubber sludge, fly ash, bottom ash, boiler slug, etc.).

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Will coal cleaning be done a the proposed plant and if so, how much mercury and other chemicals will be released with this process?

Please provide details.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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A power plant stack height, the form of mercury it releases, and the amount of rainfall in the area all affect how much mercury is deposited directly downwind of the plant.

EPA estimates up to 15% of the mercury stack emissions can deposit within 30 miles of the plant, other data estimates 50%.

Please provide a study on how this will impact the area downwind of the proposed power plant sites.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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There are other pollutants beside mercury that are in the emissions of a coal burning power plant, such as sulfur dioxide, nitrogen oxides, carbon dioxide.

How will these emissions and waste affect the surrounding communities and lakes?

Please elaborate..

Optional: Name: _____

Address: _____

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Mercury is so efficiently bioaccumulated in the aquatic food so that fish at the top of the food chain may have levels of mercury in their muscle tissue that are one million times higher than the mercury concentration in the water. Because of this extreme bioaccumulation, it takes very little mercury to contaminate a lake and its fish.

Since the proposed coal-burning power plant is so near Big Lake, many farm ponds, the Missouri River, how do Associated Electric cooperative and the USDA Rural Development intend to protect the fish in Big Lake, the ponds, and the Missouri River?

Please elaborate..

Optional: Name: _____

Address: _____

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Will all mercury captured or recovered through the use of stack controls, coal cleaning, or elsewhere during the combustion process be disposed of in a manner that would prevent the re-release of mercury into the environment, or the contamination of any rivers, lakes, or ponds.

If so, please elaborate..

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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How will combustion-waste be disposed of that will poise minimal public health or ecological risks?

Will any re-manufactores be done at the plant causing further emissions?

Is there any regulation on coal combustion waste as hazardous waste? If not, is there any specific commitment by Associated Electric Cooperative to regulate coal combustion waste? If so, please describe and determine if the regulations and/or commitment are strong enough to keep our area free from hazards.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Are the standards that Associated Electric Cooperative, Inc. have for environmental concerns "gradual" standard over many years, where they can continue to pollute at a high rate?

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Please address the following in the study:
Just because they install a particular control technology into the boiler, they must not be allowed t keep emitting high quantities of mercury. There are a number of factors other than technology that affects the amount of mercury omitted by a boiler.

There must be set emission standards and testing that at a minimum reflect the performance of the best boilers

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Has Associated Electric Cooperative, Inc. made any voluntary commitment to reduce mercury and other hazardous emissions and waste from this proposed power plant ? Or have all commitments been regulatory?

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Would there be emission trading in order to look like the power plant is not polluting the area?

An emission trading approach would allow the proposed power plant to emit more mercury and other hazardous chemicals than reported, causing an unjustifiable increase in risk for individuals and the area surrounding the plant.

Emission trading is not appropriate for highly toxic pollutants such as mercury and should not be allowed by a coal-burning power plant.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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The proposed coal-burning power plant must go beyond minimal standards on regulating bio-accumulative toxics, and require further reduction where such reductions are achievable

They should consider technologies other than those required – such as carbon injection, fuel switching, and increase efficiency of electricity production or use. These technologies are available and cost-effective in removing mercury.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Scientists and government offices are growing increasingly concerned about the health threat that mercury contamination of commonly eaten fish may pose to the delicate, rapidly developing nervous systems of fetuses, infants and young children. Concern over mercury contamination in 40 states, including Missouri, has led to government agencies to warn consumers not to eat bass & other sport fish in areas contamination by coal-burning plants. Some scientist liken the evolving evidence that dietary exposure to mercury from fish may cause damage to vision, coordination, & other nervous system functions, to the belated scientific & regulatory recognition of childhood lead poisoning. Coal burning power plants are the single largest source of mercury pollution. This proposed coal-burning power plant site is located right by Big Lake, the Missouri River, Bob Brown Conservation Area, & Squaw Creek Reserve, and many small ponds.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Mercury never disappears in the environment, ensuring that contamination today will remain a problem long into the future.

Please include this information in your study. And provide your answer on how this could possibly be an acceptable thing to bring into our community.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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Mercury pollution is a major environmental problem with serious immediate and long-termed implications for human health. Mercury is an extremely volatile metal that can be transported great distance after it is spewed into the atmosphere. Once it reaches an aquatic environment, mercury is transformed into methylmercury, a potent neurotoxin, which accumulates in top predator fish and the people and wildlife who eat them.

When ingested by pregnant women, methylmercury readily crosses the placenta & targets the developing fetal brain & central nervous system.

Even relatively tiny amounts can produce serious developmental delays in walking, talking, hearing & writing. Infants can also be exposed to high levels of methylmercury during breast feeding.

Optional: Name: _____
Please do not bring this pollutant into our community.

Address: _____

If you would like to take this form with you, please mail to:

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EPA should be providing consumers information regarding to emission and waste hazards as a part of this study.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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34133 CR 171
Norborne, MO 64668
(904) 434-3748

USDA, Rural Utilities Service
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570

September 20, 2005

Dear Ms. Strength,

I am writing you concerning the proposed power plant that Associated Electric Cooperative, Inc. is planning to build in Norborne, Missouri. There are many concerns regarding this issue that have yet to be resolved and I hope you take the time to consider what this power plant will do to Norborne, its citizens, and the surrounding communities and family farms.

There are many factors involving the planning and construction of this so called "proposed" power plant. Environmental and health factors are obviously of great concern to many citizens in the area as well as the cultural history of Carroll County being a predominately agricultural economy. Although these are very important concerns, other issues to be considered include the actions and dishonesty to the public of the Carroll County Commissioners and the County Clerk and the business conducted by AECI. Please let me explain.

Environmental

As many already know, coal-based electricity generation is often referred to as "dirty" even with todays best available technology. Mercury emissions, particulate matter, and sulfur dioxide are only a few of the pollutants that will be expelled from this plant.

Stack scrubbers will definitely reduce the amount of the emissions, but what is not released into the air will eventually be released somewhere....a nearby landfill perhaps? Man has yet to build a structure that will undeniably withstand the test of time and mother nature. This plant will be located in an area that experiences extreme and periodic heavy downpours, flash flooding (which often floods nearby highways limiting access), and tornadoes. Over time any landfill in this area will be subject to a natural disaster of these types only complicating the quality of the water supply for area residents.

AECIs flyer "Building for tomorrow's energy needs: Protecting human health and the environment" states the following: "AECI has reduced its sulfur dioxide emissions rate more than 90 percent and its nitrogen oxides emissions rate more than 80 percent during the summer months when nitrogen oxides contribute to smog formation." Does this mean that AECI will not reduce these emissions during the winter months so that the particulate matter can be released and begin their voyage around our planet until the summer months arrive the following year and then contribute to smog? Why can't those controls be used year around? Mercury emissions and particulate matter including coal ash or fly ash will undeniably settle into some of the most fertile soil of this county, thus slowly working its way into the food chain.

It should not matter if coal-technology has improved in the past 50 years. It is still the dirtiest form of electricity generation. Would ethanol (fuel cells) or wind efficiency be a more viable solution to take us well into the 21st century? Ethanol and fuel cells would not only be an advantage to the local farmers, but it would be helpful to the power companies and the environment as well. One would think that with the technology we have today (space travel and space stations, medical advances, electric appliance efficiency, military "smart bombs", just to name a few) we would be utilizing more earth-friendly sources for energy production.

Will this plant affect migrating bald eagles that have been spotted on the property? What about the noise and lights? Will these affect local wildlife populations? The Hawthorn plant recently caught fire and a black plume could be seen from dozens of miles away. Does the Norborne volunteer fire department have the resources and manpower needed if this power plant were to catch fire?

During a meeting held on August 25, 2005 by Missouri Farm Bureau regarding eminent domain rulings, Missouri Gov. Matt Blunts Task Force representative Steve Hobbs stated that the average life for a power plant is 25 years. With this being said, what might happen when this plant is out of commission? Will it just sit there to later become another SUPERFUND site or will additional stacks be added to keep it working on polluting our environment?

Health of citizens in nearby communities

The state of Missouri already has more cancer deaths per year than the National Average according to the American Cancer Society. Is this linked to the overwhelming number of coal-fired power plants in our state? According to the Missouri Department of Natural Resources there are 20 coal-fired plants in the Show-Me state with a generating capacity of almost 12,000 MW; which is not including the numerous plants operating on oil, natural gas, water or nuclear sources.

According to the MSNBC website, the EPA estimates that up to 15% of mercury emissions from coal fired utilities falls within 30 miles of the plant and up to 50% falls within 600 miles. Norborne is located downwind of the following: 30 miles from the Sibley plant, about 35 miles from the Missouri City plant, 45 miles from the Hawthorn plant, and about 70 miles from the Iatan plant. Considering each of these plants is coal-fired and according to the information provided by MSNBC, one can easily conclude that this area is already receiving its fair share of mercury emissions from nearby plants.

The Missouri Department of Conservation stated in the September 2005 publication of the Missouri Conservationist that although most fish caught from Missouri streams and rivers are safe to eat, mercury contamination still remains a concern statewide and that all nursing mothers, expectant women, women who may become pregnant, and children should limit consumption. To me, this is a red flag! If it is advised that these individuals must limit intake of local food sources then it should be advised that we all be aware of why there is even an concern regarding this possible contamination!

Demographics

Traditionally small agriculture based towns have experienced declining population after coal-fired utilities have been installed nearby. For example, Missouri City and Sibley both have power plants located within a very close distance to them. These two nearby towns are also located on major highways and within a very reasonable distance to Kansas City. So why has the local population in these towns declined over recent years? Even where there has been growth in towns close to power plants, the growth would hardly be defined as economic progress and development. For example, the Thomas Hill plant is located at Clifton Hill where the population has only increased by 20 individuals in the past 14 years. Talk about progress!!

AECI promises jobs to the local people but does not guarantee that these employees will actually reside in Norborne or Carroll County for that matter. This plant will be located about a half mile from the Ray County line and will be closer to Richmond than Carrollton. AECI stated in their flyer "Building for tomorrow's energy needs: Employment opportunities" that most of the workforce of the Thomas Hill plant is native to the area. What is "native to the area " anyway? Is it a 30 mile radius? If so, how are residents living in Richmond, Waverly, Lexington, or Hardin (all located in neighboring counties) going to benefit Norborne?

Norborne's population is already dropping each year. Many people have declared they will relocate whether the plant directly affects them and their property or not. Many residents live in Carroll County to enjoy the serenity and beauty of living in a rural environment and to escape the traffic and pollution of larger cities.

Can it be concluded that AECI would like to place the plant here due to the already dwindling population, therefore not putting as many individuals at risk to various health hazards than if it were to be placed near a larger population?

Cultural and Historical economy of Carroll County

Norborne is and always has been an agricultural community. Too often, especially since the recent Supreme Court ruling on eminent domain, farmers lose their prime farmland to development only to receive minimal (fair market value) price. It costs so much more to start a farm these days than it did 75, 50, and even 25 years ago. With grain prices being much lower now and fuel prices much higher, it is becoming increasingly harder for farmers (our nation's backbone in my opinion) to make a living and provide food for a growing and increasingly demanding population. Crop productivity advancement technologies providing higher and more efficient yields will only last so long. Transmission lines and additional railroads are just a few more obstacles for local farmers to enjoy making it harder and harder for them to contribute to the national food supply.

Many families in the Norborne area are the descendants of those who came to the United States over 100 years ago or more. Some of the family farms that will be ruined have been operational and passes down through many generations. My grandfather's farm has been in the family for 130 years. A portion of this farm is where my mother's ashes are spread. This is the same farm, all 480 acres of it, that AECI plans to take in exchange for "fair market value." How does one put a price tag on such rich and proud family heritage? Why is it up to AECI to determine how much our farm is worth? No amount of money can replace a family's heritage and hard work.

Ethics and Honesty of Carroll County officials and AECI Representatives

AECIs representatives and the Carroll County Commissioners and County Clerk have been far from honest in the development and progression of this proposed power plant. Families have been lied to, information has been withheld, and the value of family farms has not been offered to those directly affected.

Will there ever be a day when property owners will not have to worry about a big corporation pushing them out of their way to make room for so-called "improvement and development"? What is wrong with the land the way it is being used now?

The citizens of Carroll County never got the chance to vote on this issue and have been denied that right even after a petition was brought forth to the officials. AECI has been sneaky during land acquisition, telling families that their property was desired for investment purposes....but withholding what kind of investment they will be doing. My grandparents have been lied to on more than one occasion by the representatives of this company that claims "they want to be a good neighbor". It is unfair and completely uncalled for and it is not the way business in meant to be done.

It would be nice to have the USDA consider the farmers of Carroll County in this very complex issue. As with the new eminent domain ruling, it is becoming harder to fight for what we have worked for our whole lives.

I hope I have brought to your attention just a few issues that may not have been previously considered. I have included several magazine articles, website information, and newspaper articles for your review regarding this complex issue. Please feel free to contact me with any questions you may have. I pray you will take into consideration the families whose dreams have been shattered and the hardships that many in the community have endured because of the deceitful actions by the Carroll County "Authorities" and the representatives of AECI.

Thank you for all of your consideration and help.

Best Wishes,

Noelle Matthews

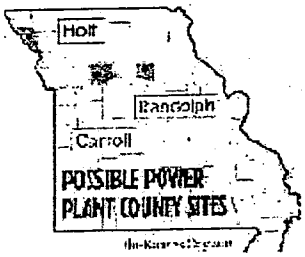
Noelle Matthews

KansasCity•com

Posted on Fri, Feb. 25, 2005

Rumors swirl about power plant locale

By KAREN DILLON The Kansas City Star



A Springfield utility is considering a handful of sites in rural counties just outside the Kansas City area to build a 600-megawatt coal-fired power plant.

Associated Electric Cooperative officials said this week that they planned to announce soon the location of a Missouri site where they would build the plant.

Utility officials would not confirm sites they are considering, but Carroll County officials conceded this week that it is one of the counties in the running.

That's information some residents of the county about 50 miles east of Kansas City have tried to get for at least two weeks as rumors have been flying.

"It's been like pulling teeth out of a chicken to get information out of any of them," said Tim Korff, a farmer near Norborne.

Some residents are especially angry because the Carroll County Commission learned more than two months ago about the utility's plans to build the power plant. The unannounced meeting, held outside the county, apparently violated Missouri's open meetings law and has sparked Attorney General Jay Nixon's interest.

"We certainly would want to look at it," Nixon said. "Public business should be done in public."

Commissioners of two other counties — Holt, which is just north of St. Joseph, and Randolph, which is east of Carroll County — confirmed they also are in the running for the plant. Atchison County in far northwest Missouri is no longer being considered, officials there said.

Holt County commissioners may also have violated the open meetings law.

Wayne Voltmer, Holt County presiding commissioner, said all three commissioners from that county met in November or December in Cameron with the utility officials. However, he didn't consider the unannounced meeting to be a violation of Missouri law.

"We didn't make any decisions whatever," Voltmer said, adding that commissioners held a public meeting later to discuss the plant.

Commissioners from Randolph County responded differently when they had the first meeting with utility officials. They sent only one commissioner so that there would not be a quorum.

"It was not a Sunshine Law meeting," said Jim Myles, Randolph County presiding commissioner.

Peggy McGaugh, Carroll County clerk, said when the commissioners, an economic developer and she attended the meeting in Cameron before Christmas, no harm was meant.

"If there was any type of open record or open law violated, I would certainly apologize for it," McGaugh said. "We just knew we were doing good for the county."

Many counties in rural Missouri have financial problems, and the power plant would be a major economic boost. The plant would mean an estimated $4 billion economic impact with construction requiring up to 1,000 workers over four years and with more than 100 permanent jobs, McGaugh said.

Associated Electric said it will need the plant to provide more power to 51 local electric cooperatives that are growing. It estimates it will need another 400 megawatts of round-the-clock power by 2011.

In January, Carroll County residents said, two real estate brokers began knocking on doors saying they represented a group of investors wanting to buy farmland.

As property was sold and some contracts were signed for options to buy, rumors began to fly about the possibility of a power plant.

Some residents are concerned because of potential health problems associated with pollution, such as ozone and mercury, from power plants.

In Carroll County, Henry and Joline Lindley's farm has been in the family for 130 years. At one point during hard times a part of the farm was lost. But Henry Lindley finally was able to buy it back.

He said he has been approached three times by one of the real estate brokers but said no.

"We've had a terrible time trying to find out what is going on," said Lindley, who would like to have some community meetings. "I'd feel better as an individual in the community if everybody was aware of what was happening, and then they could decide what they wanted."

To reach Karen Dillon,

call ***(816)234-4430*** or send e-mail

to *kdillon@kcstar.com*.

First glance

- *Associated Electric Cooperative of Springfield plans to build a 600-megawatt power plant in a rural Missouri county near the Kansas City area.*

- *Residents of one county say they have been struggling to find out about the plant even though county commissioners had been talking about it in unannounced meetings.*

Building for tomorrow's energy needs

Protecting human health and the environment, *continued*

The cooperative has spent more than $600 million to improve air quality. Since 1994 AECI has reduced its sulfur dioxide emissions rate more than 90 percent and its nitrogen oxides emissions rate more than 80 percent during the summer months when nitrogen oxides contribute to smog formation.

Improving air quality a national trend

Nationally, America's air quality is better now than it has been in decades. Emissions of pollutants regulated by federal clean air laws established to protect human health are down 54 percent since 1970 — even though use of coal to generate electricity has more than tripled. Utilities have invested more than $50 billion in new technologies to improve the environmental performance of their plants.

Environmental improvements will continue

AECI will further reduce air emissions to meet new standards set by the Clean Air Interstate Rule (CAIR) and Clean Air Mercury Rule (CAMR), both issued by the EPA in March 2005.

CAIR will lower national sulfur dioxide emissions another 70 percent and nitrogen oxides emissions another 60 percent below 2003 levels.

Although U.S. power plants contribute less than 1 percent of total global mercury emissions, under CAMR utilities will reduce mercury emissions by nearly 70 percent from 1999 levels. This marks the first time the United States, or any other country, has regulated mercury emissions from power plants.

For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

aeci

Associated Electric Cooperative, Inc.

P.O. Box 754, Springfield, MO 65801
417-881-1204, FAX 417-885-9252
www.aeci.org

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Show Me

September/October 2005 MISSOURI FARM BUREAU

Eminent domain reform

Renewable fuels

Carroll County landowners want light shed on power plant

Power plants are not intended to keep people in the dark, but a coal-fired plant proposed by Associated Electric Cooperative, Inc., (AECI) near Norborne, Mo., is doing just that. As the debate heats up on eminent domain reform, landowners around the small community want to know their rights.

Rob Korff is Carroll County Farm Bureau president. He says seven families will be displaced from their homes. "They look at this as a very small sacrificial amount," said Korff of AECI. More than 1,400 acres have been purchased for the $1 billion plant, and more will be acquired. When complete, it will employ about 130 full time workers.

To help landowners become more aware of eminent domain laws and their rights, the county Farm Bureau hosted a public meeting in Norborne Aug. 25. Although Korff may lose the opportunity to continue renting farmland, he is not directly affected. Neither is former county Farm Bureau president Tom White, who farms a couple miles north of the site. Nonetheless, both are concerned.

"Our neighbors are our friends and we have a lot of friends that are in the process of losing their farms," said White.

White says people want to know the plans for the power plant and their rights as landowners. The Farm Bureau meeting addressed the larger issue of eminent domain, but two local scoping meetings to answer concerns about the power plant were held in late August by the federal Rural Utilities Service. Although land has already been purchased by AECI, the company has not hosted any public informational meetings.

"The big problem has been a lack of information and that can't be initiated by the landowner, it has to be initiated by Associated Electric. They know how to approach this to their advantage," said White.

People want the replacement value for their land so they can replace what they are losing, says White. He adds, landowners want to know if there is compensation if a rail or transmission line is placed in front of their home affecting their resale value. And, landowners want companies to be up-front about their development plans.

AMERICAN FARM BUREAU
THE VOICE OF AGRICULTURE

Farm Bureau Calls for Legislation to Block Eminent Domain Laws

Farm Bureau was outraged when the U.S. Supreme Court ruled private property can be confiscated by local government entities for private economic development projects.

Farm Bureau has been a champion of the rights of property owners during its nearly 90 years of existence, and was incensed by the June 2005 Supreme Court ruling in the case of *Kelo v. The City of New London, Conn.* It was a sucker punch against private land owners.

"No one's home, or farm and ranch land, is safe from government seizure because of this ruling." – American Farm Bureau Federation President Bob Stallman

According to the Supreme Court's 5-4 ruling:

- Governments can seize private property from individuals to boost a community's *economic development.*
- Seized property can be handed over to private developers.
- Property seized does not need to be blighted for condemnation to occur.
- It is not necessary for final land use to be for public services (roadways, utilities, government buildings, etc.).

Could Happen to You

Justice Sandra Day O'Connor wrote in her dissent to the ruling:

"All private property is now vulnerable to being taken and transferred to another private owner, so long as it might be upgraded. The specter of condemnation hangs over all

property. Nothing is to prevent [local governments] from replacing any Motel 6 with a Ritz-Carlton, any home with a shopping mall, or any farm with a factory."

State Law is the Key

Private citizens have the power to keep government from taking their land and turning it over to the highest bidder. State law can override local law and be more restrictive than how Kelo interpreted the U.S. Constitution in this situation. Farm Bureau is leading the fight locally and nationally!

The Supreme Court ruling in *Kelo v. The City of New London, Conn.* left in place the potential for states to enact their own eminent-domain-limiting legislation. A handful of states do restrict the use of eminent domain to strictly public-use projects, banning government condemnation authority solely for economic development.

Links to Stopping Eminent Domain

- NEW! **Order the "STOP Taking Our Property" Brochure**
- **September 2005 – Ag Agenda by AFBF President Bob Stallman**
- **July 14, 2005 – *FB News*, Kelo Update: Focus Shifts to States**
- **June 23, 2005 – Statement by Bob Stallman, President, American Farm Bureau Federation, Regarding Supreme Court Ruling on Kelo Property Rights**
- **Dec. 3, 2004 – News Release, Farm Bureau Files Brief to Protect Landowner Rights**
- **August 18, 2005 – Newsline Audio, States Take Action on Eminent Domain**
- **Supreme Court Decision – Kelo v. New London**
- **Justice O'Connor's Dissent – Kelo v. New London**

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Missouri
Department of
Natural Resources

Missouri utility[i] power plants that generated electricity in 2000
Sorted by total generation in 2000

Plant name	Utility	County	Fuel[ii]	Ownership type	Net annual generation (MWh)	Generating capacity (MW)
Labadie	AmerenUE	Franklin	Coal	Investor-owned	14,936,149	2,389.5
Callaway	AmerenUE	Callaway	Nuclear	Investor-owned	9,991,845	1,235.8
Rush Island	AmerenUE	Jefferson	Coal	Investor-owned	7,895,566	1,242.0
Thomas Hill	AECI	Randolph	Coal	Cooperative	7,607,425	1,135.0
New Madrid	AECI	New Madrid	Coal	Cooperative	7,598,982	1,200.0
Sioux	AmerenUE	St Charles	Coal	Investor-owned	4,877,280	1,099.6
Iatan	KCPL[iii]	Platte	Coal	Investor-owned	3,946,409	725.0
Sibley	Aquila	Jackson	Coal	Investor-owned	3,099,279	523.0
Meramec	AmerenUE	St Louis	Coal	Investor-owned	3,042,302	985.0
Montrose	KCPL	Henry	Coal	Investor-owned	2,804,735	562.0
James River	Springfield	Greene	Coal	Municipal	1,717,296	503.5
Sikeston	Sikeston	Scott	Coal	Municipal	1,699,938	261.0
Asbury	Empire District	Jasper	Coal	Investor-owned	1,305,106	231.6
Southwest	Springfield	Greene	Coal	Municipal	1,160,801	341.6
Hawthorn[iv]	KCPL	Jackson	NG	Investor-owned	747,771	1,024.0
St Francis	AECI	Dunklin	NG	Cooperative	642,577	289.0
Lake Road	Aquila	Buchanan	Coal	Investor-owned	536,046	273.3
Chamois	Central Electric	Osage	Coal	Cooperative	454,208	59.0
Stateline	Empire District	Jasper	NG	Investor-owned	323,595	303.0
Blue Valley	Independence	Jackson	Coal	Municipal	244,490	176.0
Osage	AmerenUE	Miller	Hydro	Investor-owned	177,813	212.0
Greenwood	Aquila	Jackson	NG	Investor-owned	172,036	244.0
Energy Center	Empire District	Jasper	NG	Investor-owned	105,791	258.0
Northeast	KCPL	Jackson	Oil	Investor-owned	105,016	486.0
Nodaway	AECI	Nodaway	NG	Cooperative	99,979	207.3
Harry Truman	Corps of Engineers	Benton	Hydro	federal	76,543	161.8
Ozark Beach	Empire District	Taney	Hydro	Investor-owned	63,608	16.0
Columbia	Columbia	Boone	Coal	Municipal	63,402	86.0
Essex	AECI	Stoddard	NG	Cooperative	55,273	121.2
Marshall	Marshall	Saline	Coal	Municipal	51,948	57.3
Missouri City	Independence	Clay	Coal	Municipal	47,067	46.0
Ralph Green	Aquila	Cass	NG	Investor-owned	25,677	74.0
Chillicothe	Chillicothe	Livingston	Coal	Municipal	22,575	93.5
Stockton	Corps of Engineers	Cedar	Hydro	federal	21,242	45.2
Clarence Cannon	Corps of Engineers	Ralls	Hydro	federal	15,438	58.0
Carthage	Carthage	Jasper	NG	Municipal	6,751	41.8
Station H	Independence	Jackson	NG	Municipal	6,013	43.0
Fairgrounds	AmerenUE	Cole	Oil	Investor-owned	5,951	74.3
Poplar Bluff Gen	Poplar Bluff	Butler	NG	Municipal	5,716	14.0
Moreau	AmerenUE	Cole	Oil	Investor-owned	4,859	60.9
Mexico	AmerenUE	Audrain	Oil	Investor-owned	4,767	60.7
Carrollton	Carrollton	Carroll	NG	Municipal	4,216	22.2
Moberly	AmerenUE	Randolph	Oil	Investor-owned	3,353	60.6
Unionville	AECI	Putnam	Oil	Cooperative	3,179	46.0
Kennett	Kennett	Dunklin	NG	Municipal	2,951	31.9
Butler	Butler	Bates	Oil	Municipal	1,810	13.1
Macon	Macon	Macon	Oil	Municipal	1,698	11.3

Plant name	Utility	County	Fuel[ii]	Ownership type	Net annual generation (MWh)	Generating capacity (MW)
Shelbina #1	Shelbina	Shelby	Oil	Municipal	1,690	6.6
Niangua	Sho-Me Electric Coop	Camden	Hydro	Cooperative	1,593	3.0
Memphis	Memphis	Scotland	Oil	Municipal	1,520	9.1
Station I	Independence	Jackson	Oil	Municipal	1,459	38.0
Monroe	Monroe City	Monroe	Oil	Municipal	1,368	15.5
Trenton Peaking	Trenton	Grundy	Oil	Municipal	1,331	14.8
Howard Bend	AmerenUE	St Louis	Oil	Investor-owned	1,216	47.4
Jackson	Jackson	C. Girardeau	Oil	Municipal	1,138	22.3
Bethany	Bethany	Harrison	Oil	Municipal	1,056	8.6
Shelbina #1	Shelbina	Shelby	Oil	Municipal	956	4.6
Viaduct	AmerenUE	C. Girardeau	NG	Investor-owned	933	0.6
Nevada	Aquila	Vernon	Oil	Investor-owned	865	22.0
Unionville	Unionville	Putnam	Oil	Municipal	858	9.1
Palmyra #1	Palmyra	Marion	NG	Municipal	778	8.9
Fayette	Fayette	Howard	Oil	Municipal	771	11.0
Odessa	Odessa	Lafayette	NG	Municipal	752	8.2
Jackson Square	Independence	Jackson	Oil	Municipal	693	36.0
City of Salisbury	Salisbury	Chariton	Oil	Municipal	646	6.4
Vandalia	Vandalia	Audrain	Oil	Municipal	637	9.5
Palmyra #2	Palmyra	Marion	NG	Municipal	637	7.0
Fulton	Fulton	Callaway	NG	Municipal	593	32.7
Rockport	Rockport	Atchison	NG	Municipal	591	5.9
Trenton Diesel	Trenton	Grundy	Oil	Municipal	555	5.2
Kirksville	AmerenUE	Adair	NG	Investor-owned	552	15.0
Albany	Albany	Gentry	Oil	Municipal	427	6.3
Kahoka	Kahoka	Clark	Oil	Municipal	305	7.6
La Plata	La Plata	Macon	Oil	Municipal	203	4.9
Malden	Malden	Dunklin	Oil	Municipal	100	17.4
City of Marceline	Marceline	Linn	Oil	Municipal	63	2.9
Coleman	Sikeston	Scott	Oil	Municipal	49	4.3
Main Street	Springfield	Greene	Oil	Municipal	42	15.3
Kansas City Intl[v]	Aquila	Platte	NG	Investor-owned	(1,017)	36.0
Taum Sauk[vi]	AmerenUE	Reynolds	Hydro	Investor-owned	(192,095)	408.0
				Totals	75,617,737	18,085.0

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i This list includes power plants owned and operated by Missouri utilities but does not include non-utility electric generation. In 2000, five Missouri non-utilities generated about 2,870 MWH, about 1.5 percent of total generation in the state. The five non-utilities were Anheuser Busch Inc. St Louis Brewery, Hercules Inc. Missouri Chemical Works, Southwestern Bell Telephone, Southeast Missouri State University and University Of Missouri Columbia Power Plant.

ii Primary fuel – many plants have several generating units that are fired from different fuels. Moreover, some peaking units have fuel flexibility and some coal-fired plants co-fire a mix of fuels in the same unit.

iii Iatan is partly owned by Aquila and Empire District Electric.

iv In 2000, the Hawthorn plant's coal-fired generating capacity was being rebuilt; therefore the plant's output that year was from natural gas. In 2001, the plant generated 2,513 thousand MWh, of which 82 percent was produced from coal.

v The KCI plants is a peaking facility used to generate power only as a last resort. The power required to keep the generating facility on-line and ready to respond to peak requirements exceeds the power generated from the facility.

MSNBC.com

FACT FILE

Mercury's move into the food chain

Besides nature's own emissions, humans release mercury as well, mostly via the air and eventually into water where fish absorb particles. Use the menu below to read more information.

Power plants that use coal to produce electricity are the largest single source of U.S. mercury emissions at 40 percent of the total.

The EPA estimates up to 15 percent of mercury emissions from these utilities fall within 30 miles of a plant, and up to 50 percent falls within 600 miles.

Technology to significantly reduce emissions, the EPA estimates, would cost $1.8 billion a year for the industry, and eventually consumers. That's 0.5% of the industry's annual revenue of $400 billion.

After coal-fired utilities, the biggest mercury sources are commercial heating boilers powered by coal (10 percent), burning hazardous waste (5 percent) and chlorine production (5 percent).

Scientists still debate the amount of exposure required to harm a child's development, but most agree kidney and/or brain damage can be done to unborn babies, infants and young children who consume fish poisoned by mercury.

The EPA notes that some Americans, often families from lower income groups, are eating fish with mercury levels 10 times higher than what's advised for humans.

Because mercury is also a natural element often found in soil and water, scientists have been unable to be specific about how significant manmade emissions are.

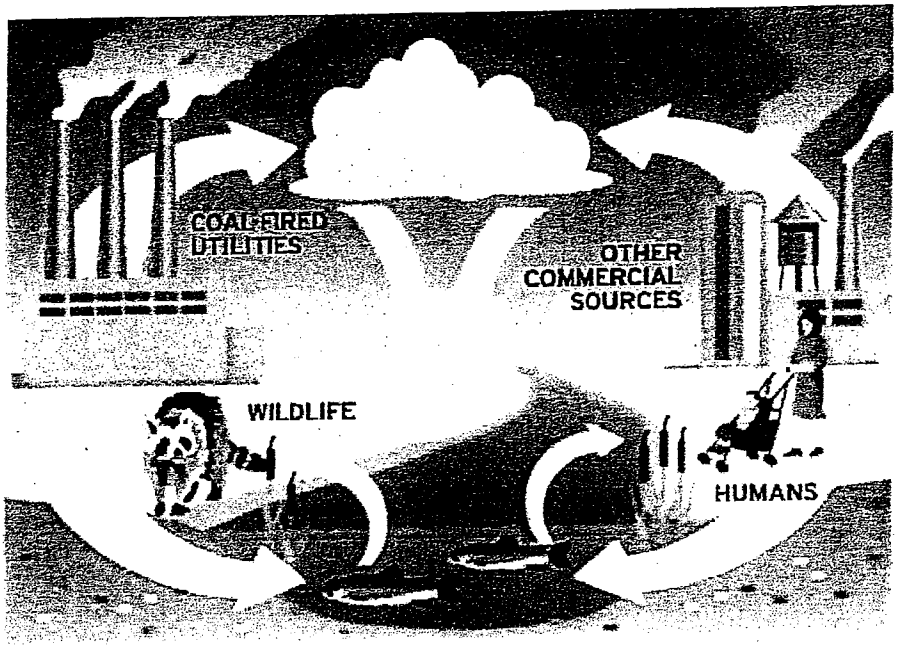
Mercury's main path into the food chain is via fish, since they pick it up as it falls into lakes, streams and coastal areas. As a result, the vast majority of states have issued fishing advisories because of mercury levels.

Even if mercury emissions ceased, it would still take decades for levels in fish and other wildlife to disappear.

A 1997 EPA report to Congress identified the mink, river otter, kingfisher, loon, osprey and bald eagle as examples of species with increased risk of mercury poisoning because they feed on fish.

Source: EPA, MSNBC research

URL: http://www.msnbc.msn.com/id/6818396/


COAL-FIRED UTILITIES
OTHER COMMERCIAL SOURCES
WILDLIFE
HUMANS

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EPA targets utilities' mercury pollution

Industry favors new system, environmentalists opposed

The Associated Press
Updated: 9:02 a.m. ET March 15, 2005

WASHINGTON - The Bush administration on Tuesday will issue the nation's first regulations to cut mercury pollution from coal-burning power plants, relying on a market trading system that gives companies 15 years to reduce it nearly by half.

The Environmental Protection Agency's regulations are aimed at reducing levels of a toxic chemical that can severely damage nervous systems, especially in fetuses and children. They result from a lawsuit brought by an environmental group 13 years ago.

The 1,032 coal-burning power plants in the United States now emit an estimated 48 tons a year of mercury, and the EPA rule aims to reduce that to 31.3 tons in 2010, 27.9 tons in 2015, and 24.3 tons in 2020.

Mercury concentrations accumulate in fish and work up the food chain, which has prompted most states to issue fish consumption advisories. Forty percent of mercury emissions come from the smokestacks of more than 450 coal-burning power plants, but those emissions have never been regulated as a pollutant.

The agency's "cap-and-trade" approach, setting a cap on how much pollution should be allowed and then letting companies trade within those limits, was favored by industry. That lets some companies increase pollution while others turn a profit by selling unused pollution allowances.

Voices against

Sens. Olympia Snowe, R-Maine, and Barbara Boxer, D-Calif., said they were disappointed with the new rule. Snowe called it "woefully inadequate and profoundly disappointing" that it would not reduce and could even increase local mercury concentrations. Boxer said she was "appalled that the Bush administration is ignoring the clear science."

Environmental and public health groups — including the Natural Resources Defense Council, whose 1992 lawsuit and subsequent court agreements prompted the mercury regulations — favored a stricter approach requiring each plant to install new controls.

The group said the agency still hadn't met its obligations under the Clean Air Act. "It's the do-nothing approach to mercury," said John Walke, NRDC's director of clean air programs. "They get a holiday basically ... that requires them to reduce mercury no more than would incidentally be achieved from their smog and soot cuts."

Voices in favor

Dan Riedinger, spokesman for the power industry's Edison Electric Institute, said a cap and trade approach is preferable to setting a single deadline for making technology improvements that, once met, gives "little or no incentive" to cut more pollution.

Scott Segal, director of the Electric Reliability Coordinating Council, a group of power companies, said using market forces to control pollution would result in significant cuts while providing stability for consumers and electricity producers.

"The federal government is wise to avoid overly inflexible mercury control programs," Segal said. "If regulations force utilities to shift from coal to natural gas, the result is predictable" — higher electricity prices.

Utilities could also meet the EPA's targets by switching to cleaner-burning coal or natural gas.

First five years

Power plants at first will not have to do anything more than what is required to reduce two other pollutants under a rule EPA issued last week to address air pollution that travels long distances.

That's because the mercury rule "relies completely" during first five years on incidental cuts from scrubbers to reduce fine particles from sulfur dioxide and from chemical processes to reduce smog-forming ground-level ozone from nitrogen oxides, EPA spokeswoman Cynthia Bergman said.

The agency believes significant reductions in mercury will result as a "co-benefit" when plants install new equipment to reduce sulfur dioxide and nitrogen oxides, she said.

The rule for utilities follows EPA rules in the late 1990s that regulate mercury dumped in water and air from municipal waste and medical waste incinerators.

"While this rule is protective of public health, most of the mercury that creates health risks for Americans comes from fish contaminated from sources that we can't control," Bergman said Monday. "This is a global problem."

In the meantime, she said, pregnant women and women of childbearing age should heed government warnings to limit fish intake.

URL: http://www.msnbc.msn.com/id/7185001/

Estimated Cancer Deaths for Selected Cancer Sites by State, US, 2005*

State	All Sites	Brain/ Nervous System	Female Breast	Colon & Rectum	Leukemia	Liver	Lung & Bronchus	Non-Hodgkin Lymphoma	Ovary	Pancreas	Prostate
Alabama	10,100	210	730	890	360	290	3,160	320	300	530	570
Alaska	800	†	50	80	†	†	210	†	†	50	†
Arizona	9,920	240	720	970	400	290	2,720	360	290	550	510
Arkansas	6,210	160	400	630	260	200	2,400	220	160	310	270
California	56,090	1,460	4,050	5,450	2,190	2,070	14,350	1,940	1,720	31,50	3,270
Colorado	6,680	180	490	640	300	170	1,660	300	220	400	350
Connecticut	7,030	140	520	650	260	170	1,850	250	200	430	440
Delaware	1,580	†	120	160	80	†	460	70	50	100	80
Dist. of Columbia	1,170	†	100	130	†	†	290	†	†	60	80
Florida	39,960	930	2,570	3,820	1,700	1,110	12,440	1,180	1,120	2,250	2,570
Georgia	14,810	300	1,120	1,350	530	340	4,550	470	420	770	740
Hawaii	1,990	†	130	210	80	100	480	90	50	150	120
Idaho	2,280	70	180	210	100	50	600	70	80	130	150
Illinois	24,810	480	1,780	2,560	1,050	680	6,840	750	650	1,470	1,230
Indiana	13,250	320	880	1,320	530	250	4,180	480	380	690	640
Iowa	6,610	160	440	660	310	120	1,700	260	210	390	400
Kansas	5,370	130	380	610	230	120	1,540	220	160	290	270
Kentucky	9,560	160	630	910	320	200	3,490	330	230	420	330
Louisiana	9,670	190	740	1,000	350	310	2,930	360	220	520	450
Maine	3,220	80	170	310	100	70	940	90	100	180	170
Maryland	10,570	200	840	1,070	440	260	3,040	350	310	590	550
Massachusetts	13,720	280	940	1,380	500	370	3,800	430	380	850	700
Michigan	20,860	450	1,380	1,870	810	530	5,790	730	590	1,140	1,000
Minnesota	9,510	250	620	860	430	210	2,480	470	270	550	570
Mississippi	6,220	170	450	630	240	150	2,070	180	160	330	420
Missouri	12,550	260	870	1,250	540	290	3,860	520	340	670	400
Montana	2,040	50	130	180	90	50	590	70	70	100	130
Nebraska	3,460	90	230	400	160	60	950	130	100	180	180
Nevada	4,620	90	310	480	170	120	1,450	150	120	230	260
New Hampshire	2,620	70	170	240	110	70	750	110	60	140	150
New Jersey	17,860	320	1,480	1,810	710	410	4,580	600	540	1,050	840
New Mexico	3,230	70	190	340	110	130	720	110	90	180	220
New York	36,160	720	2,760	3,760	1,410	1,010	9,350	1,000	1,080	2,270	1,860
North Carolina	16,830	340	1,210	1,590	640	380	5,230	600	470	910	890
North Dakota	1,280	†	100	140	70	†	310	60	†	80	80
Ohio	24,790	530	1,850	2,520	980	570	7,380	670	660	1,300	1,420
Oklahoma	7,670	170	540	780	300	170	2,440	230	180	360	320
Oregon	7,360	190	500	680	270	160	2,050	340	240	410	390
Pennsylvania	29,840	520	2,170	3,150	1,060	730	8,030	980	880	1,670	1,720
Rhode Island	2,440	50	150	250	80	60	680	100	60	140	110
South Carolina	9,080	180	630	890	330	220	2,730	320	190	510	550
South Dakota	1,620	50	100	180	70	†	410	80	60	90	120
Tennessee	12,910	320	810	1,220	490	300	4,390	460	350	680	560
Texas	36,090	910	2,460	3,590	1,460	1,280	10,620	1,040	960	1,950	1,750
Utah	2,650	90	220	260	140	60	440	130	90	170	150
Vermont	1,260	†	90	130	60	†	370	60	†	70	60
Virginia	13,990	270	1,150	1,380	540	340	4,170	400	400	750	750
Washington	11,360	350	750	1,030	470	340	3,260	480	390	690	720
West Virginia	4,650	90	270	490	140	110	1,610	170	140	200	190
Wisconsin	10,940	260	790	1,070	500	290	2,900	380	320	650	530
Wyoming	990	†	50	110	†	†	270	†	†	50	80
United States	570,280	12,760	40,410	56,290	22,570	15,420	163,510	19,200	16,210	31,800	30,350

*Rounded to nearest 10. †Estimate is 50 or fewer deaths. **Note:** State estimates may not add up to US total due to rounding and exclusion of state estimates fewer than 50 deaths.

Source: US Mortality Public Use Data Tapes, 1969-2002, National Center for Health Statistics, Centers for Disease Control and Prevention, 2004.

Power Plants and Air Pollution

Fossil fuels -- coal, oil, and natural gas -- are America's primary source of energy, accounting for 85 percent of current US fuel use. Most of the coal used in the US is burned by power plants for the production of electricity. There are more than 500 major coal-fired power plants in the US today, and the vast majority are decades old. For over thirty years the oldest, dirtiest coal-burning power plants have circumvented the most protective air emissions standards required of modern plants. As a result, these so-called "grandfathered" power plants produce the largest share of the particle-related air pollution and are permitted to emit as much as 10 times more nitrogen oxides (NOx) and sulfur dioxide (SO2) than modern coal plants. Therefore, power plants are one of the leading sources of the harmful air pollution that is taking its toll on America's health. Power plant emissions, especially those from older, more polluting, coal-burning plants release unacceptable levels of unhealthy sulfur dioxide, nitrogen oxides, mercury, and carbon dioxide.

Scores of new studies each year demonstrate that air pollution can be harmful to human health and that children are most susceptible. Power plants are the source of 67% of total U.S. emissions of sulfur dioxide, and approximately one third of the nation's nitrogen oxide. Power plants also emit fine carbon soot particles directly from their smokestacks. In 1999, power plants directly emitted nearly 300,000 tons of fine carbon soot particles. Studies indicate that exposure to such air pollutants can result in reduced lung function, increased asthma attacks, more visits to the doctor's office and to emergency rooms, increased hospitalization rates, and even death.

Power plants are the source of approximately one third of the nation's mercury pollution. Mercury released from power plants accumulates in the food chain and can be ingested as part of our diet. Individuals can also inhale mercury in the air, or be exposed to mercury in the water or soil.

Mercury is a potent neurotoxicant that interferes with brain development, especially in the fetus. Even at low levels, fetal exposure to mercury can result in deficits on neurobehavioral tests, particularly on tests of attention, fine motor function, language, and memory. Young children are also particularly vulnerable to the effects of various air pollutants.

Power plants are the source of 40% of carbon dioxide emissions. Carbon dioxide contributes to the blanketing effect of greenhouse gases, trapping excess heat in our atmosphere. This in turn forces global average temperatures to rise, and the climate to change. Higher temperatures also take their toll on human health, leading to an increase in cases of heat-related illnesses, water- and vector- borne disease, and exacerbating respiratory illnesses by increasing smog levels.

Ozone - the main component of smog - is formed in the presence of sunlight from nitrogen oxides and hydrocarbon vapors emitted by power plants, motor vehicles and industrial processes. As temperatures rise, more ozone is formed. According to the Environmental Protection Agency, short-term exposure to ozone can cause rapid, shallow breathing and related airway irritation, coughing, wheezing, shortness of breath, and exacerbation of asthma, particularly in sensitive individuals and asthmatic children.

Polluting coal-fired power plants must be made to comply with modern emissions control standards. In addition, the nation's power fleet should be held to stringent caps on all four of the key power plant pollutants including nitrogen oxides, sulfur dioxide, mercury and carbon dioxide. The deaths, hospitalizations and lost work time caused by fine particles from power plants can be reduced comprehensively only when the Clean Air Act's 30-year loophole for old, dirty power plants is finally closed.

ENVIRONMENTAL WORKING GROUP

Missouri estimated mercury emissions from coal-burning power plants.

Plant	Parent Company	City	Estimated* Total Mercury Released 1998 (pounds)	Estimated** Mercury Air Pollution 1998 (pounds)
Labadie	Union Electric Co	Labadie, MO	941	589
Rush Island	Union Electric Co	Festus, MO	711	445
Sioux	Union Electric Co	West Alton, MO	432	273
New Madrid	Associated Electric Coop Inc	New Madrid, MO	391	247
Thomas Hill	Associated Electric Coop Inc	Clifton Hill, MO	352	207
Iatan	Kansas City Power & Light Co	Weston, MO	313	172
Hawthorn	Kansas City Power & Light Co	Kansas City, MO	141	108
Meramec	Union Electric Co	St. Louis, MO	165	104
Sibley	UtiliCorp United Inc	Sibley, MO	160	101
Montrose	Kansas City Power & Light Co	Clinton, MO	131	82
James River Power Station	Springfield City of	Springfield, MO	88	56
Sikeston	Sikeston City of	Sikeston, MO	95	52
Southwest Power Station	Springfield City of	Springfield, MO	82	45
Asbury	Empire District Electric Co	Asbury, MO	58	36
Blue Valley	Independence City of	Independence, MO	25	15
Lake Road Plant	St Joseph Light & Power Co	St. Joseph, MO	24	15
Chamois	Central Electric Power Coop	Chamois, MO	11	7
State Total			4,127	2,562

* Estimated coal in mercury is calculated using plant specific coal contamination and coal consumption data. Release includes disposal in ponds and landfills as well as reuse applications such as fertilizer.

** Total stack emissions are calculated by applying total mercury released to plant specific emission modification factors. See Appendix A.

‡ Indicates plants that are under investigation by either U.S. EPA/Department of Justice or the State of New York Attorney General's Office for violations of the Clean Air Act. NRDC and a coalition of midwest groups have also served notice on many of these plants.

N/A - Plants listed with N/A released mercury into the environment, however, insufficient data precludes estimation of mercury emissions from these plants.

Source: Environmental Working Group. Compiled from U.S. Department of Energy and U.S. Environmental Protection Agency databases. Plant ownership is attributed to the parent company of the plant operator as of January 1, 1999.

The Environmental Working Group is a non-profit environmental research organization based in Washington, D.C.
Phone: (202) 667-6982 • Fax: (202) 232-2592 • Email: info@ewg.org • Web: http://www.ewg.org

MISSOURI CONSERVATIONIST

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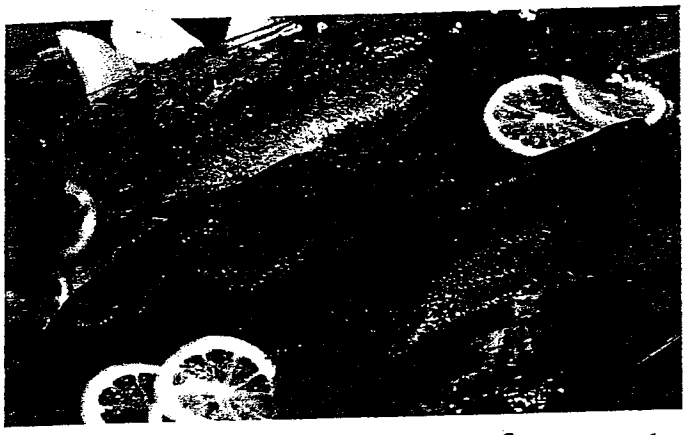
Serving Nature & You



Most Missouri fish are safe to eat

Fish provide a good alternative to meat, and Missourians can feel good about eating most fish caught in the Show-Me State, according to the 2005 Fish Advisory from the Missouri Department of Health and Senior Services (DHSS).

The report, issued in May, says that pesticide contamination of fish remains low throughout Missouri. Lead contamination is a problem on two streams. Mercury contamination remains a concern statewide, but only for certain people.

DHSS recommends against eating:

- Shovelnose sturgeon from the Mississippi or Missouri rivers because of chlordane and PCB contamination.
- Sunfish, carp and suckers from the Big River in Jefferson and St. Francois counties because of lead contamination.
- Sunfish, carp and suckers from the Flat River in St. Francois County from Highway B to six miles downstream where it enters the Big River because of lead contamination.
- Sunfish from Big Creek near the town of Glover in Iron County due to lead contamination.
- Largemouth bass larger than 12 inches anywhere in Missouri for nursing mothers, women who are pregnant or may become pregnant, and children under age 12. Other Missourians may eat all sizes of largemouth bass safely.

The U.S. Environmental Protection Agency advises people to restrict consumption of other predatory fish to one 8-ounce (weighed uncooked) meal a week if no local advisory is in effect.

Advisory details are available at *www.epa.gov/waterscience/fish advice/1-meal-per-week.pdf* and *www.dhss.mo.gov/NewsAndPublicNotices/05FishAdvisory.pdf*.

FOUNTAIN GROVE RENOVATION WILL LIMIT HUNTING THIS YEAR

Renovation work will reduce hunting opportunities at Fountain Grove Conservation Area this year, but the end result will be more and better hunting. Ongoing projects include replacing the decades-old water control structures and making improvements in Pools 1 and 3. The work will allow flooding of 220 more acres, increase the flexibility of water management and enhance habitat diversity. However, to accomplish these activities, the pools must be kept dry until construction is completed. Besides reducing wetland acreage this year, the work will restrict public access around construction areas. For more details about closed areas, call 660/646-6122.

Fed bear = Dead bear in Madison County

The death of a bear in Madison County in May demonstrates the saying, "A fed bear is a dead bear."

The 315-pound male bear broke into a shed at a rural residence to get at livestock feed. The owner reported the problem and took reasonable measures to keep the bear out. However, it returned and showed no fear when the man made noise to scare it away. The landowner shot the bear when it threatened a dog.

Bears are protected in Missouri. In this case, however, no charges were filed because the man had done everything required and had legitimate concerns for his property and safety. Had the bear not been killed, nuisance wildlife specialists might have been able to trap and relocate it.

Missourians can prevent similar fates for other bears by ensuring that livestock feed, pet food, bird seed and other food stuffs are inaccessible to wildlife. If you do have trouble, call the nearest Conservation Department office for help.

Black bear

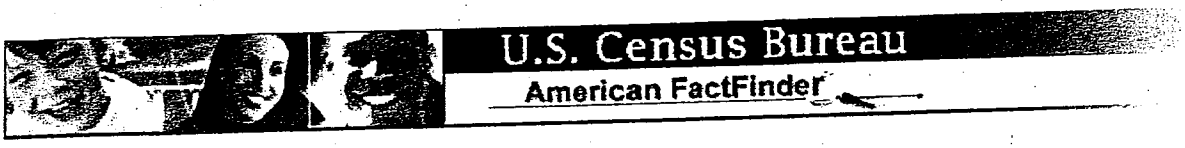
Gettin' edgy with quail management

One of the first lessons serious quail managers learn is there is no such thing as permanent bobwhite habitat. The mix of cover types that quail need to thrive quickly reverts to other things when left alone. This is especially true of brushy border areas, which disappear in a few years if left untended.

One of the best things you can do to keep edge areas productive is to set back growth of brome and fescue. These hardy grasses survive in border areas, even when eradicated from adjacent fields, and can choke out beneficial weedy growth.

Controlling these grasses in brushy borders is a challenge because they are sheltered by shrubs. The solution is to wait until after woody plants drop their leaves and use an ATV-mounted sprayer with a hand gun or a flood nozzle on the end of a boom. Use herbicides recommended for brome and fescue and follow label directions for best results. Do this in the fall, when the grasses are most vulnerable, and the benefits will last three or more years.

Information about cost-sharing and other quail-management incentives is available from Conservation Department regional offices, local Farm Service Agency offices or from Quail Unlimited, 660/885-7057, *bobwhite@iland.net*.



POPULATION FINDER

United States | Missouri | Clifton Hill city

city/ town, county, or zip
Clifton Hill

state
Missouri GO

search by address »

Clifton Hill city, Missouri

The 2004 population estimate for Clifton Hill city, Missouri is 128.

View population trends...

	2004	2000	1990
Population	128	124	108

Source: U.S. Census Bureau, 2004 Population Estimates, Census 2000, 1990 Census

View more results...

Population for all cities and towns in Missouri, 2000-2004:
alphabetic ranked

Map of Persons per Square Mile, City/Town by Census Tract:
2000 1990

See more data using the Fact Sheet and other links on the left.

U.S. Census Bureau
American FactFinder

POPULATION FINDER

United States | Missouri | New Madrid city

New Madrid city, Missouri

city/ town, county, or zip
New Madrid
state
Missouri GO
search by address »

The 2004 population estimate for New Madrid city, Missouri is 3,188.

View population trends...

	2004	2000	1990
Population	3,188	3,334	3,350

Source: U.S. Census Bureau, 2004 Population Estimates, Census 2000, 1990 Census

View more results...

Population for all cities and towns in Missouri, 2000-2004:
alphabetic ranked

Map of Persons per Square Mile, City/Town by Census Tract:
2000 1990

See more data using the Fact Sheet and other links on the left.

U.S. Census Bureau
American FactFinder

POPULATION FINDER

United States | Missouri | Sibley village

Sibley village, Missouri

city/ town, county, or zip
Sibley
state
Missouri GO
search by address »

The 2004 population estimate for Sibley village, Missouri is 341.

View population trends...

	2004	2000	1990
Population	341	347	367

Source: U.S. Census Bureau, 2004 Population Estimates, Census 2000, 1990 Census

View more results...

Population for all cities and towns in Missouri, 2000-2004:
alphabetic ranked

Map of Persons per Square Mile, City/Town by Census Tract:
2000 1990

See more data using the Fact Sheet and other links on the left.

POPULATION FINDER

United States | Missouri | Missouri City city

Missouri City city, Missouri

city/ town, county, or zip
Missouri City
state
Missouri GO
search by address »

The 2004 population estimate for Missouri City city, Missouri is 319.

View population trends...

	2004	2000	1990
Population	319	295	348

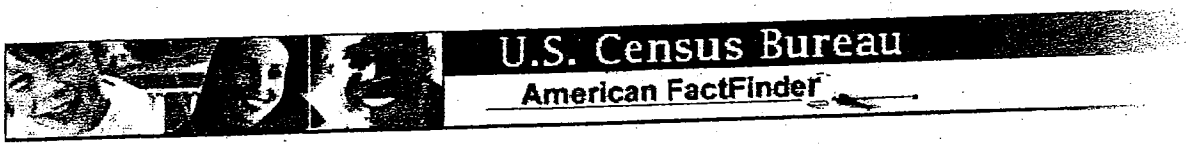
Source: U.S. Census Bureau, 2004 Population Estimates, Census 2000, 1990 Census

View more results...

Population for all cities and towns in Missouri, 2000-2004:
alphabetic ranked

Map of Persons per Square Mile, City/Town by Census Tract:
2000 1990

See more data using the Fact Sheet and other links on the left.



POPULATION FINDER

United States | Missouri | Norborne city

Norborne city, Missouri

city/ town, county, or zip
Norborne
state
Missouri GO
search by address »

The 2004 population estimate for Norborne city, Missouri is 788.

View population trends...

	2004	2000	1990
Population	788	805	856

Source: U.S. Census Bureau, 2004 Population Estimates, Census 2000, 1990 Census

View more results...

Population for all cities and towns in Missouri, 2000-2004:
alphabetic ranked

Map of Persons per Square Mile, City/Town by Census Tract:
2000 1990

See more data using the Fact Sheet and other links on the left.

Employment opportunities

Associated Electric Cooperative Inc. is proceeding with plans to build a coal-based generating plant to meet members' growing energy needs.

The proposed site is northwest of Norborne in Carroll County. The alternate site is near Big Lake, Mo., in Holt County.

Construction of the 660-megawatt unit is scheduled to begin in 2007, with operation to begin in 2011. For more information and to learn more about the power plant project visit AECI's Web site, www.aeci.org.

Bring good jobs to the local community

AECI estimates 137 full-time jobs at the finished power plant will create an annual payroll of $10 million to $12 million with average yearly salaries of $57,000 plus a competitive benefits package. With the plant expected to be operational in 2011, most full-time positions for power plant operations will not be filled before 2010.

Of the 137 jobs:

- four will require four-year degrees (engineers);
- 22 will have requirements that prefer four-year degrees but work experience will be a significant factor;
- and 111 jobs will focus on vocational skills and work experience, no degree required.

In addition, during construction of the plant, about 900 people will be working on site. Payroll during construction is projected to be about $400 million.

Job opportunities

Most AECI employees live and work in the communities where the cooperative's operations are located. At Thomas Hill Energy Center, AECI's power plant in Randolph County, most of the workforce is native to the area. Of 253 employees, 135 live in Randolph County.

Most applicants for jobs at AECI's power plants are local residents too. Last August, 50 percent of 533 applicants for jobs at Thomas Hill Energy Center lived in Randolph County, for example. From those, Associated hired 10 people for the entry-level positions; five of those new hires (50 percent) are from Randolph County. About 40 percent are from two counties adjacent to the plant.

continued on back

Associated Electric Cooperative, Inc.

P.O. Box 754, Springfield, MO 65801
417-881-1204, FAX 417-885-9252
www.aeci.org

A Touchstone Energy® Cooperative

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Too many Environmental problems for this Area.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

I am against building a generating plant in our community for the following reasons. I think it would be bad for the health of people around it due to the mercury it emits. Also it might affect the wild life here.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
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USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Against the plant here in Holt County. I think it would be a hazard to health, environment, Wildlife Refuge Areas, State Park & Lake due to the Mercury the plant produces also the power lines that would be a problem for migration of ducks & geese here

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

Attached

Optional: Name: Grace West

Address: 30911 JJ Hwy, Norborne, MO 64668-7137

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

I would like to comment on mercury pollution from coal combustion and the deleterious effects that would result from the operation of a 660 MW coal-fired power plant at Norborne, MO.

This is a quote from the website of Association Electric Cooperative, Inc. as of 9-13-05:

> *According to studies by the U.S. Centers For Disease Control and Prevention, U.S. citizens are not being exposed to unsafe levels of mercury.*

If this is the case, then why has the United States Environmental Protection Agency, the United States Department of Health and Human Services, and the Missouri Department of Health and Senior Services all issued advisories about the consumption of fish due to mercury contamination. (See attached) In addition, 44 other states have issued fish consumption advisories due to mercury contamination. The Centers for Disease Control estimate that one in 12 women of child-bearing years has an unsafe level of mercury in her blood.

AECI's website also states:

> *The Environmental Protection Agency's own estimates indicate annual emissions of mercury from U.S. coal plants are about 46-48 tons—less than 1 percent of worldwide mercury emissions.*
>
> *About 70 percent of mercury deposition in the U.S. comes from sources outside the United States.*

What the website doesn't say is that power plants are responsible for 41 percent of the total mercury emitted by all known U.S. sources according to the EPA. And Missouri ranks 9th in the country for power plant mercury emissions.

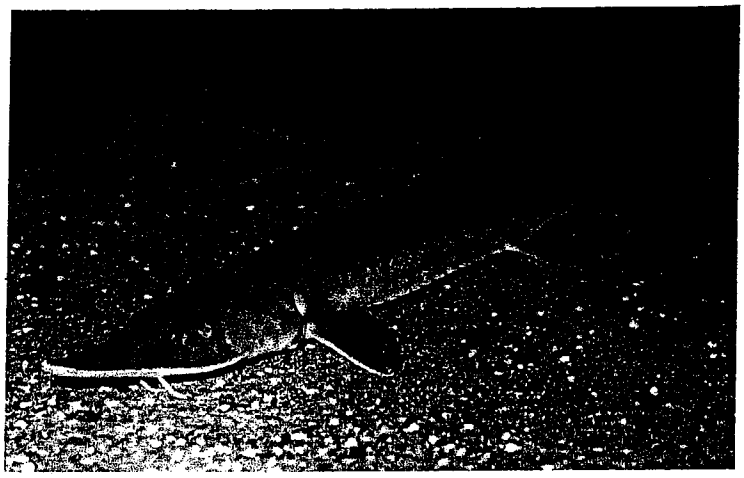
It is known that mercury occurs in the environment, but a major concern is that which is anthropogenic (human-caused). When mercury is released into the air and falls into water, it is converted into methylmercury by bacteria in the water. It is then absorbed by fish. Larger fish have higher levels of mercury, especially those that eat smaller fish. When these fish are consumed by humans, there is a risk of mercury toxicity.

The health risks of mercury toxicity, especially to children and fetuses, are well documented. Mercury is a neurotoxin that can affect the brain, heart, thyroid, liver and immune system. Effects on the brain can cause memory loss, impaired coordination, vision disturbances, and tremors, among other things. Autism has been linked to mercury toxicity during fetal development.

Mercury emissions are a global problem. Do we as a state and nation need to continue to contribute to the problem? Can we morally justify continuing to burn fossil fuels just because they are cheaper? What about the greater cost in morbidity and mortality?

MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES

2005 FISH ADVISORY



Our Feature Fish is the **Shovelnose Sturgeon** (picture above). See the Species-Specific Advisory below.

Fish Advisory Summary

The 2005 Fish Consumption Advisory is summarized in the table below. Some new information has been evaluated this year; however, the recommendations regarding fish consumption have not changed appreciably from the 2004 advisory. Please read the entire advisory to learn of continuing evaluations and of trends (local and national) that may influence future advisories.

Contaminant of Concern	Advisory	Species covered
Polychlorinated biphneyls (PCBs) and chlordane	Do not consume Shovelnose Sturgeon or their eggs from the Missouri and Mississippi rivers.	Shovelnose Sturgeon
Mercury	Women who are pregnant, may become pregnant, nursing mothers and children 12 years of age or younger should not consume largemouth bass greater than 12 inches in length from anywhere in Missouri.	Largemouth Bass greater than 12 inches in length
Lead	Do not consume certain fish species found in the Big River in St. Francois and Jefferson counties, the Flat River in St. Francois County from Highway "B", six miles downstream to where it enters the Big River, and sunfish from Big Creek near the town of Glover in Iron County, Missouri.	Sunfish (some times also known as bream or perch), carp, redhorse, and other suckers

Background Information

The Missouri Department of Health and Senior Services (DHSS) is concerned that people eat a healthy diet. Fish is a good source of high-quality protein and essential nutrients that will contribute to a healthy diet if eaten regularly. Fish is low in cholesterol and some types of fish have fats (omega-3 fatty acids) that may be beneficial in reducing heart disease. Along with the potential benefits to eating fish, DHSS also believes it is important to consider any potential risks associated with consuming Missouri sport-caught fish. In association with this goal, the Missouri Department of Conservation (MDC) has conducted extensive annual sampling and analysis of contaminants in Missouri's fish since 1985. The Missouri Department of Natural Resources (MDNR) also conducts fish sampling in cooperation with the U.S. Environmental Protection Agency (EPA). The results of sampling by both agencies are reviewed by the DHSS to determine if eating Missouri fish poses a health risk to the public.

Polychlorinated Biphenyls (PCBs) and Chlordane Advisory

Missouri has never issued a polychlorinated biphenyl (PCB) consumption advisory for any species of fish other than the Shovelnose Sturgeon. In 2001, we removed the advice that recommended people eat no more than one meal a week of catfish, carp, buffalo, drum, suckers and paddlefish from areas outside the Ozark region of the state because levels of chlordane contamination in these fish had gone down in the past few years.

For 2005, DHSS is continuing the PCB consumption advisory for Shovelnose Sturgeon and their eggs. The PCB advisory is based on an evaluation using the Food and Drug Administration (FDA) screening value or health standard for total PCBs. PCBs are found in many fish species on the Mississippi and Missouri rivers; however, the levels of PCBs are below the FDA health standard. Therefore, no other species will be added to the PCB advisory for 2005.

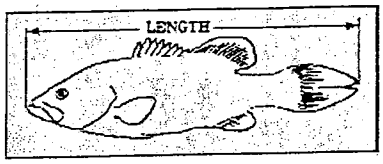
DHSS continuously evaluates the newest toxiological information and guidance available from EPA or other sources. We are presently evaluating the FDA health standard with the possibility of developing a new PCB screening value and consumption tables that are specific to Missouri. This information will be used in conjunction with the new sturgeon fish tissue data collected in 2004 by MDC with the possibility of changing the no-consumption advisory to a limited-consumption advisory next year.

Chlordane levels were also found to be high in some sturgeon tissue samples. Therefore, the advisory originally placed on sturgeon based solely on PCBs is also protective for potential risks posed by chlordane contamination.

Mercury Advisory

In 2001, DHSS issued an advisory because of mercury or, more specifically, methylmercury contamination. Methylmercury is an organic form of mercury that is easily absorbed into the living tissue of aquatic organisms and is not easily eliminated. DHSS had been concerned about mercury contamination in fish for a number of years and had been carefully monitoring the national debate and international health studies related to this issue. These studies indicated that fish with mercury in them at levels similar to those found in Missouri Largemouth Bass that were greater than 12 inches in length could cause children's nervous system development to be slowed down and possibly permanently affected. Results of these studies, and new risk estimates by the U.S. EPA that were based on these

studies, convinced us that **mercury levels in some Missouri fish could pose a possible health risk to our children. Therefore, the DHSS began advising women who are pregnant, who may become pregnant, nursing mothers, and children 12 years of age and younger not to eat any Largemouth Bass over 12 inches in total length from anywhere in Missouri. The reason we are including woman who may become pregnant is because their bodies may take more than a year to significantly reduce amounts of mercury.**

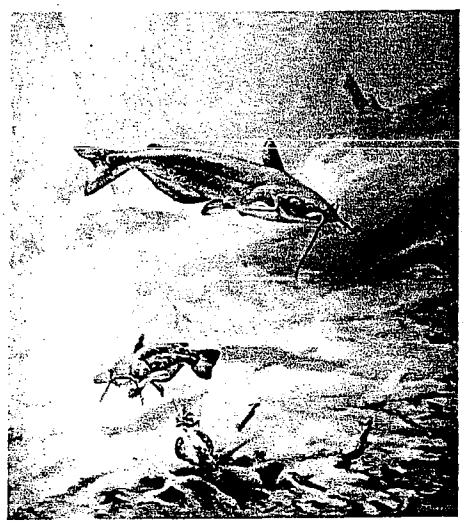


Note: We are presently evaluating the consumption advisory for Largemouth Bass and other recreational fish species to determine if a limited-consumption advisory can be implemented.

Additional mercury information

Sampling and analysis of Largemouth Bass indicate that mercury contamination is widespread, and present in fish in streams, rivers, ponds, and lakes throughout Missouri. The amount of mercury in fish seems to be mostly related to their size and the type of food they eat. For example, large fish that eat other fish have higher concentrations of mercury than smaller fish or fish that eat creatures that live on the bottom. The contamination observed in largemouth bass is widespread in Missouri and that is why our advisory is for the whole state. The MDC and MDNR are committed to the continued collection and analysis of predatory fish such as bass, walleye, and other selected species to determine mercury concentrations. These efforts will provide the Department of Health and Senior Services with the contaminant information necessary to issue additional advisories if the need arises.

The reason that mercury seems to be distributed throughout the state is because of the way it got here. Mercury is a naturally occurring element that has been used by man in many ways for thousands of years. It is found in thermometers, electrical switches, batteries, and is used in many mining and manufacturing processes as well as some cultural and religious practices. Over time, some of this mercury was released or improperly discarded. Today, we are still releasing mercury when we burn municipal trash, when we burn coal to produce electricity, or to heat or power buildings and factories. Once this mercury is released to the atmosphere, it can travel great distances before it settles back to the earth and enters our streams, rivers, ponds or lakes. During its movement among the atmosphere, land, and water, mercury undergoes a series of complex chemical transformations. One of the products of these transformations is the organic form called methylmercury. From there, it is absorbed by microscopic plants and animals, which are eaten by small animals and fish that are in turn eaten by bigger and bigger fish. This causes the mercury to become most concentrated in the largest predator fish, and in much of Missouri that is the Largemouth Bass.



For more information about how mercury is distributed throughout Missouri, see the Missouri Department of Natural Resources' fact sheet titled: "Mercury in Missouri Streams and Lakes," which is available on the Internet at: http://www.dnr.mo.gov/oac/pub2100.pdf

In 2002, mercury was found in the fillets of several fish species. We only have an advisory on Largemouth Bass over 12 inches in length because fish of that size had mercury levels of human health concern. The following table displays sampled fish that had mercury in their fish fillets. If you desire information about the levels of mercury found in a particular fish species, contact the Missouri Department of Health and Senior Services at (573) 751-6160.

Fish with Mercury in Fillets from the State-wide 2002 Fish Contaminant Sampling[1]

Bottom Feeders	Insect/Other Types of Feeders	Predator Fish Feeders
Black Bullhead	Bluegill Sunfish	Bowfin
Blacknose Redhorse	Crappie	Chain Pickerel
Carp	Paddlefish	Largemouth Bass[2]
Catfish	Redear Sunfish	Longnose Gar
Freshwater Drum	Rock Bass	Shadow Bass
Suckers	Trout	Smallmouth Bass
Stonerollers		Spotted Bass
		Walleye
		White Bass

[1] 2002 fish tissue sampling represents the latest information that DHSS has available.
[2] advisory for fish over 12 inches in length.

Starting in the spring of 2004, MDC began a study that will help to develop a new monitoring program to provide better confidence and understanding of contaminants, such as mercury, in game fish species. This study will help improve our knowledge of the range of contaminant concentrations in selected game fish species and improve our fish advisory. This study may eventually be used to develop more targeted advisories.

Nationwide Consumer Information on Mercury

EPA's National Non-commercial Fish Advisory for Mercury

In case of no local advisory, consumers are advised to restrict fish consumption of locally caught fish to **one (1) eight ounce meal a week.**

Because not all waters in the United States are monitored, the noncommercial fish consumption advice is a baseline of protection. This simplified advice balances risks from mercury with the benefits of eating fish. Consumers are encouraged to use more detailed information for the waterbodies on which they fish, and the fish species they consume. Mercury concentrations in fish vary considerably from waterbody to waterbody and region to region. Consumers should, first and foremost, consider any local advisories.

Consumer Advisory for Mercury in Commercial Fish

The **U.S. Food and Drug Administration (FDA) and the U.S. Environmental Protection Agency (EPA)** have also issued a joint consumer advisory (FDA News Release, March 19, 2004) recommending that **women who are pregnant, women of childbearing age who might become pregnant, nursing mothers and young children NOT EAT any shark, swordfish, King Mackerel, or tilefish. They should also LIMIT CONSUMPTION of albacore "white" tuna to no more than six ounces (one average meal) per week because of mercury contamination.**

See the following EPA link for more information: http://www.epa.gov/OST/fish/

Lead Advisory

The DHSS is continuing its advisory for **all species of sunfish (locally known as bream or perch), carp, redhorse, and other suckers found in the Big River in St. Francois and Jefferson counties, the Flat River in St. Francois County from Highway "B", six miles downstream to where it enters the Big River, and sunfish from Big Creek near the town of Glover in Iron County, Missouri.** These fish have been found to contain lead at levels of significant health concern and **should not be eaten.**

Lead-mine waste piles in the area have contaminated the rivers with lead at levels of health concern. **Since 1980, DHSS has recommended people not eat carp, redhorse, or suckers from the Big River downstream from Desloge to the mouth of the river where it enters the Meramec River.** For a few years in the late 1980s, we also found catfish contaminated with lead at levels of health concern. Sampling since 1992, however, indicates that **catfish no longer pose a health risk.** Sunfish were captured and analyzed for the first time in 1993 and were also found to be contaminated. The MDC is continuing to sample fish from these waters and that sampling indicates that sunfish, carp, redhorse, and other suckers in the Big River and Flat River are still contaminated with lead at levels of

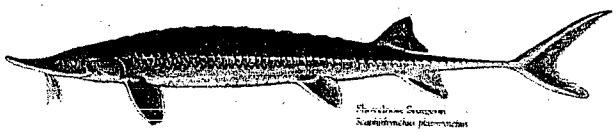
health concern. State officials believe that substances released from a nearby lead smelter have contaminated the sunfish in Big Creek near Glover.

Species- and Water-Body-Specific Advisory Summary

Some species of fish in certain water bodies in Missouri are contaminated with chemicals at levels of health concern. ***We recommend you NOT EAT the following fish from these specific waterbodies.***

LARGEMOUTH BASS

Throughout Missouri, Largemouth Bass over 12 inches in total length have been found to be contaminated with **mercury** at levels of health concern to children whose nervous systems are still in a developmental stage. **Therefore, women who are pregnant, who may become pregnant, who are nursing, and children 12 years of age or younger should not eat any Largemouth Bass over 12 inches in length from anywhere in Missouri.** Remember, based on our assessment it is safe and healthy for persons not in the sensitive population mentioned above to consume Largemouth Bass. Also, those individuals in the sensitive population can eat legally caught Largemouth Bass smaller than 12 inches in length, because these fish are younger, they consume smaller prey, and have not consumed enough fish over a long enough time period to have elevated levels of mercury in their bodies.



STURGEON

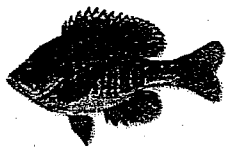
In the Missouri and Mississippi Rivers. Sturgeon and sturgeon eggs have been found to have a combination of **PCBs** and **chlordane** at levels of health concern, and DHSS recommends they not be consumed based on current information. For next year's advisory, DHSS will review recent sampling conducted by the MDC. Based on the result of our analysis, we may change to a limited-consumption advisory for sturgeon meat and sturgeon eggs for portions of the Missouri and Mississippi rivers. We have not reduced the advisory to certain sections of the two rivers because these fish do not have a restricted home range--they travel great distances (The Fishes of Missouri, William Pflieger 1997). Both chlordane and PCBs in sturgeon remain a human health concern and will remain on our advisory until further notice.

The Pallid Sturgeon is a state-listed endangered species and should not be harvested. The Lake Sturgeon is also an endangered species in Missouri. It is only the Shovelnose Sturgeon that is legal to harvest.

SUNFISH...CARP...REDHORSE...AND OTHER SUCKERS

The Big River in St. Francois and Jefferson counties, and the Flat River in St. Francois County from Highway "B", six miles downstream to where it enters the Big River. These fish have been found to contain **lead** at levels of health concern, and should not be eaten.

SUNFISH



Big Creek in Iron County near Glover, Missouri. These fish have been found to contain **lead** at levels of health concern, and should not be eaten.

For the rest of the state, use the following guidelines when deciding how much and what species of fish to eat.

CATFISH...CARP...BUFFALO...DRUM...SUCKERS...PADDLEFISH

Except for the areas mentioned above, we have removed our recommendation to restrict consumption of these fish. Therefore, except for carp, redhorse, and suckers in the Big River in St. Francois and Jefferson counties, and the Flat River in St. Francois County from Highway "B", six miles downstream to where it enters the Big River (as discussed above) **these fish may be eaten in any amount.**

SMALLMOUTH BASS...SUNFISH...CRAPPIE...TROUT

Some fish such as Smallmouth Bass, sunfish, and crappie are lower in fat and less likely to contain contaminants than the fish discussed previously. We feel you may eat as much of these types of fish from anywhere in Missouri as often as you like, except sunfish from the Big River and Flat River and from Big Creek in Iron County, discussed previously. Trout, even though they contain high levels of fat, are also safe to eat from anywhere in the state.

Note: We are evaluating the Smallmouth Bass for possible inclusion into the mercury advisory. **As stated in the National Fish Advisory, in the absence of a local advisory, predatory fish should be consumed at rate of one (1) eight ounce (uncooked) meal per week.** For more information go to:
http://www.epa.gov/waterscience/fishadvice/1-meal-per-week.pdf

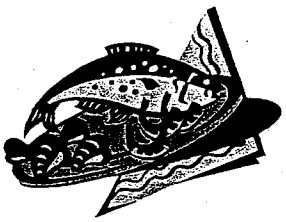
ALL FISH - ALL AREAS

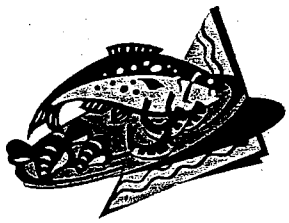
Smaller fish have lower levels of contamination than larger fish of the same species. Eat the smaller legal fish and release the lunkers so they can fight another day.

If warning signs are posted, follow those guidelines. **These specific warnings are special cases.**

The levels of some chemicals in any of the fish you eat can be reduced by carefully trimming away the fat when the fish is cleaned (See attached trimming and cooking guide). **Note: Trimming fat <u>will</u> <u>not</u> reduce lead or mercury contamination. Cooking cannot eliminate mercury and lead.**

If these guidelines are followed, you will minimize your potential health risks, but in an industrial society like ours, there are numerous health risks. Approximately one person out of three or four will get some type of cancer in their lifetime, and unfortunately, some children's nervous systems will be adversely affected. The cause may be from a family history of cancer, radiation from the sun, lifestyle exposures such as smoking cigarettes or chewing tobacco, man-made chemicals, naturally occurring chemicals or other known or unknown causes. We believe that in comparison to all these other risks, the benefits of eating fish greatly outweigh the risks.





TRIMMING AND COOKING YOUR FISH TO REDUCE FAT AND CHEMICAL CONTAMINANTS

1. Fillet your fish, or if cooking with the bones in, remove all internal organs.

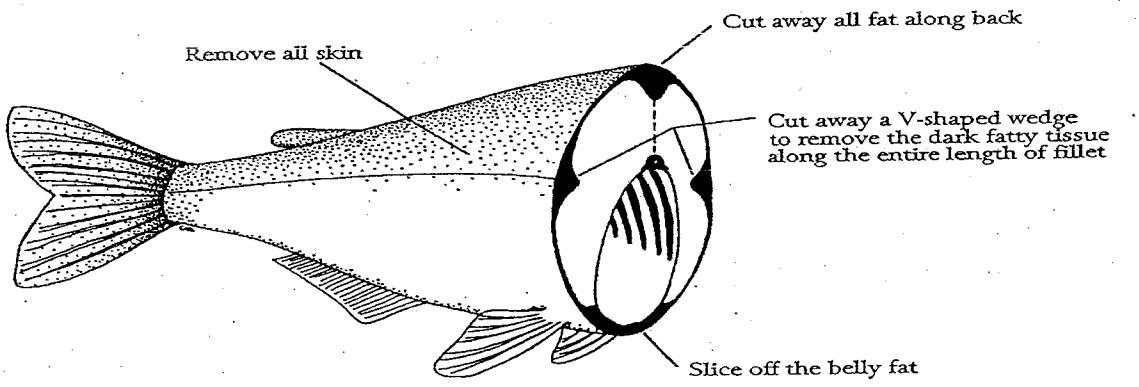
2. Trim away fatty portions of the fish such as the dorsal, lateral, and belly area. (See diagram below.)

3. Remove the skin from your fish.

4. Do not eat the eggs. They are very high in fat.

5. Bake, grill, or broil your fish on a rack and let the fat drip away. Do not use the juices. Avoid pan-frying in butter or animal fat, or making soups or chowders. These methods retain fat-laden juices. If you deep-fry your fish, do not reuse the oil. Contaminants will become concentrated in that oil.

6. Trimming fat or special cooking methods will not reduce the levels of metals, such as lead or mercury, from fish.



U.S. Environmental Protection Agency

Mercury

Fish Consumption Advisories

Fish are important in a healthy diet. They are a lean, low-calorie source of protein. However, some fish may contain methylmercury or other harmful chemicals at sufficiently high levels to be a concern. Federal, state and local governments issue fish consumption advisories when the fish are unsafe to eat. The advisories may suggest that people avoid eating certain kinds or certain amounts of fish. Some advisories apply to specific water types (like lakes). Some may focus on groups of particularly sensitive people. Some advisories include notices of "no restriction" to tell us that certain fish are safe to eat. As states increase the waters they monitor for contaminated fish, both the number of advisories and the waters where it is safe to eat fish are increasing. Visit the links below to learn more about mercury in fish, fish consumption advisories, and state fish advisories.

If you are concerned for your health or your family's as a result of exposure to mercury, get in touch with your health care provider. They will be able to tell you if mercury exposure is a problem for you and what to do about it.

EPA-FDA Joint Federal Advisory for Mercury in Fish: "What You Need to Know About Mercury in Fish and Shellfish" - The purpose of the advisory is to inform women who may become pregnant, pregnant women, nursing mothers and the parents of young children on how to get the positive health benefits from eating fish and shellfish, while minimizing their mercury exposure.

- HTML version
- PDF version (2 pp., 234K, About PDF Files)

EPA's Fish Consumption Advisories Web site - This site provides general information on fish advisories, public information materials, technical guidance documents, and related links. The site includes a state-by-state map that provides links to state, tribal and territorial fish advisory programs.

National Listing of Fish and Wildlife Advisories - This detailed and technical database contains information on specific bodies of water, contaminants, and species of fish. The database includes a state-by-state list of contacts and Web sites that can provide you with more information.

Seafood Information and Resources EXIT disclaimer - U.S. Food and Drug Administration's food information about the risks of methylmercury in fish and shellfish. You can also access this information toll-free at 1-888-SAFEFOOD.

Seafood Consumer Advice EXIT disclaimer - FoodSafety.gov, the gateway to government food safety information, provides general information on seafood safety.

Mercury Update: Impact on Fish Advisories (PDF, 10pp., 69K) - Note: This mercury fact sheet is provided for reference purposes only. Although the information provided here was accurate and current when created in June 2001, it is now outdated. We plan to update this fact sheet in 2005.

The Mercury Study Report to Congress (Volume IV: An Assessment of Exposure to Mercury in the United States) (PDF 293 pp., 1MB) - EPA prepared this report to fulfill requirements of the Clean Air Act Amendments of 1990. Published in 1997, it is an eight volume assessment of the magnitude of U.S. mercury emissions by source; the health and environmental impacts of those emissions; and the availability and cost of control technologies.

Great Lakes Information Network's Fish Consumption Advisories EXIT disclaimer

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Last updated on Thursday, January 13th, 2005
URL: http://www.epa.gov/mercury/advisories.htm

U.S. Environmental Protection Agency

Mercury

Human Exposure

Mercury exists in various forms, and people are exposed to each in different ways. The most common way people in the U.S. are exposed to mercury is by eating fish containing methylmercury. Other exposures may result from using or breaking products containing mercury. The health effects of these exposures are discussed in a separate section.

- Methylmercury
- How mercury enters the environment
- Moving up the food chain
- Elemental mercury
- Other mercury compounds (inorganic and organic)

People who use mercury in the workplace EXIT disclaimer need to take special precautions.

Methylmercury exposure

Outbreaks of methylmercury poisoning have made it clear that adults, children, and developing fetuses are at risk from dietary exposure to methylmercury. During these poisoning outbreaks some mothers with no symptoms of nervous system damage gave birth to infants with severe disabilities and it became clear that the developing nervous system of the fetus may be more vulnerable to methylmercury than is the adult nervous system. Mothers who are exposed to methylmercury and breast-feed their babies may also expose their infant children through their milk.

In 2004 EPA and FDA issued the first ever joint consumer advice about methylmercury in fish and shellfish. This advice was for women who might become pregnant; women who are pregnant; nursing mothers; and young children. The advisory provides three recommendations for selecting and eating fish or shellfish to ensure that women and young children will receive the benefits of eating fish and shellfish and be confident that they have reduced their exposure to the harmful effects of methylmercury. EPA also hosts a web-based compilation of fish advisories issued by States, tribes, territories and local governments. Fish Consumption Advisories

Recent human biological monitoring by the Centers for Disease Control and Prevention in 1999 and 2000 EXIT disclaimer (PDF 3 pp., 42 KB) shows that most people have blood mercury levels below a level (5.8 µg/L of whole blood) associated with possible health effects. Consumption of fish with

Terms Defined

Reference Dose (RfD): An estimate (with uncertainty spanning perhaps an

higher methylmercury levels can lead to elevated levels of mercury in the bloodstream of unborn babies and young children and may harm their developing nervous system. These disabilities have been documented in ability to use language, to process information, and in visual/motor integration. U.S. EPA's 2001 Reference Dose (RfD) for methylmercury was calculated to protect the developing nervous system. Currently, U.S. EPA uses a RfD of 0.1 µg/kg body weight/day as an exposure without recognized adverse effects. A description of EPA's Reference Dose for methylmercury may be found at http://www.epa.gov/iris/subst/0073.htm.

order of magnitude) of a daily oral exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. It can be derived from a NOAEL, LOAEL, or benchmark dose, with uncertainty factors generally applied to reflect limitations of the data used. Generally used in EPA's noncancer health assessments.

No-Observed-Adverse-Effect Level (NOAEL): The highest exposure level at which there are no biologically significant increases in the frequency or severity of adverse effect between the exposed population and its appropriate control; some effects may be produced at this level, but they are not considered adverse or precursors of adverse effects.

Lowest-Observed-Adverse-Effect Level (LOAEL): The lowest exposure level at which there are biologically significant increases in frequency or severity of adverse effects between the exposed population and its appropriate control group

In U.S. EPA's Mercury Study Report to Congress (1997) EPA estimated that 7% of women of childbearing age would have blood mercury concentrations greater than those equivalent to the RfD. The estimate of 7% of women of childbearing age above the RfD was based on patterns of fish and shellfish consumption and methylmercury concentrations present in fish and shellfish. Blood mercury analyses in the 1999-2000 National Health and Nutrition Examination Survey (1999-2000 NHANES) for 16-to-49 year old women showed that approximately 8% of women in the survey had blood mercury concentrations greater than 5.8 ug/L (which is a blood mercury level equivalent to the current RfD). Based on this prevalence for the overall U.S. population of women of reproductive age and the number of U.S. births each year, it is estimated that more than 300,000 newborns each year may have increased risk of learning disabilities associated with in utero exposure to methylmercury. More recent data EXIT disclaimer from the CDC support this general finding.

Nearly all methylmercury exposures in the U.S. occur through eating fish and shellfish. Microscopic organisms convert inorganic mercury into methylmercury, which accumulates up the food chain in fish, fish-eating animals, and people.

This process is explained below.

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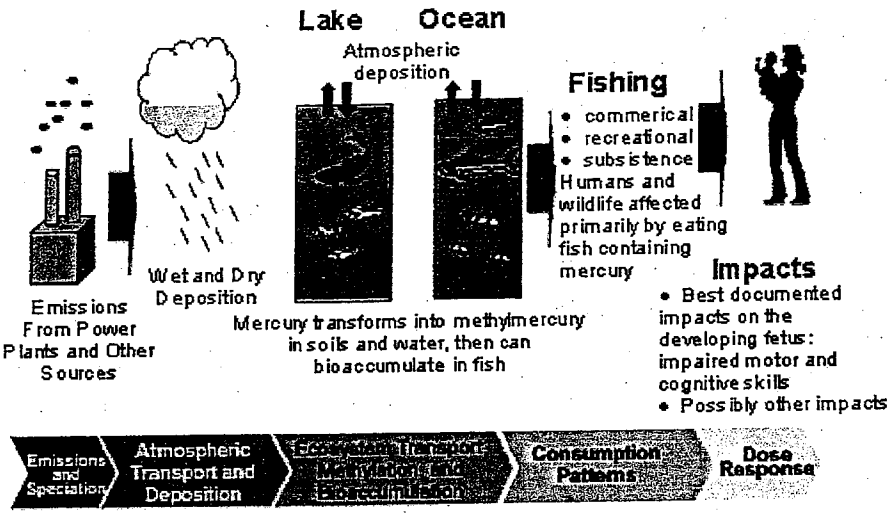
How mercury enters the environment



Mercury is emitted to the air by human activities, such as manufacturing or burning coal for fuel, and from natural sources, such as volcanos.

Typically, mercury is released into the atmosphere in one of three forms:

- elemental mercury: can travel a range of distances, may remain in the atmosphere up to one year and may travel globally before undergoing transformation
- particle-bound mercury: can fall out of the air over a range of distances
- oxidized mercury (sometimes called ionic or reactive gaseous mercury (RGM)): found predominantly in water-soluble forms, which may be deposited at a range of distances from sources depending on a variety of factors including topographic and meteorologic conditions downwind of a source.

What happens to mercury after it is emitted depends on several factors:

- the form of mercury emitted
- the location of the emission source
- how high above the landscape the mercury is released (e.g., the height of the stack)
- the surrounding terrain
- the weather.

Depending on these factors, atmospheric mercury can be transported over a range of distances before it is deposited, potentially resulting in deposition on local, regional, continental and/or global scales. Mercury that remains in the air for prolonged periods of time and travels across continents is said to be in the "global cycle."

Recent emissions estimates of annual global mercury emissions from all sources, natural and anthropogenic (human-generated), which are highly uncertain, are about 4800-8300 tons per year.

U.S. anthropogenic mercury emissions are estimated to account for roughly 3 percent of the total global emissions, and the U.S. power sector is estimated to account for about 1 percent the total global emissions. EPA has estimated that about one third of U.S. emissions are deposited within the contiguous U.S. and the remainder enters the global cycle.

Current estimates are that less than half of all mercury deposition within the U.S. comes from U.S. sources, although deposition varies by geographic location. For example, compared to the country as a whole, U.S. sources represent a greater fraction of the total

deposition in parts of the Northeast because of the direction of the prevailing winds.

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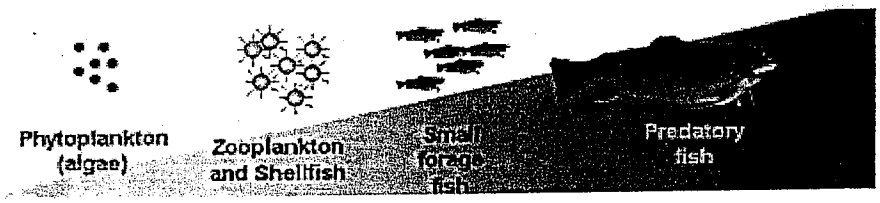
Moving up the food chain

When mercury falls in rain or snow, it may flow into bodies of water like lakes and streams. When it falls out of the air as dry deposition, it may eventually be washed into those bodies by rain. Bacteria in soils and sediments convert mercury to methylmercury. In this form, it is taken up by tiny aquatic plants and animals. Fish that eat these organisms build up methylmercury in their bodies. As ever-bigger fish eat smaller ones, the methylmercury is concentrated further up the food chain. This process is called "bioaccumulation".

Methylmercury concentrations in fish depend on many factors, including mercury, the concentration in water, water pH and temperature, the amount of dissolved solids and organic matter in the water, and what organisms live in the water. Methylmercury concentrations in fish may also be affected by the presence of sulfur and other chemicals in the water. Because of these variables, and because food webs are very complex, bioaccumulation is hard to predict and can vary from one water body to another.

However, in a given water body, the highest concentrations of methylmercury are generally found in large fish that eat other fish. The concentrations of methylmercury in large fish can be over a million-fold larger than in the surrounding water. EPA discussions of estimates bioaccumulation can be found in Chapter 6 and Appendix A of the Water Quality Criterion for the Protection of Human Health: Methylmercury.



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Elemental mercury exposure

When elemental mercury is spilled or a device containing mercury breaks, the exposed elemental mercury can evaporate and become an invisible, odorless toxic vapor. This is especially true in warm or poorly-ventilated rooms or spaces. Sources of potential exposure to elemental mercury are described below.

- Elemental or metallic mercury is the liquid metal used in thermometers, barometers, and thermostats and other electrical switches. Metallic mercury is often found in school laboratories as well as in thermometers, barometers, switches, thermostats, and other devices found in school science labs.

- It is not uncommon for children to break fever thermometers in their mouths. Mercury that is swallowed in such cases poses low risk comparison to the risk of breathing mercury vapor.

- There are some necklaces imported from Mexico that contain a glass pendant that contains mercury. The mercury-containing pendants can come in various shapes such

as hearts, bottles, balls, saber teeth, and chili peppers. If broken, they release metallic mercury to the environment.

Mercury is used in dentistry in dental amalgam. Dental amalgam is a direct filling material used in restoring teeth. It is made up of approximately 40-50% mercury, 25% silver and 25-35% a mixture of copper, zinc and tin. Amalgam use is declining because the incidence of dental decay is decreasing and because improved substitute materials are now available for certain applications. The Centers for Disease Control and Prevention (CDC) reports that, at present, there is scant evidence that the health of the vast majority of people with dental amalgam is compromised, nor that removing amalgam fillings has a beneficial effect on health. More information is available at: http://www.cdc.gov/oralhealth/factsheets/amalgam.htm EXIT disclaimer

Ritual Use of Mercury Program (PDF 111 pp., 980K) - This report deals with elemental mercury use by Haitian- and Caribbean-American communities, particularly those that practice spiritist faiths such as Santeria.

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Exposure to other mercury compounds (inorganic and organic)

Inorganic mercury compounds take the form of mercury salts. They are generally white powders or crystals, with the exception of mercuric sulfide (cinnabar) which is red. Inorganic compounds and organic compounds (such as phenylmercury acetate and ethylmercury), have been commonly used as fungicides, antiseptics or disinfectants. They have also been used in a variety of products. Most of these uses have been discontinued, but small amounts of these compounds can still be found as preservatives in some medicines. The U.S. Food and Drug Administration maintains a list of medicines that contain mercury EXIT disclaimer.

Excessive exposure to inorganic and organic mercury compounds can result from misuse or overuse of mercury-containing products, especially outdated products containing more mercury. Exposure to mercury compounds is primarily through ingestion, but can occur through other pathways. Ingested organic mercury compounds are more readily absorbed through the gastrointestinal tract than are inorganic compounds.

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C. What Should I Consider When I Prepare My Comments for EPA?

You may find the following suggestions helpful for preparing your comments:

1. Explain your views as clearly as possible.
2. Describe any assumptions that you used.
3. Provide copies of any technical information and/or data you used that support your views.
4. If you estimate potential burden or costs, explain how you arrived at the estimate that you provide.
5. Provide specific examples to illustrate your concerns.
6. Offer alternative ways to improve the collection activity.
7. Make sure to submit your comments by the deadline in this notice.
8. To ensure proper receipt by EPA, be sure to identify the docket control number and administrative record number assigned to this action in the subject line on the first page of your response. You may also provide the name, date, and **Federal Register** citation.

D. What Information is EPA Particularly Interested in?

Pursuant to section 3506(c)(2)(A) of the Paperwork Reduction Act (PRA), EPA specifically solicits comments and information to enable it to:

1. Evaluate whether the proposed collections of information are necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility.
2. Evaluate the accuracy of the Agency's estimates of the burdens of the proposed collections of information.
3. Enhance the quality, utility, and clarity of the information to be collected.
4. Minimize the burden of the collections of information on those who are to respond, including through the use of appropriate automated or electronic collection technologies or other forms of information technology, e.g., permitting electronic submission of responses.

IV. What Information Collection Activity or ICR Does this Action Apply to?

EPA is seeking comments on the following ICR:

Title: Application and Summary Report for An Emergency Exemption for Pesticides; Renewal of Pesticide Information Collection Activities and Request for Comments.

ICR numbers: EPA ICR No. 0596.07, OMB No. 2070–0032.

ICR status: This ICR is a renewal of an existing ICR that is currently approved by OMB and is due to expire September 30, 2001.

Abstract: This data collection program is designed to provide EPA with necessary data to evaluate an application for a permit for the temporary shipment and use of a pesticide product for an unregistered use to mitigate an emergency situation, and to evaluate the effectiveness of that product in allaying the emergency. Requests for Section 18 emergency exemptions, thus submission of the application, are at the discretion of a State, U.S. Territory, or Federal agency. Should one of these entities apply for the emergency, then the information and data herein are requested by the EPA.

V. What are EPA's Burden and Cost Estimates for this ICR?

Under the PRA, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

The ICR provides a detailed explanation of this estimate, which is only briefly summarized in this notice. The annual public burden for collection of information associated with the rule is estimated to average 99 hours per application, including time for reading the regulations, processing, compiling and reviewing the requested data, generating application correspondence or summary reports, and storing, filing, and maintaining the data. The following is a summary of the estimates taken from the ICR:

Respondents/affected entities: 600.

Estimated total number of potential respondents: 600.

Frequency of response: As needed.

Estimated total/average number of responses for each respondent: 5–10 annually.

Estimated total annual burden hours: 59,400.

Estimated total annual burden costs: $2,980,800.

VI. Are There Changes in the Estimates from the Last Approval?

The total burden associated with this ICR has increased 15,934 hours, from 43,466 hours in the previous ICR to 59,400 hours for this ICR. This change reflects several adjustments to the ICR calculations which are described in detail in the ICR.

VII. What is the Next Step in the Process for this ICR?

EPA will consider the comments received and amend the ICR as appropriate. The final ICR package will then be submitted to OMB for review and approval pursuant to 5 CFR 1320.12. EPA will issue another **Federal Register** notice pursuant to 5 CFR 1320.5(a)(1)(iv) to announce the submission of the ICR to OMB and the opportunity to submit additional comments to OMB. If you have any questions about this ICR or the approval process, please contact the person listed under **FOR FURTHER INFORMATION CONTACT.**

List of Subjects

Environmental protection, Pesticides and pests.

Dated: December 14, 2000.

Susan H. Wayland,

Acting Assistant Administrator for Prevention, Pesticides and Toxic Substances.

[FR Doc. 00–32401 Filed 12–19–00; 8:45 am]

BILLING CODE 6560–50–S

ENVIRONMENTAL PROTECTION AGENCY

[AD–FRL–6919–6]

2060–ZA10

Regulatory Finding on the Emissions of Hazardous Air Pollutants From Electric Utility Steam Generating Units

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of regulatory finding.

SUMMARY: This notice presents EPA's finding required by section 112(n)(1)(A) of the Clean Air Act (CAA) as to whether regulation of emissions of hazardous air pollutants (HAP) from fossil fuel-fired electric utility steam generating units (as defined in section 112(a)(8) of the CAA) is appropriate and necessary. This finding is based on the results of EPA's February 1998 "Study

of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units—Final Report to Congress' (utility RTC), and on information obtained subsequent to the utility RTC concerning HAP emissions to the atmosphere from electric utility steam generating units. In the utility RTC, the EPA indicated that coal- and oil-fired electric utility steam generating units are significant emitters of HAP, including mercury which is emitted from coal-fired units, and which EPA identified as the HAP of greatest concern to public health from the industry. Based on the available information, the Administrator finds that regulation of HAP emissions from coal- and oil-fired electric utility steam generating units under section 112 of the CAA is appropriate and necessary. As a result, this notice adds coal-and oil-fired electric utility steam generating units to the list of source categories under section 112(c) of the CAA. Also in the utility RTC, the EPA indicated that the impacts due to HAP emissions from natural gas-fired electric utility steam generating units were negligible based on the results of the study. The Administrator finds that regulation of HAP emissions from natural gas-fired electric utility steam generating units is not appropriate or necessary. The EPA does not believe that the definition of electric utility steam generating unit found in section 112(a)(8) of the CAA encompasses stationary combustion turbines. Therefore, the finding concerning natural-gas fired electric utility steam generating units does not apply to stationary combustion turbines.

ADDRESSES: Docket No. A–92–55, containing information used in development of this notice, is available for public inspection and copying between 8:00 a.m. and 5:30 p.m., Monday through Friday, excluding legal holidays. The docket is located in EPA's Air and Radiation Docket and Information Center, Waterside Mall, Room M–1500, 401 M Street, SW, Washington, DC 20460, or by calling (202) 260–7548. A reasonable fee may be charged for copying docket materials.

FOR FURTHER INFORMATION CONTACT: Mr. William Maxwell, Emission Standards Division (MD–13), U.S. EPA, Research Triangle Park, North Carolina 27711, telephone number (919) 541–5430, facsimile number (919) 541–5450, electronic mail address <maxwell.bill@epa.gov>.

SUPPLEMENTARY INFORMATION: *Docket.* The docket is an organized file of all the information submitted to or otherwise relied upon by EPA in the development of this regulatory finding. The principal purpose of the docket is to allow interested parties to identify and locate documents that serve as a record of the process engaged in by EPA which resulted in the publication of today's finding.

World Wide Web. In addition to being available in the docket, an electronic copy of today's notice will be posted on the Technology Transfer Network's (TTN) policy and guidance information page <*http://www.epa.gov/ttn/oarpg*> under "Recent Actions." The TTN provides information and technology exchange in various areas of air pollution control. If more information regarding the TTN is needed, call the TTN HELP line at (919) 541–5384.

I. What Is the Statutory Authority and Background of This Finding?

Today's finding is issued under the authority of section 112(n)(1)(A) and 112(c) of the CAA. Section 112(n)(1)(A) requires that, after considering the results of the study mandated by the same section and reported in the utility RTC, the Administrator determine whether regulation of HAP emissions from electric utility steam generating units is appropriate and necessary. The study was initiated following enactment of the 1990 Amendments to the CAA, which included section 112(n)(1)(A). Data were gathered, and the utility RTC was prepared. Section 112(c) provides that the Administrator shall list categories of sources of the air pollutants contained in the section 112(b) list. The listing of source categories under section 112(c) is a dynamic process. (See "Initial List of Categories of sources under Section 112(c)(1) of the Clean Air Act Amendments of 1990," 57 FR 31576.) Decisions as to the description and scope of source categories listed will be perfected during the course of the rulemaking process for each listed category and will take account of improvements in available information and analysis during the rulemaking. A draft utility RTC was submitted for scientific peer review in July 1995, and, concurrently, was made available for public review (60 FR 35393). A public meeting to obtain comments from the scientific peer review panel was held on July 11–12, 1995 in Research Triangle Park, North Carolina. In addition, a public outreach meeting was held on July 13, 1995 in Durham, North Carolina, at which time the public was invited to present oral comments on its interpretation of the "results of the study." The utility RTC was finalized in February 1998 and released to Congress and the public. In the final utility RTC, the EPA stated that, for the utility industry, mercury from coal-fired electric utility steam generating units was the HAP of greatest concern for public health.

To further inform the regulatory finding, the EPA issued an information collection request under the authority of section 114 of the CAA to all coal-fired electric utility steam generating units requesting coal data from such units for calendar year 1999. Certain units were also required to conduct stack tests to evaluate their HAP emissions. In addition, the EPA solicited data from the public through a February 29, 2000 notice (65 FR 10783). Another public meeting was held on June 13, 2000 in Chicago, Illinois, where the public was invited to provide EPA with their views on what the regulatory finding should be (65 FR 18992).

Further, the EPA undertook an evaluation of the mercury control performance of various emission control technologies that are either currently in use on electric utility steam generating units for pollutants other than mercury or that could be applied to such units for mercury control. The evaluation was conducted along with other parties, including the Department of Energy (DOE).

In addition, at the direction of Congress, the EPA funded the National Academy of Sciences (NAS) to perform an independent evaluation of the available data related to the health impacts of methylmercury and provide recommendations for EPA's reference dose (RfD—the amount of a chemical which, when ingested daily over a lifetime, is anticipated to be without adverse health effects to humans, including sensitive subpopulations). The NAS conducted an 18-month study of the available data on the health effects of methylmercury and provided EPA a report of its findings in July 2000.

II. What Has EPA Learned From the Utility RTC and the Subsequent Data-Gathering Activities?

The following four sections present a summary of the information and conclusions presented in the utility RTC along with the information obtained subsequent to publishing the utility RTC.

A. Health Hazard Assessment

The EPA evaluated exposures, hazards, and risks due to HAP emissions from coal-, oil-, and natural gas-fired electric utility steam generating units. Much of the assessment focused on inhalation exposure. However, multipathway exposures (*e.g.*, inhalation plus ingestion) were considered for six HAP

(mercury, radionuclides, arsenic, cadmium, lead, and dioxins). The assessment for radionuclides was relatively extensive and included multipathway modeling for all facilities identified in the utility RTC. The analysis for mercury was primarily based on information obtained from EPA's December 1997 "Mercury Study Report to Congress" (mercury RTC) and included a multipathway modeling assessment of mercury from four model electric utility plants. Screening level multipathway exposure modeling analyses were also conducted for arsenic and dioxins. For the other two HAP (cadmium and lead), a qualitative assessment of potential concerns for multipathway exposure was presented; multipathway modeling was not conducted for those two HAP. The methods and results of the analyses are presented in the utility RTC.

Based on the assessment of hazards and risks due to emissions of HAP from electric utility steam generating units, mercury is the HAP of greatest concern. Mercury is highly toxic, persistent, and bioaccumulates in food chains. Mercury emitted from electric utility steam generating units (and other sources), primarily in the elemental or divalent forms, is transported through the atmosphere and eventually deposits onto land or water bodies (with the divalent form depositing nearer the source than the elemental form). Once deposited, the chemical form of mercury can change (through a methylation process) into methylmercury which is a highly toxic, more bioavailable, form that biomagnifies in the aquatic food chain (*e.g.*, fish). Nearly all the mercury that accumulates in fish is methylmercury. Fish consumption dominates the pathway for human and wildlife exposure to mercury. As of July 2000, 40 States and American Samoa have issued fish advisories for mercury. Thirteen of those States have issued advisories for all water bodies in their State, and the other 27 States have issued advisories for over 1,900 specific water bodies.

Because the developing fetus is the most sensitive to the effects of methylmercury, the greatest concern is the consumption of mercury contaminated fish by women of childbearing age. Also of particular concern are subsistence fish-eating populations that may be consuming fish from contaminated waterbodies. The EPA estimates that about 7 percent of women of childbearing age (*i.e.*, between the ages of 15 and 44 years) are exposed to methylmercury at levels exceeding its RfD of 0.1 microgram per kilogram body weight per day (0.1 ug/kg/day). The risk following exposures above the RfD is uncertain, but risk increases with increasing exposure. About 1 percent of women have methylmercury exposures 3 to 4 times the methylmercury RfD. The NAS, in its July 2000 report "Toxicological Effects of Methylmercury," affirmed EPA's assessment of methylmercury toxicity and the level of its RfD.

Most of the mercury currently entering U.S. water bodies and contaminating fish is the result of air emissions which, following atmospheric transport, deposit onto watersheds or directly to water bodies. Wastewater discharges also contribute to environmental loadings, but to a much lesser degree than air emissions. Based on modeling conducted for the mercury RTC, the EPA estimates that roughly 60 percent of the total mercury deposited in the U.S. comes from U.S. anthropogenic air emission sources; the percentage is estimated to be even higher in certain regions (*e.g.*, northeast U.S.). The remainder of the mercury deposited from the air comes from natural emission sources, reemissions of historic global anthropogenic mercury releases, and from anthropogenic sources outside the U.S. In the mercury RTC, the EPA concluded that, given the total mass of mercury estimated to be emitted from all anthropogenic sources and EPA's modeling of the atmospheric transport of emitted mercury, coal combustion and waste incineration most likely bear the greatest responsibility for direct anthropogenic mercury deposition to the continental U.S. Mercury emissions from waste incineration (including municipal waste combustors and hospital/medical/infectious waste incinerators) have been declining substantially over the last decade largely due to regulations issued by EPA. Electric utility steam generating units (which are not currently regulated for mercury emissions) are the largest source of mercury emissions in the U.S., estimated to emit about 30 percent of current U.S. anthropogenic emissions. There is a plausible link between emissions of mercury from anthropogenic sources (including coal-fired electric utility steam generating units) and methylmercury in fish. Therefore, mercury emissions from electric utility steam generating units are considered a threat to public health and the environment. It is acknowledged that there are uncertainties regarding the extent of the risks due to electric utility mercury emissions. For example, there is no quantification of how much of the methylmercury in fish consumed by the U.S. population is due to electric utility emissions relative to other mercury sources (*e.g.*, natural and other anthropogenic sources). Nonetheless, the available information indicates that mercury emissions from electric utility steam generating units comprise a substantial portion of the environmental loadings and are a threat to public health and the environment. The EPA believes that it is not necessary to quantify the amount of mercury in fish due to electric utility steam generating unit emissions relative to other sources for the purposes of this finding.

With regard to the other HAP, arsenic and a few other metals (*e.g.*, chromium, nickel, cadmium) are of potential concern for carcinogenic effects. Although the results of the risk assessment indicate that cancer risks are not high, they are not low enough to eliminate those metals as a potential concern for public health. Dioxins, hydrogen chloride, and hydrogen fluoride are three additional HAP that are of potential concern and may be evaluated further during the regulatory development process.

The other HAP studied in the risk assessment do not appear to be a concern for public health based on the available information. However, because of data gaps and uncertainties, it is possible that future data collection efforts or analyses may identify other HAP of potential concern.

B. Emissions

In developing the utility RTC, the EPA examined HAP emissions test data acquired by the DOE, electric utility companies and organizations, and EPA itself. Further, using section 114 authority, the EPA obtained data from each coal-fired electric utility unit to update and refine the information on mercury emissions from such units. After evaluating various methods to estimate the emissions, the EPA estimates that the industry emitted 43 tons of mercury in 1999 from 1,149 units at 464 coal-fired plants.

The analyses of the data obtained are explained in the utility RTC and in subsequent documentation. Table 1 of this notice presents estimated 1990 and 2010 nationwide HAP emissions from electric utility steam generating units as presented in the utility RTC. The estimates account for projected changes in the population of units, fuel consumption, and control device configurations. Coal- and oil-fired electric utility steam generating units are major sources (as defined in section 112(a)(1) of the CAA) of hydrogen chloride and hydrogen fluoride emissions, emit a significant number of

the 188 HAP on the section 112(b) list, and are the leading anthropogenic sources of mercury emissions in the U.S.

TABLE 1.—SELECTED NATIONWIDE ESTIMATED HAP EMISSIONS

HAP	Selected nationwide HAP emissions estimates (tons/year)					
	Coal		Oil		Natural gas	
	1990	2010	1990	2010	1990	2010
Arsenic	61	71	5	3	0.15	0.25
Beryllium	7.1	8.2	0.5	0.4		
Cadmium	3.3	3.8	1.7	0.9		
Chromium	73	87	4.7	2.4		
Dioxins	0.000097	0.000108	2×10^{-5}	3×10^{-6}		
Formaldehyde	.....	.....	.....	.....	36	57
Hydrogen chloride	143,000	155,000	2,860	1,450		
Hydrogen fluoride	19,500	27,500				
Lead	75	87	10.6	5.4		
Manganese	164	219	9.3	4.7		
Mercury	46	60	0.25	0.13		
Nickel	.....	.....	393	198	2.2	3.5

For mercury, it was estimated in the utility RTC that the industry emitted approximately 46 tons in 1990 (51 tons in 1994) and was projected to emit approximately 60 tons in 2010 from 1,026 units at 426 coal-fired plants. The new information obtained under section 114 authority corroborates the emissions estimates. The increase in the number of units over that of the utility RTC results primarily from the identification of additional co-generation facilities meeting the section 112(a)(8) definition. The quality of the 1999 data is considered to be significantly better than that of the data reported in the utility RTC. Specific coal data, including the mercury content, were obtained for each coal-fired unit in the U.S. over the entire year; previously, State-average data were used. In addition, the control performance of existing control devices for each of the three major species of mercury (divalent, elemental, and particulate) were available; for the utility RTC, only total mercury values were available. The new data allowed EPA to significantly refine and improve its analyses and evaluate various methodologies in estimating nationwide mercury emissions from coal-fired electric utility steam generating units.

C. Alternative Control Strategies

Recent data show the technologies used to control criteria pollutants (particulate matter (PM), nitrogen oxides (NO_X) and sulfur dioxide (SO_2)) are effective in controlling emissions of nearly all HAP except mercury. In addition, combinations of controls for criteria pollutants can lead to varying levels of control, and in some cases full control, of mercury emissions. The application of technologies used to control mercury emissions in conjunction with technologies used to control other pollutants, an approach called multipollutant control, can substantially reduce or offset the costs of HAP control.

Potential strategies for controlling mercury and other HAP emissions include the use of: precombustion controls (*e.g.*, fuel switching, coal switching, coal cleaning); combustion modification methods used to control NO_X emissions; flue gas cleaning technologies that can be used to control emissions of criteria pollutants and HAP; and nontraditional controls such as demand side management and energy conservation.

Conversion of coal- and oil-fired units to natural gas firing effectively eliminates HAP emissions. Although conversion of coal-fired units to oil combustion will decrease emissions of some HAP, including mercury, it could increase emissions of others (especially nickel). Because of the wide variability in the trace metal contents of coals, switching coals generally may not result in consistently reduced HAP emissions. Current methods of coal cleaning remove portions of the trace metals contained within the coal; the average emissions reductions range from approximately 30 percent for mercury to approximately 50 percent for lead.

Nontraditional control methods (*e.g.*, demand side management, energy conservation, pollution prevention) have the potential to result in reduced HAP emissions, but the extent to which that is possible is currently uncertain. The nontraditional controls reduce HAP emissions through the avoided generation of HAP rather than by their removal from the exhaust gas stream.

Mercury in the flue gas from coal combustion may be present in three different forms. The forms, called species, include elemental mercury, divalent oxidized forms, and mercury adsorbed onto the surface of fly ash or other particles. The capture of mercury is highly dependent on the relative amount of mercury species that are present in the flue gas. Particulate bound mercury can easily be removed in conventional PM emission control devices such as electrostatic precipitators (ESP) and fabric filters (FF). Divalent forms of mercury are generally soluble in water and can be captured in wet scrubbers. Wet flue gas desulfurization (FGD) systems generally capture more than 90 percent of the divalent mercury, which may represent a 20 to 80 percent removal of the total mercury. Elemental mercury is insoluble in water, does not react with alkaline reagents used in FGD systems, and cannot be captured in wet scrubbers. Both the elemental and divalent forms of mercury can be adsorbed onto porous solids (*e.g.*, fly ash, powdered activated carbon, calcium-based acid gas sorbents) for subsequent removal in a PM control device, although elemental mercury is more difficult to adsorb onto solid surfaces than are the divalent forms of mercury. Bituminous coals contain higher concentrations of chlorine and other constituents that promote the oxidation and capture of mercury in conventional air pollution control devices. In contrast, flue gas from the combustion of subbituminous and lignite coals typically have higher amounts of the more difficult to control elemental form of mercury.

The available data indicate that installation of low-NO_X burners and

other combustion modification methods in pulverized coal-fired units may increase the carbon content of the fly ash. Mercury emissions may then be reduced through adsorption onto the fly ash carbon and subsequent capture in the PM control device. The improved mercury capture may come at the expense of slightly higher emissions of organic HAP. Cyclone-fired units emit low amounts of fly ash and reduce the chances of mercury adsorption and capture as particle-bound mercury. Fluidized bed combustion systems typically have high flue gas concentrations of high carbon-content fly ash and high levels of mercury capture in PM emission control devices.

Electrostatic precipitators and FF generally remove greater than 90 percent of all trace metallic HAP, with the exception of mercury. They are not effective in reducing emissions of gas-phase HAP, which include trace organic HAP and HAP such as hydrogen chloride and hydrogen fluoride.

Mechanical collectors and wet PM scrubbers are not generally effective in reducing HAP emissions. Mechanical collectors capture only HAP that are associated with large particles; fine-particle HAP and gas-phase HAP pass through and are emitted to the atmosphere. Wet PM scrubbers are moderately effective in reducing water-soluble HAP but do not effectively reduce HAP emissions associated with fine particulate or hydrophobic volatile organic HAP.

Dry scrubbers which employ a spray dryer adsorber (SDA) in conjunction with an ESP or FF are typically very effective in reducing HAP emissions. In SDA systems, water containing an acid gas sorbent is sprayed into a reaction vessel where the acid gases and other pollutants are reacted to form solid particles that can be collected in a downstream PM control device. Some coal-fired utilities that use bituminous coal in pulverized coal-fired units have shown mercury capture in excess of 90 percent in SDA/FF systems.

Wet FGD systems are capable of capturing nearly all HAP other than mercury and more than 90 percent of the divalent and particle bound mercury. Mercury removal in wet FGD systems may range from less than 20 to more then 80 percent, depending on the type of coal and combustion system used. Mercury capture in such units can be improved by the use of catalysts or reagents to increase the conversion of elemental mercury to soluble divalent forms of mercury.

Recent research indicates that mercury removal may be enhanced through the use of oxidizing agents (that convert elemental mercury to the ionized form) or through the use of sorbents (that adsorb the mercury onto solid particles). Enhanced mercury removal may also be achieved through greater use of multipollutant control options. Recent data indicate that the use of selective catalytic or noncatalytic reduction for NO_x control may also oxidize mercury and, therefore, enhance mercury control.

Thus, EPA's analysis of potential HAP control strategies allows EPA to conclude that, during the regulatory development process, effective controls for mercury and other HAP can be shown to be feasible.

D. Conclusions

The following conclusions summarize those presented in the utility RTC and those based on the information subsequently obtained and are based on the currently available scientific data. The conclusions, as a whole, support a finding that regulation of coal-and oil-fired electric utility steam generating units for HAP is appropriate and necessary.

1. Fossil fuel-fired electric utility steam generating units (coal-and oil-fired units in particular) emit a significant number of the 188 HAP included on the section 112(b) list. Estimated growth in the number of, and fuel use by, electric utility steam generating units (particularly coal-fired units) during the period 1990 to 2010 will result in an overall increase in HAP emissions. The new data gathered to date corroborate the previous nationwide mercury emissions estimate and confirm that electric utility steam generating units are the largest anthropogenic source of mercury in the U.S.

2. Mercury is highly toxic, persistent, and bioaccumulates in the food chain. Mercury emissions are transported through the atmosphere and eventually deposit onto land or water bodies. The deposition can occur locally near the source or at long distances (*e.g.*, hundreds or thousands of miles away). The air transport and deposition patterns of mercury emissions depend on various factors, including: The form of mercury released (divalent mercury deposits nearer to the source whereas elemental mercury enters the global pool and deposits farther from the source); the stack height and meteorology; and chemical transformations during transport in the atmosphere. Once deposited, the chemical form of mercury can change into methylmercury (through a methylation process), which is a more toxic form that biomagnifies up the aquatic food chain. Fish consumption dominates the pathway for human and wildlife exposure to mercury. There is a plausible link between emissions of mercury from anthropogenic sources (including coal-fired electric utility units) and methylmercury in fish.

3. Neurotoxicity is the health effect of greatest concern with methylmercury exposure. Methylmercury has a relatively long half-life in the human body (averaging about 70 to 80 days). Dietary methylmercury is almost completely absorbed into the blood and distributed to all tissues including the brain; it also readily passes through the placenta to the fetus and fetal brain. The developing fetus is considered most sensitive to the effects from methylmercury; therefore, women of childbearing age are the population of greatest concern. Offspring born of women exposed to relatively high levels of methylmercury during pregnancy have exhibited a variety of developmental neurological abnormalities, including delayed developmental milestones, cerebral palsy, and reduced neurological test scores. Studies suggest that far lower levels of in utero exposures have resulted in delays and deficits in learning abilities. It is also possible that children exposed after birth are also potentially more sensitive to the toxic effects of methylmercury than adults because their nervous systems are still developing.

4. Extrapolating from high-dose exposure incidents, the EPA derived an RfD for methylmercury of 0.1 ug/kg/day based on developmental neurological effects observed in children born to mothers exposed to methylmercury during their pregnancy. The NAS study determined that EPA's RfD is a scientifically justifiable level for the protection of public health. At the RfD or below, exposures are expected to be safe. The risks following exposures above the RfD are uncertain, but risk increases as exposures to methylmercury increase.

5. The results of recent dietary surveys indicate that most of the U.S. population consumes fish and is exposed to methylmercury as a result. Based on the surveys, about 85 percent of adults in the U.S. consume fish at least once a month, about 40 percent of adults consume fish once a week, and 1 to 2 percent of adults consume fish almost daily.

6. The EPA estimates that about 7 percent of women of childbearing age (i.e., between the ages of 15 and 44 years) are exposed to methylmercury at levels exceeding the RfD and about 1

percent of women have methylmercury exposures 3 to 4 times that level.

7. Exposure to methylmercury can have serious toxicologic effects on wildlife as well as on humans. Adverse effects to avian species and wildlife have been observed in laboratory studies at levels corresponding to fish tissue methylmercury concentrations that are exceeded by a significant percentage of fish sampled in lake surveys. Generally, wildlife consume fish from a much more limited geographic area than do humans which can result in elevated levels of mercury in certain fish-eating species in localized geographic areas. Those species can include kingfisher, river otter, racoon, loon, as well as some endangered species such as the Florida panther.

8. The EPA predicts that increased mercury deposition will lead to increased levels of methylmercury in fish, and that increased levels in fish will lead to toxicity in fish-eating birds and mammals, including humans. The NAS, in its July 2000 report, stated that "because of the beneficial effects of fish consumption, the long-term goal needs to be a reduction in the concentrations of methylmercury in fish." The EPA agrees with that goal and believes that reducing emissions of mercury from electric utility steam generating units is an important step toward achieving the goal.

9. There are a number of alternative control strategies that are effective in controlling some of the HAP emitted from electric utility steam generating units. Recent data indicate that mercury, perhaps the hardest HAP to remove from the exhaust gas stream, can be effectively removed by using oxidizing agents or sorbents injected into the gas stream. Recent data also indicate the possibility for multipollutant control with other pollutants (*e.g.*, NO_X, SO_2, and PM), greatly reducing mercury control costs.

III. What Is EPA's Regulatory Finding?

Based on the results of the study documented in the utility RTC, as well as subsequent analyses and other available information, the Administrator has concluded that mercury is both a public health concern and a concern in the environment. The Administrator has concluded that there is a plausible link between methylmercury concentrations in fish and mercury emissions from coal-fired electric utility steam generating units. Although the degree to which that linkage occurs cannot be estimated quantitatively now, the facts are that: There is a linkage between coal consumption and mercury emissions; electric utility steam generating units are the largest domestic source of mercury emissions; and certain segments of the U.S. population (*i.e.*, the developing fetus, subsistence fish-eating populations) are believed to be at potential risk of adverse health effects due to mercury exposures resulting from consumption of contaminated fish. Further, there remain uncertainties regarding the extent of the public health impact from HAP emissions from oil-fired electric utility steam generating units. Those facts and uncertainties lead the Administrator to find that regulation of HAP emissions from coal- and oil-fired electric utility steam generating units under section 112 is appropriate and necessary. It is appropriate to regulate HAP emissions from coal- and oil-fired electric utility steam generating units under section 112 of the CAA because, as documented in the utility RTC and stated above, electric utility steam generating units are the largest domestic source of mercury emissions, and mercury in the environment presents significant hazards to public health and the environment. The NAS study confirms that mercury in the environment presents significant hazards to public health. Further, it is appropriate to regulate HAP emissions from such units because EPA has identified a number of control options which EPA anticipates will effectively reduce HAP emissions from such units. It is necessary to regulate HAP emissions from coal- and oil-fired electric utility steam generating units under section 112 of the CAA because the implementation of other requirements under the CAA will not adequately address the serious public health and environmental hazards arising from such emissions identified in the utility RTC and confirmed by the NAS study, and which section 112 is intended to address. Therefore, the EPA is adding coal- and oil-fired electric utility steam generating units to the list of source categories under section 112(c) of the CAA. As a part of developing a regulation, the effectiveness and costs of controls will be examined along with the level(s) of control that may be technically feasible.

In developing a regulation under section 112(d), the statute authorizes EPA to consider subcategorization of a source category. The emissions standard for existing sources cannot be less stringent than the average emissions limitation achieved by the best performing 12 percent of existing sources in the category or subcategory (the "floor"). However, the EPA intends to develop a record to facilitate consideration of subcategorization of the source category in setting the "floor." Based on the information that EPA has to date, the EPA anticipates that a factual record will allow EPA to propose appropriate subcategories for this source category. In developing standards under section 112(d) to date, the EPA has based subcategorization on considerations such as: the size of a facility; the type of fuel used at the facility; and the plant type. The EPA also may consider other relevant factors such as geographic conditions in establishing subcategories. Once the source category is divided into subcategories, the EPA determines the "floor" for each subcategory and, in turn, the emissions standard independently for each subcategory. This approach has helped build flexibility in meeting environmental objectives in the past.

Once the floor is determined, the EPA can set an emissions standard that is more stringent than the floor if a tighter level of control is technically achievable and is justified. Factors that must be considered in deciding whether a more stringent standard than the floor is justified include: the cost of a more stringent standard; the energy requirements; and any non-air quality health and environmental factors.

Every source has to meet the level of a standard set under section 112(d), but not necessarily every individual unit at a source. Most electric generating plants have several units and so in meeting the standard there may be opportunity for lower cost solutions because the law allows for differences in reductions among units as long as the source as a whole is in compliance.

There is considerable interest in an approach to mercury regulation for power plants that would incorporate economic incentives such as emissions trading. Such an approach can reduce the cost of pollution controls by allowing for least-cost solutions among a universe of facilities that face different control costs. Trading also can allow for a greater level of control overall because it offers the opportunity for greater efficiency in achieving control. The EPA, however, recognizes and shares concerns about the local impacts of mercury emissions and any regulatory scheme for mercury that incorporates trading or other approaches that involve economic incentives must be constructed in a way that assures that communities near the sources of emissions are adequately protected. Thus, in developing a standard for utilities, the EPA should consider the legal potential for, and the economic effects of, incorporating a trading regime

under section 112 in a manner that protects local populations.

The Administrator finds that regulation of HAP emissions from natural gas-fired electric utility steam generating units is not appropriate or necessary because the impacts due to HAP emissions from such units are negligible based on the results of the study documented in the utility RTC.

The EPA has previously indicated that it construes the term "electric utility steam generating unit," as defined in section 112(a)(8) of the CAA and 40 CFR 63.41, to exclude all stationary combustion turbines, regardless of whether such turbines are used to generate electricity or used by an electric utility, and regardless of whether such turbines are used in conjunction with waste heat recovery units (65 FR 34010). Therefore, the finding concerning natural-gas fired electric utility steam generating units does not apply to stationary combustion turbines.

IV. Is This Action Subject to Judicial Review?

Today's finding that it is appropriate and necessary to regulate coal-and oil-fired electric utility steam generating units adds these units to the list of source categories under section 112(c). Section 112(e)(4) of the CAA states that, notwithstanding section 307 of the CAA, no action of the Administrator listing a source category or subcategory under section 112(c) shall be a final EPA action subject to judicial review, except that any such action may be reviewed under section 307 when the Administrator issues emissions standards for such pollutant or category. Therefore, today's finding is not subject to judicial review. As specified by section 112(e)(4), judicial review would be available on both the listing decision and the subsequent regulation at the time that such final regulation is promulgated. At such time, the exact dimensions of the source category and the nature of the control required would be sufficiently clear to allow for judicial review.

V. Is EPA Asking for Public Comment?

The EPA has held several public meetings wherein oral and written public input were solicited and obtained regarding the regulatory finding. In addition, numerous opportunities for written comment relating to both the study and the regulatory finding have been provided. The EPA has decided that it is unnecessary to solicit additional public comment on today's finding. The regulation developed subsequent to the finding will be subject to public review and comment.

VI. Administrative Requirements

Today's notice does not impose regulatory requirements or costs. Therefore, the requirements of Executive Order 13045 (Protection of Children from Environmental Health Risks and Safety Risks), Executive Order 13084 (Consultation and Coordination with Indian Tribal Governments), Executive Order 13132 (Federalism), the Regulatory Flexibility Act, the National Technology Transfer and Advancement Act, and the Unfunded Mandates Reform Act do not apply to today's notice. Also, this notice does not contain any information collection requirements and, therefore, is not subject to the Paperwork Reduction Act, 44 U.S.C. 3501 *et seq.* This notice was reviewed by the Office of Management and Budget under Executive Order 12866 (58 FR 51735, October 4, 1993).

Dated: December 14, 2000.

Carol M. Browner,

Administrator.

[FR Doc. 00–32395 Filed 12–19–00; 8:45 am]

BILLING CODE 6560–50–U

ENVIRONMENTAL PROTECTION AGENCY

[FRL–6919–2]

Science Advisory Board; Notification of Public Advisory Committee Meetings

Pursuant to the Federal Advisory Committee Act, Public Law 92–463, notice is hereby given of two meetings of the Drinking Water Committee (DWC) of the US EPA Science Advisory Board on the dates and times noted below. All times noted are Eastern Daylight Time. All meetings are open to the public, however, seating is limited and available on a first come basis. *Important Notice:* Documents that are the subject of SAB reviews are normally available from the originating EPA office and are not available from the SAB Office—information concerning availability of documents from the relevant Program Office is included below.

Drinking Water Committee (DWC) Meetings—January 11–12, 2001 and February 28, 2001

The Drinking Water Committee of the US EPA Science Advisory Board (SAB), will meet on January 11 and 12, 2001 in Room 120/126 of the Andrew W. Breidenbach Environmental Research Center, 26 West Martin Luther King Drive, Cincinnati, OH 45268; telephone (513) 569–7772. The meeting will begin at 9:00 a.m. on January 11 and adjourn no later than 3:00 p.m. on January 12, 2001.

A followup meeting is scheduled for February 28, 2001 to address any remaining issues that might arise as a result of the January 11–12, 2001 discussions. This meeting will be coordinated through a conference call connection in room 6013 Ariel Rios North (6th Floor), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue NW., Washington, DC. The public is strongly encouraged to attend the meeting through a telephonic link, but may attend physically if arrangements are made with the SAB staff by noon Friday, February 23. Additional instructions about how to participate in the conference call can be obtained by calling Ms. Dorothy Clark at (202) 564–4537, or via e-mail at: clark.dorothy@epa.gov by noon Friday, February 23.

Purpose of the Meeting—The Drinking Water Committee will continue its review of EPA's draft research plan in support of the Safe Drinking Water Act's Contaminant Candidate Listing (CCL) program.

Background

Research Plan for Candidate Contaminant Listing (CCL)—The Safe Drinking Water Act (SDWA), as amended in 1996, requires the EPA to establish a list of unregulated microbiological and chemical contaminants to aid in priority setting for the Agency's drinking water program. A new list must be published every five years. The first Contaminant Candidate List (CCL1) was first proposed by EPA in 1997 and was then finalized in 1998, following extensive consultation with stakeholders.

The Agency must select five or more contaminants from the CCL1 and determine, by August 2001, whether they should be regulated. To support these decisions, the Agency will have to evaluate when and where these contaminants occur, the extent of exposure and risk to public health, and determine if cost effective control methods are available.

EPA has sorted CCL1 contaminants into categories depending upon whether they need additional research (Research or Occurrence Priorities categories) or have sufficient data for the evaluation of exposure and risk to public health, and therefore enough data to support a drinking water standard (Regulatory Determination Priorities category). The contaminants considered for selection and regulatory determination by August

CLEAR THE AIR

Missouri's Dirty Power Plants

Power Plants: The Number One Polluter

Today, the nation is facing a health crisis from power plant pollution. Every year power plants spew billions of tons of pollution into our air. Nationally, 50 percent of electricity comes from coal,[1] but coal-fired power plants are responsible for the lion's share of dangerous pollution from the electric power industry. Within the electric power industry, these plants generate:

- 97 percent of deadly fine particle soot and sulfur dioxide emissions;
- 92 percent of smog-forming nitrogen oxide emissions;
- 86 percent of emissions of carbon dioxide, the primary global warming pollutant; and
- Almost 100 percent of toxic mercury emissions.

Moreover, power plants are responsible for more than 68 percent of the total annual emissions of sulfur dioxide, the primary ingredient of deadly fine particle pollution, from all sources, including cars and trucks.[2]

Show Me State Air Pollution

Power plant pollution is taking its toll on Missouri's health and environment. Every year, pollution from power plants is sending hundreds of children to the emergency room for asthma attacks, and shortening the lives of hundreds of Missourians. We need a national solution to the problem of power plant pollution.

Harming Your Health

Recent scientific studies by researchers affiliated with the American Cancer Society, the Harvard School of Public Health and other top universities and research institutions have made it possible for scientists working for the U.S. Environmental Protection Agency (EPA) to predict how many premature deaths, heart attacks, and other impacts are caused by power plant pollution.

Power plant pollution cuts short the lives of hundreds of Missourians each year

EPA's own consultants estimate that fine particle pollution from power plants shortens the lives of 754 Missourians each year. Fine particle pollution from power plants also causes 94,534 lost work days, 699 hospitalizations and 16,634 asthma attacks every year, 957 of which are so severe they require emergency room visits.[3]

Leads to lung cancer and heart attacks

A recent scientific study by researchers affiliated with the American Cancer Society found that people living in the most polluted cities have approximately a 12 percent increased risk of cardiopulmonary death over those living in the cleanest areas of the country. Similarly, for lung cancer, there is approximately a 16 percent increased risk for those living in the more polluted cities.[4] Based on EPA data, each year, 94 lung cancer deaths and 1,236 heart attacks in Missouri are attributable to power plant pollution.[5]

Children at risk

Children are the most susceptible to the detrimental effects posed by power plant air pollution. In Missouri, 1,163,815 children live within 30 miles of a power plant, the area in which the greatest health impacts are felt.[6] Additionally, researchers have found that infants in areas with high levels of particulate matter pollution face a 26 percent increased risk of Sudden Infant Death Syndrome and a 40 percent increased risk of respiratory death.[7]

Don't eat the fish

Power plants are responsible for 41 percent of the total mercury emitted by all known U.S. sources.[8] Missouri has advised against consuming fish from ALL of its river and lakes (51,015 miles of river and 288,315 acres of lake) due to mercury contamination.[9] Mercury is a toxic heavy metal, which, when ingested, can cause serious neurological damage, particularly to developing fetuses, infants, and children. Children can be exposed to mercury in the womb or through breast milk if their mothers ingest mercury tainted fish or by consuming contaminated fish themselves. The neurotoxic effects of mercury exposure are similar to the effects of lead toxicity in children and include delayed development and cognitive deficits, language difficulties, and problems with motor function, attention, and memory.[10]

Missouri's Dirty Power Plants

Damaging Your Environment

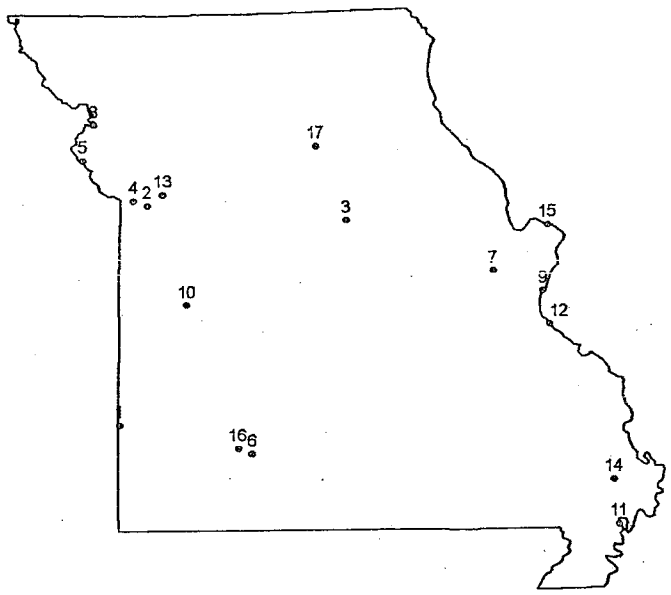
Increased warming and weather disasters

The ten hottest years on record have occurred since 1980. Man-made carbon dioxide emissions have contributed to the rise in the earth's temperature and the increase in tornadoes, hurricanes, heat waves and flooding, according to the United Nations' Intergovernmental Panel on Climate Change.[11]

How to Clear The Air

For more than 30 years the oldest and dirtiest power plants have managed to avoid modern pollution controls. These plants, some of which were built as long ago as the 1940s and 1950s, are responsible for billions of tons of pollution each year. The EPA now estimates that more than half of the population of the United States – almost 160 million Americans – breathe and live in areas with unhealthy air. Fortunately, the technology exists to make these plants as clean as new plants. Cleaning up the oldest and dirtiest plants is the first step towards a cleaner and more responsible energy future for the United States. It's time to Clear the Air.

Location of Power Plants in Missouri



Missouri Plants

1 Asbury
2 Blue Valley
3 Columbia
4 Hawthorn
5 Iatan
6 James River
7 Labadie
8 Lake Road
9 Meramec
10 Montrose
11 New Madrid
12 Rush Island
13 Sibley
14 Sikeston
15 Sioux
16 Southwest
17 Thomas Hill

1. Electric Power Annual — 2002, DOE/EIA-0348(2002), December 2003. Table ES, page 6.
2. Emissions data from EPA: National Air Pollutant Emission Trends, 1990-1998, Appendix A: National Emissions (1970-1998) by Tier 3 Source Category and Pollutant http://www.epa.gov/ttn/chief/trends/trends98/browse.html; Emissions data from 2001 comes from EPA, from updates to the National Air Quality and Emissions Trends Report received from EPA in the form of spreadsheets; Power plant emissions shares for 2002 come from EPA's Continuous Emissions Monitoring System data, downloaded from the EPA web site at http://www.epa.gov/airmarkets/arp/index.html.
3. Abt Associates, "Power Plant Emissions: Particulate Matter-Related Health Damages and the Benefits of Alternative Emission Reduction Scenarios" June 2004.
4. C. A. Pope, et. al., Lung Cancer, Cardiopulmonary Mortality and Long-Term Exposure to Fine Particulate Air Pollution. Journal of the American Medical Association Vol. 287, no 9. - March 6, 2002. www.jama.ama-assn.org/cgi/content/abstract/287/9/1132
5. See Abt Associates, supra, note 3.
6. Clean Air Task Force, Children At Risk, How Air Pollution from Power Plants Threatens the Health of America's Children, May 2002. www.cleartheair.org
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New Report Finds Missouri Ranks 9th in Power Plant Mercury Emissions Nationwide

ST LOUIS—As the Senate prepares to vote on whether to overturn an EPA rule on power plant mercury emissions, a new Missouri Public Interest Research Group (MoPIRG) report shows that Missouri ranked 9th in the nation for power plant mercury pollution.

The report—"*Made in the U.S.A.*"—identifies which states and localities nationwide have the most mercury emissions from power plants and which power plants emit the most mercury. In 2003, power plants in the U.S. emitted more than 90,000 pounds of mercury into the air.

"Mercury pollution from power plants is serious business," said MoPIRG Field Organizer Ellen Treimel. "Scientists have found that just a gram of mercury, about a drop, deposited over the course of a year was enough to contaminate the fish in a Wisconsin lake."

Mercury is a potent neurotoxin that can affect the brain, heart, and immune system. Developing fetuses and children are especially at risk; even low-level exposure to mercury can cause learning disabilities, developmental delays, lowered IQ, and problems with attention and memory. EPA scientists estimate that one in six women has enough mercury in her body to put her child at risk should she become pregnant. Studies also indicate that mercury exposure is associated with an increased risk of heart attacks in adults.

Power plants are the largest industrial source of U.S. mercury emissions. EPA data show that about one-third of the mercury deposited in the U.S. comes from U.S. power plants alone, and deposition can be much higher near individual plants, since

local sources can account for 50-80 percent of mercury deposition at hot spots. Mercury pollution is so pervasive that 44 states have posted mercury-related fish consumption advisories, half of the states for every lake or river. In Missouri, mercury-related fish consumption advisories cover every lake and river in the state. These advisories warn people to avoid or limit their consumption of certain types of fish

MoPIRG's "Made in the U.S.A." uses 2003 data from EPA's Toxics Release Inventory, the most recent available, to rank power plant mercury emissions by state, county, zip code, facility, and company. Key findings include:

- In Missouri, power plants emitted 3,289 pounds of mercury in 2003. Missouri ranked 9th in the country for power plant mercury emissions.
- Franklin County led the state in power plant mercury emissions, with 960 pounds, 29% percent of the state's total power plant mercury emissions, in 2003.
- The AmerenUE Labadie Power Plant, owned by Ameren Corporation, was the largest power plant mercury emitter in the state, with 960 pounds, 29% percent of the state's total power plant mercury emissions, in 2003.
- The most polluting 15 companies in the U.S. emitted more than 48,000 pounds of mercury in 2003, 54% of power plant mercury emissions nationwide. Ameren Corporation has a plant in Franklin County.

Under the Clean Air Act, sources of hazardous air pollutants, including mercury, are required to install pollution control technology to reduce these toxic emissions by the maximum achievable amount. EPA acknowledged in 2001 that compliance with the law would require reducing power plant mercury emissions by about 90 percent.

In March 2005, however, the EPA issued regulations that allow power plants to avoid the Clean Air Act's maximum achievable control technology (MACT) requirement. One of these rules, the "delisting rule," removed power plants from the list of sources subject to MACT standards. This paved the way for a second, industry-favored "cap-and-trade rule" that allows power plants to buy and trade the right to pollute and delays even modest mercury reductions until at least 2018.

"EPA is essentially saying that mercury from power plants isn't toxic," Treimel said. "That not only defies law and logic, but it's outrageous."

At least 16 states have challenged one or both of the rules in court or have petitioned EPA for reconsideration of the delisting

rule. Moreover, in June, Senators Patrick Leahy (D-VT) and Susan Collins (R-ME) introduced a bipartisan joint resolution against the delisting rule pursuant to the Congressional Review Act, a law that enables Congress to disapprove of federal agency rules using special, expedited procedures. Disapproval of a rule voids the rule, meaning it has no effect. A vote is expected in early September, after the Senate returns from its August recess.

"We urge Senators Talent and Bond to take action to protect public health by supporting the Leahy-Collins resolution," Treimel said. "It is long past time for power plants to comply with the law and join other industries in reducing their mercury pollution by 90 percent."

THE MISSOURI PUBLIC INTEREST RESEARCH GROUP
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Selective Analysis of the

AECI Site Selection Study Report

Re: Proposed Coal Fired Power Plant

Norborne, Missouri

Submitted to RUS for Public Comment

by

Concerned Citizens of Carroll County
(The C^4 Association)

Our analysis will address specific issues brought out in the AECI Site Selection Study Report... recently made available to the public for review. Our main areas of analysis will address:

1.1 Current Generation Capabilities
1.2 County Population Data
1.3 The Project's Impact on Population

2.1 Projected Generation Requirements
2.2 Existing Generation & Distribution Capabilities

3.1 Need for the Norborne Project
3.2 Public Disclosure
3.3 Energy Demand Growth Rates

4.1 Project Financing
4.2 Other Financing Secured
4.3 Economic Development Agreement Questionable
4.4 Violation of the Americans with Disabilities Act

5.1 Environmental Concerns
5.2 AECI Response to Questions from Community Meeting
5.3 Congressional Statement of Findings
5.4 Example of AECI Track Record Re: Clean Air Act
5.5 Hazardous Materials Re: Radioactive Materials

6.1 Conclusion
6.2 Generation Capacity
6.3 Inappropriate Actions
6.4 Farmland Preservation
6.5 Government Inaction
6.6 Viable Alternative

1.1 - Current Generation Capabilities

AECI Report Pages 1.1: The existing generation facilities AECI owns and operates include coal-fired steam units:

Thomas Hill -	1,153 megawatts (MW)	
New Madrid -	1,200 megawatts (MW)	
		2,353 MW

Gas fired combined cycle and simple cycle units:

Chouteau	522 MW	
St. Francis	501 MW	
Nodaway	182 MW	
Essex	107 MW	
Holden	321 MW (gas fired – oil backup)	
Unionville	45 MW (oil fired)	
		1,678 MW

Power purchase agreements:

City of New Madrid, Missouri (New Madrid Unit 1)	570 MW	
Central Electric Power Coop (Chamois Power Plant)	68 MW	
KAMO Power (Grand River Dam Authority's Unit 2)	198 MW	
Southwestern Power Administration – (hydro capacity)	478 MW	
City of West Plains, Missouri (peaking capacity)	36 MW	
Duke Trading and Energy Marketing (St. Francis)	No Info.	
		1,350 MW
Current Capabilities		5,381 MW

Further review indicates inconsistencies in reported power production capabilities. 1 However, the numbers show adequate power capabilities through 2015 contrary to AECI's graph 2, depicting slightly over 4,500 MW availability which excludes the power purchase agreements presented earlier in the report. The inconsistencies shown indicate the probability of a report purposely skewed to reflect an immediate need for the proposed coal fired unit, where no such need is evident in this region of the state.

1.2 - County Population Data: Data for this area indicates a consistent reduction over the past several decades. This is primarily due to the County Government's view towards maintaining the status quo regarding business development. Without this growth the population has moved to other areas seeking higher paying jobs, shopping facilities and readily available medical care. AECI's project would not alleviate this

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Footnote 1 See, AECI Report, Pages 4.6, 4.7, 4.8

Footnote 2 See, AECI Report, Page 4.9

problem in the slightest, as the majority of qualified workers necessary for plant operations and construction would come from outside the Norborne area, with minimal, if any, job availability for the local citizens.

1.3 - The Project's Impact on Population: We find there will be no appreciable population gain because of the jobs offered, where the area services are not adequate to sustain such growth (*i.e. infrastructure and local commerce*); and..., a rather large number of people have already committed to moving should this project be built, thereby resulting in a significant population reduction in Norborne.

In reality the proposed project will adversely impact the Norborne region, already stymied by the inaction of the Carroll County Government. The business/population losses already sustained will be further impacted by the proposed power plant; foreseeable impact... Norborne will become a ghost town or near ghost town!!!! its population and farm community devastated... for this so-called "public purpose"!!!!

2.1 - Projected Generation Requirements

AECI Report - Pages 4.1 – 4.5: The most recent electrical energy demand analysis indicates that the peak capacity demand for AECI exceeded 3,650 MW during 2004. This peak capacity demand is projected to exceed 4,450 MW by 2011.

Report Page 4.1: AECI is purchasing the Dell Project from TECO Power Services (TPS), a subsidiary of TECO Energy (AECI, 2005). The partially constructed Dell Power Station is situated within the city limits of Dell, Arkansas, on approximately 100 acres. This project is a nominal 540 MW (599 MW, with duct firing) combined-cycle, natural gas-fired power plant. Construction of this facility was temporarily suspended in 2002 (TECO, 2005). AECI's plans call for completing construction and starting the Dell plant by May 2007. This plant, with strategic power purchases, will provide AECI's peaking and intermediate power needs through 2011. **3**

Considering the existing generation and distribution capabilities of AECI (5,381 MW) and including its purchase of the Dell Project (540 MW), AECI's total generation capabilities by May 2007 will exceed: 5,921 MW (*without taking into account the purchased generation from the Duke Trading and Energy Market (St. Francis)*). With this in mind the total generating capacity is beyond AECI's forecasted needs for 2015. **4**

2.2 - Existing Generation & Distribution Capabilities: AECI can easily meet and exceed its generation needs beyond the forecast date, without the proposed Norborne project, by adding capacity ("repowering or uprating") to its existing base load plants

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Footnote 3 See, AECI Report - Chart, Page 4.14, Capacity Requirements
Footnote 4 See, AECI Report - Page 4.2

or other cooperative member plants ("participation in another company's generation project") for significantly less cost and capital outlays.

AECI Report - Page 1.1, 1.2: A review of alternative ways to meet the needs of AECI was conducted. Options evaluated included load management, renewable energy resources, distributed energy, fossil fuel generation, repowering or uprating existing units, participation in another company's generation project, purchase power, and adding new transmission capacity. It was concluded that a new coal-fired unit would be the most economical, particularly at larger unit sizes. **5** (emphases added)

The previous emphasized statement is without merit when considering the long term operational costs of a coal fired unit; its related hazardous waste management/disposal; air quality controls; fuel delivery; fuel preparation and ongoing maintenance considerations does not bring these "units" into a reasonable cost benefit relationship.

Of course the organization (AECI) being a "public utility" (*yet identified as a "rural utility"*) nonetheless would capture it profits or breakeven point by adjusting the rates to its customer base. These adjustments find no point of leveling off in this scenario, where governments will require additional environmental controls as the years progress, including additional costs related to hazardous material handling.

3.1 - Need for the Norborne Project

Reading on... we find that AECI is providing the following alternate information.

AECI Report - Page 4.5: The 2000 Power Requirements Study (PRS) for AECI contains the most recent 15-year forecast. This study provides a class-specific energy sales forecast, as well as system energy requirements and a forecast of peak demand. This PRS includes historical data through 1999 with projections through 2014. Prior to the completion of the 2000 PRS, AECI's previous PRS was published in 1999, and included historical data through 1997. AECI is currently in the process of developing a new PRS. This study will be available as soon as it is completed (expected in late 2005).

We conclude from the statements thus far that the supporting facts for the proposed project, as enumerated in the present report, are premature and lacking an adequate foundation for its current assumptions. AECI has "put the cart before the horse" without including in its reports full consideration for the long term environmental and economic impacts to the proposed site area. *(See, Environmental Concerns - below)*

Footnote 5 See, AECI Report, Pages 5.1 – 5.8 (See, also Pages 5.22, 5.23 Repowering & Uprating)

3.2 – Public Disclosure: AECI has been remiss in it public reporting, 6 where it has failed to provide the exact locations for the increased load requirements and whether their G&T members have the capability of additional generation to meet this projected need. However, the report has indicated that 78% of the load requirements are not in Carroll County or this region, but are required by the Show-Me Power Electric Cooperative 7 in South Central Missouri.

3.3 – Energy Demand Growth Rates: AECI expects us to believe that a growth rate of 2.6% for AECI's customer base in Missouri will require the production of an additional 660 MWs, thereby supporting the need for this proposed power plant. This growth rate would translate to a consumer or population growth exceeding 445,000 households over the targeted period of the report... some 5 years 8 or the addition of 89,100 households per year. This is historically false for this region of the state where the population has steadily declined over the last several decades. 9 Yet..., AECI's expected growth for this County would exceed 14,800 households over this same period and again... this assumption is historically false.

This fact brings a number of reasonable assumptions to mind...

(1) there is no significant need for additional energy in this region of the state...
(2) the energy requirements to substantiate the need for this project are elsewhere...
(3) AECI is building its proposed plant to an "economy of scale" perhaps due to the locating or relocation of a major industrial customer in its service area, necessitating the sale of excess power production. This scenario was played out in the construction of AECI's New Madrid facility, initially 600 MW. 10
(4) AECI is building its proposed plant to secure an increased percentage of the energy market. AECI is promoting this project to further increasing its sales of power through additional interconnections to an ever widening market... under the guise of regional market demand. A true example of "Smoke & Mirrors."

Therefore... we conclude that this proposed plant is not necessary under current or projected regional market requirements; but... if deemed necessary for a substantiated growth in regional consumer demand, the necessary power should be provided by an alternate means of generation..., and any new power plant should be located where the need for additional generation is required. In this manner we would prevent the loss of

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Footnote 6 See, Article in Sept/Oct Issue of Shoe Me, Published by the Missouri Farm Bureau, Page 9 (Attached as Exhibit "A")
Footnote 7 Additional power needed for municipal consumers (See, AECI Report, Page 4.14)
Footnote 8 See, Chart - AECI Report - Page 4.4 – Historic and Projected Energy Demand Growth Rates
Footnote 9 Missouri Secretary of State, Population Trends by County
Footnote 10 See, Win - Win – An Informal History of AECI, 1996 (See Chapter 7, Page 85)

our precious farmland (*The Primary Source of America's Food Supply*), eliminating the adverse environmental impact and thereby sustaining our quality of life.

4.1 - Project Financing

AECI Report - Page 1.3: Because AECI intends to finance the project through a guaranteed Federal Financing Bank loan, the project represents a major federal action that must be reviewed under the National Environmental Policy Act (NEPA). The agency with responsibility to carry out the NEPA review is the Rural Utilities Service (RUS), formerly known as the Rural Electrification Administration (REA).

AECI announces here it will seek financing through a federally guaranteed loan (most likely via a RUS guarantee). This is the first notification to the public concerning the use of this source.

4.2 - Other Financing Secured

Earlier this year AECI entered into negotiations with the Carroll County Commission seeking, amongst other gratuities and incentives, Chapter 100 Bond financing for this project. On June 6, 2005, AECI and Carroll County entered into an "Economic Development Agreement" for financing an amount exceeding 1.2 billion dollars. The financing was approved under an Ordinance enacted on the same date.

4.3 - Economic Development Agreement Questionable

We find the procedure, utilized by the Carroll County Commission for the financing of the AECI Project, contrary to existing Constitutional provisions in Missouri. We speak here of the Chapter 100 Bonds and the means of gaining approval under existing provisions of Missouri law.

The Missouri provisions speak directly to the definition of "public utility" and "industrial development" as they apply to the procedures for Bond approval. In this instance we find the use of "industrial development" as the vehicle for securing the issue of Bonds. However, AECI's project fails to meet the definition of "industrial development", yet the project does meet the definition of "public utility" under these provisions.

The difference in the methods of approval for the Bond issue necessitates the following:

(a) "industrial development" vote of the County Commission;

(b) "public utility" vote of the people.

It appears by this process AECI and Carroll County where moving in concert... to eliminate legislated public participation, preventing probable public interference with the project; thereby usurping Missouri law. This type of action is not new to this cooperative where we find the process of testing state law was attempted in the past by Sho-Me Power. Sho-Me gains cooperative status by organizing under the Agricultural Chapter of the Cooperative Companies Act...; Sho-Me assuming that "electricity" is, in fact, an "agricultural commodity." However, they found themselves before the courts.

The Missouri Supreme Court rejected this assumption ruling..., "electricity" was not a "commodity" in this sense. Sho-Me, later becoming a founding G&T of AECI, is the forerunner of "testing state law."

With the signing of the "Economic Development Agreement" with Carroll County AECI is "testing the waters" as to the application of "industrial development" for the Norborne project; AECI considering "distribution" as the compliance factor..., notwithstanding the intent of the specific law and its application to other industries.

It is the assumption of the Concerned Citizens of Carroll County that AECI's modus operandi will continue... if and until this issue is brought before the courts for clarification. The possibility of a court action may be one of the major reasons for AECI seeking financing via federal guarantees at this point in the project. **11**

Research into the AECI/Carroll County matter has brought to light that "public notice" was woefully lacking; and this in a state which requires open government under its Sunshine Law. To compound the issue, during this period AECI, through an agency agreement of some sort with McFadden Land and Title, began purchasing farmland located in the proposed project site. The purchasing process leaves open a question of ethics, regarding the manner in which the landowners were:

(a) deceived regarding land use; and
(b) in some cases threatened with eminent domain if they refused to sell.

These actions were kept in strict confidence until a group of citizens decided to come together and investigate the matter; thus the creation of the Concerned Citizens of Carroll County (a charitable association – duly filed with Missouri's Attorney General). AECI went so far as to enter these proposed (and as yet not purchased) lands, without permission from the owners, for the professed purpose of survey and data collection for the project; not along the roadways as presented in their public announcements. Such entry certainly may be considered a violation of state laws. AECI's actions here may be

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Footnote 11 See, Win – Win – An Informal History of AECI, 1996 – Chapter 12, Page 120

considered wise business practices for economic purposes, but we believe the actions to be deceitful, unethical and contrary to their professed business practices. 12

4.4 – Violation of the Americans with Disabilities Act: The "economic development" process went further to violate Title II of the Americans with Disabilities Act (*prescribed pursuant to Section 504 of the Rehabilitation Act of 1973*) by excluding the disabled from the "public meeting" process, i.e. "accessibility, accommodation and integration." Only now do the people find "public meetings" and "public notice" available... when AECI intends to seek alternative financing under prescribed federal programs. This process has placed a cloud over this entire project and has raised a cautionary flag... leaning towards the distrust of any project proposed by AECI, and/or, any of it's published or pronounced guarantees or warrantees regarding the environmental operation of the proposed plant.

5.1 - Environmental Concerns

Our concerns about the environment in the surrounding area of the proposed power plant (*Norborne, Missouri*) will be limited to relevant statements of AECI as published on their website; produced by or on behalf of AECI.

5.2 – AECI Response to Questions from Community Meeting

AECI Website – Responses to questions distributed at March 4, 2005, Norborne, Mo., community meeting. The following are the statements published for public consumption:

(i) We do not anticipate any short or long-term health effects from the construction and operation of this plant.

We see here AECI does not "anticipate" short or long term effects from plant operations. We limit our discussion to plant operations beginning with:

AECI has not undertaken or accomplished studies of the prevalence of asthmatic population, the aged population, and the disabled population in and around the plant site, nor has any study considered these factors for the populations immediately downwind from the proposed plant site.

Footnote 12 See, Win - Win – An Informal History of AECI, 1996; Chapter 6 – Pages 56, 57 - Thomas Hill Land purchases were direct negotiations, without the use of agency agreements; no need for eminent domain.

AECI has admitted the area considered in Norborne is within an air quality "attainment" area; and further admits:

(ii) Air emissions, solid waste combustion byproducts and water effluents will result from the operation of this plant.

(iii) With respect to air emissions, federal law requires the Environmental Protection Agency to set ambient air quality standards such that they will protect human health and the environment with a margin of safety. In other words, the EPA must determine the level of contaminants in the air we breathe such that human health is protected, then set the standard lower than that level. (*See, Example of AECI Track Record Re: Clean Air Act, below*)

(iv) We have not yet completed evaluating how this plant will affect air quality, but preliminary assessments show that after this plant is in operation, the air quality in the area of the plant will continue to be below the ambient standards that protect human health and the environment with a margin of safety.

(v) With respect to coal combustion byproducts, we see no potential for long-term health effects. (*See, Hazardous Materials, below*)

It is understood that certain specific pollutants will find their way into the environment; and without a doubt add to that already existing in the area. Technology is not now available to assure complete removal of these environmental hazards, which will be produced at the project site and carried by the winds and water to neighboring areas. AECI's assumptions regarding health effects are unfounded in light of current scientific and medical data in this respect.

Two specific materials are not well addressed or not presented at all; that being mercury and radioactive materials inherent in the coal supply. These materials alone have cumulative effects upon exposure; the longer the exposure the greater the risk. Radioactive materials internalized by ingestion or inhalation have a known cumulative effect (*See, Hazardous Materials, below*); disease manifestation can take 30 years or more to present itself and is also known to skip generations before the effects appear. Knowing this, AECI's statements are ill advised and inappropriate for public presentation especially when the project site is located in the midst of productive farmland, where these hazardous materials will, most assuredly, find their way into our food supply.

AECI assurances concerning compliance with EPA environmental requirements are not comforting to those who will feel the effects of exposure (the young, the aged and the infirm). We are aware that the EPA has certain regulations and policies allowing for the purchase/sale of credits and other means of reducing the impact of AECI's environmental compliance requirements (*See, Example of AECI Track Record Re: Clean Air Act, below*). The credits are utilized by coal-fired utilities to meet the published environmental standards; and AECI has provided no guarantee it will comply with

EPA requirements and forego any credits available under the existing regulations and policies. At this point if AECI made such assurances we would not consider them trustworthy.

(vi) To our knowledge, there has never been a coal combustion byproduct that has been determined to be hazardous in the state of Missouri."

AECI's last statement is absurd and an affront to the mentality of the people of Norborne or anyone faced with a decision concerning this type of project. Missouri statutory provisions make clear that:

> any material which may cause or contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness, or pose a present or potential threat to the health of humans or the environment is a hazardous material.

State regulations essentially restate the EPA requirements for hazardous materials. However, fly-ash is not considered a hazardous material in Missouri, disregarding the hazardous materials inherent in its composition; and contrary to current federal provisions regarding such composition. As Missouri's law follows directly the federal statutory and regulatory provisions in this area (*excepting fly-ash and its material composition*) the exclusion of fly-ash would make that portion of Missouri's regulations inconsistent with federal provisions and thereby invalid under the Supremacy Clause of the U.S. Constitution. What is exemplified here is the political power of the electrical cooperatives in this state to sway the bureaucracy to there benefit.

Continued review of existing material reveals that the federal government has published specific concerns regarding environmental pollution. Those concerns are cited here:

5.3 - Congressional Statement of Findings 13

The Congress finds that there is general agreement that air, water, and other common environmental pollution may be hazardous to the health of individuals resident in the United States, but that despite the existence of various research papers and other technical reports on the health hazards of such pollution, there is no authoritative source of information about

(1) the nature and gravity of these hazards,

(2) the availability of medical and other assistance to persons affected by such pollution, especially when such pollution reaches emergency levels, and

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Footnote 13 Title 42 U.S. Code, Section 4391

(3) the measures, other than those relating solely to abatement of the pollution, that may be taken to avoid or reduce the effects of such pollution on the health of individuals.

5.4 - Example of AECI Track Record Re: Clean Air Act

AECI's track record regarding compliance with the Clean Air Act is inconsistent with its professed assurances concerning the project at hand. An example of its noncompliance may be found in AECI's own publications regarding the New Madrid facility. **14** It appears this plant was operating in violation of the Clean Air Act; resulting in a lawsuit being filed by the federal government to shut down the plant. However, the initial suit was dismissed on a technicality and AECI expected an immediate refilling of the case.

To prevent the shutdown of the New Madrid facility, AECI negotiated with the federal government's attorneys; the result being that AECI would sue the manufacturer of the pollution control system instead, allowing the plant to continue operating; the federal government agreed to this procedure. This suit was settled a couple of years later for 4 million dollars worth of spare parts from the manufacturer. However, in the interim the New Madrid plant continued operations in violation of the Clean Air Act; the AECI reasoning... economics. The cost savings to AECI members (rather than buying power on the open market) apparently outweighs the environmental impact of continued operations... including the inherent health effects adversely impacting the people in the area and downwind of the power plant.

As you can see by this past performance... AECI's actions are based upon economics and will continue to be so. The continued reliance on their nonprofit cooperative status has no bearing upon their economic business decisions. AECI actions are no different from any other for-profit company acting to protect its income and investments... at the expense of the environment and the health of the people. The almighty dollar once again reigns supreme!!! This is not the type of "corporate" neighbor we would welcome in this County... and our government (*federal, state or county*) should not force the citizenry to accept or condone such actions by any person or entity under the guise of "economic development" and "public purpose."

In this particular case our federal government officials have, again, demonstrated their shortsightedness... where a greater significance is placed upon the probable losses on its financing of the New Madrid project... yet... bureaucracy ignores entirely the long term medical costs which the federal and state governments will surely be faced with in allowing this environmental noncompliance to continue. This is truly a bean-counter's mentality... if it's beyond your nose... it's too far away to worry about (speaking to the measure of time).

Footnote 14 See, Win - Win – An Informal History of AECI, 1996; Chapter 9 – Page 103

5.5 - Hazardous Materials; Re: Radioactive Materials

One group of hazardous materials which will have a prominent impact upon the population in the area of the proposed facility, those directly downwind and those consuming the agricultural products in the path of the facility's emissions, are the radio-nuclides or radioactive material found in coal. The exposure is not limited to the facility's hazardous emissions (*this radioactive material will also be found in the fly-ash and other waste products*).

These materials are converted into other forms of radio-nuclides by the high levels of heat from the firing process and the environment; they will take the form of particulates which can easily be carried by the winds, inhaled or ingested by the citizenry and taken up by the agricultural crops. AECI does not speak to the question of the adverse impact of these hazardous materials on the population; the federal government (DOE and EPA) does not speak to this question (referencing coal-fired utilities)..., but one department of the federal government has a long history with the effects of exposure to these hazardous materials in all its forms... the Department of Veterans Affairs (VA).

The VA's history has established a "presumptive" 15 list of diseases for exposures to radioactive materials 16

(A) Leukemia (other than chronic lymphocytic leukemia)
(B) Cancer of the thyroid
(C) Cancer of the breast
(D) Cancer of the pharynx
(E) Cancer of the esophagus
(F) Cancer of the stomach
(G) Cancer of the small intestine
(H) Cancer of the pancreas
(I) Multiple myeloma
(J) Lymphomas (except Hodgkin's disease)
(K) Cancer of the bile ducts
(L) Cancer of the gall bladder
(M) Primary liver cancer (except if cirrhosis or hepatitis B is indicated)
(N) Cancer of the salivary gland
(O) Cancer of the urinary tract
(P) Bronchiolo-alveolar carcinoma

Footnote 15 The term "presumptive" under VA law refers to an unquestioned cause. The list of diseases refer to those which can be expected for certain exposures; and if the disease is present... no question exists concerning its cause.

Footnote 16 Title 38 U.S. Code, Section 1112(c)(2)

Added by 38 CFR 3.309 (2004 Edition)

(Q) Cancer of the bone
(R) Cancer of the brain
(S) Cancer of the lung
(T) Cancer of the ovary

Note: For the purpose of this section, the term "urinary tract" means the kidneys, renal pelves, ureters, urinary bladder and urethra.

This is by no means an exhaustive list of diseases... it is the list of diseases which are presumed caused by the exposure... not requiring other medical or scientific proof in the VA Claims Process. This list was complied over the VA's many years of involvement (commencing Post World War II), including input from various scientific and medical authorities. (*See, Public Law 98-542*)

Further..., there is no limiting time frame from exposure to the onset of the related disease... in some cases within hours, days, months or a year or two...; in others... up to thirty years or more before the diagnosable onset of the disease...; and in the rare case... because of radio-nuclide's mutagenic properties, the disease may skip a generation before manifesting itself. The appearance of the related disease is based upon the amount of exposure, the time over which the exposure occurred and the general health of the person exposed.

Taking into consideration the Congressional Statement of Findings (*See, Section 5.3 above*) we will address a portion of Public Law enacting the VA statutory provisions, concerning "presumptive diseases" related to exposure to radioactive materials and their emissions (*X-ray, gamma ray, etc*). (*Title 38 U.S. Code, Section 1112(c)(1) et seq.*)

Congress was slow to act upon the needs of the exposed Veterans, but under longstanding and persistent pressure from Veterans' Organizations and a special group of Veterans (*known as the "Atomic Veterans"*) the law was enacted in 1984. 17 (*some 42 years after initial exposures by military personnel*) Included in this enactment was a means for removing the radioactive particulates from the body... (*known as "Chelation"* 18 *(which had been in use by the nuclear industry for some time)*). However, instead of mandating this process the Public Law required inquiry into the procedure as a probable means of therapy. To this date Chelation, and testing for the existence of radio-nuclides, are not available under the VA Medical System; yet exposures continue.

Footnote 17 See, Public Law 98-542, enacted Oct. 24, 1984

Footnote 18 Chelation therapy involves the use of chemical compounds (nowadays herbal compounds are available) are injected into the bloodstream, muscle or taken by mouth to bind metals that are present in toxic concentrations so they can be excreted (usually in urine) from the body.

Additional medical and scientific materials indicate that exposure is cumulative. 19 In other words... the initial dosage may not be considered dangerous... but this dosage builds up over time. The more time exposed... the greater the exposure. And... once these hazardous materials enter the body... they remain in the body... not removed by the body's process of expelling or attacking foreign material or organisms. The radioactive particles remain and build over the time of exposure and continue to radiate... thus the list of presumptive diseases.

We have included a review entitled: Coal Combustion: Nuclear Resource or Danger, by Alex Gabbard of Oak Ridge National Laboratory, for your review. (Attached as Exhibit "B") This review further supports our concerns about the hazardous nature of the radioactive materials emitted by coal fired power plants, its impact on the environment and the health of the public at large.

Alex Gabbard's extrapolation indicates population exposures of 490 person-rem/year for coal plants. (*citing NCRP Reports No. 92 and No. 95*) Past experience with Veteran exposures, with as little as 3 hour exposure - 10rem over 3 days, or a 90rem accumulation, resulted in manifestations of "presumptive diseases" 20 over a period of 26 to 42 years. The particular Veterans were not involved with onsite atmospheric detonations; some were members of decontamination crews (*ground crews*) for aircraft gathering data from a bomb-blast (*flying through the mushroom cloud*); and broken-arrow exercises (*B-52 carrying nuclear weapons, aircraft crashed and burned*) resulting in exposure to an irradiated environment and contaminated materials)) True the Veterans' daily exposures were significantly greater than the population downwind of a coal plant. However, the annual exposure of this population is more than 5 times greater than the subject Veterans'.

6.1 - Conclusion

6.2 - Generation Capacity: We find AECI will have sufficient capacity (*with the purchase of the Dell Project*) to meet its forecasted power requirements beyond 2015. If additional power becomes necessary for AECI's client base the additional power could be made available from expansion of the existing G&T facilities, existing interconnections with the TVA and other open market purchases (*i.e. recently authorized KCP&L 1200 MW Coal Fire Plant*). An expansion of existing G&T generating facilities would provide this power with significantly less capital outlay than building a new facility, with substantially less financial impact upon AECI Membership. Therefore, the AECI Report does not substantiate the need for an additional coal fired power plant in Norborne, Missouri.

Footnote 19 Nation Academy of Science and National Institute of Health
Footnote 20 Veterans were monitored for exposure by the U.S Air Force during their involvement.

6.3 - Inappropriate Actions: AECI actions, along with that of the Carroll County Commission, may be considered contrary to federal and state law; its agency with McFadden Land and Title for land purchases; its unauthorized access to proposed project site properties for survey and data collection; its failure to be forthcoming with our citizens concerning operational impacts and location of all facets of the proposed facility; have placed a cloud of impropriety upon AECI operations and its corporate philosophy. If these actions are an example of what our citizens can expect from a prospective corporate neighbor... we do not want them located in or near our town or in the county. We can surely find another avenue of "economic development" which would greatly enhance our area without the impropriety and deceit; and, without the environmental impacts inherent with a coal-fired power plant.

6.4 - Farmland Preservation: As the prospective location is primarily agricultural we would surely benefit from related commercial and light industrial development in and around Norborne... yet... to continue our heritage of agribusiness we should prevent the development of heavy industry (coal burning in particular) in order to preserve the purity of our nations' food supply...; a vital consideration for the powers that be.

Our farmlands are disappearing at an alarming rate... giving way to urban sprawl and commercial development. At present agribusiness in this region has been able to maintain an increasing supply of produce, with development of new farming techniques and enhanced plant species; yet agribusiness will not be able to sustain this edge for any extended period with a continual decline in productive farmland. This is an important consideration when reviewing the development of any commerce or industry in the midst of farm country!!! and something we have not seen considered in this instance.

6.5 - Government Inaction: We find our government officials (*local, state and federal*) place greater emphases upon so-called "economic development" and "public purpose" than upon the environmental and health impacts such development will have upon our citizenry. It is high time the people and the environment came first... not the almighty dollar or political favoritism/expediency!!! It is also essential that our government assess the long-term financial impact upon national/state tax revenues for medical expenses related to prolonged exposure to these contaminants. This will surely be visited upon the Medicare/Medicaid healthcare system as the population ages and exposures increase. Least we forget... the governments involved with the approval process of a coal-fired plant will most probably be visited in the future by mammoth settlement costs, which would be related to legal claims based upon their prior authorizations of undisclosed and unregulated carcinogenic and mutagenic materials released into our environment that "pose a present or potential threat to human health."

Our government officials have had ample opportunity to review and consider the long-term environmental/health effects of a coal fired power plant. Enough scientific and medical information is available to persuade the average person of the long-term ill effects of this type of operation; and..., all such requests for additional facilities should be denied.

6.6 - Viable Alternatives: Alternatives are now available... needing only an incentive from our government to become commonplace. Such is the fuel cell concept... where in fact, this concept would not only eliminate pollutants... it would enhance agribusiness!!! The fuel cell concept has already been tested and is in use in various parts of this country. Recent advances in fuel cell technology will bring the use of ethanol as a source of fuel... and coupled with an ethanol production plant the heat generated by the fuel cell could be used for plant operation (instead of electrical cogeneration), thereby significantly reducing emissions of the ethanol plant by reducing its reliance on fossil fuels. This process is something the Concerned Citizens of Carroll County would fully support. In fact... we would entertain becoming the forerunner in initiating this type of electrical power production (as an alternative to the AECI Project) in concert with regional farmers and the university... as a demonstration project.

We respectfully request your offices fully consider the contents of this public response and take our later offer of a demonstration project under advisement.

Respectfully submitted by,

Gerhardt List & Manuel Machado, Jr.
Advisory Committee
Concerned Citizens of Carroll County

EXHIBIT A

Article from the Sept/Oct Issue of Shoe Me
Published by the Missouri Farm Bureau
Page 9

Carroll County landowners want light shed on power plant

Power plants are not intended to keep people in the dark, but a coal-fired plant proposed by Associated Electric Cooperative, Inc., (AECI) near Norborne, Mo., is doing just that. As the debate heats up on eminent domain reform, land owners around the small community want to know their rights.

Rob Korff is Carroll County Farm Bureau president. He says seven families will be displaced from their homes. "They look at this as a very small sacrificial amount," said Korff of AECI. More than 1400 acres have been purchased for the $1 billion plant, and more will be acquired. When complete, it will employ about 130 full time workers.

To help land owners become more aware of the eminent domain laws and their rights, the county Farm Bureau hosted a public meeting in [Carrollton] Aug, 25. Although Korff may lose the opportunity to continue renting farmland, he is not directly affected. Neither is former county Farm Bureau president Tom White, who farms a couple miles north of the site. Nonetheless, both are concerned.

"Our neighbors are our friends and we have a lot of friends in the process of losing their farms," said White.

White says people want to know the plans for the power plant and their rights as landowners. The Farm Bureau meeting addressed the larger issue of eminent domain, but two local scoping meetings to answer concerns about the power plant were held in late August by the federal Rural Utilities Service. Although land has already been purchased by AECI, the company has not hosted any public informational meetings.

"The big problem has been a lack of information and that can't be initiated by the landowner, it has to be initiated by Associated Electric. They know how to approach this to their advantage," said White.

People want the replacement value for their land so they can replace what they are losing, says White. He adds, landowners want to know if there is compensation if a rail or transmission line is placed in front of their home affecting their resale value. And, landowners want companies to be up-front about their development plans.

EXHIBIT B

Coal Combustion: Nuclear Resource or Danger

By Alex Gabbard

Alex Gabbard at the coal pile for ORNL's steam plant.

Over the past few decades, the American public has become increasingly wary of nuclear power because of concern about radiation releases from normal plant operations, plant accidents, and nuclear waste. Except for Chernobyl and other nuclear accidents, releases have been found to be almost undetectable in comparison with natural background radiation. Another concern has been the cost of producing electricity at nuclear plants. It has increased largely for two reasons: compliance with stringent government regulations that restrict releases of radioactive substances from nuclear facilities into the environment and construction delays as a result of public opposition.

Americans living near coal-fired power plants are exposed to higher radiation doses than those living near nuclear power plants that meet government regulations

Partly because of these concerns about radioactivity and the cost of containing it, the American public and electric utilities have preferred coal combustion as a power source. Today 52% of the capacity for generating electricity in the United States is fueled by coal, compared with 14.8% for nuclear energy. Although there are economic justifications for this preference, it is surprising for two reasons. First, coal combustion produces carbon dioxide and other greenhouse gases that are suspected to cause climatic warming, and it is a source of sulfur oxides and nitrogen oxides, which are harmful to human health and may be largely responsible for acid rain. Second,

although not as well known, releases from coal combustion contain naturally occurring radioactive materials--mainly, uranium and thorium.

Former ORNL researchers J. P. McBride, R. E. Moore, J. P. Witherspoon, and R. E. Blanco made this point in their article "Radiological Impact of Airborne Effluents of Coal and Nuclear Plants" in the December 8, 1978, issue of Science magazine. They concluded that Americans living near coal-fired power plants are exposed to higher radiation doses than those living near nuclear power plants that meet government regulations. This ironic situation remains true today and is addressed in this article.

The fact that coal-fired power plants throughout the world are the major sources of radioactive materials released to the environment has several implications. It suggests that coal combustion is more hazardous to health than nuclear power and that it adds to the background radiation burden even more than does nuclear power. It also suggests that if radiation emissions from coal plants were regulated, their capital and operating costs would increase, making coal-fired power less economically competitive.

Finally, radioactive elements released in coal ash and exhaust produced by coal combustion contain fissionable fuels and much larger quantities of fertile materials that can be bred into fuels by absorption of neutrons, including those generated in the air by bombardment of oxygen, nitrogen, and other nuclei with cosmic rays; such fissionable and fertile materials can be recovered from coal ash using known technologies. These nuclear materials have growing value to private concerns and governments that may want to market them for fueling nuclear power plants. However, they are also available to those interested in accumulating material for nuclear weapons. A solution to this potential problem may be to encourage electric utilities to process coal ash and use new trapping technologies on coal combustion exhaust to isolate and collect valuable metals, such as iron and aluminum, and available nuclear fuels.

Makeup of Coal and Ash

Coal is one of the most impure of fuels. Its impurities range from trace quantities of many metals, including uranium and thorium, to much larger quantities of aluminum and iron to still larger quantities of impurities such as sulfur. Products of coal combustion include the oxides of carbon, nitrogen, and sulfur; carcinogenic and mutagenic substances; and recoverable minerals of commercial value, including nuclear fuels naturally occurring in coal.

The amount of thorium contained in coal is about 2.5 times greater than the amount of uranium

Coal ash is composed primarily of oxides of silicon, aluminum, iron, calcium, magnesium, titanium, sodium, potassium, arsenic, mercury, and sulfur plus small quantities of uranium and thorium. Fly ash is primarily composed of non-combustible silicon compounds (glass) melted during combustion. Tiny glass spheres form the bulk of the fly ash.

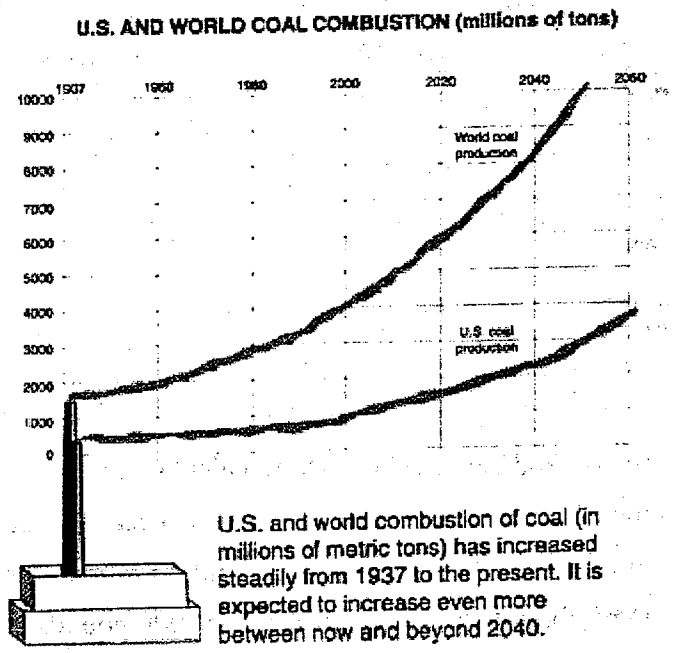
Since the 1960s particulate precipitators have been used by U.S. coal-fired power plants to retain significant amounts of fly ash rather than letting it escape to the atmosphere. When functioning properly, these precipitators are approximately 99.5% efficient. Utilities also collect furnace ash, cinders, and slag, which are kept in cinder piles or deposited in ash ponds on coal-plant sites along with the captured fly ash.

Trace quantities of uranium in coal range from less than 1 part per million (ppm) in some samples to around 10 ppm in others. Generally, the amount of thorium contained in coal is about 2.5 times greater than the amount of uranium. For a large number of coal samples, according to Environmental Protection Agency figures released in 1984, average values of uranium and thorium content have been determined to be 1.3 ppm and 3.2 ppm, respectively. Using these values along with reported consumption and projected consumption of coal by utilities provides a means of calculating the amounts of potentially recoverable breedable and fissionable elements (see sidebar). The concentration of fissionable uranium-235 (the current fuel for nuclear power plants) has been established to be 0.71% of uranium content.

Uranium and Thorium in Coal and Coal Ash

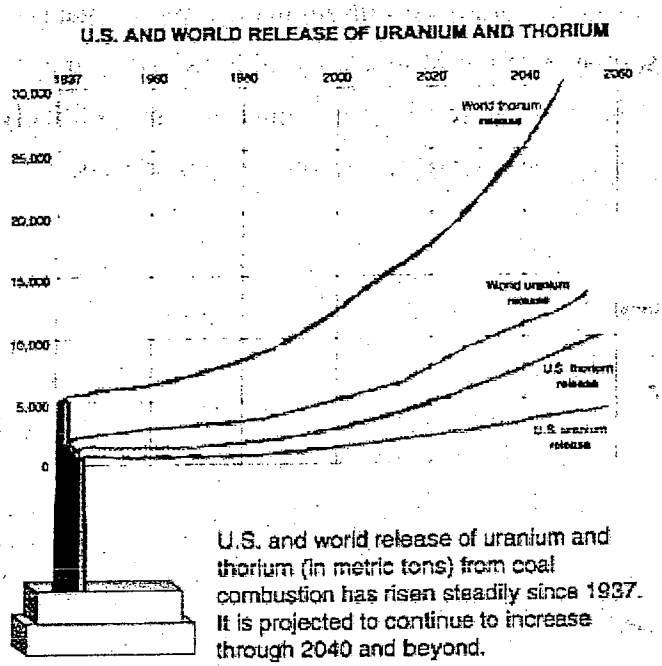
As population increases worldwide, coal combustion continues to be the dominant fuel source for electricity. Fossil fuels' share has decreased from 76.5% in 1970 to 66.3% in 1990, while nuclear energy's share in the worldwide electricity pie has climbed from 1.6% in 1970 to 17.4% in 1990. Although U.S. population growth is slower than worldwide growth, per capita consumption of energy in this country is among the world's highest. To meet the growing demand for electricity, the U.S. utility industry has continually expanded generating capacity. Thirty years ago, nuclear power appeared to be a viable replacement for fossil power, but today it represents less than 15% of U.S. generating capacity. However, as a result of low public support during recent decades and a reduction in the rate of expected power demand, no increase in

nuclear power generation is expected in the foreseeable future. As current nuclear power plants age, many plants may be retired during the first quarter of the 21st century, although some may have their operation extended through license renewal. As a result, many nuclear plants are likely to be replaced with coal-fired plants unless it is considered feasible to replace them with fuel sources such as natural gas and solar energy.



U.S. and world combustion of coal (in millions of metric tons) has increased steadily from 1937 to the present. It is expected to increase even more between now and beyond 2040.

As the world's population increases, the demands for all resources, particularly fuel for electricity, is expected to increase. To meet the demand for electric power, the world population is expected to rely increasingly on combustion of fossil fuels, primarily coal. The world has about 1500 years of known coal resources at the current use rate. The graph above shows the growth in U.S. and world coal combustion for the 50 years preceding 1988, along with projections beyond the year 2040. Using the concentration of uranium and thorium indicated above, the graph below illustrates the historical release quantities of these elements and the releases that can be expected during the first half of the next century, given the predicted growth trends. Using these data, both U.S. and worldwide fissionable uranium-235 and fertile nuclear material releases from coal combustion can be calculated.



U.S. and world release of uranium and thorium (in metric tons) from coal combustion has risen steadily since 1937. It is projected to continue to increase through 2040 and beyond.

Because existing coal-fired power plants vary in size and electrical output, to calculate the annual coal consumption of these facilities, assume that the typical plant has an electrical output of 1000 megawatts. Existing coal-fired plants of this capacity annually burn about 4 million tons of coal each year. Further, considering that in 1982 about 616 million short tons (2000 pounds per ton) of coal was burned in the United States (from 833 million short tons mined, or 74%), the number of typical coal-fired plants necessary to consume this quantity of coal is 154.

Using these data, the releases of radioactive materials per typical plant can be calculated for any year. For the year 1982, assuming coal contains uranium and thorium concentrations of 1.3 ppm and 3.2 ppm, respectively, each typical plant released 5.2 tons of uranium (containing 74 pounds of uranium-235) and 12.8 tons of thorium that year. Total U.S. releases in 1982 (from 154 typical plants) amounted to 801 tons of uranium (containing 11,371 pounds of uranium-235) and 1971 tons of thorium. These figures account for only 74% of releases from combustion of coal from all sources. Releases in 1982 from worldwide combustion of 2800 million tons of coal totaled 3640 tons of uranium (containing 51,700 pounds of uranium-235) and 8960 tons of thorium.

Based on the predicted combustion of 2516 million tons of coal in the United States and 12,580 million tons worldwide during the year 2040, cumulative releases for the 100 years of coal combustion following 1937 are predicted to be:

U.S. release (from combustion of 111,716 million tons):
Uranium: 145,230 tons (containing 1031 tons of uranium-235)

Thorium: 357,491 tons

Worldwide release (from combustion of 637,409 million tons):

Uranium: 828,632 tons (containing 5883 tons of uranium-235)

Thorium: 2,039,709 tons

Radioactivity from Coal Combustion

The main sources of radiation released from coal combustion include not only uranium and thorium but also daughter products produced by the decay of these isotopes, such as radium, radon, polonium, bismuth, and lead. Although not a decay product, naturally occurring radioactive potassium-40 is also a significant contributor.

The population effective dose equivalent from coal plants is 100 times that from nuclear plants

According to the National Council on Radiation Protection and Measurements (NCRP), the average radioactivity per short ton of coal is 17,100 millicuries/4,000,000 tons, or 0.00427 millicuries/ton. This figure can be used to calculate the average expected radioactivity release from coal combustion. For 1982 the total release of radioactivity from 154 typical coal plants in the United States was, therefore, 2,630,230 millicuries.

Thus, by combining U.S. coal combustion from 1937 (440 million tons) through 1987 (661 million tons) with an estimated total in the year 2040 (2516 million tons), the total expected U.S. radioactivity release to the environment by 2040 can be determined. That total comes from the expected combustion of 111,716 million tons of coal with the release of 477,027,320 millicuries in the United States. Global releases of radioactivity from the predicted combustion of 637,409 million tons of coal would be 2,721,736,430 millicuries.

For comparison, according to NCRP Reports No. 92 and No. 95, population exposure from operation of 1000-MWe nuclear and coal-fired power plants amounts to 490 person-rem/year for coal plants and 4.8 person-rem/year for nuclear plants. Thus, the population effective dose equivalent from coal plants is 100 times that from nuclear plants. For the complete nuclear fuel

cycle, from mining to reactor operation to waste disposal, the radiation dose is cited as 136 person-rem/year; the equivalent dose for coal use, from mining to power plant operation to waste disposal, is not listed in this report and is probably unknown.

During combustion, the volume of coal is reduced by over 85%, which increases the concentration of the metals originally in the coal. Although significant quantities of ash are retained by precipitators, heavy metals such as uranium tend to concentrate on the tiny glass spheres that make up the bulk of fly ash. This uranium is released to the atmosphere with the escaping fly ash, at about 1.0% of the original amount, according to NCRP data. The retained ash is enriched in uranium several times over the original uranium concentration in the coal because the uranium, and thorium, content is not decreased as the volume of coal is reduced.

All studies of potential health hazards associated with the release of radioactive elements from coal combustion conclude that the perturbation of natural background dose levels is almost negligible. However, because the half-lives of radioactive potassium-40, uranium, and thorium are practically infinite in terms of human lifetimes, the accumulation of these species in the biosphere is directly proportional to the length of time that a quantity of coal is burned.

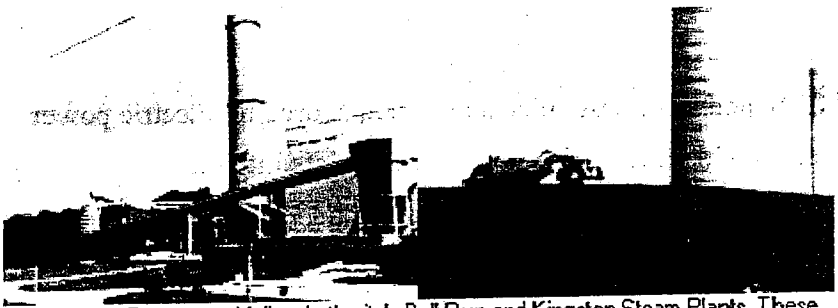
Although trace quantities of radioactive heavy metals are not nearly as likely to produce adverse health effects as the vast array of chemical by-products from coal combustion, the accumulated quantities of these isotopes over 150 or 250 years could pose a significant future ecological burden and potentially produce adverse health effects, especially if they are locally accumulated. Because coal is predicted to be the primary energy source for electric power production in the foreseeable future, the potential impact of long-term accumulation of by-products in the biosphere should be considered.

The energy content of nuclear fuel released in coal combustion is greater than that of the coal consumed

Energy Content: Coal vs Nuclear

An average value for the thermal energy of coal is approximately 6150 kilowatt-hours(kWh)/ton. Thus, the expected cumulative thermal energy release from U.S. coal combustion over this period totals about 6.87 x 10E14 kilowatt-hours. The thermal energy released in nuclear fission produces about 2 x 10E9 kWh/ton. Consequently, the thermal energy from fission of uranium-

235 released in coal combustion amounts to 2.1 x 10E12 kWh. If uranium-238 is bred to plutonium-239, using these data and assuming a "use factor" of 10%, the thermal energy from fission of this isotope alone constitutes about 2.9 x 10E14 kWh, or about half the anticipated energy of all the utility coal burned in this country through the year 2040. If the thorium-232 is bred to uranium-233 and fissioned with a similar "use factor", the thermal energy capacity of this isotope is approximately 7.2 x 10E14 kWh, or 105% of the thermal energy released from U.S. coal combustion for a century. Assuming 10% usage, the total of the thermal energy capacities from each of these three fissionable isotopes is about 10.1 x 10E14 kWh, 1.5 times more than the total from coal. World combustion of coal has the same ratio, similarly indicating that coal combustion wastes more energy than it produces.



Views of the Tennessee Valley Authority's Bull Run and Kingston Steam Plants. These coal-fired facilities generate electricity for Oak Ridge and the surrounding area.

Consequently, the energy content of nuclear fuel released in coal combustion is more than that of the coal consumed! Clearly, coal-fired power plants are not only generating electricity but are also releasing nuclear fuels whose commercial value for electricity production by nuclear power plants is over $7 trillion, more than the U.S. national debt. This figure is based on current nuclear utility fuel costs of 7 mils per kWh, which is about half the cost for coal. Consequently, significant quantities of nuclear materials are being treated as coal waste, which might become the cleanup nightmare of the future, and their value is hardly recognized at all.

How does the amount of nuclear material released by coal combustion compare to the amount consumed as fuel by the U.S. nuclear power industry? According to 1982 figures, 111 American nuclear plants consumed about 540 tons of nuclear fuel, generating almost 1.1 x 10E12 kWh of electricity. During the same year, about 801 tons of uranium alone were released from American coal-fired plants. Add 1971 tons of thorium, and the release of nuclear components from coal combustion far exceeds the entire U.S. consumption of nuclear fuels. The same conclusion applies for worldwide nuclear fuel and coal combustion.

Another unrecognized problem is the gradual production of plutonium-239 through the exposure of uranium-238 in coal waste to neutrons from the air. These neutrons are produced primarily by bombardment of oxygen and nitrogen nuclei in the atmosphere by cosmic rays and from spontaneous fission of natural isotopes in soil. Because plutonium-239 is reportedly toxic in minute quantities, this process, however slow, is potentially worrisome. The radiotoxicity of plutonium-239 is 3.4 x 10E11 times that of uranium-238. Consequently, for 801 tons of uranium released in 1982, only 2.2 milligrams of plutonium-239 bred by natural processes, if those processes exist, is necessary to double the radiotoxicity estimated to be released into the biosphere that year. Only 0.075 times that amount in plutonium-240 doubles the radiotoxicity. Natural processes to produce both plutonium-239 and plutonium-240 appear to exist.

Conclusions

For the 100 years following 1937, U.S. and world use of coal as a heat source for electric power generation will result in the distribution of a variety of radioactive elements into the environment. This prospect raises several questions about the risks and benefits of coal combustion, the leading source of electricity production.

First, the potential health effects of released naturally occurring radioactive elements are a long-term issue that has not been fully addressed. Even with improved efficiency in retaining stack emissions, the removal of coal from its shielding overburden in the earth and subsequent combustion releases large quantities of radioactive materials to the surface of the earth. The emissions by coal-fired power plants of greenhouse gases, a vast array of chemical by-products, and naturally occurring radioactive elements make coal much less desirable as an energy source than is generally accepted.

Second, coal ash is rich in minerals, including large quantities of aluminum and iron. These and other products of commercial value have not been exploited.

Third, large quantities of uranium and thorium and other radioactive species in coal ash are not being treated as radioactive waste. These products emit low-level radiation, but because of regulatory differences, coal-fired power plants are allowed to release quantities of radioactive material that would provoke enormous public outcry if such amounts were released from nuclear facilities. Nuclear waste products from coal combustion are allowed to be dispersed throughout the biosphere in an unregulated manner. Collected nuclear wastes that accumulate on electric

utility sites are not protected from weathering, thus exposing people to increasing quantities of radioactive isotopes through air and water movement and the food chain.

Fourth, by collecting the uranium residue from coal combustion, significant quantities of fissionable material can be accumulated. In a few year's time, the recovery of the uranium-235 released by coal combustion from a typical utility anywhere in the world could provide the equivalent of several World War II-type uranium-fueled weapons. Consequently, fissionable nuclear fuel is available to any country that either buys coal from outside sources or has its own reserves. The material is potentially employable as weapon fuel by any organization so inclined. Although technically complex, purification and enrichment technologies can provide high-purity, weapons-grade uranium-235. Fortunately, even though the technology is well known, the enrichment of uranium is an expensive and time-consuming process.

Because electric utilities are not high-profile facilities, collection and processing of coal ash for recovery of minerals, including uranium for weapons or reactor fuel, can proceed without attracting outside attention, concern, or intervention. Any country with coal-fired plants could collect combustion by-products and amass sufficient nuclear weapons material to build up a very powerful arsenal, if it has or develops the technology to do so. Of far greater potential are the much larger quantities of thorium-232 and uranium-238 from coal combustion that can be used to breed fissionable isotopes. Chemical separation and purification of uranium-233 from thorium and plutonium-239 from uranium require far less effort than enrichment of isotopes. Only small fractions of these fertile elements in coal combustion residue are needed for clandestine breeding of fissionable fuels and weapons material by those nations that have nuclear reactor technology and the inclination to carry out this difficult task.

Fifth, the fact that large quantities of uranium and thorium are released from coal-fired plants without restriction raises a paradoxical question. Considering that the U.S. nuclear power industry has been required to invest in expensive measures to greatly reduce releases of radioactivity from nuclear fuel and fission products to the environment, should coal-fired power plants be allowed to do so without constraints?

If increased regulation of nuclear power plants is demanded, then we can expect a significant redirection of national policy in regulation of radioactive emissions from coal combustion

This question has significant economic repercussions. Today nuclear power plants are not as economical to construct as coal-fired plants, largely because of the high cost of complying with regulations to restrict emissions of radioactivity. If coal-fired power plants were regulated in a similar manner, the added cost of handling nuclear waste from coal combustion would be significant and would, perhaps, make it difficult for coal-burning plants to compete economically with nuclear power.

Because of increasing public concern about nuclear power and radioactivity in the environment, reduction of releases of nuclear materials from all sources has become a national priority known as "as low as reasonably achievable" (ALARA). If increased regulation of nuclear power plants is demanded, can we expect a significant redirection of national policy so that radioactive emissions from coal combustion are also regulated?

Although adverse health effects from increased natural background radioactivity may seem unlikely for the near term, long-term accumulation of radioactive materials from continued worldwide combustion of coal could pose serious health hazards. Because coal combustion is projected to increase throughout the world during the next century, the increasing accumulation of coal combustion by-products, including radioactive components, should be discussed in the formulation of energy policy and plans for future energy use.

One potential solution is improved technology for trapping the exhaust (gaseous emissions up the stack) from coal combustion. If and when such technology is developed, electric utilities may then be able both to recover useful elements, such as nuclear fuels, iron, and aluminum, and to trap greenhouse gas emissions. Encouraging utilities to enter mineral markets that have been previously unavailable may or may not be desirable, but doing so appears to have the potential of expanding their economic base, thus offsetting some portion of their operating costs, which ultimately could reduce consumer costs for electricity.

Both the benefits and hazards of coal combustion are more far-reaching than are generally recognized. Technologies exist to remove, store, and generate energy from the radioactive isotopes released to the environment by coal combustion. When considering the nuclear consequences of coal combustion, policymakers should look at the data and recognize that the amount of uranium-235 alone dispersed by coal combustion is the equivalent of dozens of nuclear reactor fuel loadings. They should also recognize that the nuclear fuel potential of the fertile isotopes of thorium-232 and uranium-238, which can be converted in reactors to

fissionable elements by breeding, yields a virtually unlimited source of nuclear energy that is frequently overlooked as a natural resource.

The amount of uranium-235 alone dispersed by coal combustion is the equivalent of dozens of nuclear reactor fuel loadings

In short, naturally occurring radioactive species released by coal combustion are accumulating in the environment along with minerals such as mercury, arsenic, silicon, calcium, chlorine, and lead, sodium, as well as metals such as aluminum, iron, lead, magnesium, titanium, boron, chromium, and others that are continually dispersed in millions of tons of coal combustion by-products. The potential benefits and threats of these released materials will someday be of such significance that they should not now be ignored.--*Alex Gabbard of the Metals and Ceramics Division*

References and Suggested Reading

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C. B. A. McCusker, "Extensive Air Shower Studies in Australia," *Proceedings of International Conference on Cosmic Rays, Volume 4: Extensive Air Showers,* Jaipur, December 1963.

T. L. Thoem, et al., *Coal Fired Power Plant Trace Element Study, Volume 1: A Three Station Comparison, Radian Corp. for USEPA,* Sept. 1975.

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USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

See Notes

Optional: Name: Bill Carter

Address: Norborne, Mo 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Sept 19- 2005

Stephanie A Strength
U.S.D.A. Utilities Service
Washington D.C.

Ms Strength

Thank you for coming to Norborne & lending a ear, however there ~~are~~ are many things that we look at that does not really show such as land where this plant is to be constructed middle of no where maybe. however it is not replaceable you can go no where to replace it so God made only so much. another item when a person goes to purchase Rand it question 1. how much water do you have in your well next thing they think about is roads & transportation to town, also you have to think about excess water run off. all of the ~~ooo~~ above are important, however the greatest thing is the air we take in with each breath, this area has that this is one of the reasons this area was selected in 1982. for a power plant.

The things mentioned above have been discussed at the Norborne meeting to a point, nothing in length is associated is trying to cover things to their liking. They could not give a solid answer of what they were to do about water, the roads will be hazardes a times of harvest & Planting The combines go on these roads with 25'-30 foot head that take up the whole road when they move from field to field

is long and if a car hits that tractor or combine you are at falt, he has the right away, they harvest (Haul) with semi tractor trailer that ar 70 foot long
There are times that that site could not be reached in any direction due to flood water. in 1993. this area was surronded by water if you wanted out you went a long way out, I have experience this three times in my liftime, even though the site my be built up it will be impossible to get to it.
You have spent your time for A.E.C.I. to come for them, now we would like for you to first hand (see) what we are talking about, You can read all you want however some time the eye has a different veiw of things.
I know A E C I has done things below the table such as not meeting properly with county officials, not purchasing land in a fair manner & trying to hide everything that comes before them, as I feel they think they can buy their way in anything, & if I were looking them I would really be skeptical of their doings.
I think it is only fair you give us time as you give A.E.C.I in your decision, we are working with some people that has a lot of hard knock knowledge
The wells should be tested by some company that represents the landowners, should be done at different times of the year especially summer

I feel there are more power plants in Mo for the population, & they are located in farmland instead of lake areas.

The size of this plant 660M. is a lot of power it is a very profitable project to construct.

If you are interested enough to learn more before your decision lift your phone to 660-484-3156.

Thank you for the opportunity to visit a Norbore with you.

Sincerely
Bill Castes

Strength, Stephanie - Washington, DC

From: Andy Melichar [melicharphoto@gmail.com]
Sent: Monday, September 26, 2005 1:37 PM
To: Strength, Stephanie - Washington, DC
Subject: Fwd: Power Plant in Big Lake, MO

Dear Stephanie,

My name is Andy Melichar, and am a frequent visitor to the Village of Big Lake, Missouri. I recently became aware of plans to build a power plant in the area, and I am writing to inform you of my staunch opposition to the proposal.

I just recently started visiting Big Lake, and have completely fallen in love with the community and the atmosphere of big lake. Several of my friends and colleagues own cabins on the lake that we all use as weekend getaways. The lake is a community of people who take pride in the quiet, laid back, comfortable and friendly atmoshpere of Big Lake. The air is clear, and there is an abundance of wildlife in the area. Every time I visit, I am more and more in love with it.

I am saddened and appalled at the idea of a power plant near Big Lake. There is no need for it. There is no reason to put it there, other than for the benefit of a company that has no ties to Big Lake other than the potential property it would like to occupy. There is no benefit to the area, in jobs or commerce, that would come out of the power plant. The only thing we would get would be a big, loud, bright, smelly building that would be an eyesore and a detriment to the environment. When I am in Big Lake, I get to enjoy the sounds of fish jumping, birds chirping, frogs croaking, and bugs buzzing. With a powerplant these would all be gone. It would take Big Lake from a peaceful, friendly lake community and turn it into an environmentally dead area. The livelihood of the community would be gone. We go to Big Lake to escape the industrial buildings and environment.

I would like to get involved in proposing this power plant. I request that you inform me of anything I can do to prevent this powerplant from becoming a reality.

Sincerely,

Andy Melichar
Frequent Visitor to Big Lake
402-706-3191
andy@melicharphoto.com

Strength, Stephanie - Washington, DC

From: MJ McBride [mj@rebel2studios.com]
Sent: Monday, September 26, 2005 1:14 PM
To: Strength, Stephanie - Washington, DC
Subject: Big Lake Power Plant Opposition

Dear Stephanie,

My name is MJ. I'm a lover of Big Lake at the Village of Big Lake, MO. My family and I are strongly opposing the approval of a coal power plant near our property for many reasons. These are my top six.

1. First, the location is shockingly close to our lake community and farming families.
2. Second, we are fortunate to have two Wild Life Refuges within a few miles of our lake and the plant site. The noise and the pollution will drive away the birds and other wildlife.
3. Third, our fish would be contaminated by the emissions from the power plant and cease being a resource for the birds.
4. Fourth, our Wetlands will be drained by the water pulled to operate the plant.
5. Fifth, the power plant represents no benefit to the community of Big Lake. No power, no jobs, no commerce.
6. Six, we have a beautiful State Park that will be overshadowed by the sound, the lights, the pollution, the truck traffic and the sadness that this plant would bring.

Because our community is small, it seems like we are suddenly up against a Goliath. Please note that we are deeply offended and horrified by the possibility of this plant.

Big Lake has always been a serene haven for families and wild life. A power plant would disrupt, then devastate our community.

Stephanie, my only question is to ask you or the committee, "how can you help us stop this?" "How can we participate and be heard in the process?"

Sincerely,

MJ McBride
Red Cabin Lakeshore Drive
Big Lake, MO
402.312.0520
mj@mjmcbride.com

Strength, Stephanie - Washington, DC

From: -sarah p.- [littlefish82@hotmail.com]
Sent: Monday, September 26, 2005 1:13 PM
To: Strength, Stephanie - Washington, DC
Subject: NW Missouri power plant

Dear Ms. Strength:

I am writing to express my deep concern - outrage - at the prospect of a coal-fired power plant in NW Missouri. Missourians do not want a coal-fired power plant near our children and/or near our treasured Squaw Creek National Wildlife Reserve. Therefore, I expect you, as a public servant, to consider the following information and respond to my concerns with solid, verifiable data.

My concerns/questions are as follows:

Thousands of gallons of water use per minute from wells beneath the Missouri River, possibly drawing down the water table, can be expected, or even considered obvious in view of the fact that the proposed plant locations are near the Big Mo.

The issue of toxic wastes, including aresenic, mercury and lead, and where a landfill for such wastes will be located is a big question. If the landfill is located on the flood plain, the strong possibility of toxins leeching into the ground water is of major concern.

We know that coal burning power plants generate acid rain chemicals, emit air-borne mercury, exacerbate smog and contribute to global climate change. These conditions are linked to asthma, lung disease, developmental delays and birth defects.

As you know, coal burning power plants are the largest source of mercury air emissions, which are not currently regulated (such pending regulations are of little comfort, considering that "pending" offers no assurance that regulations will be put in place or how dependable such vague regulations would be). The entire stretch of the Missouri River within Missouri's borders, is on the EPA's water quality 303(d) list for mercury contamination. Effects on children exposed during pregnancy include learning disabilities, attention deficits and motor delays. 630,000 infants are at risk each year.

Coal-burning power plants are the primary contributor to ozone smog, which can irritate the respiratory system, aggravate asthma, reduce lung capacity and increase susceptibility to respiratory illnesses.

Coal-burning power plants are major contributors to particulate matter, associated with asthma, lung disease, heart disease and even premature death.

Citizens of NW Missouri treasure the natural beauty of the area.

The possibility of miles of unsightly power lines and related transmission stations is of serious concern. Landowners are unlikely to agree to forteiting their property rights in favor of such unsightly power equipment.

The issues listed above - air contaminants, water depletion and pollution, threats to our childrens' health, property rights - present questions that must be addressed. In the future these threats can be avoided by lowering energy consumption through energy efficiency, combined with research and development of clean renewable energy sources. For example, through the EPA's Energy Star Program American's saved enough energy to power 20 million homes; avoided greenhouse gas emissions equivalent to those from 18 million cars; and saved $9 billion on energy bills. This is but one example of Energy Efficiency programs currently in use that can lower energy consumption while at the same time protecting the global environment and our children's health. I strongly urge the USDA to reject proposed coal-fired power plants in favor of Energy Efficiency pograms and clean renewable sources of energy.

Sincerely,

Mrs. Sarah Podrasky

2105 N. 34th Terrace, St. Joseph, MO 64506

Strength, Stephanie - Washington, DC

From: Don Sullwold [sullwold@1internet.us]
Sent: Monday, September 26, 2005 12:29 PM
To: Strength, Stephanie - Washington, DC
Subject: Coal-Fired power plant in NW Missouri

Dear Stephanie,

I am writing in protest to the coal-fired power plant in NW Missouri. We need a better plan...one that would protect our wildlife, especially at Squaw Creek, and the thousands of tourist that visit the refuge. Clean air and clean water are vital to all of us. Please look for an alternative to better serve our nation.

Sincerely,
Patty Sullwold

Strength, Stephanie - Washington, DC

From: The Halls [TheHalls@MightyMoMunchies.com]
Sent: Monday, September 26, 2005 12:15 PM
To: Strength, Stephanie - Washington, DC
Subject: Concerned resident from Holt County

Iam a resident of Holt County and I am concerned about the air and water quality of our county should the proposed coal fired power plant be built in our county. How much mercury, nitrogen oxide and particulate matter will the plant emit? Rosemary Hall

Strength, Stephanie - Washington, DC

From: The Halls [TheHalls@MightyMoMunchies.com]
Sent: Monday, September 26, 2005 12:07 PM
To: Strength, Stephanie - Washington, DC
Subject: over exposed with dangerous emissions

Stephanie,

Holt County Missouri is in a geographical area where 4 states meet. We have exposure from dangeros emissions from coal fired plants from Omaha, Kansas City St. Joseph Nebraska City. Why is Holt County being considered for a power plant when we are already over exposed to pollutants? Rosemary Hall

Strength, Stephanie - Washington, DC

From: The Halls [TheHalls@MightyMoMunchies.com]
Sent: Monday, September 26, 2005 11:56 AM
To: Strength, Stephanie - Washington, DC
Subject: Geographical area exposed to emissions from power plants

Stephanie,

Holt County Missouri is in a geographical area where dangerous emissions from coal fired power plants in Omaha, Nebraska City, Kansas City, St. Joseph are polluting our air and water. Why is Holt County being considered for housing a power plant when we are already over exposed?

Strength, Stephanie - Washington, DC

From: The Halls [TheHalls@MightyMoMunchies.com]
Sent: Monday, September 26, 2005 11:45 AM
To: Strength, Stephanie - Washington, DC
Subject: water supplies in Holt County

Stephanie

How will this proposed coal fired power plant affect our water supplies in Holt County?

Rosemary Hall

Strength, Stephanie - Washington, DC

From: Mary Sullwold [squirrel-nutkin@msn.com]
Sent: Monday, September 26, 2005 11:49 AM
To: Strength, Stephanie - Washington, DC

I agree with the following letter from Shirley Yurkonis, and hope you take into consideration the consequences of building this coal-fired power plant and reject the proposition to build it.

Thank you for your time,
Mary Sullwold
722 Francis St.
St. Joseph, MO 64501

Dear Ms. Strength:

I am writing to express my deep concern - outrage - at the prospect of a coal-fired power plant in NW Missouri. Missourians do not want a coal-fired power plant near our children and/or near our treasured Squaw Creek National Wildlife Reserve. Therefore, I expect you, as a public servant, to consider the following information and respond to my concerns with solid, verifiable data.

My concerns/questions are as follows:

Thousands of gallons of water use per minute from wells beneath the Missouri River, possibly drawing down the water table, can be expected, or even considered obvious in view of the fact that the proposed plant locations are near the Big Mo.

The issue of toxic wastes, including aresenic, mercury and lead, and where a landfill for such wastes will be located is a big question. If the landfill is located on the flood plain, the strong possibility of toxins leeching into the ground water is of major concern.

We know that coal burning power plants generate acid rain chemicals, emit air-borne mercury, exacerbate smog and contribute to global climate change. These conditions are linked to asthma, lung disease, developmental delays and birth defects.

As you know, coal burning power plants are the largest source of mercury air emissions, which are not currently regulated (such pending regulations are of little comfort, considering that "pending" offers no assurance that regulations will be put in place or how dependable such vague regulations would be). The entire stretch of the Missouri River within Missouri's borders, is on the EPA's water quality 303(d) list for mercury contamination. Effects on children exposed during pregnancy include learning disabilities, attention deficits and motor delays. 630,000 infants are at risk each year.

Coal-burning power plants are the primary contributor to ozone smog, which can irritate the respiratory system, aggravate asthma, reduce lung capacity and increase susceptibility to respiratory illnesses.

Coal-burning power plants are major contributors to particulate matter, associated with asthma, lung disease, heart disease and even premature death.

Citizens of NW Missouri treasure the natural beauty of the area. The possibility of miles of unsightly power lines and related transmission stations is of serious concern. Landowners are unlikely to agree to forteiting their property rights in favor of such unsightly power equipment.

The issues listed above - air contaminants, water depletion and pollution, threats to our childrens' health, property rights - present questions that must be addressed. In the future these threats can be avoided by lowering energy consumption through energy efficiency, combined with research and development of clean renewable energy sources. For example, through the EPA's Energy Star Program American's saved enough

energy to power 20 million homes; avoided greenhouse gas emissions equivalent to those from 18 million cars; and saved $9 billion on energy bills. This is but one example of Energy Efficiency programs currently in use that can lower energy consumption while at the same time protecting the global environment and our children's health. I strongly urge the USDA to reject proposed coal-fired power plants in favor of Energy Efficiency pograms and clean renewable sources of energy.

Sincerely,

Shirley A. Yurkonis
16278 State Rt. D
Savannah, MO 64485

Strength, Stephanie - Washington, DC

From: The Halls [TheHalls@MightyMoMunchies.com]
Sent: Monday, September 26, 2005 11:40 AM
To: Strength, Stephanie - Washington, DC
Subject: coal fired power plant in Holt County Missouri

Stephanie,

With our air quality in Holt County already affected by Exide Battery plant, Golden Triangle Ethanol plant and the diesel fuel, chemicals and fertilizers used by farmers, why are we being considered for a coal fired power plant that would dirty our air and water even more? Our county needs to be cleaned up not exposed to any more pollutants. Rosemary Hall a Holt County resident.

Strength, Stephanie - Washington, DC

From: Ron Pederson [pederson@asde.net]
Sent: Monday, September 26, 2005 2:26 AM
To: Strength, Stephanie - Washington, DC
Subject: Holt Co Power Plant

1) Why is this plant referred to as "the Forbes site" in AECI's book?

2) Where, exactly, will the fill come from to raise the bottomland to build the plant?

3) Why is AECI allowed to use air quality data from St. Louis when KC is much closer and frequently out of ozone compliance? Why is the pollution in St. Joe and even from the battery plant in Canon Hollow and Golden Triangle (both in Holt Co), plus the diesel fumes added up in these stats?

4) Exactly what jobs will be available AFTER the plant is built? What are the job requirements and salaries of these SPECIFIC jobs? Why is AECI allowed to tell people that the average salary is $57,000 when, in truth, no one local is likely to qualify for such a salary?

5) What economic effect has building AECI's plant in New Madrid had on that town's economy--specifically, what businesses were there BEFORE the plant was proposed and what businesses are there now?

6) From where will the bulk of building materials come?

7) Why does Kansas law disallow mercury/pollutant containment in the floodplain?

8) What effect will building this plant in the heart of a recreational area have on the recreational economy? Why should we trade a clean economic base for a dirty one?

9) Who assigns the points to the system used for ranking in AECI's book? What aren't wildlife concerns given a higher priority?

10) What effect will the increased noise level have on wildlife?

11) What effect will the increased light level have on wildlife?

12) What effect will building this plant have on the future of tourism? How will it effect promoting our rare loess hills?

I have lived in Holt County for nine years. The only reason to stay here is the natural beauty of this place. I am very much against this power plant.

Cynthia Pederson

Strength, Stephanie - Washington, DC

From: Ron Pederson [pederson@asde.net]
Sent: Monday, September 26, 2005 12:33 AM
To: Strength, Stephanie - Washington, DC
Subject: Holt County Power Plant

Hello:

These questions I have in reference to the AECI Construction of a coal-based Electrical Generating Plant. I am a Family Nurse Practitioner who has resided in this county for nine years. Here are some of the many concerns I have about this project.

1. As a health professional I would like to know the impact of respiratory illnesses on the aging population of Holt County. Obviously I have seen an increase in respiratory illnesses in all age groups, particularly asthma now and I believe that there will be a significant increase with the power plant.

2. The water requirements of 5500 gallons/minute, will there be an impact on the wetlands in our area?

3. What are the ramifications of building a plant on a floodplain?

4. What are the impediments of the bird migrations (this is a major flyway corridor) through our area by the power lines and 600ft smokestack?

5. Why is Squaw Creek National Wildlife Refuge not considered a Class I area by the government?

6. What is the reason for using St Louis instead of Kansas City for the criteria for air pollution in our area? We do live between Kansas City, St Joseph, MO and Omaha,NE..

7. We are a farming community. What kind and how bad will there be economic damage to our crops?

8. What will be the economic impact on hunting and fishing and other recreational activities in our area?

9. Is the new Power Requirement study available?

10. What will be the economic impact on Big Lake State Park, Squaw Creek NWR, Jamerson McCormack Conservation Area, and Bob Brown Conservation Area?

11. What will be the economic impact on land values in Holt County?

12. What is the impact on the endangered species Pallid Sturgeon and the Missouri River?

13. Given all the power plants(nuclear and coal fired) north of us, how will this additional burden to the Missouri River--pollution, heated water, drain on water resources-- affect the river?

14. What will be the requirements and economic impact for our EMS and fire departments for disaster plans?

Thank you for your time.

Ronald Pederson, ARNP
Family Nurse Practitioner

Strength, Stephanie - Washington, DC

From: Rick Barnes [rickey@barnesrealty.com]
Sent: Sunday, September 25, 2005 9:10 PM
To: Strength, Stephanie - Washington, DC
Subject: FW: comments on power plant in Holt County, Missouri

-----Original Message-----
From: Rick Barnes [mailto:rickey@barnesrealty.com]
Sent: Friday, September 23, 2005 4:05 PM
To: stephanie.strength@wdc.usds.gov
Subject: comments on power plant in Holt County, Missouri

Dear Ms. Strength,

I am writing to express my full support of the plan to construct a coal-fired power plant south of the Village of Big Lake, in Holt County, Missouri.
As a full time, long-term resident of The Village of Big Lake (over thirty years), I do not believe that a modern, coal fired power plant would constitute a safety or environmental hazard. I have grand children and I do not fear that they would be damaged by such a power plant.
I believe that this plant would be a major economic benefit to the entire area by providing many long term, high paying jobs. These jobs would go a long way towards reversing the slow but steady decline of jobs and relative wages in this mostly agricultural community. Most of the local schools are suffering from fewer and fewer students each year, there are many empty houses in the general area, and the general population keeps going down as our children grow up and move to the larger cities in order to earn a decent wage. Therefore, the additional student populations would be very helpful in improving the efficiency of the schools since every school in the area has room for several more students. And finally, the county could obviously use the significant increase in the tax base, resulting extra revenues. These new revenues would increase funds available for public projects and would lower taxes for everyone else in the county.
I simply see no downside to such a plant.

Rick Barnes

My phone number is 660-572-0018 if you would need to call me for any reason.

Strength, Stephanie - Washington, DC

From: Charles & Shirley Yurkonis [csy@ccp.com]
Sent: Saturday, September 24, 2005 3:06 PM
To: Strength, Stephanie - Washington, DC
Subject: AECI Proposed coal-fired power plant in NW Missouri

Dear Ms. Strength:

I am writing to express my deep concern - outrage - at the prospect of a coal-fired power plant in NW Missouri. Missourians do not want a coal-fired power plant near our children and/or near our treasured Squaw Creek National Wildlife Reserve. Therefore, I expect you, as a public servant, to consider the following information and respond to my concerns with solid, verifiable data.

My concerns/questions are as follows:

Thousands of gallons of water use per minute from wells beneath the Missouri River, possibly drawing down the water table, can be expected, or even considered obvious in view of the fact that the proposed plant locations are near the Big Mo.

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Sincerely,

Shirley A. Yurkonis
16278 State Rt. D
Savannah, MO 64485

Forests precede civilizations, deserts follow.

Strength, Stephanie - Washington, DC

From: Caroline Wilson [caroline@rebel2studios.com]
Sent: Friday, September 23, 2005 4:07 PM
To: Strength, Stephanie - Washington, DC
Subject: Proposed 660 Megawatt Coal-Based Electrical Generating Plant ‹ Oregon MO.

Hi Stephanie,

I am writing my questions and concerns for the proposed power plant —660 Megawatt Coal-Based Electrical Generating Plant — Oregon MO.

Questions:

1. How many land acres will the plant occupy?
2. How much light pollution will the plant put out?
3. How much noise pollution will it generate?
4. Will the smell of sulfur permeate the surrounding wetland and residential lake property area? How bad will it smell?
5. What will be the immediate effects of the plant in regards to wildlife?
6. How will my lakefront home value be effected due to the fact that the plant will be less than 3 miles from my house?
7. What are the long-term effects of the plant in regards to wildlife?
8. Who will own the plant?
9. Is it true that tax payers will pay for the construction of the plant?
10. Is it true that none of the power generated by the plant will be used in the vicinity?

Concerns:

1. This plant will be DEVASTATING to the Big Lake area! It will be 1.5 miles from Big Lake, MO. It is way to close to where people live, work and play.
2. This plant will be located less than two miles from a residential area! Over 127 families live on Big Lake. The health crisis it will create puts all of the families at risk.
3. Big Lake is directly down-wind from the site. Particulates , smoke, and gas that will pass directly over and rain down on Big Lake, causing harm to residents and wildlife alike.
4. There is a State Park on Big Lake! Thousands of people visit the park each year.
5. Squaw Creek National Wildlife Refuge is VERY close to the site, within 5 miles. The refuge hosts over 500,00 migratory birds and animals each year! It is a major stop for seasonal flights. The transmission lines will kill many birds, as they will fly into them during times of low visibility.
6. The power plant site, being 1.5 miles from the Big Lake will tower over the area and ruin the serene environment many people enjoy. It will ruin the view.

I know that there are many more suitable locations that could be considered for this power plant; locations that would still be acceptable with respect to the power grid and the required resources, but

without the serious consequences of the current proposed site.

Please help stop this power plant from being located at Big Lake, Missouri.

Thank you.

Sincerely.

CAROLINE WILSON creative partner

REBEL2 STUDIOS "Be a REBEL... Get what you want!"
Studio 402.561.0520 | 1217 South 13th Street Omaha NE 68108 |
http://rebel2studios.com

Strength, Stephanie - Washington, DC

From: Susan White [dellbeck@hotmail.com]
Sent: Friday, September 23, 2005 2:47 PM
To: Strength, Stephanie - Washington, DC
Subject: Comments on Megawatt Coal Electrical Plant

Concerns for Our Top Resource:

The adverse effects on the six new family units with 13 young in the direct area. All the adults after years of planning and preparation and years spent physically building have returned to their home area to raise their young. Studies show concern that when these units are disturbed during nesting and raising the young often the male and female separate and/or the family unit is unable to function to produce secure young.

Concern for the established adults losing their security of home, livelihood and future heritage.

Concern of the devaluing of lifestyle and land around the plant, power lines and railroad tracks of its living on, working on and resale value.

Concern of land taken out of production and farmers needing to find surrounding farm land to make a living.

Concern of land over time and immediately being polluted. Pollution of ponds and streams with mercury and ash effecting fish and animals depending on those resources. Pollution of ground water, wells and underground streams and the effects on area human life and animals supported by wells.

Concern of air being polluted and number of children already having asthma in the area.

Concern for the depleting of the resource of ground water shared by area wells to support families and animals.

Susan White
10345 Hwy JJ
Norborne, Mo

Strength, Stephanie - Washington, DC

From: Joline Lindley [noltd@greenhills.net]
Sent: Friday, September 23, 2005 10:29 AM
To: Strength, Stephanie - Washington, DC
Subject: AECIs proposed power plant in Norborne, MO

Dear Ms. Strength,

I strongly oppose the power plant and here are the reasons why:

The actions of the representatives from AECI and our county commissioners and county clerk have been nothing but deceitful since the beginning. Originally, we had been contacted by Lonnie McFadden who had some "investors" looking to puchase property in Carroll County but he would not disclose who the investors were or what they wanted to do with the property. We told him our farm wasn't for sale. He contacted us again a few days later and said he wanted 320 acres of our farm but was still very vague on why our property was wanted. A few weeks later our son called AECI and asked them to please leave us alone because we were not in good health and the land was not for sale. One of their representatives (possibly Mike Miller) responded, **"We can take any land we want to."** I do not see how this company can take our farm by eminent domain when they are a private company. The man that cash rents and farms our property (Bentley Hogan) asked the AECI representatives during the Soybean festival whose property was involved because he was concerned if this plant would affect his farming operation. The reps told him that they were not interested in the Lindley property anymore. Approximately 3 weeks later, Lonnie McFadden and Mike Miller arrived at our home and told us they wanted all 480 acres of our property. When we asked Mike Miller if we would be served eminent domain papers, he responded, "Probably." Our commissioners and county clerk have denied our right to bring this issue to a vote and that is just wrong.This just goes to show how dishonest and deceitful these individuals have been with us and others in our community. It seems that there have been some card playing under the table here in Carroll County.

Our farm has been in the family for 125 years; my daughter's remains are on our farm and we have Choctaw Indian ancestry. This land was to be the legacy to our children, grandchildren and their children. Our farm is much more important that any amount of money. We are 71 and 72 years old and have guardianship our our complete invalid granddaughter. If we are forced to move who can guarantee that she will still get assistance from Tri-Connections and Central Missouri Regional (help services)?

This "proposed" power plant has already caused us enough pain and hardships and construction hasn't even been started. The electricity that this plant will produce will not even be used in this area. This plant should not be allowed until it is brought to a vote. Only then if the plant is approved by the citizens of this county should AECI give the property owners industrial value since that is what they will be using the property for.

These personal reasons are not the only reasons why I oppose this plant. Mercury emissions, water taken from the local aquifer (and in return making local wells run dry), and job availability are also concerns of mine. The pollution that this plant will create will only harm the future residents of this community. The damage to the area and county roads alone just during construction will be a major setback to the people living in the area. Who is going to fix the roads when they are all torn up? Jobs have not been guaranteed to the local population. Other towns where this same situation has occurred have become literally nothing (Clifton Hill, Missouri City among others). Norborne is a farming community and we want it to stay that way.

The only people that will truely benefit from this is AECI.

Sincerely,

Joline Lindley

Strength, Stephanie - Washington, DC

From: Amy Deitch [adeitch@communitybankmissouri.com]
Sent: Friday, September 23, 2005 10:10 AM
To: Strength, Stephanie - Washington, DC
Subject: August 25th Scoping Meeting - Norborne, MO

Dear Ms. Strength,

We would like to share our concerns about the proposed coal-based power plant in Carroll County.

1. Property value – Our newly constructed house (less than 2 years old) is sitting in a proposed railroad and transmission line corridor. We are very concerned that the value of our property will greatly decrease with a railroad or transmission line very close to our home and farmland.
2. Water supply – From the discussion at the public scoping meeting, we are aware that the water supply will be tested. However, this is still a concern. Individuals living in rural Carroll County do not have rural water.
3. Loss of Income – We, as many others in Carroll County, make our living off of the land. We are concerned with the amount of valuable farmland that may be sacrificed for transmission lines and railroad.
4. We are also concerned with the obvious issues – air, noise, water pollution and health consequences.

Thank you for your time.

Sincerely,

Jim and Amy Deitch
deitch@greenhills.net

Strength, Stephanie - Washington, DC

From: Redmond, Jim [Jim.Redmond@briarcliff.edu]
Sent: Tuesday, September 13, 2005 6:08 PM
To: Strength, Stephanie - Washington, DC
Cc: Doris.F.Miller@usps.gov
Subject: Siting of a coal burning power plant in Holt County Missouri

Great harm will come from siting a coal burning power plant next to the Missouri River in Holt County, Missouri.

The National Research Council in its study The Missouri River Ecosystem: Prospects for Recovery documents the decline of native fish species in the river. More than two thirds of such species are rare, threatened, or endangered; populations are not just decimated, but down to 10% or 15% of what they were midway in the 20th century.

They point out it is time to work on the recovery of this important river; instead this proposal stresses the ecosystem with another power plant.

The proposed coal-burning power plant will be built with old technology that will not remove mercury and other toxins from emissions. Women and their fetuses will be at greater risk because of mercury concentration in fish. Heat pollution will also take its toll on the river's biota.

Dr. Jim Redmond
Sierra Club Missouri River Taskforce
712-279-5544
jim.redmond@briarcliff.edu

SEP 19 2005

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Why is this being called the 'Forbes' plant when it is NO WHERE NEAR Forbes, Mo - Could it be you were intentionally trying to hide the fact it is at Big lake? Sure seems like a real possibility to us. Now we wonder if this is the begining of one deception after another.

Optional: Name: Concerned Propity Owner

Address: Big lake Mo

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Ralph A. Spurrier
21225 Smasal Rd
Sedalia, Missouri 65301

SEP 19 2005

September 14, 2005

I cannot support your effort to build electric power poles through our residential area. Bel-Aire Estates is a thirty five acre lake surrounded with twenty-five high dollar homes. Our utilities are buried.

Just South of our residential area is four Missouri Conservation Sites devote to the preservation of the endangered Missouri Prairie Chicken. I understand, that at this point and time, there are alternated routes that are being studied. I am confident that there would be a great deal of resistance should you approve a route that is in or near our area.

Ralph A. Spurrier
President of Be-Aire Estates

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Sedalia, Missouri/August 23, 2005

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Strength, Stephanie - Washington, DC

From: Jw Carr [tecamo_7@hotmail.com]
Sent: Tuesday, September 20, 2005 9:46 AM
To: Strength, Stephanie - Washington, DC
Subject: Comments to RUS- Holt County Power Plant (Forbes)

Importance: Low

I am writing in concerns to the enviromental impact on our Squaw Creek National Wildlife Refuge. This area provides habitat for a wide variety of wildlife species. The first and foremost the endagered Bald Eagle. They come here to feed on the ducks and geese who in turn feed of the fish and bottoms of the wetlands. It is my understanding that the Conservation Department has been saying to humans not to eat fish more than once a week because of the high mercury content found in the fish and bottoms of ponds and rivers. This particular form of wildlife cannot abide by these rules for survival. This area is in close proximity to the proposed site. How will the fallout and air quality affect all these animals that use the water and land as a main source of survival

We also have Bob Brown's Conservation Area which is also a wetland for a wide variety fo wildlife species. We are very fortunate to have these areas and a primary concern would be to keep them enviromentally safe to be enjoyed by future generations.

Big Lake State Park will also be in close proximity, approximately 1 mile from the proposed location. How will this affect camping and lake water,fishing and of course the view to people who are trying to get away from the noise and pollution and just want to see country at it's best.

We are mostly agricultural in this area growing mainly corn and soybeans. This in turn is used to make our food supply to feed the nation. Again what effect will the air pollutants and fallout even while being monitored from this plant going to have over a period of time on our grain that will be converted into food for humans and or animals? How many pounds of accumulated fallout can our enviroment, land, ponds, rivers and air take before it is considered unsafe?

Sincerely,
Simone Carr
Oregon, Mo. 64473

Strength, Stephanie - Washington, DC

From: Case, Mike [Mike.Case@agcocorp.com]
Sent: Wednesday, September 21, 2005 11:57 AM
To: Strength, Stephanie - Washington, DC
Subject: Concerns about Electric Plant near Norborne, MO

Stephanie,
This email is to express comments and questions to the USDA, concerning Associated Electric Cooperative, Inc. constructing a 660 Megawatt coal-based electrical generating plant near Norborne, MO. A scoping meeting was held on August 25, 2005.

Norborne, MO is my home area. In fact, my parent's, David and Sharon Case, own property that is adjacent to the proposed site for the power plant. They also own land that would be crossed by a proposed route for the power lines. Someday, this land will be mine. I believe that the construction of the plant and related structures pose a threat to the environment, the community, and to a way of life in general. With regards to that, I request that the USDA do investigations in the specific area of the proposed site, the Norborne, MO area, and Carroll County; and to provide information/reports to address the concerns and impacts of the following:

- Degradation of Wetlands
- Displacement of Wildlife.
- Depletion of the Water Table
- Particulate content of the air.
- Noise and air pollution from the plant and supply trains.
- Electromagnetic fields caused by high-power electric lines and their impacts.
- Environmental Impacts from power line towers
- Consumption of valuable farmland and the impact on the local agricultural economy.
- Devaluation of Property

Thank you for you attention to this matter. If you desire to reach me for any reason, my contact information is below.

Sincerely,
Michael D. Case
GTA Product Engineer
AGCO Corporation
Ph#: 620-327-5503
Fax: 620-327-6697
Email: mike.case@agcocorp.com

Home Address:
492 Creek Trail Ct.
Kechi, KS 67067
Ph#: 316-688-1664

Strength, Stephanie - Washington, DC

From: carol [carol@fringessalon.com]
Sent: Wednesday, September 21, 2005 6:40 PM
To: Strength, Stephanie - Washington, DC
Subject: Please Save Big Lake

Stephanie,

I am a resitdent at Big Lake and I am writing to inform you that I am strongly against a power plant coming to the area. I have 4 small grandchildren and do not want them exposed to the air that will be polluted around the area if a power plant is close by. I also am very concerned for the birds and animals that find refuge at our lake. I care very much for all life and I believe that this plant would not only kill the wild life but expose the whole area to less than adequate quality of life that I think we are all entitled to.

I am also concerned with the water supply being taken away from our lake to support this plant. Our source is the river and if the plant takes water from the river then I am afraid it will deplete what we need to keep our lake at adequate levels.

We do not need the power as we have a sufficient supply here and we do not need the pollution and we certainly don't need the eyesore by our beautiful refuge from our busy work week.

Please stop this plant from being built in our backyard!

Please do not "pave paradise to put up a power plant" !

Thank you for your help in this matter,
Carol Cole
Big Lake, MO

Strength, Stephanie - Washington, DC

From: Jw Carr [tecamo_7@hotmail.com]
Sent: Wednesday, September 21, 2005 9:12 PM
To: Strength, Stephanie - Washington, DC
Subject: Comments to RUS re: Holt County Power Plant (Forbes)Oregon, MO.Aug 22,05

My question on this matter is: Why are they rating air quality by the St. Louis, Mo. criteria (a nonattainment area) when we are approximately 240 miles North and West of there. We are in the far northwest corner of the state bordered by Kansas, Nebraska, Iowa. Our closest city would be St. Joseph, Missouri which is my understanding would probably be a nonattainment area if and when tested. Have they had this city tested for air quality and pollutants? We also have Kansas City to our south approximately 95 miles which has always been border line for air pollution and depending on when the last study was done and amount power plants that are there now may also be a nonattainment area. Then to our North by the same distance that Kansas City is we have Omaha, Nebraska which is in another state but air pollutants have no boundaries. How does this city rate in the air pollutant criteria? I think more testing needs to be done in our immediate area. I believe it's being overlooked because we are an agricultural area. We also have an Exide Battery Factory in Forest City, Mo approximately 11 miles from the proposed site which pollutes our air. There is an Ethenol plant in Craig, Mo approximately 17 miles. I believe our air quality needs to be addressed and tested first before we look at a town 240 miles away.

Sincerely
Simone Carr
Oregon, Mo. 64473

Strength, Stephanie - Washington, DC

From: Anita Rodenberg [anitamd44r@socket.net]
Sent: Thursday, September 22, 2005 12:39 AM
To: Strength, Stephanie - Washington, DC
Subject: Re: Norborne Power Plant

Ms. Strength

Please consider my e-mail as a disaproval of the intention of building a coal fired power plant in the Norborne, Missouri area. Not only because of the emissions that the plant will put out into the surrounding countryside that I am against but also I am in one of the proposed transmission corridors and of course I do not wish to live in sight of them. I also know that it will be just a matter of time before they will be adding units to this plant and then we will have even more emissions then what the original plant puts out. I do think that the plant does pose an all too real health risk to most of the citizens of Carroll County for many many years in the future.

Thank you,

Anita Rodenberg
Carrollton, Mo.

-35-

Strength, Stephanie - Washington, DC

From: Parker Family [parkfam@ccp.com]
Sent: Thursday, September 22, 2005 7:55 AM
To: Strength, Stephanie - Washington, DC
Subject: AECI Coal-Based Electrical Generating Plant

Ms. Strength,

As a resident of Holt County Missouri, farm owner and recreational user of Big Lake I have the following concerns about the proposed power plant site:

The proposed site near Big Lake is too close to the environmentally sensitive areas of Big Lake, Big Lake State Park, and Squaw Creek National Wildlife Refuge. In a recent poll in the St. Joseph News Press, Big Lake was named the third most popular recreation area behind Smithville Lake and Lake Ozark. Big Lake is the premier recreational site in Holt County consisting of over 400 privately owned recreation properties and the most popular state park north of Kansas City. The state park alone is host to approximately ------ campers, ------ motel and cabin guests and thousands of day users each year. Visitors to Big Lake State Park are seeking quality outdoor recreational experiences including camping, birdwatching, fishing, swimming, boating, and just enjoying the peaceful outdoors. It is estimated that approximately 2000 people converge at Big Lake each weekend during the summer months to enjoy the outdoors. Nearby Squaw Creek National Wildlife Refuge also draws thousands of visitors seeking to enjoy the outdoor recreation activities associated with that facility. Big Lake and the refuge are precious natural resources in close proximity that compliment each other and jointly create a major outdoor recreation complex serving hundreds of thousands of visitors annually. In addition to providing recreation both areas provide unique habitat to many species of plants and animals, including some that are rare or endangered. Big Lake State Park contains one of the last remaining natural Missouri River marshes. The refuge is host to hundreds of thousands of migrating waterfowl and birds each year and is located in the center of one major migratory bird corridors in North America. One of the more noteworthy birds, which concentrate in large numbers at the refuge and Big Lake, is the Bald Eagle.

I believe that if a power plant were to be built at the Big Lake location it would have a profound major negative impact on Big Lake, Big Lake State Park , and Squaw Creek National Wildlife Refuge. My specific concerns are as follows:

· Noise Pollution - The terrain in this area is flat with very few trees, permitting sounds to be transmitted easily over long distances, especially after dark. As an example, when the breeze is in the right direction, at Big Lake you can easily hear the noise from the interstate highway eight miles away. Noise created by a power plant and its accompanying heavy equipment would be clearly audible to lake users at all times. This would be especially annoying at night during the peak attendance summer months when the prevailing wind is from the south, which would help even more to carry noise from the plant to the lake area.
· Visual Intrusions - The view of the natural landscape in this area is considered to be beautiful and inspirational and is highly treasured by many visitors and residents. A power plant with a large smokestack and a web of transmission lines would be dominant and imposing figures clearly visible for miles in the flat terrain. A 622-foot. smokestack would be visible from any point at Big Lake State Park or Squaw Creek Refuge creating a major unsightly visual intrusion on the landscape.

· Light Pollution - The view of the night sky is one that is greatly admired, appreciated and enjoyed by the thousands of visitors to the area,

especially those camping "under the stars" at Big Lake State Park. The light glow created by the lighting at the plant and the continual flicker of lights on the smoke stack would become the dominant night sky feature in the area severely degrading the view of the night sky that is uniquely important to the recreational users of this area.

· Altering Area Hydrology - Big Lake is a shallow lake and the Big Lake Marsh as well as other area wetlands are shallow water areas. Historically in dry months when local farmers are running irrigation pivots, the water level in Big Lake drops significantly negatively impacting water recreation and fish and wildlife. Major fish- kills have occurred at Big Lake in recent years during such conditions. A power plant continually drawing large amounts of water from the aquifer near the lake could have major permanent negative impacts on the hydrology of the lake and the delicate ecosystems of area wetlands.

· Hazards to Wildlife - Transmission lines, wherever they are located are always hazardous to birds and it is well known that thousands of birds are killed each year in the United States in collisions with power lines. The proposed Big Lake site would create a hazardous maze of transmission lines across one of the major migratory bird flyways in North America. Squaw Creek National Refuge is a lure that funnels hundreds of thousands of migratory birds and eagles into this area each year. The proposed transmission line corridors would surround Squaw Creek Refuge on three sides creating a deadly gauntlet for the birds. Over time this would inflict needless high mortality losses to migratory birds and eagles in direct contrast to the purpose of the refuge which is to provide a safe resting area for the birds.

I am well aware of the increasing need for electrical power in this country and the consequent need to build more power plants. The proposed location near Big Lake however, would come with an unacceptably high environmental price tag. Big Lake State Park and Squaw Creek National Wildlife Refuge are unique priceless natural resources that have been developed and are supported at the cost of millions of tax dollars. The area surrounding them should be treated as a buffer zone to preserve and protect these resources for future generations. Developments such as the proposed power plant in such close proximity would no doubt damage and degrade these resources and the outdoor experiences of those who would want to enjoy them.

Sincerely,
Phyllis Parker
Mound City, Missouri

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Sedalia, Missouri/August 23, 2005

Please do not tear up my Papa's farm with your big power lines.

This is for the central Sweet Springs + Houstonia Area.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

(38)

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

Dear Ms Strength,

We own a cattle farm only 1/4 mile from the proposed site of this coal power plant. Our main concern is that the water supply in the aquafer will not be sufficient to meet the huge demand of the plant, and that our wells will run dry. If this happens, dozens of farmers around the plant will lose their livelihood - you cannot water 200

p.t.o. →

Optional: Name: Gary and Renate Albrecht

Address: 26106 CR 121, Norborne, Mo. 64668
E-Mail: albrecht@greenhills.net

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

heads of cattle with rural water, even if it were offered to us as a recompensation. The test wells that AECI promises to install would have to be tested at different times and dryness conditions of the year, for longer periods (not just for a day), and pump amounts of water that come as close as possible to the amounts the plant will actually need, in order to give a realistic picture.

We are also concerned about the landfills with toxic waste. Even if you cover them up nicely, what is underneath is still toxic and will poison the soil for many generations to come. What we don't understand in the first place is why this plant has to be built on prime farmland, and why it cannot be built in an area where the electricity is actually needed — this would save miles and miles of unnecessary power lines!

Also we are worried about the mercury and the radio-active materials that will be admitted into the environment. Carroll County already has an unusually high rate of cancer, and the people here do not need any additional risk factors in the air they breathe. There are several severely handicapped persons living in the immediate vicinity of the proposed plant, and the construction of the plant as well as the emissions from the plant may prove to be desastrous for their health.

Several of the families that will be forced from their farms by eminent domain have owned and worked their land for decades some even for more than a century. They are feeding America with the crops they grow and the cattle they raise, and they do not deserve to be forcefully driven away. Farmland is valuable and ought to be preserved — why can't such a plant be built on land that is not suitable for farming? We do have areas like that in Missouri, too!

Last, but not least, AECI must realise that on 10 to 15 days every year there will be no access to the plant from the East. Highways 10 and E flood on a regular basis after just a few days of constant rain and are impassable. The locals use little country roads about 10 or 12 miles north of Norborne, which will not be able to support major traffic.

We do hope that you will consider our concerns and examine all aspect very thoroughly before giving financial assistance to a technology that is a) completely outdated and b) downright dangerous.

Please read our letter!

Strength, Stephanie - Washington, DC

From: Gerhardt List [glist@greenhills.net]
Sent: Monday, September 12, 2005 1:28 PM
To: Strength, Stephanie - Washington, DC
Subject: Comments/Questions RE Scoping meeting

Dear Ms. Strength,

I've taken the liberty of emailing you my questions and comments concerning the proposed power plant in Norborne, MO. Hope this is OK...just too much to fit on your questionnaire page handed out at the referenced meeting.

It was good meeting you and again, my thanks for your efforts.

Sincerely,

Gerhardt List

Staphanie A. Strength
USDA, Rural Utilities Service
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570

Comments/Questions RE AECI
Rural Utilities Services

Water

1. Supply

AECI plans to acquire their needed water from the Missouri river aquifer. According to their statement, this will be 5,600 gal/minute* OR 8+ MGD. Wouldn't it be advisable to measure this aquifer first? Part of the EIS should involve certified hydrologists to actually determine the volume of water this aquifer contains. What is AECI's planned remedy if private wells go dry? There should be an added plan in writing describing this strategy?

*The DOE estimates water consumption for this size plant to be 9,100 gal/min or 13+MGD. Although we believe the Department of Energy to be a more reliable authority on this subject, for the purpose of these comments, AECI'S web site posting is used.

Another concern is sinkholes. Sinkholes form when the land surface is changed, such as when industrial and runoff-storage ponds are created. The substantial weight of the new material can trigger an underground collapse of supporting material, thus causing a sinkhole. It is AECI's intention to completely raze the range of hills north of the proposed site to build up the elevation to meet 500-year floodplain requirements.

The overburden sediments that cover buried cavities in the aquifer systems are delicately balanced by ground-water fluid pressure. The water below ground is actually helping to keep the surface soil in place. Ground-water pumping for urban water supply, for irrigation, and for a project of this magnitude can produce new sinkholes in sinkhole-prone areas. If pumping results in a lowering of ground-water levels, then underground structural failure, and thus, sinkholes, can occur.

Both the substantial weight of new material being added, combined with the extremely high volumes of water being removed from the subterranian aquifer AT THE SAME LOCATION is an accident waiting to happen!

The aquifer's water quality should also be determined. It is very "hard" water, i.e., high concentrations of calcium, magnesium, and iron. This may require AECI to pretreat the water to prevent scaling. Whether Reverse Osmosis, softeners, or other methods are used, the removed contaminants will be added to the total waste disposal equation. I certainly hope they don't plan to use chemical de-scalers as most of these products are phosphates, highly regulated by the EPA.

2. Environmental water quality

A "baseline" study of surrounding wells, ponds, lakes and rivers should be performed. This should include the chemicals normally produced by coal-fueled operations such as N, S, pH, Pb, Cd, Hg, U, Th, and by-products (daughters) of heated and/or decayed radioactive elements. (Tissue analyses of aquatic and terrestrial flora and fauna should be included.) It would be interesting to perform identical analyses on samples near AECI's existing Thomas Hill Power Plant, which has been operating for some time, for comparison. In addition to the above chemical constituents, water table or well levels should be measured in farms potentially affected by excessive water usage. AECI's proposed "test well/s" is a ludicrous method to determine anything but water quality...it certainly can't determine aquifer volume unless they are operated at 8 MGD for a long period of time.

Wastewater

1. Cooling water

It is AECI's intent to discharge spent cooling water to the MO River. They assume that it will automatically cool below 90 degrees F before the end of pipe. This may not be the case. In fact 90 degrees F is an arbitrary number and may not be acceptable for an NPDES permit. Thermal pollution is defined as heated water discharges with the potential to alter the growth and existence of aquatic organisms. During winter months, a 90-degree discharge will certainly alter the growth of aquatic organisms in the mixing zone. Furthermore, if, as mentioned above, chemicals are added to treat the cooling

water, then the effluent must first be treated to remove them before discharge. A discharge of 8+ MGD will require a LARGE treatment plant.

2. Treated water effluent

How many treatments systems will be subject to NPDES effluent guidelines? There should be one for the coal pre-washing operation, another for storm water run-off, one for scrubber waste, perhaps one for cooling tower discharge, and one for sanitary treatment. Who is going to monitor these effluents, and where will they be discharged? What provisions will be in place to prevent treatment plants' integrity, i.e. leaching into to ground water and/or flooding during our normal heavy rains? AECI has planned to raise the elevation of their power plant site to meet the 500-year floodplain height. This obviously, will not affect the overflow potential of treatment lagoons due to rain. Will these systems be covered? Will there be any barriers to contain runoff?

Note: Dilution is NOT an acceptable form of treatment, thus clean water such as cooling water cannot be mixed with other point sources to meet discharge limitations.

Solid Waste

Solid waste is simply the result of pollutants removed from gaseous or liquid matrices. Any substance removed from the combustion flue gas by the use of liquid and/or dry pollution control systems, electrostatic precipitators, catalytic converters, filtering systems, etc. will eventually concentrate ALL the removed pollutants into some form of solid waste. Furthermore, ALL toxic and hazardous inorganic substances in or produced by coal combustion will be present in ALL the resulting sources of these wastes.

AECI proposes it will "most likely" use selective catalytic reduction (SCR) for NOX reduction; lime spray flue gas desulfurization (FGD) for SOX reduction, (will the lime be pulverized on site or procured as a powder?); filter bags for particulate removal; and powdered activated carbon for mercury abatement. AECI goes on to state that the combustion residue, (ash and fly-ash) will be "land filled on site in a permitted landfill". Elements known to be present in coal such as lead, cadmium, thorium, uranium, and mercury will be

present in all the above sources. How can ash and fly-ash, containing hazardous materials, receive a permit to be buried on site? From whom? Their quislings; our commissioners? What about the spent activated carbon? Its sole purpose is to absorb mercury. How will that be handled?
We hope it's not added to the coal and re-burned!! Bear in mind that powdered activated carbon is indiscernible from powdered coal carbon, and AECI'S history for honesty is questionable. At any rate, it cannot be landfilled locally.

Who will determine when these control systems are "spent"? How will this be determined? (As an environmental analytical chemist, would I be allowed this task?)

Air

Coal-fired energy is, without a doubt, the dirtiest form of energy. There is so much extant information confirming this fact to everyone, except AECI and Carroll County Commissioners, that it serves no purpose in being redundant here.

Our questions again focus on the secrecy surrounding AECI's public releases. We asked for a diffusion map of the plant's emissions in early March of this year. AECI stated that it was not possible to produce one this early. This is false. EPA and other environmental companies have had mathematical models in use for over 30 years for just this purpose. Some of the more recent programs include:

- *U.S. Environmental Protection Agency's Models-3/CMAQ.*
- *U.S. EPA regulatory models ISCST3, ISC-Prime, AERMOD and AERMOD-Prime.*
- *U.S. EPA preferred CALPUFF for downwind distances up to 150-200 km.*

These models can predict the dispersion of SO_2, NO_x, VOCs, ozone, particulate matter, visibility, mercury and other criteria pollutants.

The parameters needed to map the probable effluent stream in the surrounding environment are: Stack height – AECI knew this in March; Emission velocity – AECI can use data from their other plants, also available in March; and meteorological conditions – they vary and are readily available from a number of sources.

AECI's every action thus far has been to confuse the public; test our legal regulations; and falsify their purpose. At an open town hall meeting on March 4th of this year sponsored by the Concerned Citizens of Carroll County, when asked why they were acting behind closed doors, AECI spokesman, Mike Miller, publicly stated, "Simple, we've had great success doing things this way." The reason they don't want a dispersion map available is to avoid alarming the rest of Carroll County. So far, most of the residents assume this is just Norborne's problem. With a few facts, they would soon find that the effects would go beyond Carroll County's borders.

In Conclusion

The construction of a coal-fired power plant in rural Carroll County farmland is:

1. Unnecessary – The energy need cannot be substantiated. This is a typical ploy by a non-profit organization to glean more profit. Litigation can be expensive.
2. Unwanted – Hard working families who, for generations, have contributed to the economy and world demand for their produce will have to relocate. This is not just unwanted, but immoral.
3. Unsafe – Its operation will cause irreversible health damage; contaminate the surrounding environment; deplete existing natural resources; and contribute to the overburdened global warming threat by spewing tons more of Carbon Dioxide into the atmosphere.

It would be unconscionable if even one person suffered health-wise for "big business" to make more money. Yet many will. And even though the EPA seems to have abdicated their mandate to protect the environment by overlooking a major source of pollution, coal fueled energy, that is no reason other governmental agencies, including the USDA, must follow suit. Will the entire nation require medical treatment for ingested toxins before our laws are enforced?

Environmental issues aside, AECI are proud of their well-earned reputation of double-dealing, secrecy, and intentional non-compliance with the law. Knowing this, should RUS associate with, much less support their endeavors? The answer is obvious.

We certainly appreciate your presence and your efforts at sponsoring the second "open" meeting to be held re this subject, and your request for comments is ABSOLUTELY a refreshing change!

Sincerely,

Gerhardt List
29462 CR 131
Norborne, MO 64668

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

From the meeting in Norborne, you may have thought that there is a great deal of opposition to having the power plant here. This is not the case. There are a few families who are opposed and their reasons appear to me to be ridiculous. A great majority of the people in this community are either in favor to the plant or are Neutral.

The plant will be a great asset to Norborne and To Carroll County

Optional: Name: Jim Dunham + Sandra Dunham

Address: 327 E. 4th Norborne, MO 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Sedalia, Missouri/August 23, 2005

I am writing to oppose the Associated Electric Cooperative running power lines through the Central Sweet Springs + Houstonia area. I am concerned for the health of my family regarding massive power lines. I also want the land in our family to be untouched by these destructive and unsightly power poles + lines. Please consider an alternate plan to go somewhere else.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Strength, Stephanie - Washington, DC

From: Karen and David [kdmatthis@austin.rr.com]
Sent: Saturday, September 17, 2005 1:55 PM
To: Strength, Stephanie - Washington, DC
Cc: Karen and David; Grace West; nsouthworth@aeci.org
Subject: AECI comments, Norborne, Missouri

Comments to SDA-RUS.doc (41 K.

Ms. Strength,
I have attached our comments/questions regarding the proposed AECI power plant near Norborne, Missouri. They are also included in the body of this email because I did not know which would be most convenient for you.

Thank you for taking the time to read our concerns. We would appreciate a response to our questions.

Sincerely,
Karen Saadeh
David Matthis

Comments/Questions to
U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)

Associated Electric Cooperative, Inc.
Proposed Construction of a 660 MW Coal-Based Electrical Generating Plant
Norborne, Missouri Meeting on August 25, 2005

We own property about 1 ½ miles east of the proposed sight. Our farm is a portion of a family farm (all still owned by descendants of the original settlers) settled with land grants in the 1860's. Our farms are in the proposed paths of both rail lines and transmission lines.

Our concerns include:

1) It does not appear that all alternatives have been adequately considered to reduce the need for yet another polluting power plant; such as: wind, solar, and water generation; incentives to reduce use; incentives to encourage solar generation by individuals and businesses - which can result in returning power to distribution facilities. There are many communities around the country which have had success with incentives to reduce use, incentives for individuals to install solar generation, and generating electrical power using wind, water, and solar energy..

2) Our farm includes an 80 year old farm house, which we are restoring, and an older notched and pegged barn. They were built by the son of the original settler. We are in the proposed path of transmission lines, which would harm the historic quality of our farm. Neighboring farms also include buildings dating to the nineteenth century, which are in the path of proposed transmission line and railroad corridors. Damage to historic sights cannot ever be undone.

3) The plant will use a huge amount of water daily.
How can we be sure our wells will not be depleted or contaminated because of AECI's excessive water use?
What will AECI do to assure their water use will not negatively affect our wells?

What will be done if area wells are negatively impacted? Will AECI provide clean water to our homes and farms?

4) How will 1000 construction workers affect the area in terms traffic, litter, stress on services, crime, etc?

5) The current plan is for construction traffic to come off Hwy 10 and go through the town of Norborne:
This will endanger children walking to school and playing
The roads are not built for the level of traffic and weight of the increase traffic (the AECI plan states that they don't plan to make roadway upgrades)
All the proposed traffic will cross the railroad tracks on Highway D. This crossing is already extremely worn and will not able to withstand the increased traffic
The congestion and traffic noise will be very disruptive to the town or Norborne.

6) There seems to be excessive concern about impacting hunting grounds in the area (a recreational activity) and no concern about disrupting farming/ranching activities (a primary source of income for much of the population in the area and an important part of the countries food supply line).

7) The sight is within the 100 year flood plain. AECI plans to raise the plant to protect it from flooding.
How will this impact neighboring farms if there is flooding? It seems that this could increase flooding around the raised area.
Will the ash disposal sight be protected from flood waters? If the disposal sight is flooded, the ash will contaminate crop land, pastures, wells, and yards where children play. Neighboring farms depend on wells for their drinking water and livestock.
What other contaminants might be in the flood waters? How will AECI protect the community from these contaminants?

8) Why is it OK to pullute air that is currently not very polluted?
What is the expected increase in respiratory diseases in the area?
How will this affect asthmatics living in the area?

9) Mercury pollution is not addressed at all. Coal-burning power plants are the largest source of mercury pollution in this country. Air borne mercury settles on soil and in waterways, contaminating soil, crops, animals feeding, and fish in area ponds and streams.
What steps will be taken to protect the community from mercury?
Will "Best Available Control Technology" be used? Best available at time of construction, not necessarily at time of original permitting?

10) How will the community be protected from light pollution? Light pollution can weaken human immune response, impact cattle health and growth, and potentially impair crop growth.

11) Noise pollution will be a major problem. The plant, trains, coal unloading, and traffic will all contribute to reducing the quality of life in the community.
How will AECI protect the community from noise?
Section 6.5.7 of the Alternatives Report says "…construction noise would generally only occur during day time hours." What does "…generally only…" mean? What are daytime hours? Day light hours could include morning and evening hours which interfere with the sleep schedules of children and the elderly.
Noisy construction and operation must be limited to business hours.

12) Why does AECI need more than 1 rail line? Additional rail lines damage farms; hurt the community through income reduction, noise, and air pollution; bi-sect farms making it more difficult, expensive, and dangerous for farmers to work; and waste resources.

13) How will waste ash be controlled to prevent it from becoming air borne,

or from seeping into ground water?

14) What will AECI do to ensure that the coal storage facility and coal moving operations do not release air- or water-borne pollutants, contaminating air, soil, and water?

15) How will wastewater be treated and disposed of? According to the Alternatives Report, wastewater could contain oil, human waste, coal dust, fly ash, mercury and other contaminants.
This wastewater must not be allowed to enter the community's ground water and pollute wells.

16) How will run-off be controlled during construction?

17) How will foul odors be prevented from escaping into the air?

18) What kind of on going inspections/permitting are required for the plant to continue operations?
How often will monitoring be done to assure the plant is complying with all regulations?
If the plant is built, how can the community stay informed about the plant's operations and express concerns about environmental and safety issues?

19) In the Plant Operations section of the Alternatives Report there is not a section devoted to Safety. There is mention of safety procedures for workers.
What safety measures will be required to protect the community?
Will there be on-going monitoring and precautions taken to ensure the safety of the community?

20) Ammonia stored on sight could be a danger to the community.
How can AECI guarantee that the ammonia will not be released into the environment?
Can we be guaranteed that anhydrous ammonia will not be used or stored on sight?

21) No mention was made of chlorine use. Chlorine gas poses extreme dangers to the community.
Can we be guaranteed that there will be no chlorine gas on the property?

22) When looking at environmental pollution, it should be kept in mind that farm families spend more time outdoors than non-farming families and therefore face greater exposure to environmental pollutants.

23) Will this plant be required to use Integrated Gasification Combined Cycle technology? This technology can strip out half of the coal's pollutants and about ninety-five percent of the mercury before combustion.

24) There is still uncertainty around the link between living near high-voltage power lines and adverse health risks. This community does not want to be part of this potentially risky experiment.

The bottom line is that we do not want a power plant in our farming community. It will stress the resources of the community, pollute our air and water and endanger our health, put families in the path of dangerous industrial accidents (fires, ammonia or other toxic chemical releases, explosions), possibly make our wells (our only water source) unusable, and create an eyesore in our beautiful community.

Thank you,
Karen Saadeh and David Matthis
3502 Arrowhead Dr.
Austin, Texas 78731

Owners of a family farm dating to the 1860's on CR 300, Norborne, MO

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.

Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

Optional: Name: Judith Goetting

Address: 206 E. 4th St. Norborne, Mo 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

My comments relate to the expected loss of at least 2000 acres of productive farm land and the adverse environmental and economic impacts if a 660 MW coal-fired power plant is built near Norborne, MO.

The Missouri Revised Statutes specifically advocate the protection of Missouri farmland under Chapter 262, Promotion of Agriculture and Horticulture. Some of the stated purposes of the Farmland Protection Act (Section 262.000) are: to protect agricultural, horticultural and forestry land; promote continued economic viability of agriculture, horticulture and forestry as a business; and promote quality of life in the agriculture community.

The authors and supporters of this Act and the related sections of this chapter realized how vulnerable our precious farmland is to encroaching urban sprawl and other non-agricultural uses of the land. They sought to remind all of us, including those who seek to misuse this non-renewable resource, of its importance—of its economic and esthetic value to this state.

Now comes an entity that wants to destroy this environment and replace it with a pollution-producing monster in the name of "Economic Development " which will deface the landscape, displace a number of families, damage the local economy (not only of farmers, but also those business dependent on farming), and affect other land and property values.

From an environmental standpoint, this area, which is subject to frequent seasonal heavy rains and flooding, will have more than just 2000 acres at risk. There may be times when runoff from coal piles, toxic landfills, and other waste sites cannot be controlled. What happens then to any affected areas? The lack of specific information from Associated Electric Cooperative, Inc., has not provided any reassurance that other local agriculture environments will not suffer.

Finally, consider the beauty of this land at any time of the year. That alone makes it worth protecting.

Sincerely yours,

Judith Goetting

Judith Goetting
206 East 4th St.
Norborne, MO 64668

Strength, Stephanie - Washington, DC

To: Nathan.White@fcsmo.com

Subject: RE: Site Selection Study and Macro Corridor Study Report, prepared by Associated Electric Cooperative

Nathan,

The advertisements for the project were published earlier than expected. The reports have not been finalized yet. As soon as they are available (by the end of this week) I will send you a link to the RUS site where they will be posted. Please let me know if you would prefer to receive the documents via another method and I will try to accomodate your request.

Sincerely,

Stephanie A. Strength
Environmental Protection Specialist/RD
1400 Independence Ave. SW Room # 224
Washington, DC 20250-1571

(202) 720-0468

-----Original Message-----
From: Nathan.White@fcsmo.com [mailto:Nathan.White@fcsmo.com]
Sent: Monday, August 01, 2005 2:48 PM
To: Strength, Stephanie - Washington, DC
Subject: Site Selection Study and Macro Corridor Study Report, prepared by Associated Electric Cooperative

Stephanie,
How is your day going? I was wondering if you would send me an electronic copy of the Coal Power Plant Site Selection Study and Macro Corridor Study Report, prepared by Associated Electric Cooperative of Springfield, Missouri. Let me know if this is possible.
Thanks for your help,
Nathan White

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

I feel it would be a great injustice to the property owners at Big Lake, Missouri, Rulo, Nebraska and the National Wildlife Refuge at Mound City, Missouri, if you would build a power plant near Big Lake, Missouri.
The property owners of Big Lake have struggled for many years to keep the water in the lake at an adequate depth for recreation and the vast amount of wildlife that visits the area.
I feel that a power plant and the transmission lines would deter wildlife from their natural flyway.
I will certainly appreciate your careful consideration and thoughts in deciding if this is truly the right place for a power plant.

Optional: Name: MARGIE H. GIBBS

Address: 323 Fairlane Drive
Big Lake, Missouri 64437

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

SEP - 8 2005

Stephanie Strength
USDA, Rural Utilities Service
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570

Re: Proposed 660 megawatt generating plant near Norborne, MO

Dear Ms Strength; 9/1/2005

My comments specifically address the proposed Mt. Hulda transmission corridor's east routing that generally follows "B" Highway south of Cole Camp, MO.

Please be aware of some serious concerns and obstacles presented to that particular routing. We own about 1600 acres along "B" hwy about 4 miles south of Cole Camp (general location; all of Sec. 19, Township 42, Range 20 + more & titled "Moss Family Trust"). As a conservationist, nature lover and outdoor enthusiast, I realize that any transmission corridor crossing my land would be extremely disruptive and destructive in many ways. Some items of immediate concern are:

- Disruption of a 36-acre lake and migratory bird flyway used by ducks, geese and white pelicans!
- Hazardous towers and cables to a grass airplane landing strip.
- Destruction of numerous historical civil war redoubts (fortifications) and trenches located there.
- Obstruct or inhibit our plans to build another, larger lake.
- Designated USAF A-10 low altitude, high-speed training and MOA (Military Operations Area).
- Detrimental effects of long-term exposure to EMR and EMI on wildlife and humans.

Your personal attention to this matter will be greatly appreciated. Please keep me updated and informed as to the status of this proposed corridor. Thank you.

Sincerely yours,

William G. Moss

William G. Moss
2101 South Kentucky
Sedalia, MO 65301
Phone 660-827-0827

AUG 30 2005

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Sedalia, Missouri/August 23, 2005

Please see the attached letter to Ms. Stephanie A. Strength. In my judgement as outlined in the letter, the best route for the 345 KV line south of the Sedalia Substation, lies West of the homes along the West side of Tetro Road. The crossing of Westmoreland Road is prohibitive because of country homes on two adjacent lakes on the South and one on the north at the West end of Westmoreland.

Optional: Name: Robert Heltenburg

Address: 22520 Westmoreland Rd, Sedalia, Mo. 65301

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

August 23, 2005

Stephanie A. Strength
USDA, Rural Utilities Services
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington D.C., 20250-1570
Dear Ms. Strength:

Below are my comments regard the east transmission line corridor which is tentatively located in a southeasterly direction from the Sedalia Substation to Mt. Hulda, Mo. and which is part of a 345KV line which would run from the proposed power plant at Norborne, Mo. to the Sedalia substation. My understanding is that this Sedalia Substation is the one currently located along the west side of Quisenberry Road and north of Palmer road in Pettis County, Mo. My main concern is the easterly route south from the Sedalia substation.

The east corridor crosses US Highway 65 about five miles south of Sedalia, Mo. in the vicinity of Westmoreland Road where I live. While Westmoreland has several spots of open pasture land along its north side from US 65 west to its termination into Tebo Road, the south side of Westmoreland Rd. is composed of relatively new country homes and two private lakes. Homes are interspersed on the north side between pieces of open grounds that are currently in development or being advertised for development. Another lake lies on the north side of Westmoreland among the homes at its west end at Tebo. Westmoreland Rd. is an asphalted collector road for new development in the area.

The routing of a 345,000 volt line across any part of Westmoreland would be difficult because of the conditions described above, if not on one side of the road then the other side. Any zigzagged line routing would surely require angle structures or self supporting steel poles or towers through the open spaces between the houses or the lakes; would come dangerously close to those houses or severely impair their lakeside values. The open land along the north side of Westmoreland Road and US 65 is adjacent to a dairy farm and access to it is blocked by three houses that are about 1000 ft north of Westmoreland at the 0.5 mile west of US 65.

There may be less troublesome, but narrower routes in the east corridor north of Westmoreland Road., however, in my judgment the portion of west corridor that lies west of the houses that are along Tebo Road (N-S road) would be the cleanest route. It would permit a less difficult turn to the east that would be south of the area of Westmoreland lakes and on east,

across US 65 if it becomes necessary to avoid public lands south of Smasal and Maltsbarger Roads. These roads lie one and two miles south of Westmoreland Rd. in a less developed area. I should also point out that a fourth lake and subsequent estate development exists on the north side of Smasal Road at its west end at Tebo Road, thus necessitating a route some distance west of Tebo.

If the transmission line can be taken west of Tebo road all the way or far enough, before turning east, it could miss a problem connected with crossing or passing near the Sedalia water supply in Springfork Lake which is located east of US 65.

Thank you for the opportunity to comment upon the proposed line routing.

Sincerely,

Robert L Hiltenburg

Robert L Hiltenburg
22520 Westmoreland Road
Sedalia, 65301

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

My main concerns are: living approximately 3 miles North of plant
1. The water levels at our home will be lower to the extent of very little water in our wells, if wells are dug plus the quantity used
2. The overhead electrical transmission lines - safety of the people, homes & livestock under these or in close back

Optional: Name: Sharon L. Case

Address: 11323 JJ Hwy - Norborne MO 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

proximity.

(3) The devaluation of our farm land. We've lived on our farm for 35 years and the other part of the farm has been in the family not quite 100 years. This land is mainly our investment / inheritance for our children + their family (3) and with the plant it will be worth considerably less.

(4) The general health + safety of all in the area due to the building + operation of a coal-burning electrical plant.

(5) Working at the Nodaway School, I realize the school will receive "in lieu of" tax monies, but how do we plan on an unknown number of students / families - Plus will those people even bring families or will they be short-term during building +

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

My main concern is the water levels of the many wells in the area and the economic impact on farmers who will lose farm land to the power plant.

Optional: Name: David E. Case

Address: 11323 JJ Hwy - Norborne, Mo. 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660-Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

I am totally against a power plant in the Big Lake, Missouri area.
I would surely think that you could find a place on the Missouri River that is not right next to the town of Rulo, Nebraska and not right next to a recreational Lake and only a few miles from the National Wildlife Refuge.
Not only the noise of the plant but also the poles and lines to transfer the power will be most annoying. Also, I believe our property values will decline.
Many people from all over enjoy the Big Lake State Park, the lake and the Wildlife Refuge where the migrating birds visit each year.
It would truly be a shame to spoil this area.

Optional: Name: Linda L. Sides

Address: Nebraska City NE 68410 / Big Lake

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

I am one of a number of people who own property in the Rulo, Nebraska, Falls City, Nebraska, Squaw Creek Wildlife Refuge, and Big Lake, Missouri area that feel a power plant in the Big Lake area would be a detriment to the entire area. Not only would a power plant ruin the recreation but would confuse the wildlife as they yearly migrate this area. It would also make fluctuations in the depth of the Missouri River which in turn affects the water table of the lake and the Refuge.
I also feel that a large influx of construction workers would overrun the existing facilities available.
Please consider my feeling and others when making your decision.

Optional: Name: [illegible]

Address: 411 No. 10th St.
NEBRASKA CITY, NE 68410

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

We have two main concerns.
(1) The water source the power plant will use. Whenever a field irrigation system is turned on - we have water problems. Even just the month of dry weather caused us to have water problems. The problem - lack of water available.
(2) The loss of useable, tillable farm land. (cont. on back)

Optional: Name: Norman & Louise Brown

Address: 14242 CR 324 Norborne, Mo 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Why can't this power plant be moved north onto hill ground. They claim they need to haul in more dirt to raise up the area they are looking at. By going north they could find higher ground that really isn't good for anything. It could be leveled and give them a stone base to build on. A lot of that ground doesn't even make good pasture ground. Why contaminate good farm ground when it really isn't necessary and we loose more tillable soil every year to contractors in the name of Progress. What we need is MORE tillable land, not less.

United States Department of Agriculture

USDA

NRCS Natural Resources Conservation Service

3915 Oakland Avenue, Suite 103, St. Joseph, MO. 64506

September 20, 2005

Ms. Stephanie A. Strength
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, DC. 20250-1571

Dear Ms. Strength;

This letter is in response Mr. Glendon D. Deal's letter to the Natural Resources Conservation Service, (Missouri); dated August 10, 2005. Mr. Deal's letter invited comments regarding the proposed power plant site near Norborne, Missouri; and alternate site near Big Lake, Missouri. A copy of his letter is enclosed. The following are my comments:

1. Background Information-In 1981, the U.S. Congress passed the Farmland Protection Policy Act (FPPA) which directs USDA through NRCS to provide technical assistance to Federal agencies, and State and local governments or organizations that desire to develop programs or policies to limit the conversion of productive farmlands to non-agricultural uses.

2. The Goal of FPPA- is to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of important farmland to nonagricultural uses. More information can be found at http://www.nrcs.usda.gov/programs/fppa/index.html. Form AD-1006 is enclosed.

3. Potential Wetlands-The NRCS County Hydric soil lists can be obtained at the county NRCS field office. Hydric soils are soils that show properties of long term saturation, and have a high probability of being classified as a wetland. The Hydric soil list is available on the web at http://www.nrcs.usda.gov/technical/efotg/. Wetlands are critical to the ecosystem, and have numerous benefits. NRCS, under the Secretary of Agriculture, has responsibility for the Wetland Reserve Program. The Wetland Reserve Program is a voluntary program which places 30 year and perpetual easements on marginal crop ground for the specific purpose of restoring those lands back to wetlands. These are restricted deed easements which require the landowner to maintain the functions and values of the wetland for the specified time period of the easement. There is a Wetland Reserve Program easement within the area proposed for the Norborne power plant site. Any development in the easement area, which would potentially impact the functions and values of the wetland easement, would be a concern to our agency. Additional information on the Wetland Reserve Program can be found at http://www.nrcs.usda.gov/programs/wrp/index.html.

4. Erosion Considerations-If your project includes trenching, or construction activity that would destroy grass or vegetative cover, we recommend special attention be given to areas subject to soil erosion caused by rain and water flow. Even though most trenches are narrow, soil erosion can still be a significant hazard on slopes greater than 2 percent. I recommend vegetative cover be promptly reestablished on all disturbed areas The Critical Area Planting standard from our Field Office Technical Guide can be accessed at http://www.nrcs.usda.gov/technical/efotg/.

5. Conservation Structures- such as: terraces, diversions, underground drain tiles, grade stabilization structures, grassed waterways: If the project construction causes any damage to soil and water conservation practices or structures, they should be promptly repaired.

6. Endangered Species- Certain trees and forest habitats are critical to the Indiana Bat. To obtain detailed information regarding threatened and endangered species in Missouri, please contact the Missouri Department of Conservation, 2901 W. Truman Blvd, P.O Box 180, Jefferson City, MO. Phone- 573-751-4115.

If you have any questions, please call me at 816-232-6555 ext. 138.

Sincerely,

David K. Kacirek

David K. Kacirek
Area Resource Soil Scientist

Enclosure

cc: David V. Johnson, District Conservationist, Carrollton, MO
Ronnie J. Owen, District Conservationist, Rock Port, MO
Patricia L. Hufford, Area Conservationist, St. Joseph, MO
Dennis K. Potter, State Soil Scientist, Columbia, MO
Doug L. Helmers, Wetland Team Leader, Chillicothe, MO

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request	
Name of Project	Federal Agency Involved	
Proposed Land Use	County and State	
PART II *(To be completed by NRCS)*	Date Request Received By NRCS	Person Completing Form:

Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)*	YES ☐ NO ☐	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %	Amount of Farmland As Defined in FPPA Acres: %	
Name of Land Evaluation System Used	Name of State or Local Site Assessment System	Date Land Evaluation Returned by NRCS	

PART III *(To be completed by Federal Agency)*	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly				
B. Total Acres To Be Converted Indirectly				
C. Total Acres In Site				
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide Important or Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)				

PART VI *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*	**Maximum Points**	Site A	Site B	Site C	Site D
1. Area In Non-urban Use	(15)				
2. Perimeter In Non-urban Use	(10)				
3. Percent Of Site Being Farmed	(20)				
4. Protection Provided By State and Local Government	(20)				
5. Distance From Urban Built-up Area	(15)				
6. Distance To Urban Support Services	(15)				
7. Size Of Present Farm Unit Compared To Average	(10)				
8. Creation Of Non-farmable Farmland	(10)				
9. Availability Of Farm Support Services	(5)				
10. On-Farm Investments	(20)				
11. Effects Of Conversion On Farm Support Services	(10)				
12. Compatibility With Existing Agricultural Use	(10)				
TOTAL SITE ASSESSMENT POINTS	160				
PART VII *(To be completed by Federal Agency)*					
Relative Value Of Farmland *(From Part V)*	100				
Total Site Assessment *(From Part VI above or local site assessment)*	160				
TOTAL POINTS *(Total of above 2 lines)*	260				

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES ☐ NO ☐

Reason For Selection:

Name of Federal agency representative completing this form:	Date:

(See Instructions on reverse side)

Form AD-1006 (03-02)

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006.

Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s)of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)

Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days. In the event NRCS fails to complete a response within the required period, the agency may proceed as thought the site were not farmland.)

Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.

Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form.

Step 7 - The Federal agency involved in the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA and the agency's internal policies.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County And State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities) that will cause a direct conversion.

Part VI: Do not complete Part VI if a State or Local site assessment is used.

Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, powerline and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.

Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, FPPA suggests the agency consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites).

In rating alternative sites, Federal agencies shall consider each of the criteria and assign points within the limits established in the FPPA rule. Sites most suitable for protection under these criteria will receive the highest total scores, and sites least suitable, the lowest scores.

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, adjust the site assessment points to a base of 160.
Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

USDA Rural Development

United States Department of Agriculture
Rural Development

COPY

August 10, 2005

Natural Resource Conservation Service
Missouri State Office
Parkade Center, Suite 250
601 Business Loop 70 West
Columbia, Missouri 65203-2546

Dear Participant:

The Rural Utilities Service (RUS) is preparing an Environmental Impact Statement (EIS) in connection with a proposal by Associated Electric Cooperative, Inc. (AECI) of Springfield, Missouri. AECI proposes to construct a 660 MW coal-based power plant and associated electrical transmission facilities. Initial alternative evaluation and site selection studies have located the proposed power plant site at two sites in northwestern Missouri-Carroll County near Norborne, Missouri, and an alternative site in southwest Holt County, near Big Lake, Missouri. AECI is requesting RUS to provide financial assistance for the construction of this proposal.

In accordance with RUS' environmental regulations, 7 CFR 1794, Environmental Policies and Procedures, RUS will be the lead agency for preparing the EIS. As part of the scoping process and prior to any public scoping meetings, RUS is distributing and making available specific planning documents prepared by AECI for review and comment by Federal, State and local agencies and the public. Enclosed is a compact disk that contains the Alternatives Analysis, Macro-Corridor and Site Selection Studies in both Microsoft Word and Adobe Acrobat portable document file (pdf) formats. Copies of the documents are also available on RUS' website at: http://www.usda.gov/rus.water/ees/eis.htm.

Additionally, you are invited to an interagency meeting hosted by RUS on Tuesday, August 23, 2005 at 10:00 a.m. The meeting will be held at in Sedalia, Missouri at the Missouri Electric Cooperatives Building, Missouri State Fairgrounds, located at 2503 W. 16th Street. RUS and AECI representatives will be at this meeting to solicit and accept your comments and answer questions regarding the proposal.

Please address any written comments by September 26, 2005, to Ms. Stephanie A. Strength, Rural Utilities Service, Engineering and Environmental Staff, 1400 Independence Avenue, SW, Stop 1571, Washington, D.C. 20250-1571 or E-mail: stephanie.strength@usda.gov.

Sincerely,

GLENDON D. DEAL
Director, Engineering and Environmental Staff
Rural Utilities Service

Enclosure

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Please DO NOT pbuild a plant by Rulo, NE! This would be very unhealty for humans and animals and also crop farmers. Residents need to be aware of the unseen fall out in the air of said plant. This will cause many health problems to us, our children and grand children.

This would greatly affect Big Lake State Park and The Refuge!

Optional: Name:

Address: Mound City Resident Thank You

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

PLEASE SEE ATTACHMENT

Optional: Name: STEPHEN FELD

Address: 24826 CR121 NORBORNE MO 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

Sept. 18 2005

To:

Stephanie A. Strength
USDA,Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571,Room 2244
Washington,DC 20250-1570

I have several points against the construction of the 660 Megawatt coal based electrical generating plant near Norborne MO by Associated Electric Cooperative.

1

The plant site is located in a flood plain. In 1993 and again in 1995 state routes DD and JJ which lead directly to the plant site were closed for several weeks due to flooding from the Missouri River. This was considered at the time to bee 100 year floods. There is an ongoing debate at the present time by several states and government agencies about releasing water from the upper Missouri River lakes to have a natural spring rise in the river levels. The concern here is that if we have high amounts of rain at the same time we could see more frequent "100" year floods. This could effect access to the plant as well as the discharge water system.

2

Air pollution is a major concern with mercury and other harmful emissions. The wind here generally blows from west to east. We are already getting smokestack fallout from several coal fired plants,Sibley MO, approximately 30 miles west, the Hawthorne plant in eastern Kansas City MO,approximately 45 miles west,and a new plant to be built at Platte City MO, approximately 60 miles west. We are getting this besides all the other air pollution from the Kansas City area blowing over us. For those of us who already have breathing difficulties another plant up and running is not acceptable. The Kansas City area will keep growing in the future and with it more air pollution,we don't need this plant sited here to add to it.

3

As to water usage of the aquifer for plant cooling water. I rent pasture for cattle which is located one mile from the plant site. We use a spring fed creek and a 30 foot deep hand dug well for stock water. During dry years we sometimes run short of water, 100 head of cows on a 100 degree day can drink 1000+ gallons per day. What recourse will I have with AECI if they pump the aquifer low and I run out of water? Probably none. What about the many residents who live in the surrounding area,and possibly the town of Norborne itself? The town of Norborne is only 3 miles from the plant site,given the amount of water this plant is going to need will it affect the cities water and if it does it will be to late. When the test well is pumped will it be done during a wet time of year or a dry time? Running the pumping test one time for 24 hours seems totally inadequate. Weather and water levels are always variable during the seasons and aren't the same every year. When there are very dry years like the 1930's and 1980, all wells ran low or dry. Even the towns,cities and water districts start running short of water. With no documentation of the ground water levels during the very dry years just mentioned, no one will be able to estimate with any accuracy the water levels with this power plant tapped into to the aquifer. AECI has already

offered to hook up some residents to the rural water system. So apparently they expect to lower the water levels. In Carroll County the rural water comes from wells near Carrollton about 10 miles from the site. Also the town of Hardin MO pumps their water from wells and is located about 6 miles from the plant site. Having said all of this how can any one know with any certainty that during very dry years there will be enough water to keep the plant in operation let alone have water for residential use. Should the AECI plant take precedence on water usage over residential and agricultural use? I don't think it should.

4

The toxic land fill at the site even with the best methods of lining etc.,how well will it remained sealed for 25 years, 50 years ? If it leaks into the ground water how far will the contamination carry, and who will pay for the clean up? I suspect at some point in the future it will need to be cleaned up.

5

The proposed rail spurs running north from the plant site to the Burlington RR will have to cross several rural roads. Given the length of the trains and the speed of travel the area in which we live will be cut off from our rural fire dept. while the train is transiting the area. If needed at that time the fire dept. would have to travel 4 or 5 miles farther than normal if needed. This at a time when time is important to save life and property. These trains will apparently transit the area several times per month and could present a serious problem.

There are several families who will be forced from their homes and farms that have been in the same families for several generations by eminent domain. It seems to me that the USDA would have an interest in keeping these farms in productive agriculture as millions of acres of productive land are taken out of production every year.

The whole process for this project from the start has not been honest and in the open by our county officials or AECI people.

Stephen Feild

Stephen Feild
24826 CR 121
Norborne MO 64668

660-484-3166

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

5 page letter Attached

Optional: Name: Joseph D. Heil

Address: 30517 D. Hwy Norborne, MO 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
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Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570

September 21, 2005

Dear Ms. Strength,

I am writing to convey my opposition to the proposed AECI power plant to be located two miles west of my residence and farm property in Carroll County Missouri for the following reasons.

No Need for More Generating Plants in Missouri

A few years ago I visited the Bagnel Dam generating plant in central Missouri. This plant uses water from the Lake of the Ozarks for power. At that time three of the four generators were not being used. The reason they gave me was there was no need. There are generating plants at Missouri City and KC Mo that are, to my knowledge, not producing near capacity. According to the last census rural Missouri in this area is not growing but receding in population. Why does AECI need to build a plant in this area? I would guess they are trying to find an area where they can find some support with the least amount of dissension. George Bernard Shaw's statement that "A government which robs Peter to pay Paul can always depend on the support of Paul" applies to this situation.

Water (Quantity and Quality)

The town of Norborne located one mile to the south of my property has wells over 200 ft. deep. AECI is proposing to pull water from the same aquifer at about 6000 gallon per minute. The surrounding rural homes are on sand points from 20 to 40 ft deep. During a drought period would the town, plus AECI, plus farm irrigation wells pull enough water to lower the surrounding water table below the existing 20 ft. depth? If the water table is lowered, who will be held responsible and how will the problem be resolved?

I presented this question to an AECI representative that was in Norborne on Aug. 13th and was told, "We'll take care of any problems." Ms. Strength I am currently paying on a loan I had to take to cover expenses because I believed a person from a big company that said they would "Take care of any problems and don't worry." AECI has not done any test well study to date and yet are telling us they will not be affecting our water.

Also in this area movement of a sand point can lead to a sulfur (rotten egg) smell. Who will be responsible if the quality of our water changes? Again am I to believe "Don't Worry?"

AECI is proposing a landfill to hold the fly ash collected from the smoke stack scrubbers. This landfill would be located about two and a half miles from my home and three miles from the town of Norborne over the aquifer that supplies us water. This fly ash has high concentrations toxic elements. AECI proposed a poly liner under this waste for "protection of the ground water." This area is blessed with wild animals. Groundhogs, moles, mice, coyotes, fox, are local burrowing animals that could make short work of putting a hole in a poly liner regardless of how thick. A hole in this liner would be almost impossible to detect and would lead to contamination of our ground water source. This waste dump is also proposed to be adjacent to a wetland area where migratory water fowl land. AECI representatives couldn't tell me what they had in mind for this area.

Transmission Lines

There are three proposed transmission corridors to the east and three to the south of the plant. These lines are 50 to 60 miles long and will be affecting more people than the plant itself. I asked an AECI employee at the Aug 25th meeting what would happen if the line would come over someone's house. He stated they would probably negotiate a settlement for the house. He also stated that the demand for electricity was in the Southwest Missouri and Northeast Oklahoma area. Surely there is a rail and water source closer to the demand than Carroll Co. MO.

Question: Why is the plant located so far from the final substations?

Years ago an article in the Reader's Digest told of a farmer (I believe in Southeast MO) who didn't realize his larger combine would not clear the sagging high power lines. After the tires blew out he was stranded on the combine not being able to get off due to the fact that the current would follow him to the ground as he jumped. The proposed power line corridors cross areas where some of the largest farm equipment manufactured is used.

Time magazine published a picture about a year ago where the photographer had stuck one end of hundreds of fluorescent light tubes in the ground directly under a cross-country high power line. He waited until evening to take the picture, which was very eerie. All the tubes glowed as if they were connected to an electric circuit. Who can, or will tell us of the physical effects of this type of electrical leakage from the transmission lines?

Financial

An AECI employee, at the Aug 25th meeting in Norborne, told me that the company does not make money.

Question: If they don't make money why do they want to invest 1 billion dollars and borrow from the USDA?

From the AECI website: AECI's Thomas Hill and New Madrid coal plants ranked among the top 25% of 334 coal, oil & gas units internationally for financial performance in 2003.

Question: If I am to believe the statement that the company does not make money, who will benefit from this "top financial performance"?

Jobs

"The IBEW Union will hire employees. AECI does not hire directly," An AECI's employee told me this on Aug. 13th.

To my knowledge very few if any residence of Norborne belong to the IBEW. This would mean no local individuals would benefit from the proposed plant unless they joined the IBEW. Current union members would surly be given priority to these jobs.

Taxes

AECI's own website states that the Thomas Hill plant pays several million dollars in taxes annually helping to support local education and county services.

The proposal given to AECI by the county commissioners was far below the figure given for the Thomas Hill area.

There has been no mention of tax cuts if this project goes through. The saying that "one's expenses rise to meet their income" would probably apply. One of the past projects in Carroll Co. that comes to mind in overspending is the ambulance building in Carrollton. I believe the cost was over $300,000.00 for a tin building with sleeping quarters. Would the next step be to put gold hubcaps on the ambulance?

Recently the Gov. has expanded the enterprise zone to almost the entire county instead of just Carrollton. Per the Carrollton Paper, since 1986 Carrollton has received over 11 Million Dollars from the state for development. It stated that this has provided over 450 new jobs. The 1 Billion dollar AECI project is only providing 139 full time jobs. Since Norborne now qualifies as an enterprise zone wouldn't it be more prudent to apply for enterprise zone money for the area?

Heritage

Several weeks ago in the Carrollton newspaper there was a listing of land transfers that had occurred in the area. Among them was the transfer of land from a grandparent to his grandchildren. Even though, to my knowledge, none of these grandchildren farm they

Conclusion

The original purpose of the Electric Rural Co-Op was to provide affordable electricity for rural areas and farms. An AECI employee told me that the biggest demand for electricity is in the Branson area. Norborne and a certain area surrounding Norborne would not even be able to benefit from a local power plant since AECI sells only to Rural Co-Ops. Aquilla provides Norborne's electricity. Rural Co-Ops biggest users are now towns like Branson, Chillicothe, Sedalia, etc. Although these towns used to be considered rural, I believe they are benefiting from an outdated government-funded project. If the USDA really wants to help the rural economy they would require that new electric plants burn ethanol. This would benefit the farm economy by the use of more corn, raising the price of corn and eliminating the need for LDP's. Also, since ethanol is clean burning the controversy over emissions would be eliminated. Smaller power plants could be built closer to the end users, eliminating the need for long corridors for high voltage power lines. Less land would be needed with no need for landfill area for fly ash. It seems AECI is not looking forward but backward at technology in wanting to build a coal powered electric generating plant.

Thank you,

Joseph D. Heil
30517 D Hwy
Norborne, MO 64668
jheil@greenhills.net

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

This plant is taking several homes away from people who have owned the land for years. I am concerned about the mercury levels in the air and about the land fill that will be put in for the waste from the plant. All in all I think this is a bad thing for our county and it will disrupt families & homes

Optional: Name: Barbara Scheble

Address: 213 N. Pine Norborne Mo. 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

(over)

Sept. 21-05

I am Very much against the Power plant as it is hard on the people that it takes their land an homes. It is no good for the County as it won't help the people for Jobs or Work. The power lines will tear the land in many Ways, I just Wish that the plant Would move to another spot of land. I am Very much against the plant.

Roy Schilb
213 N. Pine St.
Norborne, MO
64668

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

See enclosed letter.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

September 18, 2005

Bill and Patty Carter
12181 CR 270
Norborne, MO 64668

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570

RE: Comments/Questions - Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri

Dear Ms. Strength:

The proposed coal fired powered plant for the Norborne, Missouri site has not been handled properly. The Carroll County Commission sold out to AECI and land was purchased before there was a public hearing. Citizens were not properly informed and allowed to voice concerns until after agreements had been made. The citizens of Carroll County have serious concerns about the environmental impact this power plant will have on our community. A community that is supported mainly by agriculture.

1. *One of our greatest concerns regarding this coal fired power plant is the water usage by AECI, and how the testing will be conducted.* At the public meeting on 8/25/05 in Norborne, we learned that AECI will be using 5600 gallons of water per minute. AECI stated , "This type of well shouldn't bother the water table." They also stated that they would be testing and monitoring for best location, and testing water quality as well. In addition, they stated that the test well will only be tested using 1500 - 2000 gallons a minute, <u>not at the same rate the plant would be using</u>. They also stated that "the maximum rate would be 7400 gallons per minute in peak time, "a probable rate each day for 90% of the time." We also learned that the testing period would be for 24 hours, and then engineers would calculate the amount of water usage with data from the testing.

   Our biggest concern regarding the water testing is that it will not be tested at the operational usage rate as announced by AECI, nor will it be tested for an adequate length of time to determine how much of an impact it will have on the community of Norborne and the private drinking wells in the area. From the previous Environmental Impact Study conducted in 1982 for the Norborne, Missouri site we have learned that during the study period various issues were looked at: topography; geology; climate and weather; vegetation/soils (looking at Prairie grasses, forests; soil types; rockbeds, etc.); prime farm

land and natural areas; faunal ecology; woodlands; grasslands and open lands; aquatic areas (types of fish, etc.); rare and endangered species - plants and animals; Missouri wildlife areas; hydrology - public water systems; irrigation and wells; prehistoric and historic sites; floodplains; archaeologically sensitive areas; land use - public, private, and resources; mineral use; municipal areas; transportation; missile sites; airports; and populations where minority populations are noted.

It appears that the Environmental Impact Study goes to great lengths and detail to study all of the above concerns for a considerable period of time (15 months). However, this power plant is proposing to use a large volume of water, well water, but the proposed new study will only conduct a water test for a period of 24 hours. At the public meeting on 8/25/05, a question was raised regarding conducting the testing for a longer period of time. The response we heard was that it was nearly impossible to test at peak usage amount – "what would they do with the water?"

Another major concern we have with the well water testing is, "W*ho regulates the companies that do the testing?"* If the government feels it is important to regulate other types of businesses and conduct a 15 month environmental impact study, *why shouldn't our most valuable asset (water) be protected, testing procedures properly regulated by the government, plus thorough and detailed testing conducted for a longer duration - as compared to the 15 months of environmental impact studies?*

Shouldn't companies responsible for testing water supplies be regulated just the same as other businesses? *Isn't the supply of water to the people in the city of Norborne (approximately 900+ people) and the rural residents surrounding the community (or any other community), more important than an endangered specie, plant or historic site?* Given how important water is, the government should be conducting water testing for at least 15 months, just as it does with the environmental impact study. In addition, has Carroll County ever had a detailed water study done to determine the amount of water available, where water sources are located and where they come from?

Due to the likelihood that this power plant could impact the Norborne community water supply, we believe that *an indepth study of the water supply and water quality should be mandatory prior to the approval of this power plant*. Not only is the water in the area used as drinking water for the town of Norborne and rural residents, it is also used for livestock and irrigation. In all likelihood, the usage of water by the power plant will make a considerable disturbance in the availability of water. Has a survey in the area adjacent to the proposed site been conducted to see how many people in the site area have wells and depend on water for personal, livestock, and irrigation usage? This is an agricultural community and our land and water are valuable assets in the operation of our agricultural businesses.

A question was asked to the people present at the 8/25/05 meeting as to when we wanted the testing done (spring, summer...)? Our question to you would be – how can you get accurate test results by only testing the well water drawdown if it is only done for 24 hours during a plentiful time following a rainy season? What happens during drought seasons? Also, how do you test for water quality caused by probable contaminated runoff?

Another question asked at the public meeting was, "What happens if the water table is too low and we run out of water?" AECI replid by stating, "We will make it right, we want to be good neighbors." *The citizens of the community need more specifics regarding this*

important issue, and an agreement/guarantee should be in writing detailing the steps AECI will take to correct the problem if the City of Norborne and landowners with well water experience loss of water.

We would like a certified hydrologist, appointed by USDA, present during the well water testing to oversee and varify the tests. In addition, we would also like someone to represent the citizens of the Norborne community during the tests. We have also asked that a report be brought back to the Norborne citizens with the results of the water testing. At the 8/25/05 meeting we were told we would get a report on the testing. However, when we asked AECI if they would have a public hearing and disclose the water testing information they were hesistant to state that this would be done. We challenged them regarding the statement that they made earlier in the meeting stating that this information would be made available. Will we be kept in the dark again – this time about the water conditions and availability?

2. As stated in the 1982 Environmental Impact Study, "A*lmost all of the area is intensive agricultural activity - soybeans, corn, grain sorghum, hay and pasture."* Farming is one of the oldest business operations in the United States. There is strong historical background associated with farming! Farmland must be protected. It is the food source of our future! More and more farmers are being run off their land by big cooperations such as AECI. What about the Farmland Protection Act?

Within this proposed power plant site there are three pieces of farmland that have been in the family for 164 years, 150 years and 130 years. Our farm is located within five miles of the site and it has been in our family since 1868 (137 years). Numerous other farms in and around the site location have longevity of ownership. These families intend to continue farming.

Not until the 8/25/05 meeting did other farming families in the area learn that their land would also be needed – for access of the railroad coal cars, the possibility of taking more farmland for discharge water to empty into the Missouri River, for landfill, for fill dirt to raise the land above the flood plain, for "buffer,"and for possible expansion of the plant. The exact locations with the total amount of land wanted by AECI have not been made public yet.

Acquisition of all this farmland will result in loss of crop production in the area.. As compared to businesses located within a manufacturing area that are taken over by other companies and new facilities built, one facility is torn down and another built on that location. This is not possible with farmland. *Once farmland is taken over for use by a power plant, it can never be returned to farm production.* As our population increases over the next 10-100+ years, farmland will still be needed to provide food. Power plants will also be needed for electricity, but *should not be located within an area that is taking farmland out of production.* In addition, loss of farmland also means loss of income for numerous families and some having to relocate. Relocation for these families may be very tramatic due to being displaced from their home and farmland of many years. The loss of crop production and relocation of families may possibly have an large impact on other businesses in the area as well.

In addition, will farmers be given a business value for their land and the loss of future years of production, instead of a sum as determined by AECI? What impact will a coal-fired power plant have on the value of land located near the power plant? With a railroad line close to our homes and processing 135-150 coal cars every other day, there will be disruption

in our livelihood for raising livestock, and farming. Does AECI plan to compensate us like other businesses would have to compensate for disruption in business? What happens to those farmowners with livestock on land cut off by the railroad going through their pasture? What access will be available to them for getting to their livestock and pastures? Will this result in total loss of land for them?

3. *We have serious concerns about the emissions from the power plant.* We believe that there have been studies conducted that provide enough information concerning the use of coal and prove that buring coal and the release of emissions in the air is unhealthy and damages our air quality. Why are air quality tests being conducted – to prove that our rural air is clean enough to let the power plant "dirty" the air? Dirty air which will result in an increase of health problems among the people living in and several miles around the power plant site. At the 8/25/05 meeting, a statement was made that this particular power plant won't be included in the new law regarding mercury emissions? Why will they be allowed to their own regulations? Will AECI or USDA take the responsibility of educating people about possible health concerns due to coal fired power plant emissions and aid with medical bills?

4. With the proposed power plant planning to empty discharge water (with a temperature of 90 degrees) into the Missouri River, concern should be given to the affects this will have on fish and other wildlife using the river.

5. The plant site is located very near the 500 year flood plain area and roads leading in and out of the area are under water whenever there is heavy precipitation in and around the area. This could possibly lead to public safety issues due to the fact that workers at the plant would be hindered by flood waters in getting to the plant for daily operations.

6. If the power plant should decide to pump water from the Missouri River for use instead of using well water, we have concerns about this causing the water level on the river to fall too low for permitting barge traffic on the river. In the spring time, if water is released to the river when the level of water is higher the result would be flooding of prime farmland located in the bottoms. Barge traffic is needed to transport agricultural commodities out of the area and is a necessity for successful crop production.

7. It has been brought to the attention of AECI and the Carroll County Commissioners that Carroll County has an ordinance for no landfills. How can a power plant be allowed to build within the county and operate a landfill on their site?

8. Have the commissioners and residents near the Ray and Carroll county boundary lines been notified of the proposed power plant and how it will impact their property?

9. During the construction of the power plant there will be a great deal of disruption to traffic flow as well as when railroad trains bring in the 135-150 carloads of coal every other day. Will an overhead bridge be built to allow school busses, people going to and from work, farm trucks, tractors and implements to reach their destinations without having to drive miles around?

10. Another area of concern has to do with the noise level we will experience due to the operations of the power plant and railroad traffic. Our quiet life of living in the country will no longer be the same. In addition, this noise increase may cause livestock to be less productive and to spook easily, thus, even more disruption to farming production.

11. One last area of concern has to do with the County Commissioners changing zoning laws in the county without the vote of its citizens. Commissioners are to represent the people and we feel that several things have not been handled correctly and we are strongly recommending that the issue of the proposed power plant and new zoning laws should be taken to the citizens of the county for a vote.

Ms. Strength, we thank you for coming to the 8/25/05 public meeting and allowing us to enter our concerns as part of the decision process for this proposed power plant. We hope you will take our concerns into consideration and conduct the testing and requests we have listed.

In addition, we would like to request a copy of the Environmental Impact Study whenever it is completed. Please mail to our address listed above. Thank you.

Cordially,

Bill and Patty Carter

Bill and Patty Carter

USDA Rural Development

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In a project the size that AECI is proposing in Norborne honesty with the people in the area is very important. From the very start of this project there has been a total lack of any honesty or respect for the people of this area. They have been sneaky and deceptive to the people. They have not even had a meeting with the people to discuss their

BACK

Optional: Name: Thomas White III

Address: Norborne, Mo

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Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

plans. They misrepresented themselves on the first land that was acquired. On the other land that they are trying to acquire they have put unethical pressure on the people to sell. They have told landowners that if you do not sell for our price "we will just take it from you". All of this is OK if AECI is getting a bank loan like most other businesses. But this is not the case. They are asking for a ~~subsidy~~ government loan. Money that comes from you and I and the rest of the people of this country. Does honesty and integrity matter in this country any more? It ~~does~~ very well should! AECI cares nothing about the people in this community. They have negociated out of ~~paying~~ paying any property ~~taxes~~ taxes to ~~the~~ our schools & county for 24 years. They do not care about the people, children, schools. If this project takes place our community will slowly die. Who will build a new home, move into town, or start a business so close to a coal fired power plant? We have a great town. The people in this town are very proud and support the community and school. As you heard at the public meeting the people do not want this project to happen. I think the project was approached wrong. I think honestly and integrity do matter. I ask that you vote NO to this loan request. Tell AECI to find a location with less people impacted; because people are the most important consideration.

Sincerely,

Thomas White

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I oppose this power plant because of many reasons. First of all, I don't want to look at the monstrosity and all that will be included with it: power lines, additional rail lines, smokestacks, etc. I own $350,000 property in Carroll County for a reason – to escape the city lights, noise, and pollution. When I retire in a few years I would like to put a runway on my property for small aircraft access. Will that be possible if there are transmission

please see next page →

Optional: Name: _____

pg. 1 of 4

Address: _____

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lines installed on my property against my will? The eddy current from high voltage power lines is a hazard just as is the particulate matter that will be released from the smoke stacks. It makes no sense to build a new power plant when there are many already in the existing power grid. AECI is a company that is taking advantage of an uneducated local population. Our commissioners are not professional politicians. They have

Optional: Name: please see next sheet →

Address: pg. 2 of 4

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no skills in the political process. We need to exercise our right to vote! Just to show you how dirty this process is, we have been denied the right to even petition for a vote by our county officials. What part of the U.S. Constitution denies it's citizens a right to vote (and I don't mean voting for officials). We deserve the right to vote on issues that affect the livelihood and well-being of every citizen in this county. Since we

please see next sheet →

Optional: Name: _____

Address: _____

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are being denied this right, what IS the difference between living in the U.S.A – the land of the "FREE" or North Korea? Is this country becoming a democratic society run by dictators?

Optional: Name: J D Matthews
Address: 34133 CR 111 Norborne, MO 64668 pg. 4 of 4

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Oregon, Missouri/August 22, 2005

see attached

Optional: Name: Tom Chaffee

Address: 107 W 6th - Mound City, MO. 64470

If you would like to take this form with you, please mail to:

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When I first heard about the power plant proposal it was supposed to be located at Forbes, Mo. Now I find that the [redacted] proposed site is right next to Big Lake State Park and close to Squaw Creek National Wildlife Refuge. Bob Brown State Wildlife Area is also nearby. I do not think that facilities, such as power plants, that create such large environmental impacts should be located so close to a state park and a national wildlife refuge. This would simply be poor environmental planning. A power plant so close would be harmful to all of these areas. There are thousands of acres of sensitive wetlands on these public areas and there are many more that are privately owned nearby. Many of the privately owned wetlands are in the Wetlands Reserve Program, which is funded by the USDA. Toxic releases (specifically mercury) from a power plant could contaminate these sensitive wetland ecosystems and be harmful to the many species of fish and wildlife that inhabit them, some of which that are rare or endangered. Many of the privately owned wetlands are managed for waterfowl hunting and are seasonally flooded by pumping water from underground wells. I am very concerned that the proposed power plant, which would also draw from wells, would draw too much water from the aquifer and permanently alter the water levels of the wetlands and the capacities of the wells that are used to flood them. If we are unable to maintain water levels in the area wetlands they would no longer be wetlands.

The proposal also calls for approximately eleven feet of fill to be placed over quite a few acres on which to construct the plant. I am concerned that this huge amount of fill dirt would likely be taken form the nearby Missouri River Bluffs. These bluffs are known internationally as Loess Mounds and are geologically significant in that the only other place in the world where they are found is in China. Removing such a large amount of fill from these bluffs would have a major negative environmental impact. This area has a long history of flooding. Placing such a large amount of fill in the floodplain could also alter the nature and damage potential of future floods to the surrounding area.

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I believe that putting a Power Plant by Big Lake State Park and Close to the Squaw Creek Wild life Refuge would be a big mistake. Also We have a lot of people around here and the Mercury from the plant would not be wise to breath in for anyone, or Contaminate the river and the Lake. I believe you could find a better and safer place than here.

Optional: Name: _____

Address: Mound City, MO 64470

If you would like to take this form with you, please mail to:

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Submit no later than Sept 26

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First let me say, I think I am in favor of the power plant at the Big Lake location. Especially if it is built with high-tech emission control. My understanding is that you will need considerable land fill for the site. Would you consider (AECI) taking that fill from the bottom of Big Lake and then when the plant is built, returning the cooled cooling water to the lake. A win-win situation for both of us.

Optional: Name: H. LaVern Wymore

Address: 123 Richards Ln. Craig Mo 64437

If you would like to take this form with you, please mail to:

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My mother's ashes were spread on land that you're trying to buy for your dirty power plant. If I had known something like this could've happened I would've kept her ashes or spread them somewhere else. I was only 16 when she died and you could not imagine the kind of pain I've been through and this power plant definitely doesn't help! You people don't think about the kind of stress you're putting on landowners—and their family—in Norborne. Please take your powerplant somewhere else—or better yet, don't even build one!

Optional: Name: Danika Linville

Address: _____

If you would like to take this form with you, please mail to:

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Is this power plant absolutely necessary, or is this just another way for AECI to make more money? Let me answer these for you: No, this power plant is NOT ABSOLUTELY NECESSARY and Yes, it IS just another way for AECI to make more money. I just wish AECI would open their eyes and see what they're doing to the environment, wildlife, and PEOPLE! But all you're seeing is money. People working at AECI aren't having their homes and farms taken from them and I'm sure none of them live by one of their plants! Put yourself in our shoes.

Optional: Name: Danika Linville

Address: ____

If you would like to take this form with you, please mail to:

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This coal fired power plant is something that will benefit the members of AECI only & no one else. The area that your company is going to take is an area that is very sentimental to my wife. I have no land that would be affected from the power plant, but someday I will have Kids that for sure would live in this pollution ridden community. I feel that this project is strictly to make AECI's pockets a little bigger & once the project is up and rolling the citizens of this community will be the last thing on AECIs mind

Optional: Name: Bruce Linville

Address: _____

If you would like to take this form with you, please mail to:

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The money that AECI has agreed to pay the corrupt comissioners of Carroll County will not benefit the community at all. The county officials are lying tours for some reason to try to get the power plant built. They tell us that all the tax dollars will benefit the citizens of the community. I would bet you won't see a dime put into the community that will benefit anyone. Once the power plant is built there will be more people leaving the community eventually even the brain dead people that supported this scam.

Optional: Name: Brice Linville

Address: _____

If you would like to take this form with you, please mail to:

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MY FARMS WERE WANTED BY YOU. I HAVE SAID I DON'T WANT MONEY, ONLY LAND OF EQUAL PRODUCTIVITY. YOU HAVE SAID NO ONE WOULD SELL THAT QUALITY OF LAND. I'D RATHER NOT SELL, BUT IF I MUST, I NEED THE PRICE I'LL HAVE TO PAY.

Optional: Name: OTTO PLACKE

Address: 1 JEFFERSON PARK DRIVE - CARROLLTON, MO APT. 219

If you would like to take this form with you, please mail to:

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I am definitely in favor of locating a power plant at Norborne! I am sure that it will not damage the air or water quality. We need the electricity and it might as well come from here. We must move forward with the times or get left behind. I think it's about time Norborne moves on.

Optional: Name: Mary Licite

Address: 205 E. 5th St. Norborne, Mo. 64668

If you would like to take this form with you, please mail to:

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We don't want it because of Pollution and the distruction of the land. We'll also be only 2 miles from ~~it~~ the plant. Our land is our living.

Optional: Name: Donald & Bessie Kelly

Address: 28998 II Hwy - Norborne, MO -

If you would like to take this form with you, please mail to:

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I dislike the idea of people losing their homes and farm land in this community. This is our way of life and has been for generations.
I truly wish you would choose another site and choose one that doesn't affect other people and their homes.

Optional: Name: _____

Address: Norborne

If you would like to take this form with you, please mail to:

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Norborne, Missouri/August 25, 2005

How close does the railroad have to be to a home before home is purchased or even the powerlines. My home is in the path of Alternative B. railroad I would rather have to move then live near the railroad if it is going to be right outside my door. How long before I know?

Optional: Name: Staci Wood

Address: 26251 CR111 Norborne MO 641668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

loving it on

Optional: Name: MARK NOELKER

Address:

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
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Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

Big Big Concern

Water

Optional: Name: _____

Address: Norborne

If you would like to take this form with you, please mail to:

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USDA, Rural Utilities Service,
Engineering & Environmental Staff
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Norborne, Missouri/August 25, 2005

I would like to thank all of the people that are involved in this project. This plant will be great for the Norborne Community. This Community has needed something to help it for a long time. The taxes and the jobs will be great. I know first hand that associated is a good company to work for and a good company for the community. Thanks again

Optional: Name: David F. Clemens

Address: 202 W. 3rd St., Norborne MO. 64668

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
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Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

LOSS OF WELL WATER - 2 mi N. OF PLANT.
BOTTOM FARM IRRIGATORS DRAINS MY WELL.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
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Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

How will power plant affect my well water?

Power plant built in platte county will pay 2.2 million for 20 years why pay carroll county 50,000 for 24 years?

If railroad goes thru land owned by carroll county commissier will price of land be mack public?

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
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Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

Great potential for the Community and County.
Three thing certain in this life, taxes, death,
and Change. What a chance for this area.

Optional: Name: Ed Castle

Address: 310 N. Folger Carrollton

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

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Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Sedalia, Missouri/August 23, 2005

Ralph A. Spurrier
21225 Smasal Rd
Sedalia, Mo 65301

Representing 25 Property owners located at Bel-Aire Estates. location of proposed route is of great concern. Endangered specie (Prairie Chicken) an area Conservation locations.

Optional: Name:

Address:

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
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MAIL CD

USDA Rural Development

Comments/Questions

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Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

PLEASE MAIL ME A COPY OF THE CD THAT CONTAINS ALL OF THE INFORMATION REGARDING THIS PROJECT. I AM WITH THE MO DEPT OF CONSERVATION IN HOLT CO.

THANKS.

Optional: Name: CRAIG CRISLER

Address: 21999 HWY B
MAITLAND MO
64485

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
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Comments/Questions

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Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Bean Lake Sugar Lake
Iatan S of St. Joseph
across river from Atchison, KS

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

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USDA, Rural Utilities Service,
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Oregon, Missouri/August 22, 2005

I am the President of a duck club located 1½ miles North of Bigelow. Our concern is the impact on current flight patterns and environmental impact of this project. The Squaw Creek Res. is one of the prime holding areas for ducks, geese & other wildlife in the entire area and attracts a significant number of tourists each year. It is our opinion that this project could

Optional: Name: Ken Brown

Address: 12602 Cherokee Lane Leawood, KS 66209

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
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Oregon, Missouri/August 22, 2005

I Believe the Bigelow area is a poor choice, because of the proximity to An Environmentally Sensitive area. i.e. Squaw Creek Nat'l Refuge and it's Watershed

Optional: Name: Joan Noyes

Address: 8963 SE 232nd Lathrop, Mo. 64465

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
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Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

I haven't learned an opinion yet I think economically it's great! Environmentally I'm not sure.

Optional: Name: Ray Winebrenner

Address: 487 E 4th Maryville

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
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Comments/Questions

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Oregon, Missouri/August 22, 2005

(1) Concerned about lake level
(2) " emissions from burning coal (dust)
(3) Impact on State & Federal Wildlife areas
(4) Why in such a populated area? Reports show 127 people at Blake - Are approx 2,000 on weekend all summer long - the reports are wrong & outdated
(5) Impact on property values & people must

Optional: Name: Karen Phillips

Address: Big Lake Mo.

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
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Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Sheet 2

I WOULD LIKE TO SEE A HEADING IN THE EIS FOR ASTETHICS.

Optional: Name: KEN KOLTNOFF

Address: PO BOX 215 CRAIG MO 64437

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

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Oregon, Missouri/August 22, 2005

Recreation is pretty intangible.
Big Lake Residents live there for recreation.
If you were a resident of Big Lake, what would be the overwhelming reason why they should welcome this entity, and - Some will support it and benefit and some will not. The people of Mound City will welcome this county development.

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
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Mail Stop 1571, Room 2244
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Oregon, Missouri/August 22, 2005

Many of us in Holt County have serious concerns about the environmental impact on our community. The county includes a national wildlife refuge, a state park, and several state conservation areas. This plant poses a threat to these natural places which create substantial income for the area. Emissions, both air and water, are a major concern. The representatives were poorly informed and prepared to answer questions regarding environmental concerns

Optional: Name: Brenda Ryan

Address: 205 Savannah St. Mound City, MO 64470

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
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Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

Pro

Optional: Name: Carla Markt

Address: 28028 Trinity Rd Oregon Mo 64473

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
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Oregon, Missouri/August 22, 2005

1. PLEASE PUBLISH MAJOR CATEGORIES IN THE SCOPE BY ROOM EIS. PRIOR TO SCOPING MEETINGS
2. THE RESULTS OF THE EIS MAY CHANGE YOUR ROUTE SITING.
3. PLEASE EXPLAIN WHY THE BIG LAKE ALTERNATIVE WAS CHOSEN SINCE IT IS IN A FLOOD PLAIN. (PEMA)
4. HAS LAND ALREADY BEEN PURCHASED FOR PLANT OR LINES?

Optional: Name: KEN KOLTHOFF

Address: PO BOX 215 CRAIG MO. 64437

If you would like to take th[illegible]

-87- plus 83

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

What impact will the construction project have on our local schools?
If, as you say, most of the construction workers come from outside the area, where are the job or economic benefits to our communities?

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
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Associated Electric Cooperative, Inc.
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Oregon, Missouri/August 22, 2005

How will the possible changes in the river level affect the endangered species such as the pallid sturgeon?

Optional: Name: _____

Address: _____

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

SEP - 2 2005

AUG 30 2005

STATE OF MISSOURI

Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

August 22, 2005

Stephanie A. Strength
Engineering & Environmental Staff
Rural Utilities Service
1400 Independence Avenue, SW
Washington, DC 20250

Re: AECI Coal-Based Power Plant & Transmission Lines (RUS) Holt & Carroll Counties, Missouri

Dear Ms. Strength:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR part 800, which require identification and evaluation of cultural resources.

We have reviewed the information provided concerning the above referenced project. We have determined that there is a moderate to high potential for the presence of archaeological sites near and within the area of the Norborne and Forbes proposed project areas, as indicated by the topographic location, and that an archaeological survey should be conducted. This survey should be completed prior to the initiation of project-related construction activities.

A list of independent archaeological contractors who can perform such services is available through the Department of Natural Resources, Division of Administrative Support. The list can be obtained by calling (573) 751-0958 and requesting the "archaeological contractors list." Note that any 36 CFR Part 61 qualified archaeologist may perform an archaeological survey. If you choose a contractor not on the list, please be certain to include his or her curriculum vitae in the report. We would appreciate two (2) copies of the archaeological survey report when it is finished so we may complete the review and comment process.

If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call Ms. Deel at 573/751-7862. Please be sure to include the SHPO Log Number **(019-HO-05)** on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy
State Historic Preservation Officer

c Bob Quigle, RUS

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.

Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

My concern is for the Forbes to Fairport transmission lines. We have center pivots in the proposed corridors. The transmission lines & the poles specifically could keep us from making complete circles if not properly placed or avoided. Following is a list of sections in which we have center pivots. They may not all be right in the corridor but are in proximity. They are on an attached sheet.

Optional: Name: Darwin Binder

Address: 31669 Hwy T / Forest City, MO 64451
660-572-0001

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

List of Irrigation systems in Forbes to Fairport transmission corridor for Darwin Binder/ Midwest Grain:

Township 59	R 38	Sections	9, 10, 15, 16, 23
Township 60	R 39	Sections	14, 22, 23, 27, 26
Township 61	R39	Sections	4, 5, 8, 9, 15, 16, 17, 20, 29,
Township 62	R39	Section	26, 34, 29, 32, 33, 35

There are at least 3 sites in this list that could get irrigation also. Please contact me with any questions

Darwin Binder
31669 Hwy T
Forest City, MO 64451
660-572-0001

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Columbia Ecological Services Field Office
101 Park DeVille Drive, Suite A
Columbia, Missouri 65203-0057
Phone: (573) 234-2132 Fax: (573) 234-2181

September 28, 2005

Ms. Stephanie Strength
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, D.C. 20025-1571

Dear Ms. Strength:

Please refer to the August 10, 2005, Federal Register notice announcing the Rural Utilities Service's (RUS) intent to prepare an Environmental Impact Statement regarding a proposal to construct and operate a 660 megawatt, coal-based electrical generating plant and associated transmission facilities. The applicant, Associated Electric Cooperative, Inc. (AECI), is requesting the RUS to provide financing for the project that will service AECI's customers in Missouri. The U.S. Fish and Wildlife Service (Service) has reviewed that Notice, and materials (i.e., *Alternatives Report, Proposed Baseload Power Plant, AEC, Inc., August 2005*) provided at a August 23, 2005, interagency meeting in Sedalia, and offers the following scoping comments pursuant to the National Environmental Policy Act (42 U.S.C. 4321-4327), the Endangered Species Act (16 U.S.C. 1531 et seq.) and Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.).

General Comments

The Alternatives Report identifies 5 critical elements for a desirable facility location: land area, water source, rail access, not a Class 1 area and nonattainment (air quality) areas. The facility will require a minimum of 1,200 - 1,500 (generally level) acres, ideally outside a floodplain. AECI representatives indicated that acreage is necessary to accommodate the proposed facilities, as well as potential future development. The EIS should, to the extent possible, address not only the proposed facilities, but potential at any site for future development, as indicated. This should include potential cumulative effects to water (both supply and discharge), air (including air modeling information), traffic, transmission facilities, etc., resulting from additional future development at the proposed sites.

There are two proposed sites: the preferred site at Norborne, and the alternate site at Forbes. While both sites appear to be viable options, the Service has significant concerns

with the Forbes site that should be thoroughly addressed in the EIS if RUS decides to retain this alternative. As noted throughout the document, the Forbes sites is located near Squaw Creek National Wildlife Refuge, a major migratory stopover for waterfowl with peaks exceeding 0.5 million birds. At times those birds can also be accompanied by some of the largest concentrations of wintering bald eagles in the Midwest. Numerous other species of migratory songbirds, as well as state and federally listed species use the Missouri River corridor, the surrounding state parks, state wildlife conservation areas, and Corps of Engineers wildlife mitigation lands as breeding, migration, and overwintering habitat. Construction and operation of the proposed facility and associated supply and transmission facilities has the potential to significantly affect surrounding fish and wildlife resources, as well as recreational opportunities associated with those resources.

The Forbes site, albeit protected by a federal levee, nonetheless is solidly within the floodplain of the Missouri River. The Corps has recently recalculated flood flow frequencies for the Missouri River (http://www.mvr.usace.army.mil/pdw/pdf/Flow Frequency/Documents/FinalReport/default.asp), and that information should be used in evaluating the potential for flooding at the site, and potential impacts to the designated floodway. Furthermore, the ash disposal facility would be located in a less than ideal site, subject to a catastrophic flood, and built using fill in a floodplain with a high water table, adjacent to wetlands. Should AECI carry this location forward, the EIS should address the measures used to ensure the integrity of the disposal facility, as well and monitoring requirements to detect problems (i.e., leaks) should any develop. Over the last twenty years, the federal government, in partnership with the states and localities, have recognized the need to restore some of the historic functions of the Missouri River floodplain, and documented such restoration as an effective tool to help minimize floodstages and reduce flood damages to private property. The proposed project at the Forbes site could be at odds with those goals, and potentially foreclose future opportunities to restore a portion of the Missouri River system.

The Alternatives Report indicates the plant will need a water supply of approximately 5,600 gallons per minute (gpm). The EIS should comprehensively address hydrologic effects of the project to the surrounding areas, including water resources for the local community, hunt clubs, center pivot irrigation systems, Mallard Marsh, Big Lake State Park, and area wetlands. For example, when the Service installed a small pump on our Squaw Creek NWR, pumping approximately 2,500 gpm from the aquifer, adversely affected 2 homeowners about 1 mile away in the town of Bigelow. Fortunately rural water was completed several years ago, but the volume of water needed for the proposed project demands a rigorous analysis of potential effects to local hydrology.

For both the Forbes and the Norborne sites the EIS should include a detailed description and evaluation of all work needed for the facilities and transmission corridors, including any additional tree clearing, land clearing, river crossings, etc., as well as measures to reduce effects to fish and wildlife (e.g., measures to reduce bird strikes on transmission lines). As those details are developed the Service can offer specific recommendations, as appropriate, to avoid or minimize effects to fish, wildlife, or federally listed species. The

list included in the Alternative Report noted the species of concern that may occur in and along the proposed project corridors.

While the Service appreciates the difficulty of predicting future development, we believe it is important to include a cumulative impact analysis. As noted earlier, AECI hopes to locate the proposed facility at a site that could also accommodate additional development in the future. We have been told by other power interests that several new facilities may likely be needed along the lower Missouri River over the next decade. The Service requests that the EIS address the cumulative effects of the proposed facility as well as additional facilities in the same area, using the same water sources, and having similar, adjacent, or overlapping areas of effects, particularly for air impacts.

Specific Comments

Table 6-1 (page 6-8) – This table should be revised to reflect the information presented on Page 6-64 for the Forbes Site "These areas consist of palustrine emergent (approximately 50 acres), palustrine forested (approximately 130 acres) and palustrine scrub/shrub (approximately 70 acres) wetlands, totaling approximately 250 acres of wetlands present on the site." The current table is incomplete. In addition, in Missouri many farmed wetlands have not been mapped as part of the NWI so those figures may be conservative.

Page 6-55 "For residents living in Big Lake, the plant will be visible but not the dominant feature due to the distance from the site." The Alternatives Report may have underestimated the visual effect of the proposed facility at the Forbes site. The 125 feet high stack at the ethanol plant in Craig is clearly visible at Squaw Creek NWR, 10 miles away. The 600-foot tower and associated facility will likely have a large presence at the rural Forbes site.

Figure 6-23 – Historically, bald eagles nested at Big Lake, which appears to be in the larger area delineated on the map. Please check with the Missouri Department of Conservation for the most recent information on nest activity at that site.

Page 6-69 – The Federal Highways Administration recently completed an EIS on replacing the Highway 159 Bridge. That document contains a cultural resources study of much of the area along the highway to Big Lake.

Conclusion

In accordance with Appendix II of the Council on Environmental Quality's Regulations for Implementation of NEPA (50 CFR, Part 1500), the U.S. Fish and Wildlife Service has special expertise pertaining to fish and wildlife impacts associated with NEPA actions. We believe that construction of the proposed power plant at the alternate Forbes site would have significant impacts on important fish and wildlife resources. We are especially concerned with the direct and in-direct effects of a power plant at this location on Squaw Creek National Wildlife Refuge, a fish and wildlife resource of national

significance. The Service considers the Forbes site as the most environmentally damaging alternative currently being evaluated. Therefore, the Service recommends that RUS either delete the Forbes alternative from consideration in the EIS or adopt early in the NEPA process the Norborne site or another environmentally acceptable site as the preferred alternative.

Thank you for the opportunity to review the proposed project. Please add this office to your mailing list for this project. If you have questions regarding our comments, please contact Ms. Jane Ledwin, 573.234.2132, extension 109.

Sincerely,

Charles M. Scott
Field Supervisor

cc: Squaw Creek NWR, Mound City, MO (Bell)
Swan Lake NWR, Sumner, MO (Guthrie)
GIFO, USFWS, Grand Island, NE

O:\Ledwin\Letters\20050842RUScoalplant.doc

Ballard, Carla

From: forrest r and sharon alderman [foralder@earthlink.net]
Sent: Saturday, October 15, 2005 9:02 AM
To: Strength, Stephanie - Washington, DC
Subject: Coal Fired Power Plant at Big Lake Missouri

In reference to the proposed coal fire power plant being considered at Big Lake Missouri.

Where is the cooling water going to be obtained? Will they be taking the water from underground aquifer or will it be from the Missouri River?

My main concern is that it does not come from the underground aquifer. If it is from the Missouri River, I don't have a problem with that. I know there are numerous power plants, both coal and nuclear, in Nebraska and Missouri that take their cooling and they have not adversely affected the river.

As for the other issues of health effects, noise and light pollution, and declining property values are over blown or just plain false. There are power plants all over this nation and with are people living in close proximity and they have not been adversely affected. We are being told that these plants create risks to people of all ages living nearby? If there were such adverse conditions as being described, why are people still choosing to live near them? Why aren't the areas around these plants vast desert wastelands void of all forms of life? Think about it.

I've worked in power plants of all types and none of them are noisy. For those concerned about light pollution, take a look around their rural home and you'll see that most have night security lights. Isn't that light pollution?

As far as the local property values declining - have you ever tried to find housing in communities near power plants? Their property values are always much high than they were before the plant was built.

Forrest R. Alderman

Tarkio, Missouri

forrest r and sharon alderman
foralder@earthlink.net
EarthLink Revolves Around You.

Ballard, Carla

From: McGinnis, Leslie [mcginnisl@turnerusd202.org]
Sent: Friday, October 14, 2005 12:49 PM
To: Strength, Stephanie - Washington, DC
Subject: Big Lake Missouri

To Whom It May Concern:

As a property owner at Big Lake, Missouri, I am concerned about the possibility of any power plant in this recreation area. The water level of the Missouri River and Big Lake is a concern as well as the pollutants created by the power plant. Big Lake is part of the Missouri State Parks and as such is a vacation destination for many people from Iowa, Nebraska, Kansas, and Missouri. Construction of any power plant near Big Lake would certainly have an adverse effect on the local environment and it's attraction for visitors and potential homeowners alike. Please thoughtfully consider this impact on Big Lake and the surrounding area.

environment general

Sincerely,

Leslie McGinnis

308 & 310 Lakeshore Drive

Big Lake, Missouri 64437

-94-

Ballard, Carla

From: roger [cyline2976@sbcglobal.net]
Sent: Thursday, October 13, 2005 10:50 PM
To: Strength, Stephanie - Washington, DC
Subject: coal fired plant @ Big Lake, no way

I am opposed to the idea of a coal fired power plant at the south end of Big Lake. I am a property owner on the lake and have great concern. Negative affect may well include issues related to; Health, pollution, environmental impact, water and fish, sinking property values, as well as possible learning problems in children as a result of placing a known polluting source in this delicate environment.

The likely impact on the habitat of the protected birds and animals in this area is huge, and should be an issue addressed by those in charge of the large area of protection set aside for animals and migratory birds. If river water is used for cooling, then the sturgeon fish could be affected. This plant brings a large source of noise and light, which alone could affect the environment in adverse ways.

The dangerous and negative affects of introducing a known polluting system will be on the heads of those who go along with this dumb plan as the stuff will fall from the sky. Take a stand and don't le em pollute this beautiful area.

Roger Newton

Ballard, Carla

From: Nicole Stromgren [nicolestromgren@cox.net]
Sent: Thursday, October 13, 2005 7:50 PM
To: Strength, Stephanie - Washington, DC
Subject: Big Lake

As a property owner at Big Lake, I would like to voice my concern over the coal fired plant going in at the lake. I am 100% against this plant being put into place. We have paid for years to have a pump to maintain the water level as it is, and now this plant will put our water at a much higher risk. I am also concerned about the air pollution and the headaches it will cause. I choose not to live in a big city because the pollution gives me headaches and makes me nauseous. I do NOT want this plant to be put into my area and functioning. Leave my lake alone!

Nicole Stromgren
115 Schoonover
Big Lake, Mo

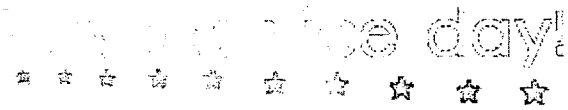
Ballard, Carla

From: Al Gibbs [algibbs@alltel.net]
Sent: Wednesday, October 12, 2005 9:51 PM
To: Strength, Stephanie - Washington, DC
Subject: Proposed Power Plant Site

Stephanie, hello again
We met you at the Power Plant meeting in Oregon, MO. We enjoyed visiting with you regarding the Power Plant proposed for the south end of Big Lake, MO area. We are still very concerned with the proposed Power Plant being built in this location south of Big Lake.
Our concerns are:
1. The use of river water and/or water from under the river used by the plant 2. The health risks involved with the various pollutants
3. The close proximity to the Squaw Creek National Wildlife refuge, surrounding towns and the Big Lake State Park Recreation Area
4. The light, transmission lines and noise associated with the operation of the power plant 5. The removal and placement of the waste products from the plant 6. The disruption of the migratory routes of the birds which are such a great part of the refuge 7. The increased train traffic, there are already 20 some trains a day in this area!!
8. We have many permanent residents in the area and the beauty of the area is the quiet and solitude that we have so enjoyed. Many people from the cities of Kansas City, St. Joe, Omaha and Lincoln have cabins at the lake to get away to enjoy this environment. Big Lake has endured 2 major floods (1984 & 1993) many summers of very low water, local owners footing the bills for pumping water into the lake! We have done a lot to make this a good recreational area and we do not want it ruined with a power plant so close.
Are there no areas along the Missouri River, away from population, lakes and refuges that a power plant would be a "good fit" ?
Please, think carefully before a decision is made on this location and consider how many people and the environment will be hurt by this power plant.
Your careful consideration is respectfully requested.
Thank you for taking the time to read and think about this email!
Al & Margie Gibbs
323 Fairlane Drive
Big Lake Village, MO 64437

Ballard, Carla

From: mdjjhn [mdjjhn@tampabay.rr.com]
Sent: Wednesday, October 12, 2005 3:53 PM
To: Strength, Stephanie - Washington, DC
Subject: power plant



What can we do to stop this ?

Ballard, Carla

From: Chris and Linda Boultinghouse [moundcitynews@socket.net]
Sent: Wednesday, October 12, 2005 7:25 AM
To: Strength, Stephanie - Washington, DC
Subject: Re: AECI plant proposal

thanks

chris

On Oct 12, 2005, at 6:41 AM, Strength, Stephanie - Washington, DC wrote:

> Yes, the comment period has been extended. The extension information
> was published in the Federal Register and posted on our website.
> Comments received prior to October 28 will be addressed in the scoping
> report prepared for this project.
>
> Sincerely,
>
> Stephanie A. Strength
> Environmental Protection Specialist/RD
> 1400 Independence Ave. SW Room # 2244
> Washington, DC 20250-1571
>
> (202) 720-0468
>
>
> -----Original Message-----
> From: Chris and Linda Boultinghouse [mailto:moundcitynews@socket.net]
> Sent: Wednesday, October 12, 2005 7:35 AM
> To: Strength, Stephanie - Washington, DC
> Subject: AECI plant proposal
>
>
> Has the comment period for the proposed sites at Big Lake and Norborne
> been extended?
>
> chris
>
> chris and linda boultinghouse
>
>
chris and linda boultinghouse

Ballard, Carla

From: Chris and Linda Boultinghouse [moundcitynews@socket.net]
Sent: Wednesday, October 12, 2005 6:35 AM
To: Strength, Stephanie - Washington, DC
Subject: AECI plant proposal

Has the comment period for the proposed sites at Big Lake and Norborne been extended?

chris

chris and linda boultinghouse

Ballard, Carla

From: cjromaire [cjromaire@cox.net]
Sent: Tuesday, October 11, 2005 5:44 PM
To: Strength, Stephanie - Washington, DC
Subject: Coal-fired Power Plant at Big Lake, MO

My husband and I want to voice or NEGATIVE opinion about building this plant near our homes.

We are very much against this because the negatives by far out weigh the positives.

As a matter of fact, there is no positive side to this at all.

So we say NO! NO NO NO NO NO NO NO NO NO NO AND NO.

Carol & Joe Romaire

Ballard, Carla

From: Caroline Wilson [caroline@rebel2studios.com]
Sent: Tuesday, October 11, 2005 3:17 PM
To: Strength, Stephanie - Washington, DC
Subject: More questions on BIG LAKE

Hi Stephanie,

1. How can BIG LAKE be considered, if, as the AECI Alternate Report said, location outside of a flood plain as best. BIG LKAE in a flood plain.
2. Since Norborne was an alternative site 6 years ago, is it safe to assume that even if the BIG LAKE is not selected in this go around, it will eventually have a power plant, based on the AECI marching across the state?
3.

.....

CAROLINE WILSON creative partner

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http://rebel2studios.com

Ballard, Carla

From: Caroline Wilson [caroline@rebel2studios.com]
Sent: Tuesday, October 11, 2005 1:37 PM
To: Strength, Stephanie - Washington, DC
Subject: Re: More questions about Big Lake

Great. Thanks for your reply and the information.

.....

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http://rebel2studios.com

From: "Strength, Stephanie - Washington, DC" <Stephanie.Strength@wdc.usda.gov>
Date: Tue, 11 Oct 2005 14:13:32 -0400
To: "Caroline Wilson" <caroline@rebel2studios.com>
Subject: RE: More questions about Big Lake

A scoping document will be created after the close of the extended comment period. That document will address the questions (or explain how they will be addressed in the EIS). The scoping document will be available on our website:

http://www.usda.gov/rus/water/ees/eis.htm

Sincerely,

Stephanie A. Strength
Environmental Protection Specialist/RD
1400 Independence Ave. SW Room # 2244
Washington, DC 20250-1571

(202) 720-0468

-----Original Message-----
From: Caroline Wilson [mailto:caroline@rebel2studios.com]
Sent: Tuesday, October 11, 2005 1:41 PM
To: Strength, Stephanie - Washington, DC; MJ McBride; Andy Melichar; Carol Cole
Subject: More questions about Big Lake

Hi Stephanie,

I understand the questions period for the BIG LAKE, MISSOURI power plant proposal has been extended. I have more questions.

1. How will the Squaw Creek National Wildlife Refuge and Wetland damaged?
2. The water table is 10 feet down. Given the massive amount of water the power plant will take per minute, will the power plant drain the wetlands?
3. Is it right to assume that the Squaw Creek National Wildlife Refuge and Wetland will be damaged if not destroyed by the power plant and its wet consumption?
4. Given the massive amount of water the power plant will take per minute, will it drain BIG LAKE? This is already a concern, given the lake is shallow to begin with. 2-7 feet in most areas.
5. How long into operation will it take for the power plant to drain BIG LAKE and the wetlands?
6. Based on your estimates, how many birds, wildlife and habitat will be killed per year by the power plant?
7. How many estimated birds a year will fly into the power lines and die?
8. Besides death, what are the other issues facing the fish, birds and wildlife (local habitat) that make the area their home year round?
9. Given the devastating environmental impact of the power plant and based on your studies, how long will it take for the local habitat to die off?
10. What are the economic factors facing residents?
11. What kind the health issues will arise from the power plant emissions and pollution?
12. Is it true that pregnant women, children and elderly people are at risk?
13. What are the health issues, aka. diseases that come from exposure to power plant emissions?
14. The area is sustained in large part by recreation....BIG LAKE State Park and the National Wildlife Refuge. How many jobs will be lost and how many business will close due the the loss of recreation users and customers as well as residents moving from the area?
15. How will the power plant effect real estate values? I would like to have a percentage figure...ie...10% drop in value.
16. How come, in Missouri, the citizens seem to have no legal recourse and no way to oppose? In other words, there is no vote, no referendum, no say what so ever on a issue such as this?
17. Does your agency work with the power companies to install power plants or are you only a liaison agency between the people and the power companies?

Thank you for your response. I will write more as more questions come up, prior to the deadline.

When can I expect a response to these questions and where can they be viewed?

Regards.

.....

CAROLINE WILSON creative partner

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http://rebel2studios.com

Ballard, Carla

From: Strength, Stephanie - Washington, DC [Stephanie.Strength@wdc.usda.gov]
Sent: Tuesday, October 11, 2005 1:14 PM
To: Caroline Wilson
Subject: RE: More questions about Big Lake

A scoping document will be created after the close of the extended comment period. That document will address the questions (or explain how they will be addressed in the EIS). The scoping document will be available on our website:

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Stephanie A. Strength
Environmental Protection Specialist/RD
1400 Independence Ave. SW Room # 2244
Washington, DC 20250-1571

(202) 720-0468

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http://rebel2studios.com

Ballard, Carla

From: Caroline Wilson [caroline@rebel2studios.com]
Sent: Tuesday, October 11, 2005 12:41 PM
To: Strength, Stephanie - Washington, DC; MJ McBride; Andy Melichar; Carol Cole
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Ballard, Carla

From: Jeff Martin [Jeff_Martin@kcmo.org]
Sent: Tuesday, October 11, 2005 1:36 PM
To: Strength, Stephanie - Washington, DC
Subject: Proposed Holt County Power Plant

I am a property owner in Big Lake, Mo I would like to express concern over the proposed site for a new power plant in Holt County near Big Lake. This area has a large wildlife refuge nearby and I have concerns about the effect of the construction and operation of this plant on the birds habitat. This area is also a recreational destination for many in the region. The increased noise, light, and air pollution, from both the plant and the increased traffic for deliveries to the plant, would greatly decrease the natural setting for those wishing to enjoy the area.

Overall I hope that the Holt County, Missouri location is not chosen as the location of the power plant.

Thank You,
Jeff Martin
332 Lake Shore Dr
Big Lake, MO

Ballard, Carla

From: Diane Waddell [waddell@ccp.com]
Sent: Tuesday, October 25, 2005 12:12 AM
To: Strength, Stephanie - Washington, DC
Subject: coal plant

Dear Stephanie,
I am extremely opposed to putting a coal power plant in Northwest Missouri. Yes, they may be the cheapest form of energy, but their negative effects are devistating to the world. They use trememdous amounts of water and toxify the air and surrounding area.
Honestly,the future of the world is at stake. We MUST use cleaner sources of fuel. This includes wind energy, solar energy, and much more.
At some point there is a time to look past financial well being and material possessions. It had got to be soon.
Please help.
Diane Waddell
St Joseph,MO

-103-

Ballard, Carla

From: Sr. Christine Martin [scmosf@stjoelive.com]
Sent: Monday, October 24, 2005 10:10 AM
To: Strength, Stephanie - Washington, DC
Subject: Power Plant

This letter is in reference to the proposed coal-fired power plant. I am in opposition to any new coal-fired power plant in NW Missouri. We in Northwest Missouri treasure our Squaw Creek National Wildlife Reserve and Big Lake. We do not want additional pollution in our state or any other kind of hazard to our people or wildlife.
I do not consider the possibility of increased economic benefits (jobs) to be a good argument for this plant, since increased health problems and health care costs that accompany coal-fired power plants will far outweigh any possible positive economic benefits. I would like the following concerns addressed:

Power plants are known to use thousands of gallons of water per minute. Historically when farmers are running irrigation pivots the water level in Big Lake drops, with resulting negative impact on water recreation, fish and wildlife. Major fish kills have occurred in recent years during such conditions..How would this reduction of water be addressed? Will fish and wildlife at Big Lake and Squaw Creek be protected from such water shortage? How will this be done?

A power plant in such close proximity to wildlife, outdoor recreation and tourism areas will no doubt degrade the outdoor experiences. How would the degradation of established recreation and tourism be countered? How would the resulting loss of community revenue affect current residents?

As you know, coal burning power plants are the largest source of mercury emissions, which are not currently regulated (such pending regulation are of little comfort, considering that "pending" offers no assurance that regulations will be put in place or how dependable such vague regulations would be). Current Mercury levels need not be measured in large amounts to be considered serious health hazard. Mercury is a PBT (Persistent Bioaccumulative Toxin) which accumulates in the body tissue of any fish, duck, human who consumes food in which mercury exists. As we go up the food chain the mercury accumulates from one species to the next. The entire stretch of the Missouri River within Missouri's borders is on the EPA's water quality 303(d) list for mercury contamination. Effects on children exposed during pregnancy include learning disabilities, attention deficits and motor delays. What steps to protect Missouri citizens from mercury poisoning will be required of AECI?

Coal burning power plants are the primary contributor to ozone smog and other air-borne particulate matter, all of which are associated with asthma, lung disease, heart disease and even premature death--in the US annualy 30,000 premature deaths, 10 times as many as occurred on September 11. Current information suggests that the technology to clean 90% of these contaminants out of power plant emissions exists. Will AECI be required to use the very best, most efficient technology to control exposure of Missourians to such contaminants mentioned above?

Squaw Creek National Refuge is a lure that funnels hundreds of thousands of migratory birds and eagles into this area each year. The proposed transmission line corridors would surround Squaw Creek Refuge on three sides, creating a deadly gauntlet for the birds. Over time this would inflict needless high mortality losses to migratory birds and eagles in direct contrast to the purpose of the refuge which is to provide a safe resting area for the birds.

Americans' energy demands can be reduced through Energy Efficiency, which is cleaner and cheaper. Such programs as the EPA's Energy Star program have proven that there are easy, simple ways to reduce energy consumption, and at the same time save consumers' money. It is obvious that AECI would prefer to sell more energy, therefore increase profits. What efforts are being made, or will be made, to educate Americans about Energy Efficiency?

Sincerely,
Christine Martin, OSF

Ballard, Carla

From: Charles & Shirley Yurkonis [csy@ccp.com]
Sent: Friday, October 21, 2005 12:13 PM
To: Strength, Stephanie - Washington, DC
Subject: Proposed coal-fired power plant

I'm writing in opposition to any new coal-fired power plant in NW Missouri. Missourians do not want a coal-fired power plant near our children or near our treasured Squaw Creek National Wildlife Reserve and Big Lake. Therefore I am requesting that you consider the following information and respond to my concerns with solid, verifiable data. I want to know what specific actions will be taken to address these issues. Please don't tell me that a plant would provide jobs. We know that increased health problems and health care costs that accompany coal-fired power plants far outweigh any possible positive economic benefits. At AECI's "scoping" meeting I found their representatives' answers to my questions to be inadequate and disturbing. My concerns are as follows:

Power plants are known to use thousands of gallons of water per minute. Historically when farmers are running irrigation pivots the water level in Big Lake drops, with resulting negative impact on water recreation, fish and wildlife. Major fish kills have occurred in recent years during such conditions..How would this reduction of water be addressed? Will fish and wildlife at Big Lake and Squaw Creek be protected from such water shortage? How will this be done?

A power plant in such close proximity to wildlife, outdoor recreation and tourism areas will no doubt degrade the outdoor experiences. How would the degradation of established recreation and tourism be countered? How would the resulting loss of community revenue affect current residents?

Exactly how many temporary jobs would be filled by current residents of the area? How many workers would be brought in from outside? What is the expected duration of these jobs?

How many permanent jobs would be filled by current residents? How many permanent jobs would be filled by people not currently living in the area? What kind of professional education/training is required for such jobs?

As you know, coal burning power plants are the largest source of mercury emissions, which are not currently regulated (such pending regulation are of little comfort, considering that "pending" offers no assurance that regulations will be put in place or how dependable such vague regulations would be). Current Mercury levels need not be measured in large amounts to be considered serious health hazard. Mercury is a PBT (Persistent Bioaccumulative Toxin) which accumulates in the body tissue of any fish, duck, human who consumes food in which mercury exists. As we go up the food chain the mercury accumulates from one species to the next. The entire stretch of the Missouri River within Missouri's borders is on the EPA's water quality 303(d) list for mercury contamination. Effects on children exposed during pregnancy include learning disabilities, attention deficits and motor delays. What steps to protect Missouri citizens from mercury poisoning will be required of AECI?

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Americans' energy demands can be reduced through Energy Efficiency, which is cleaner and cheaper. Such programs as the EPA's Energy Star program have proven that there are easy, simple ways to reduce energy consumption, and at the same time save consumers' money. It is obvious that AECI would prefer to sell more energy, therefore increase profits. What efforts are being made, or will be made, to educate Americans about Energy Efficiency?

Sincerely,

Shirley A. Yurkonis
16278 State Rt. D
Savannah, MO 64485

Ballard, Carla

From: David Ray [rdavidray@msn.com]
Sent: Monday, October 17, 2005 7:58 AM
To: Strength, Stephanie - Washington, DC
Subject: Coal-fired power plant at Big Lake MO.

October 17, 2005

I have many concerns regarding the proposed coal-fired power plant being proposed near Big Lake, MO. Amoung my concerns are health issues regarding mercury and othe air pollutants, the amount of water that will be taken from the "lower basin" and the noise and light from the plant itself.

I fear the influx of 800-900 workers and what it will do to our lake. Increase in crime. The sheriff's department only has the sheriff and two deputies now.

I have concerns about the transmission lines and how it will effect Squaw Creek Refuge.

I feel at this time the negitaves outway any positive contributions it may make.

David Ray
981 S Saunders
Maryville, MO 64468
rdavidray@msn.com

-106-

Ballard, Carla

From: JOHN WEHLING [JWEHLING@neb.rr.com]
Sent: Sunday, October 16, 2005 1:10 PM
To: Strength, Stephanie - Washington, DC
Subject: POWER PLANT

On coal-fired power plant, I would offer the following comments, based on having a 15-20 year old coal-fired power plant about 7 miles southeast of Nebraska City NE where we live.
On Issues to Consider:
1. If they get the water out of the river like here, I don't think it affects the aquifer, because it runs through the plant and is then returned to the river, which should not deplete the supply.
I am not aware of any pollution, other than it is a warmer temperature when it is returned.

2. There have not been any issues of air quality here that I am aware of. The exhaust is released high enough that it dissipates in the atmosphere. At first, many were concerned about coal dust residue, but that has not ever been an issue. I am not aware of any increased health problems in the area.

3. If it is to be located beside the river, that is about 2 miles or more away, depending upon where it is built. At that distance, I would doubt that noise or lights would be an issue. The current train traffic across the bottom of the lake makes more noise than this plant would, and I believe everyone is used to that.

4. From the time construction began on the power plant here, property values have actually increased significantly, not decreased. The wage scale of the construction workers as well as the permanent employees is pretty good. Actually, with the increased opportunity for employment, the economy here has improved.

I think you can tell that I see this as a positive, not a negative for the area. Thank you for the opportunity to comment.

John Wehling
Big Lake property owner

Ballard, Carla

From: Johnson.Kim-O@epamail.epa.gov
Sent: Monday, September 26, 2005 1:46 PM
To: Strength, Stephanie - Washington, DC
Cc: Cothern.Joe@epamail.epa.gov
Subject: AECI Powerplant Comments

Stephanie,

Just wanted you to know that we are working on a comment letter for the AECI Powerplant being proposed in Missouri. As of today, I am still collecting comments from some of our offices, so hopefully I'll have it together for you in the next few days. I can fax or e-mail a copy of the letter once it is signed.

Sorry for the delay,

Kimberly O. Johnson, P.E.
Environmental Services Division - NEPA Team
Region 7 EPA
901 N. 5th Street
Kansas City, KS 66101

913-551-7975

Ballard, Carla

From: dianecsg@cox.net
Sent: Sunday, October 02, 2005 6:39 PM
To: Strength, Stephanie - Washington, DC; biglakeclearsky@hotmail.com
Subject: Power Plant at Big Lake

We are homeowners on Big Lake - please forward any and all information you have pertaining to this Power Plant as soon as possible. We will do whatever is necessary to prevent this from happening.

Diane and Mark Goeser

Ballard, Carla

From: Ruth & Roy Baker [rbaker3@alltel.net]
Sent: Tuesday, October 11, 2005 9:34 AM
To: Strength, Stephanie - Washington, DC
Subject: coal fired power plant by Big Lake

I am writing reference the possibility of a coal-fired power plant at the south end of Big Lake.
As a cabin owner at the lake and having recently retired so we can spend more time at the lake than ever before, it concerns me of the possibility of a facility that could prove detrimental to our retirement years.

In addition to the possibility of a lack of water for the lake, the health risks are concerning. health

We also consider our lake property as an investment for our retirement years and when we no longer are able to enjoy it, we were hoping it will have improved in value and are concerned that a coal-fired power plant could cause our property value to decrease. property values

Thanks for listening!

Ruth Baker

Ballard, Carla

From: lmosier [sm60903@netins.net]

Sent: Tuesday, October 11, 2005 5:23 AM

To: Strength, Stephanie - Washington, DC

Subject: power plant at big lake.

We have several major concerns. We struggle continually to maintain a normal water level; this plant would make that a major struggle. The smell would be terrible. During the summer months, when the wind is out of the south, it would carry that odor. I drive past the power plant on I29 every day I go to work, and believe me when I say we do not want that. We have train noise now, but it is not something annoying at present. The plant would certainly change all of that. We do not want the trains stopping there to drop off and pick up cars. That is just asking for trouble from indigents hopping off and on. The whole concept of a power plant at big lake is inconceivable. So we strongly object to the idea. We like the property values the way they are.

Ballard, Carla

From: Barry Hardman [barry_hardman@hotmail.com]
Sent: Monday, October 10, 2005 7:48 PM
To: Strength, Stephanie - Washington, DC
Subject: Coal-fired Power Plant at Big Lake

Stephanie,
I am concerned about the talk of plans to build a Coal-fired power plant at the South end of Big Lake. Last August my wife and I purchased a lake lot in the Ruwwe addition at Big Lake. We choose this lake because we like the atmsophere of it, especially the quietness and the lack of crowds. It provides a place for us to come and relax, and we do not have to put up with the noise and crowds that one finds on The Lake of the Ozarks, Table Rock or other such lakes.
I am afraid that if a power plant is constructed on Big Lake, then the relaxing atmosphere that we have come to enjoy will be lost. Besides the noise of the power plant itself, one will have to endure a very large number of trains hauling coal into the plant. Several trains pass by daily as it is now, hauling coal to other power plants. If the power plant is built on Big Lake, then the number of trains necessary to supply coal to that plant will increase the traffic to an almost constant level, I am afraid.
We are also concerned about what the plant would do to the water level of the lake. Big Lake is not a deep lake. I have been told that it averages six to seven feet in depth at its deepest point. The area off of our property has a water depth of only 24". Once the power plant begins drawing water from the lake to for cooling puposes, will it cause the lake in front of our property to dry up? Should this occur, our property will become almost worthless. If we were able to find some one who would purchase it, we would probably only be able to sell it for a mere fraction of what we have invested in it.
My and my wife's plea to you is to reconsider these plans and do not build this coal-fired power plant on Big Lake.

Thank you for your time and consideration.

Sincerely,
Barry S. Hardman

Ballard, Carla

From: Roger and Kim Lightle [bubba202@direcway.com]
Sent: Monday, October 10, 2005 3:30 PM
To: Strength, Stephanie - Washington, DC
Subject: Big Lake Coal-Fired Power Plant

I am emailing my concerns on the proposal for a coal-fired power plant located near Big Lake, MO. I'm a current Big Lake property owner. My wife and family bought lakefront property last year to enjoy the peaceful surroundings of the lake. I am concerned for my wife's health as she is on two prescription medications for respiratory health problems. She cannot be around polluted air. I also am concerned about what the power plant would do to the lake environment. I DO NOT WANT THIS POWER PLANT LOCATED NEAR BIG LAKE, MO.

Property Owner, Roger LIghtle.

Ballard, Carla

From: John Thompson [jthompson@catf.us]
Sent: Friday, September 30, 2005 2:58 PM
To: Strength, Stephanie - Washington, DC
Subject: Re: AECI Scoping Process

Thanks for your quick response. I'm unclear about what deadline has been extended to Oct 28.

Thanks,

John Thompson
Advocacy Coordinator
Clean Air Task Force
231 W. Main, Suite 1E
Carbondale, IL 62901

Phone(618) 457-0137
Fax (618) 457-0513

www.catf.us

Please note: CATF headquarters has a NEW ADDRESS and PHONE NUMBER:
Clean Air Task Force
18 Tremont Street
Suite 530
Boston, MA 02108
Ph: 617-624-0234
Fax: 617-624-0230

On 9/30/05 2:16 PM, "Strength, Stephanie - Washington, DC" <Stephanie.Strength@wdc.usda.gov> wrote:

> Here is the link to the currently available documents on AECI's proposed
> plant. The scoping report will not be available for more than a month
> (we have extended the comment period)
>
> Please let me know if you need further information.
>
> http://www.usda.gov/rus/water/ees/eis.htm
>
> Sincerely,
>
> Stephanie A. Strength
> Environmental Protection Specialist/RD
> 1400 Independence Ave. SW Room # 2244
> Washington, DC 20250-1571
>
> (202) 720-0468
>

-114-

> -----Original Message-----
> From: John Thompson [mailto:jthompson@catf.us]
> Sent: Friday, September 30, 2005 3:10 PM
> To: Strength, Stephanie - Washington, DC
> Subject: AECI Scoping Process
>
>
> Dear Ms. Strength,
>
> Has RUS prepared any fact sheets or other documents dealing with the
> scoping
> study for AECI's proposed coal plant? I'd appreciate any information on
> the
> process.
>
> Thank you in advance for your help,
>
>
> John Thompson
> Advocacy Coordinator
> Clean Air Task Force
> 231 W. Main, Suite 1E
> Carbondale, IL 62901
>
> Phone(618) 457-0137
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>
>

Ballard, Carla

From: John Thompson [jthompson@catf.us]
Sent: Friday, September 30, 2005 2:10 PM
To: Strength, Stephanie - Washington, DC
Subject: AECI Scoping Process

Dear Ms. Strength,

Has RUS prepared any fact sheets or other documents dealing with the scoping study for AECI's proposed coal plant? I'd appreciate any information on the process.

Thank you in advance for your help,

John Thompson
Advocacy Coordinator
Clean Air Task Force
231 W. Main, Suite 1E
Carbondale, IL 62901

Phone(618) 457-0137
Fax (618) 457-0513

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Ph: 617-624-0234
Fax: 617-624-0230

Ballard, Carla

From: Joe Stark [qdrvrnws@grm.net]
Sent: Thursday, October 06, 2005 7:20 PM
To: Strength, Stephanie - Washington, DC
Subject: Power Plants

I am the editor of the Quad River News in Sheridan, MO. I am personally opposed to power plants being in or near my home. There is more to life than obtaining money. Such as a nice walk down the creek, or a 4 wheeler ride through a field. It's beautiful here, and power plants are ugly, looming eye-sores that create waste and pollution. Thanks -Marla McElvain

Ballard, Carla

From: Melody Omeara [melodyomeara@sbcglobal.net]
Sent: Thursday, October 06, 2005 3:24 PM
To: Strength, Stephanie - Washington, DC
Subject: power plant at big lake missouri

as a property owner at big lake we have enough problems keeping the lake full we do not need any more water pumped out lowering the water basin,plus there is alot of wild life that depends on the water and fresh air.there are very few places any more that you can go and visit that is as great view for wild life,fishing,camping,boating and just enjoying the fresh air and beauty and relax along side of the lake.there are many deer, eagle, geese and other great wildlife that this lake makes home for not counting all the families and friends that look forward to enjoying their weekends and people who live here year round.i and my wife live in st.joseph mo.which is 35 min. drive and we plan to move there and retire within the next 7 years.please keep the power plants out of here we enjoying our place very very much.wego there every weekend and so does family and friends.just check out how much property has been sold in the last year.we want more friendly people but forget the powerplant

thank you very much if you take time to read this and listen to my imput
PATRICK & MELODY O'MEARA
105 E.CHESTNUT
ST.JOSEPH,MISSOUR
64505

Ballard, Carla

From: Jomel Nichols [Jomel@DBPlans.com]
Sent: Thursday, October 06, 2005 9:44 AM
To: Strength, Stephanie - Washington, DC
Subject: Coal Fired Power Plant in NW Missouri

We would like to go on the record in opposition to the proposed Coal-Fired Power Plant in NW Missouri. We moved to this rural area to escape the pollution of the city and are disheartened that local decision makers aren't more dedicated to keeping our rural areas clean. We are personally exploring wind and solar power and would like to see our local utility providers doing the same. I would like my children to be able to enjoy clean air and water.

Sincerely,

Joe, Jomel, Paris and Maya Nichols
Residents, Savannah, Missouri

--

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

OCT 2 6 2005

NOV - 3 2005

Stephanie A Strength
Rural Utilities
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, D.C. 20250-1571

Dear Ms. Strength:

Re: Associated Electric Cooperative, Inc. proposed 660 MW coal-based power plant and associated electric transmission facilities in Carol County or Holt County, Missouri

Per your request, the Environmental Protection Agency (EPA) has reviewed the Alternatives Analysis, Macro-Corridor, and Site Selection studies for the Associated Electric Cooperative, Inc. (AECI) proposed coal based power plant in Missouri and associated electric transmission facilities as referenced above. Through our evaluation and experience with other proposed power plants in the Region, the three most significant issues related to coal based power plants are air quality, wetlands, and cumulative impacts.

Power plants are the largest emitters of air pollutants in the United States. Even with the newly proposed controls, power plants will have significant air emissions including volatile organic compounds (VOC), sulfur dioxide (SO_2), nitrogen oxides (NOx), and particulate matter (PM). Therefore, we recommend completing a thorough emissions accounting and air quality modeling analysis of the project including fugitive emissions from haul roads and storage piles. In addition to these criteria pollutants, mercury also represents a significant issue of public concern and scientific debate, therefore, we recommend evaluating mercury impacts at various scales (local and deposition area). Please see the attached air quality comments for more information.

The proposed power plant has the potential to impact wetlands. Although wetland impact criteria were used to determine the location of the plant, minimizing impact seemed to take precedence over avoidance. Please see the detailed wetland comments as attached.

Cumulative impacts are the third most significant issue related to power plants. We recommend that cumulative impacts analysis be done to identify the potential for significant impacts to transportation facilities, including railways and roadways, air pollution (locally and downwind), and wetlands. This analysis should consider other existing and reasonably foreseeable future projects within the area of this proposed plant's influence.

Thank you for considering our comments early in the environmental analysis process. Please contact Kim Johnson at (913) 551-7975 if you have any questions or concerns regarding this letter.

Sincerely,

Joseph E. Cothern
NEPA Team Leader
Environmental Services Division

cc: Kyra Morre, MDNR
Jane Ledwin, USFWS
Ms. Sandra Keo, Chairperson, Sac & Fox Nation in Kansas and Missouri

DETAILED COMMENTS

Associated Electric Cooperative, Inc.
Proposed Coal-based power plant and transmission facilities
Carol County or Holt County, Missouri

1. Air Quality - EPA requests an opportunity to review the air construction permit application which outlines the proposed air pollution controls and potential air emission limits for this project. This application will be submitted to the Air Pollution Control Program at the Missouri Department of Natural Resources and must be in compliance with the Clean Air Act.

2. Air Quality - We recommend including an evaluation of mercury impacts in your environmental analysis. A new plant will increase mercury emissions in the immediate project area, and will be additive with emissions from other existing and future sources in a larger impact area. We also recommend addressing the possibility of a mercury hot spot and any potential impact to human health and the environment. On October 21, 2005 EPA issued a notice of proposed rulemaking to reconsider certain aspects of the final Clean Air Mercury Rule (CAMR), (70 FR 28606) which was published on May 18, 2005. Due to the uncertainty of the applicable mercury regulations for coal-fired power plants, we recommend using the most current regulations at the time of your analysis.

3. Air Quality - We recommend that you work with the Missouri air permitting authorities to fully assess potential ozone impacts. Although project proximity to ozone non-attainment areas was used as criteria for site selection, the project will result in significant increases in emissions of ozone precursors and the potential exists for transport of these emissions to the Kansas City ozone maintenance area and the St. Louis ozone non-attainment area.

4. Airports - The reference to FAA Part 17 on page 197 should be changed to FAA Part 77. Part 17 is "Procedures for Protests and Contract Disputes." Part 77 is "Objects Affecting Navigable Airspace." Part 77 protects public use airports that have at least one runway which is 3200' long or greater. The Part 77 Reference can be found at CFR Title 14, Part 77, see the following web page: http://www.gpoaccess.gov/ecfr/

5. Drinking Water - We recommend that you contact Missouri Department of Natural Resources, Public Drinking Water Program at (573) 751-5331 for information concerning public water system requirements. The project proposes development of a well field in the Missouri River alluvium to provide water for operations, including an option to use this source for potable drinking water. It should be noted that by providing drinking water, the facility may be classified as a public water system and subject to regulation by the state of Missouri as such. The state of Missouri, Department of Natural Resources, has permitting, design, construction, treatment, testing, and operational requirements, which would be applicable in this circumstance. An evaluation would be required to determine the classification of the water source. Depending on the vulnerability of the wells to infiltration of surface water, the facility might be classified as "ground water

under the direct influence of surface water". If so, more stringent treatment and monitoring requirements would apply, in order to meet standards for drinking water safety.

6. River Crossings - Please contact Roger Wiebusch at the U.S. Coast Guard, (Suite 8.104E, 1222 Spruce Street, St. Louis, MO 63103) at (314) 539-3900, ext. 2378 to determine permit requirements for potential construction of a bridge over the Missouri River.

7. Wetlands - Part 6.0 Siting Alternatives – The AECI indicated that one of the critical elements in the siting process was locating a plant "outside of floodplains." (This is consistent with Executive Order 11988, dated May 24, 1977, which requires the consideration of alternatives to avoid adverse effects and incompatible development in floodplains.) However, at 6.1, page 66, the Report indicates that all 8 sites under consideration were located within a floodplain. Granted, the Report presents 3 criteria (i.e., cost of developing site in hilly terrain, the benefit-cost of transporting water, and the protection of visual landscapes) that apparently were used to eliminate any non-floodplain sites. Unfortunately, the Report provides no information that would serve as an examination of these criteria relative to any non-floodplain sites. Further, the reader is given a glimpse of the weighting assigned only to the first criteria, specifically a small 4% of all screening factors (see Table 6-2 on page 71). No weighting was provided for the other two criteria. EPA urges USDA to reconcile conflicting information about selecting floodplain sites within the context of the project's objective and with the Executive Order which urges agencies to avoid them. In particular, the project proponents should be made aware of Clean Water Act Section 404 Guidelines for Specification of Disposal Sites for Dredged or Fill Material (The Guidelines), which affect the selection of site alternatives. The requirements are provided in the The Guidelines at section 230.10 (a)(3), which have the effect of regulation, state that "where the activity associated with a discharge which is proposed for a special aquatic site (e.g., wetlands) does not require access or proximity to or siting within the special aquatic site in question to fulfill its basic purpose (i.e., is not "water dependent"), practicable alternatives that do not involve special aquatic sites are presumed to be available, unless clearly demonstrated otherwise." EPA does not consider a coal-fired power plant to be a water dependent activity; thus, a practicable alternative that is less environmentally damaging, e.g., non-wetland floodplain site or an upland site with no wetlands is presumed to exist. In addition, AECI should be aware that increased costs of alternatives, or an unwillingness to pursue practicable alternatives do not render such alternatives impracticable.

8. Wetlands - Table 6-1, page 68 – The table contains a number of cells with no information provided. Of the information that is presented, it is unclear how impacts shown in the table (e.g., Norborne potential wetlands = 7 acres) compare to impacts identified in the narrative (e.g., Norborne site wetlands = 18.25). We recommend that the table be completed, and that the narrative be used to explain any differences in available resources and known or expected impacts to those resources.

9. Wetlands - Table 6-1, page 68 – To ensure that complete information is provided for purposes of comparison, we recommend that the "Floodplains" row consistently indicate the amount of fill that would be expected for elevating a facility out of the floodplain.

10. Wetlands - 6.2 Identification of Proposed Sites, p. 66 – Given the lack of information provided in the assessment comparing the 8 sites (see comments above for Table 6.1), we do not believe that the conclusion, "None of the eight siting areas resulted in a location that was clearly above and beyond the other sites ..." is made with sufficient justification.

11. Wetlands - The Report indicates in numerous locations (pages 89, 97, 99) that the proposed project would result in numerous stream crossings. To ensure that aquatic life migration is maintained throughout area stream systems for any final site that is selected, we recommend that any crossings (e.g., bridges, culverts, etc.) be designed to pass bank-full discharges, and be set (i.e., culverts) at or slightly below grade so as to present no barriers to aquatic life.

12. Wetlands - Part 6.3.2.5.4, page 121 – The Report indicates that impacts to wetlands "must either be avoided or be mitigated...." We recommend that this language be corrected as follows: "must be avoided, or where not practicable to avoid, they must be mitigated...." In other words, avoidance of impacts, where practicable, is a requirement, not an option.

13. Wetlands - The Report is broken down into impacts examined at potential plant sites and in transmission line corridors. EPA recommends that impacts be aggregated into a summary table that would allow for a valuable comparison between project alternatives.

14. Wetlands - Part 6.3.3, page 134 – Although it may be premature to have included natural resources (e.g., streams, wetlands) mitigation costs into the project, the project proponent should be aware that such costs should be factored into the development costs.

15. Fish and Wildlife - To address potential impacts to Threatened and Endangered Species in the project area, please contact Charlie Scott at the Ecological Services office, U.S. Fish and Wildlife, 101 Park DeVille Drive, Suite A, in Columbia, MO 65203-0057. His phone number is 573-234-2132. Impacts to sensitive ecosystems could be analyzed through a local mercury deposition analysis. A similar evaluation was included in the environmental analysis done by the Corps of Engineers, St. Louis District, for the Holcim, Inc. Clean Water Act Section 404 permit.

16. Government to Government Coordination - Please contact Ms. Sandra Keo, Chairperson of the Sac & Fox Nation in Kansas and Missouri, Phone: 785/742-7471, to discuss the potential impacts of the power plant, both on the community and the environment, depending on the proximity of power plant (Forbes location) to the Sac and Fox Indian Reservation and their residents. Also please include a discussion of how the tribe can be more involved with decision making and mitigation of these potential impacts.

Missouri Department of Transportation

MoDOT

Pete K. Rahn, Director

105 West Capitol Avenue
P.O. Box 270
Jefferson City, MO 65102
(573) 751-2551
Fax (573) 751-6555
www.modot.org

September 23, 2005

Ms. Stephanie A. Strength
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW
Stop 1571
Washington, D.C. 20250-1571

Dear Ms. Strength:

SUBJECT: Proposed Missouri power plant

This is in reply to your August 5, 2005 letter regarding the proposal by Associated Electric Cooperative, Inc. (AECI) of Springfield, Missouri to construct a coal-based power plant at either a site near Norborne (Carroll County) or else near Big Lake (Holt County). We have reviewed the planning documents you provided and have the following comments.

Norborne Site

Our North Central District Office offered the following comments:

Generally, the largest impact to MoDOT will be the construction traffic using the MoDOT system to get to the site. Your planning documents indicate that 1,000 construction workers plus 75 trucks delivering materials will be accessing the site each day. Missouri Route DD will need work in order to hold up under the proposed construction traffic for several years.

Once constructed and during normal operations, 135 employees plus the trucking of flyash, gypsum, lime and ammonia will travel to and from the power plant. MoDOT will need to assess the impacts to our system caused by this traffic. What will be the frequency of the long-term trucking of these materials?

For our assessment of the proposed at-grade rail crossings at Missouri Route DD and either Missouri Route AA or else Missouri Route JJ, we shall need to know the frequency and duration of trains crossing at these locations. We also need clarification about the rail crossing at Missouri Route DD because the planning documents indicate an at-grade crossing, yet a consultant working on a Request for Proposal contacted our staff about specifics for a rail grade separation there.

Access to the proposed substation at the northeast corner of Missouri Routes DD and JJ will require a MoDOT permit. Any additional access points or changes in access points from Missouri Route DD to the plant will also require MoDOT permits.

Our MoDOT District Office in Macon will be the point of contact for the Norborne site. Please contact Mr. Dan Niec, District Engineer, North Central District, Missouri Department of Transportation, 902 North Missouri Street, P.O. Box 8, Macon, MO 63552. The telephone number there is (660) 385-3176; the fax is (660) 385-4195.

Big Lake Site

Our Northwest District Office offered the following comments:

Interstate Access: To construct a power plant at the Big Lake Site will require truck-delivered materials (almost everything used for the construction of the power plant) to be shipped on Interstate 29 and exited at either the southerly U. S. Route 59 interchange or the Missouri Route H interchange near the Honey Creek Wildlife area. From either of these interstate access points, it will be a 15-mile trip on cold mix routes to the project site. The roads will not support the heavy volume of heavy truck traffic and MoDOT will have to upgrade the roads with a minimum of four inches (4") new base and 10 inches of asphalt just to make them usable for the construction period. Depending on the origin of the materials, truck traffic may also originate in Kansas, cross the U. S. Route 159 Missouri River Bridge and then use Missouri Route T to access the site. That route is approximately 28 miles long.

Rail Crossing: The Burlington Northern-Santa Fe (BNSF) Railroad would be the rail carrier of choice to deliver the coal to the plant. Based on the generating capacity, the plant will probably use a minimum of two trains per week in the start-up mode. The BNSF track has a single high-speed main track that passes within three (3) miles of the site. A siding, nearly 1.75 miles long, might have to be constructed parallel to the main track, and a loop spur track will have to be constructed to the power plant facility which will require an at-grade crossing with Missouri Route T in Holt County. We believe that since this power plant project will be a benefit for the railroad, they likely will not object to the at-grade crossing which they will construct, own, operate and maintain forever. All MoDOT will need to do is provide the permit and negotiate the agreement. The railroad will likely build it all.

Rail Siding: In the vicinity of the power plant, the BNSF track right of way is bounded by Missouri Route T on the west and by the Riverbreaks State Forest on the east. Some additional care will be required to build a siding in this narrow corridor, if the BNSF chooses to do so.

Bridges: There are several small bridge structures on Missouri Route T, Missouri Route 111, and U.S. Route 159. It might be necessary to schedule some or all of these structures for expensive improvements to carry the numerous heavy trucks.

Worker access from St. Joseph on Missouri Route T: During construction of the power plant and during the life of the facility, many of the workers will likely come from the St. Joseph area. The most direct access to the power plant will be westerly from St. Joseph on Missouri Route T to where it dead ends in Nodaway. At Nodaway, the workers will have to use a gravel county road for a distance of five (5) miles to reconnect with Missouri Route T at the intersection of Missouri Route T and Missouri Route U. From this intersection, it is approximately five (5) additional miles to the power plant. The disposition of the five-mile portion of the gravel county road might have to be addressed, just to provide access for the workers to the power plant.

General roadway infrastructure: There are four roadway corridors that provide access to the proposed site. Most of the roads that comprise the existing roadway infrastructure are two-lane, low-volume, cold mix routes. In most cases the roads consist of two ten-foot (10') or two eleven-foot (11') lanes with no shoulders. This infrastructure is substandard and unsuitable to accommodate the large trucks and an increased volume of traffic. MoDOT suggests that the proponents, in coordination with MoDOT, designate a single corridor to be used by the trucks and other construction vehicles so MoDOT does not have to rebuild an excessive amount of the existing roadway network.

The Northwest District's concerns are similar to those of the North Central District in that the local roads are cold mix and would not withstand increased truck traffic without some type of rehabilitation to accommodate the additional traffic. The Northwest District suggests a designated truck route from Interstate 29 to the Big Lake facility be selected. Innovative Financing Funds might be used to make the necessary improvements on the truck route. Railroad crossing improvements would also need to be included in the rehabilitation, depending upon the site selection for the plant and the selection of the truck route.

Our MoDOT District Office in St. Joseph will be the point of contact for the Big Lake site. Please contact Mr. Don Wichern, District Engineer, Northwest District, Missouri Department of Transportation, 3602 North Belt Highway, P.O. Box 287, St. Joseph, MO 64502. The telephone number there is (816) 387-2350; the fax is (816) 387-2359.

Summary

Our concerns can be summarized as follows:

Existing state routes to the proposed sites are low-volume, cold mix roadways. We shall need to consider upgrading these facilities, including roadway bridges, and perhaps even non-MoDOT roadways to handle the construction traffic and the operations traffic. The identification of a specific route(s) for construction and operations access is recommended in coordination with the appropriate MoDOT District Office to help us all focus our needs and resources.

We shall need clarification of the types of rail crossings being proposed across MoDOT roadways. The type of crossings being proposed should be tied to the frequency and duration of trains accessing the power plant sites. Coordination among AECI, MoDOT and the appropriate railroad companies is recommended to establish concepts and responsibilities in this issue.

Permits will need to be acquired from the appropriate MoDOT District Office for any access desired to the MoDOT system.

MoDOT also is interested in discussing the availability of cinders from the power plant for use on the roads of our system regardless of whether the site chosen is in our North Central District or our Northwest District. We would consider a contract between AECI and MoDOT for the cinder material that MoDOT could use on the roads.

We assume that we shall be able to work with you to address these issues during the course of the preparation of the National Environmental Policy Act (NEPA) documents for the proposal and also subsequent to that site selection and approval.

Please provide our District Office contacts noted above and our Central Office with NEPA documents as they are prepared. We shall review those during the public comment period and offer any comments that we might have. Our Central Office contact is Mr. Mark Kross, Environmental Process and Policy Specialist, Design Division-Environmental Section, Missouri Department of Transportation, P.O. Box 270, Jefferson City, MO 65102. Please address any parcels to Mr. Kross at MoDOT, 1320 Trail Creek Drive, Jefferson City, MO 65109.

Sincerely,

Pete K. Rahn
Director

msk-de

cc: Don Wichern-1
Dan Niec-2
Kathy Harvey-de

DEPARTMENT OF THE ARMY
KANSAS CITY DISTRICT, CORPS OF ENGINEERS
700 FEDERAL BUILDING
KANSAS CITY, MISSOURI 64106-2896

REPLY TO
ATTENTION OF:

September 23, 2005

Regulatory Branch
(200502430)

Ms. Stephanie A. Strength
U.S. Department of Agriculture
Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Ave., SW, Stop 1571
Washington, DC 20250-1571

Dear Ms. Strength:

As requested by your agency in a letter dated August 5, 2005, the Kansas City District's Regulatory Branch has reviewed an Alternatives Report, dated August 2005, prepared by Associated Electric Cooperative of Springfield, Missouri, for a proposed baseload power plant. Our review of the Report for the proposed 660 MW coal-based power plant and associated electrical transmission facilities did not identify any significant issues, at this time, which are related to our program responsibilities. We appreciate the opportunity to comment on the proposed project and look forward to continued participation in the NEPA process during preparation of an Environmental Impact Statement for the proposal.

If you have any questions or issues you would like to discuss regarding this matter, please feel free to write me at the address above or to call/e-mail me at 816-983-3656, (FAX 816-426-2321), or e-mail Robert.j.smith@nwk02.usace.army.mil.

Sincerely,

Robert J. Smith
Special Projects Manager
Regulatory Branch

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Oregon, Missouri/August 22, 2005

The location in Holt county for the proposed coal/fueled power plant would cause negative impact on the community as a whole. This area is along one of 3 major fly ways for waterfowl, shorebirds and passerines. Since these birds migrate at night, there would be many collisions with buildings and towers, as well as lines. We are opposed to the construction of the plant here for this reason, as well as health risks, noise, air pollution, interferance with hunting, wildlife and water use.

Optional: Name: Tammie Rogers

Address: 305 Weightman Rd Mound City, MO 64470

If you would like to take this form with you, please mail to:

Stephanie A. Strength
USDA, Rural Utilities Service,
Engineering & Environmental Staff
1400 Independence Ave. SW
Mail Stop 1571, Room 2244
Washington, DC 20250-1570
202-720-0468 or stephanie.strength@wdc.usda.gov

USDA Rural Development

Comments/Questions

U. S. Department of Agriculture, Rural Development,
Utilities Programs (Rural Utilities Service)
Scoping Meeting

Associated Electric Cooperative, Inc.
Construction of a 660 Megawatt Coal-Based Electrical Generating Plant
Norborne, Missouri/August 25, 2005

I have several concerns: 1. Is the water issue-the surveyors from AECI stated to us that there is not enough water in the aquafor for this plant & everyone who draws water from it. 2. The emissions from the coal-fired plant- like mercury, uranium, & other particulate matter. 3. The loss of productive agricultural land and the farmers who farm it. The loss of income and the farmers losing the land. 4. The Families that are going to lose their homes & their land. Some of these families are Vietnam Vets that served this country & came home and now farm this Land & Live there and they not only will ~~be~~ lose their source of income but their homes as well. This is WRONG!!!!

Optional: Name:

5. The fact that AECI stated that they will NOT train unqualified applicants to work there. When AECI was given the opportunity to provide an educational curriculum to a local Technical school to train local individuals to a qualified status to apply for jobs, They said "NO"

Address:

I hope that AECI is denied funding for the coal fired plant at the Norborne Site. There are numerous Reasons for my decision to be able to list. I appreciate your time & cooperation on this subject.

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