

PROPOSED NEW COAL-FIRED POWER PLANT  
**COMMENT SUMMARY FOR PUBLIC  
SCOPING MEETINGS IN CONNECTION  
WITH PREPARATION OF JOINT  
FEDERAL/STATE EIS**

**FOR THE SOUTHERN MONTANA  
ELECTRIC GENERATION AND  
TRANSMISSION COOP, INC.  
HIGHWOOD STATION**

**ADDENDUM 1 TO ADD SCOPING  
COMMENTS RECEIVED IN RESPONSE TO  
NOTICE FROM THE MONTANA  
DEPARTMENT OF ENVIRONMENTAL  
QUALITY**

SALEM SITE AND SALEM INDUSTRIAL SITE

**DATED: JUNE, 2005**

## CONTENTS

- 1 INTRODUCTION
- 2 PUBLIC SCOPING
  - 2.1 Goals and Objectives
  - 2.2 Notification Process
  - 2.3 Public Scoping Meetings
  - 2.4 Public Comments

## APPENDICES

- Appendix H: Public Notice
- Appendix I: Public Scoping Meeting Agenda
- Appendix J: Attendees List
- Appendix K: Public Comment Summary and Letters
- Appendix L: Agency Letters

# 1 INTRODUCTION

This Addendum 1 incorporates comments received by the Montana Department of Environmental Quality (MDEQ) during their 30 day public scoping period (April 6 – May 6, 2005) related to the proposed construction of a coal-fired electric plant in the area of Great Falls, MT. This State scoping is supplementary to the Federal scoping conducted by the USDA Rural Utilities Service (“RUS”) during the fall, 2004.

The MDEQ public scoping meeting was conducted on April 18, 2005 at the Great Falls Civic Center. The public was notified by advertisements in the local newspapers, via State websites and through specific invitations. Copies of the newspaper notices are included in **Appendix H**.

## 2 MDEQ PUBLIC SCOPING MEETING

### 2.1 GOALS AND OBJECTIVES

The goal of a public scoping meeting is to solicit comments and encourage participation in accordance with RUS guidelines and MDEQ scoping requirements. The objective is 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 Environmental Impact Study (EIS).

### 2.2 NOTIFICATION PROCESS

A Meeting Notice to hold public scoping meetings and to prepare an EIS was published by MDEQ on their website and the press release was sent to the following media. A copy of the notice is included in **Appendix H**.

- The Great Falls Tribune
- Cascade Courier
- High Plains Warrior
- KEIN AM
- KFBB TV – ABC
- KMON AM
- KRTV – CBS
- KTGF TV – NBC
- KXGF AM

In addition the Press Release was sent to Newlinks, the Associated Press, the Western Environmental Trade Association, the Montana Environmental Information Center (MEIC), Senator Conrad Burns office, The Environmental Protection Agency (EPA) and the Helena Independent Record. A notice for the meeting was also sent to ninety nine 99 additional individuals per the mailing list in **Appendix H**.

## 2.3 PUBLIC SCOPING MEETING

The public scoping meeting for the project was conducted by MDEQ per the agenda shown in **Appendix I**. There were 45 people registered on the attendee's list. There were additional people in attendance that did not sign the Attendance List. The Attendee's list is shown in **Appendix J**.

## 2.4 PUBLIC COMMENTS

A total of thirty-eight (38) written responses containing one hundred and thirty seven (137) comments were received from the public and agencies during the scoping comment period that ended May 6, 2005. Comments were received in the form of direct letters mailed to MDEQ, emails, and completed comment forms. All written comments were entered into a spreadsheet for analysis and summary. A summary of this information is included in **Appendix K**. All original completed public comment forms and sign-in sheets are on file at MDEQ.

Some comment letters were received from parties who also commented during the RUS Scoping Period. These letters are included in the response and comment count to insure that any new comments were not overlooked. The duplicate responder's names are highlighted in ***bold italics***.

## SUMMARY OF COMMENTS BY CATEGORY

### Air Quality

A total of fifty-one (51) comments were received on air quality issues. Ten (10) of the comments were in regards to sulfur dioxide (SO<sub>2</sub>) and nitrogen dioxides (NO<sub>x</sub>) emissions levels. Eight (8) comments were in regard to various forms of particulate matter emissions. Seventeen (17) comments were in regards to mercury emissions and the health issues related to them. Fourteen (14) comments pertained to emissions of carbon dioxide (CO<sub>2</sub>) and other greenhouse gases and the potential effects on global warming. One (1) comment expressed concern about dioxin emissions. One (1) comment expressed general concern about all plant emissions.

### Alternative Fuels

Two (2) comments expressed concern that fuels other than coal will be burned and that emissions from the other fuels may not be known.

### Alternative Technology

Nine (9) comments were received regarding alternative technologies and the need to use renewable resources in lieu of coal for generating electricity. Wind generation was the main technology listed as an alternative. Others suggested study of Integrated Gasification Combined Cycle (IGCC) technology and solar power.

### Conservation

One (1) comment was received regarding the general need for conservation alternatives and incentives.

### Due Process/Public Input

Three (3) comments were received expressing concern that the public was not involved in the selection of the generating alternative for the plant.

### **Economic Viability**

Three (3) comments questioned the ability of the plant to operate at a price competitive rate. One (1) of these comments questioned the future legality of fossil fuel generating plants.

### **Environment (General)**

There were five (5) comments on general environmental issues. The comments centered on environmental impacts that could be caused by the proposed power plant and the type of controls that would be put in place to minimize those impacts.

### **Health & Safety**

There were twelve (12) comments related to health and safety. Most of the comments related to mercury emissions and the alleged possible link to autism. There were also comments about general human health concerns associated with the proposed power plant, including asthma and cancer.

### **Land Use**

Two (2) comments were in regard to land use. One (1) expressed concern that the plant would be built on valuable farm land. One (1) asked why the plant would not be located closer to the coal mine source.

### **Noise**

There was one (1) comment expressing concern that the plant will contribute to noise pollution in the area.

### **Project Support**

Eleven (11) letters were received expressing support for the project. Comments specifically pointed to economic benefits, permanent job growth, affordable power and environmental friendly operation.

### **Reclamation/Remediation**

Two (2) comments questioned whether there were plans for future reclamation or remediation of the site if the plant were to shut down or be decommissioned.

### **Solid Waste**

There were ten (10) comments regarding possible disposal of solid waste on site. Solid waste disposal topics include the amount of ash to be disposed, potential for leakage and run-off, monitoring requirements, and the adequacy of current laws to regulate solid waste disposal.

### **Traffic**

One (1) comment was received expressing concern about added traffic for plant activities.

### **Visual**

Two (2) comments were received on visual impacts. One comment was in regard to possible light pollution. One expressed concern about haze near parks and reserves.

## **Water**

Sixteen (16) comments on water issues were received. Six (6) of the comments expressed concern regarding pollution of water resources resulting from power plant emissions. The other ten (10) were in regard to water rights and usage, specifically questioning the use of Great Falls water rights for the project and the usage of water in a drought condition.

## **Wildlife**

There were two (2) comments regarding the potential effects of mercury exposure of local fish.

## **Agency Comments**

The US Fish and Wildlife Service sent a letter referring back to their comment to the RUS scoping request. The Montana Department of Transportation stated that they would like to review effects of the plant on right-of-way and traffic volume. The Lewistown Water Resources Office advised that water use will require authorization from the Department of Natural Resources. Agency Letters are attached in **Appendix L**.

## Appendix H

### Public Notice

FOR IMMEDIATE RELEASE  
April 6, 2005

FOR MORE INFORMATION  
Kathy Johnson  
DEQ MEPA Unit  
(406) 444-1760  
[katjohnson@mt.gov](mailto:katjohnson@mt.gov)

DEQ SEEKING PUBLIC COMMENTS ON PROPOSED GREAT FALLS POWER  
PLANT

Helena -- The Montana Department of Environmental Quality (DEQ) began a public scoping period today to accept public comments on the preparation of an Environmental Impact Statement for the proposed Highwood Generation Station coal-fired electrical generation facility to be located near Great Falls, MT.

Southern Montana Electric Generation and Transmission Cooperative, Inc. supplies electricity to five rural electric cooperatives in central and south-central Montana and a municipal utility. The company is proposing to construct the 250 megawatt coal-fired power plant. Highwood Generating Station Unit #1 would use a circulating “fluidized bed” combustion technology fueled by low sulfur southern Montana coal..

The purpose of scoping is to allow interested members of the public to express their comments and concerns regarding the proposed project and associated permits. A public meeting has been scheduled for Monday, April 18, to take comments. It will be held in the Missouri Room of the Great Falls Civic Center beginning at 7:00 p.m.

Written comments may also be sent to the DEQ. They should be sent to Kathy Johnson, Montana DEQ, PO Box 200901, Helena MT, 59620-0901, or by e-mail to [katjohnson@mt.gov](mailto:katjohnson@mt.gov). Comments must be received no later than May 6, 2005.

The DEQ will make reasonable accommodations for persons with disabilities who wish to participate in this meeting. If you require an accommodation, please contact the department at the address above no later than April 13, 2005.

### END ###



April 6, 2005

Dear Interested Citizen:

The Montana Department of Environmental Quality (MDEQ) is announcing a 30-day public scoping period under the Montana Environmental Policy Act (MEPA) for the following proposed project and its related state permits:

**Highwood Generation Station Unit #1**  
**A 250 megawatt (MW) Coal-Fired Electrical Generating Facility**  
**near Great Falls, Montana**

Southern Montana Electric Generation and Transmission Cooperative, Inc. (SME) is proposing to construct a 250 MW coal-fired power plant at a site near Great Falls (Highwood Generation Station Unit #1). SME conducted an alternatives analysis to meet the power needs of its customers and concluded that owning its own source of electrical generation is in the best interests of its members. Results of a statewide power plant siting study by SME identified two sites near Great Falls as having the best attributes to support a coal-fired generation plant. Further details on the proposal is provided in the enclosed scoping document.

MDEQ is entrusted with the authority to review and issue environmental permits required for discharges from power generation and other industrial facilities. The department must conduct an environmental analysis under MEPA of its decision regarding these environmental permits. Because SME applied for financing for the project from the Rural Utility Service (RUS), U.S. Department of Agriculture, RUS must also conduct an environmental analysis of the project under the National Environmental Policy Act (NEPA). MDEQ will prepare and issue a joint environmental impact statement (EIS) for the project with RUS.

MDEQ is holding a public meeting and will collect comments during a 30-day public comment period on the state permits and licenses that SME would need to implement its proposed power plant. RUS conducted a public scoping meeting and received public comments on the proposed project during the fall of 2004. The purpose of public scoping is to allow interested members of the public to express their comments and concerns regarding the proposed project and associated permits. The agencies will then consider those comments and concerns in determining the issues to be addressed in the EIS.

You are invited to attend MDEQ's public scoping meeting as outlined below. The department will make reasonable accommodations for persons with disabilities who wish to participate in

this meeting. If you require an accommodation, please contact the MDEQ at the address below no later than April 13, 2005:

**Public Scoping Meeting  
on the Preparation of an EIS for  
Southern Montana Electric Generation and Transmission Cooperative's  
Highwood Generation Station Unit #1**

*Location: Great Falls Civic Center, Missouri Room*

*Time: April 18, 2005, 7:00 p.m.*

You may submit written comments or concerns to MDEQ at the meeting. Or, if you wish, you may mail or e-mail them to MDEQ at the addresses listed below no later than May 6, 2005:

Kathleen Johnson, MEPA Coordinator  
Re: SME's Highwood Generating Station EIS  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901  
406-444-1760  
[katjohnson@mt.gov](mailto:katjohnson@mt.gov)

If you already submitted comments to RUS during its scoping period, it is not necessary for you to comment again to MDEQ during the State's scoping period unless you have new or additional concerns. Both agencies will consider all comments received by RUS as well as MDEQ when preparing the draft and final EISs.

Sincerely,

[Signed: April 6, 2005]

Thomas M. Ellerhoff  
Environmental Program Manager

Kelly Audet  
PO Box 5021  
Great Falls, MT 59403

Coleen Balzarrici  
3230 2<sup>nd</sup> Avenue S.  
Great Falls, MT 59405

JoDee Black  
Great Falls Tribune  
PO Box 5468  
Great Falls, MT 59403-5468

Clayton Braden  
2708 4<sup>th</sup> Avenue NW  
Great Falls, MT 59404

David Brown  
PO Box 524  
Great Falls, MT 59403

Rep. Edward Butcher  
House of Representatives  
State Capitol  
Helena, MT 59620

Martha Cappio  
332 36<sup>th</sup> Avenue NE  
Great Falls, MT 59401

Ted Church  
PO Box 23  
Hysham, MT 59038

Arthur DeVries  
PO Box 156  
Roberts, MT 59070

Dave Dobbs  
609 40<sup>th</sup> Street N.  
Great Falls, MT 59401

Lee Ebeling

Debbie Ball-Giop  
1417 Old Hwy. 91  
Cascade, MT 59421

Randy Bize  
1000 1<sup>st</sup> Avenue S.  
Great Falls, MT 59405

Charles Bocock  
51 Prospect Drive  
Great Falls, MT 59401

Clayton Briden  
1012 24<sup>th</sup> Avenue SW  
Great Falls, MT 59401

Jim and Marcia Bundi  
4410 10<sup>th</sup> Avenue N.  
Great Falls, MT 59405

Rep. Tim Callahan  
House of Representatives  
State Capitol  
Helena, MT 59620

John A. Cassidy  
3712 7<sup>th</sup> Avenue N.  
Great Falls, MT 59401

Sen. John Cobb  
Montana Senate  
State Capitol  
Helena, MT 59620

Rep. Sue Dickenson  
House of Representatives  
State Capitol  
Helena, MT 59620

Russ and Patty Dunn  
1510 Central  
Great Falls, MT 59401

4700 Huckleberry Drive

Great Falls, MT 59404-4633

Mae Nan Ellingson  
Courtney Feldman  
746 Highwood Road  
Great Falls, MT 59405

Richard Fisher  
3015 Acacia Way  
Great Falls, MT 59404-3692

Dan Flynn  
1901 S. Montana  
Butte, MT 59701

Clark Fritz  
PO Box 3  
Decker, MT 59025

Gary Gates  
2725 Skyway Drive, Suite 2  
Helena, MT 59602-1213

Patrick Gordon  
2919 5<sup>th</sup> Street NE  
Great Falls, MT 59401

Randy Hanson  
PO Box 311  
Havre, MT 59501

Terry Hilgendorf  
3507 Fairway Drive  
Great Falls, MT 59401

Dan Huestis  
2901 4<sup>th</sup> Avenue N.  
Great Falls, MT 59401

Nurul Islam, Env. Protection Spec.  
Rural Utilities Service

10055 Grant Creek Rd.  
Missoula, MT 59808

Joanne Fisher  
City-County Health Dept.  
115 4<sup>th</sup> Street S.  
Great Falls, MT 59401

Jaybe Floyd  
12 Homestake Lane  
Great Falls, MT 59405

Rep. Eve Franklin  
House of Representatives  
State Capitol  
Helena, MT 59620

Rep. Kathleen Galvin-Halcro  
House of Representatives  
State Capitol  
Helena, MT 59620

Rep. George Golie  
House of Representatives  
State Capitol  
Helena, MT 59620

Mayor Randy Gray  
City of Great Falls  
P.O. Box 5021  
Great Falls, MT 59403

Randy Harmon  
2224 2<sup>nd</sup> Street S.  
Great Falls, MT 59405

Mike Hoy  
232 Salem Road  
Great Falls, MT 59405

Scott Irvin  
613 NE Main Street, Suite E  
Lewistown, MT 59457

Engineering & Environmental Staff  
1400 Independence Ave, SW, Stop 1571

Washington, DC 20250-1571

Mike Jacobson

Patrick Judge  
PO Box 1184  
Helena, MT 59624

Harriett King  
Seattle News Desk  
McGraw-Hill / Platts  
[harking@oz.net](mailto:harking@oz.net)

Jack Kovacich  
PO Box 583  
Lakeside, MT 59922

Carol Lawton  
1406 3<sup>rd</sup> W. Hill Dr.  
Great Falls, MT 59401

Mark Lindberg  
Governor's Office  
PO Box 200801  
Helena, MT 59620-0801

LeRoy Malsam  
2400 River Rd. N.  
Great Falls, MT 59401

Dan Martin  
2701 Prospect Avenue  
Helena, MT 59620-1001

Pete and Ruth McDermott  
3720 2<sup>nd</sup> Avenue S.  
Great Falls, MT 59405

PO Box 5021  
Great Falls, MT 59403

Larry Kaufman  
1817 Dover Road  
Billings, MT 59105

Peter Klevberg  
1601 2<sup>nd</sup> Avenue N., Suite 116  
Great Falls, MT 59401

Dale Krause  
12 3<sup>rd</sup> Street NW, Suite 300  
Great Falls, MT 59403

John Lawton, City Manager  
City of Great Falls  
PO Box 5021  
Great Falls, MT 59403

Cheryl Lucas  
1618 Central  
Great Falls, MT 59401

Sen. Jeff Mangan  
Montana Senate  
State Capitol  
Helena, MT 59620

Maxim Technologies  
303 Irene Street  
Helena, MT 59601

Megan McKay  
400 27<sup>th</sup> Street NW  
Great Falls, MT 59404

Rep. Joe Mckenney  
House of Representatives  
State Capitol  
Helena, MT 59620

Rep. Mike Milburn  
House of Representatives  
State Capitol  
Helena, MT 59620

John Murphy  
3506 2<sup>nd</sup> Avenue N.  
Great Falls, MT 59401

Jesse Oldham  
6100 Buckboard Lane  
Great Falls, MT 59404

Cheryl Patton, Asst. City Mgr.  
City of Great Falls  
PO Box 5021  
Great Falls, MT 59403

Carol Peretti  
1221 10<sup>th</sup> Avenue SW  
Great Falls, MT 59401

John Prinkki  
Box 2020  
Roberts, MT 59070

Cheryl Reichert, MD, PhD  
51 Prospect Drive  
Great Falls, MT 59405

Sen. Don Ryan  
Montana Senate  
State Capitol  
Helena, MT 59620  
Denver Schlaeppi  
PO Box 20792

Duane Mellinger  
110 N. Warren  
Helena, MT 59601

Damon Murdo  
Montana Historical Society  
225 N. Roberts  
Helena, MT 59620-1201

James O'Hara  
Chouteau Co. Commissioners  
Courthouse  
Fort Benton, MT 59442

Rep. John Parker  
House of Representatives  
State Capitol  
Helena, MT 59620

Ole Stimac  
Plumbers & Fitters #41  
PO Box 1703  
Great Falls, MT 59403

Mark Plank  
Rural Utilities Service  
Engineering & Environmental Staff  
1400 Independence Ave, SW, Stop 1571  
Washington, DC 20250-1571

Arlyne Reichert  
1409 4<sup>th</sup> Avenue S.  
Great Falls, MT 59405-2415

Russell Rice  
1925 4<sup>th</sup> Avenue N.  
Great Falls, MT 59401

Earl Salley  
1104 19<sup>th</sup> Street S.  
Great Falls, MT 59405

Billings, MT 59104

David Schmidt  
303 Clarke St.  
Sen. Trudi Schmidt  
Montana Senate  
State Capitol  
Helena, MT 59620

Helena, MT 59601

Rich Southwick  
173 Cottonwood  
Townsend, MT 59644

Allan Steinle  
10 W. 15<sup>th</sup> St., Suite 2200  
Helena, MT 59626

Nadine Symons  
1107 1<sup>st</sup> Avenue S.  
Great Falls, MT 59405

Diana Talcott  
2004 1<sup>st</sup> Avenue S.  
Great Falls, MT 59401

Sen. Jon Tester  
Montana Senate  
State Capitol  
Helena, MT 59620

Joyce Thares, Exec. Secretary  
City of Great Falls  
PO Box 5021  
Great Falls, MT 59403

Matt Thoeny  
1615 5<sup>th</sup> St. NW  
Great Falls, MT 59404

Ken Thornton  
31 Paradise Lane  
Great Falls, MT 59404

Dennis Tighe  
717 13<sup>th</sup> Street SW  
Great Falls, MT 59404

James Torske  
314 N. Custer Avenue  
Hardin, MT 59034

Sen. Joseph Tropila  
Montana Senate  
State Capitol  
Helena, MT 59620

Bob Walker  
PO Box 57  
Joliet, MT 59041

John Wardell  
U.S. EPA  
10 W. 15<sup>th</sup> St., Suite 3200  
Helena, MT 59626

Lois M. Wells  
1516 3<sup>rd</sup> Avenue S.  
Great Falls, MT 59405

Jim Whitaker  
4020 5<sup>th</sup> Avenue S.  
Great Falls, MT 59405

R. Mark Wilson  
US Fish & Wildlife Service  
100 N. Park, Suite 320  
Helena, MT 59601  
Bill Wiseman  
3310 Centennial Cr.  
Great Falls, MT 59404

Rep. William Wilson  
House of Representatives  
State Capitol  
Helena, MT 59620

R.E. Wynia  
203 20<sup>th</sup> St. S.

Great Falls, MT 59405  
Ronald Yates  
3817 8<sup>th</sup> Avenue S.  
Great Falls, MT 59405



Appendix I

Public Scoping Meeting Agenda

Agenda  
**Montana Department of Environmental Quality**  
**Public Scoping Meeting**  
**for**  
**Southern Montana Electric Generation and Transmission Cooperative, Inc.**  
**Highwood Generating Station Unit #1**  
**Environmental Impact Statement**  
April 18, 2005 7:00 pm  
Great Falls Civic Center, Missouri Room

- |  |     |
|--|-----|
| 1. Open Meeting/Introductions (5 minutes)  | DEQ |
| 2. Presentation on Highwood Generating Station (25 minutes)  | SME |
| 3. Overview of MEPA and Permitting Process (15-20 minutes)   | DEQ |
| 4. Information on the Applicable Permits and Opportunity for the Public to Ask Questions (until 9:00 p.m.) |     |

*Separate Stations to address questions and provide information:*

- |  |      |
|--|------|
| ➤ Air Quality Permitting Program   | DEQ  |
| ➤ Water Quality Permitting Program   | DEQ  |
| ➤ Solid Waste Management Program   | DEQ  |
| ➤ Public Water Supply and Waste Water Program                                    | DEQ  |
| ➤ Montana Environmental Policy Act (MEPA)/EIS process                            | DEQ  |
| ➤ Water Rights   | DNRC |
| ➤ SME Displays and Exhibits (i.e., power plant diagram, transmission maps, etc.) | SME  |

*Comment Sheets are available to provide opportunity for written submission of questions and comments either at the public scoping meeting or by mail before May 6, 2005.*

## Appendix J

### Attendees List

**Southern Montana Electric Generation  
and Transmission Cooperative, Inc.**

**Highwood Generating Station Unit #1  
Public Meeting Attendees  
April 18, 2005**

Debbie Ball-Giop  
1112 7<sup>th</sup> Street S.  
Great Falls, MT 59405

Wally Bell  
1425 8<sup>th</sup> Ave. S.  
Great Falls, MT 59405  
[bellmeek@in-tch.com](mailto:bellmeek@in-tch.com)

Charles Bocock  
51 Prospect Drive  
Great Falls, MT 59401

Bill Boland  
3401 4<sup>th</sup> Avenue N.  
Great Falls, MT 59401

Randy Boysun  
1000 First Ave. S.  
Great Falls, MT 59401

Helen Comer  
403 Park Garde Rd.  
Great Falls, MT 59404

Don Cabbage  
506 9<sup>th</sup> Ave. SW  
Great Falls, MT 59403

Andree Deligelisch  
3016 Central  
Great Falls, MT 59401

Joe Dirksen  
PO Box 77  
Winifred, MT

Aart Dolman  
[aart-dolman@bresnan.net](mailto:aart-dolman@bresnan.net)

David Dover  
HC 81, Box 61  
Buffalo, MT

Lee Ebeling  
4700 Huckleberry Dr.  
Great Falls, MT 59404

Bob Evans  
Fergus Fleet

Alan Evans  
4380 US Hwy. 87 S.  
Roundup, MT

Pat Farmer  
PO Box 6045  
Helena, MT 59604

Richard and Joanne Fisher  
3015 Acacia Way  
Great Falls, MT 59404

William FitzGerald  
[wcfitz@rangeweb.net](mailto:wcfitz@rangeweb.net)

Mert and Vicki Freyholtz  
Box 211  
Gildford, MT 59525

G. Gallagher  
Box 1234  
Great Falls, MT 59403  
Randy Gray  
[randygray@gmail.com](mailto:randygray@gmail.com)

Randy Hanson  
520 6<sup>th</sup> Avenue  
Havre, MT 59501

LisaLotte Hardman  
3726 4<sup>th</sup> Avenue N.  
Great Falls, MT 59401  
[lisa-hardman@bresnan.net](mailto:lisa-hardman@bresnan.net)

Gary Helm  
Tongue River Electric

Dave Kelsey  
1902 Molt Rapelje Road  
Molt, MT

John Koslosky  
38 Treasure St. Dr.  
Great Falls, MT

Craig La Casse  
727 33rd Ave. NE  
Great Falls

Joe LaForest  
Coal Board  
Montana Dept. of Commerce

Duane Mellinger  
1112 7<sup>th</sup> St. South  
Great Falls, MT 59405

Bill Neumiller  
PPL Montana  
PO Box 38  
Colstrip, MT 59323

Joe Perrie  
Fergus Elec. Coop.

John Prinkki  
Beartooth Electric  
Box 2020  
Roberts, MT 59070

Jim Rafferty  
100 Central Avenue

Great Falls, MT 59401

Ed Reinhardt  
6011 4<sup>th</sup> Avenue SW  
Great Falls, MT 59403

Earl Salley  
1112 7<sup>th</sup> Street S.  
Great Falls, MT 59405

Denver Schlaepfi  
RUS  
PO Box 20792  
Billings, MT 59104

G. Schmidt  
3721 7<sup>th</sup> Avenue N.  
Great Falls, MT 59401

Alan See  
Box 138  
Ashland, MT

Rich Southwick  
173 Cottonwood  
Townsend, MT 59644

Mike Stanley  
[mike@ferguselectric.coop](mailto:mike@ferguselectric.coop)

Scott Sweeney  
PO Box 127  
Lewistown, MT 59457

Keila Szpaller  
312 N. 6<sup>th</sup> Street  
Great Falls, MT 59401

Ken Thornton  
31 Paradise Lane  
Great Falls, MT 59404

Duane and Mary Urquhart  
2044 Widow Coulee Road  
Highwood, MT 59450

Scott Urquhart  
3615 Central  
Great Falls, MT 59401

Bob Walker  
PO Box 57  
Joliet, MT

Gary Wiens  
gwiens@sofast.net



Appendix K

Public Comment Summary and Letters

Category	Sub- Category							Category Comment	Comments
	SO <sub>2</sub> /NO <sub>x</sub>	PM (Particulate Matter)	Mercury	Green House Gas (GHG) incl. N <sub>2</sub> O & Methane	Chloride Dioxins	Water Use	Waste Disposal		
133									Commenting Entity/Person ( <i>names in Bold Italics represent commentors that replied to RUS Scoping</i> ) <i>Comment letters are in alphabetical order by the last name following this matrix.</i>
<b>Public Comments</b>									
Air Quality	1	1	1						Wilbur Wood
Air Quality			1						<b><i>Diana Talcott</i></b>
Air Quality	1	1	1	1					Dennis Tighe
Air Quality			1						Guy Schmidt
Air Quality				1					Craig Lacasse
Air Quality			1	1					Hilary Ransdell Lewin
Air Quality	1	1	1	1					Stuart Lewin
Air Quality							1		Stephen Mayernick
Air Quality			1	1					Ronald Mathsen
Air Quality		1							Richard Fisher
Air Quality	1	1	1	1					Joanne Fisher
Air Quality	1		1	1					Diane Stinger
Air Quality	1		1	1					Jude Smith
Air Quality			1						Mert and Vicki Freyholtz
Air Quality		1	1						Aart Dolman
Air Quality	1		1	1	1				<b><i>Charles Bocock</i></b>
Air Quality	1		1	1					Lisa Lotte Hardiman
Air Quality			1	1					Pat Helvey
Air Quality	1		1	1					<b><i>Sue Dickenson</i></b>
Air Quality		1		1					Ellen Pfister
Air Quality	1	1	1	1					Mindy Nielsen
<b>Air Quality Totals</b>	<b>10</b>	<b>8</b>	<b>17</b>	<b>14</b>	<b>1</b>			<b>1</b>	
Alternate Fuel Concerns (Waste Products)								1	Stuart Lewin
Alternate Fuel Concerns (Waste Products)								1	Mert and Vicki Freyholtz
<b>Alternate Fuel Concerns (Waste Products) Totals</b>								<b>2</b>	
Alternative Technology								1	Wilbur Wood
Alternative Technology								1	<b><i>Diana Talcott</i></b>
Alternative Technology								1	Joanne Fisher
Alternative Technology								1	Duncan Riley
Alternative Technology								1	<b><i>Charles Bocock</i></b>
Alternative Technology								1	Pat Helvey
Alternative Technology								1	<b><i>Cheryl Reichert M.D. (Dr. Reichert also attached her letter to the RUS which can be found in the RUS Scoping Summary)</i></b>
Alternative Technology								1	Joseph Femling

Category	Sub- Category							Category Comment	Comments
	SO <sub>2</sub> /NO <sub>x</sub>	PM (Particulate Matter)	Mercury	Green House Gas (GHG) incl. N <sub>2</sub> O & Methane	Chloride Dioxins	Water Use	Waste Disposal		
133									Commenting Entity/Person ( <i>names in Bold Italics represent commentors that replied to RUS Scoping</i> ) <i>Comment letters are in alphabetical order by the last name following this matrix.</i>
Alternative Technology								1	Mindy Nielsen
<b>Alternative Technology Total</b>								<b>9</b>	
<b>Conservation</b>								<b>1</b>	Ellen Pfister
Due Process/Public Input								1	Hilary Ransdell Lewin
Due Process/Public Input								1	Stuart Lewin
Due Process/Public Input								1	Aart Dolman
<b>Due Process/Public Input Total</b>								<b>3</b>	
Economic Viabilty								1	Stuart Lewin
Economic Viabilty								1	Stephen Mayernick
Economic Viabilty								1	Mindy Nielsen
<b>Economic Viabilty Total</b>								<b>3</b>	
General Environment								1	Richard Fisher
General Environment								1	Joanne Fisher
General Environment								1	Jude Smith
General Environment								1	Ellen Pfister
General Environment								1	Joseph Femling
<b>General Environment Total</b>								<b>5</b>	
General Support Comments								1	Guy Schmidt
General Support Comments								1	Gerhard Helm
General Support Comments								1	Bob and Ann Evans
General Support Comments								1	E. A. Johnson
General Support Comments								1	Alan See
General Support Comments								1	Alan Evans
General Support Comments								1	Jim Heberly
General Support Comments								1	Warren Bickford
General Support Comments								1	David Brown
General Support Comments								1	Dianne Jovick-Kuntz
General Support Comments								1	Bill Beecher
<b>General Support Comments Totals</b>								<b>11</b>	
Health & Safety								1	<b><i>Diana Talcott</i></b>
Health & Safety								1	Dennis Tighe
Health & Safety								1	Stuart Lewin
Health & Safety								1	Stephen Mayernick
Health & Safety								1	Ronald Mathsen
Health & Safety								1	Richard Fisher
Health & Safety								1	Joanne Fisher

Category	Sub- Category						Category Comment	Comments
	SO <sub>2</sub> /NO <sub>x</sub>	PM (Particulate Matter)	Mercury	Green House Gas (GHG) incl. N <sub>2</sub> O & Methane	Chloride Dioxins	Water Use		
133								Commenting Entity/Person ( <i>names in Bold Italics represent commentors that replied to RUS Scoping</i> ) <i>Comment letters are in alphabetical order by the last name following this matrix.</i>
Health & Safety							1	Diane Stinger
Health & Safety							1	Mert and Vicki Freyholtz
Health & Safety							1	Aart Dolman
Health & Safety							1	<b>Charles Boccock</b>
Health & Safety							1	Pat Helvey
<b>Health &amp; Safety Total</b>							<b>12</b>	
Land Use							1	Stephen Mayernick
Land Use							1	Mert and Vicki Freyholtz
<b>Land Use Total</b>							<b>2</b>	
<b>Noise</b>							<b>1</b>	
Reclamation/Remediation							1	Lisa Lotte Hardiman
Reclamation/Remediation							1	Stuart Lewin
Reclamation/Remediation							1	Mert and Vicki Freyholtz
<b>Reclamation/Remediation Total</b>							<b>2</b>	
Solid Waste Disposal							1	Dennis Tighe
Solid Waste Disposal							1	Hilary Ransdell Lewin
Solid Waste Disposal							1	Ronald Mathsen
Solid Waste Disposal							1	Richard Fisher
Solid Waste Disposal							1	Joanne Fisher
Solid Waste Disposal							1	Mert and Vicki Freyholtz
Solid Waste Disposal							1	Aart Dolman
Solid Waste Disposal							1	Lisa Lotte Hardiman
Solid Waste Disposal							1	<b>Sue Dickenson</b>
Solid Waste Disposal							1	Mindy Nielsen
<b>Solid Waste Disposal Total</b>							<b>10</b>	
<b>Traffic</b>							<b>1</b>	
Traffic							1	Mert and Vicki Freyholtz
Visual							1	Dennis Tighe
Visual							1	Pat Helvey
<b>Visual Total</b>							<b>2</b>	
Water						1		Wilbur Wood
Water						1		Dennis Tighe
Water						1		Hilary Ransdell Lewin
Water						1	1	Stuart Lewin
Water						1		Joanne Fisher
Water						1		Stephen Mayernick
Water							1	Diane Stinger
Water							1	Jude Smith

Category	Sub- Category							Category Comment	Comments
	SO <sub>2</sub> /NO <sub>x</sub>	PM (Particulate Matter)	Mercury	Green House Gas (GHG) incl. N <sub>2</sub> O & Methane	Chloride Dioxins	Water Use	Waste Disposal		
133									Commenting Entity/Person ( <i>names in Bold Italics represent commentors that replied to RUS Scoping</i> ) <i>Comment letters are in alphabetical order by the last name following this matrix.</i>
Water								1	Mert and Vicki Freyholtz
Water								1	Aart Dolman
Water						1			Charles Bocock
Water						1			Lisa Lotte Hardiman
Water						1			<b><i>Cheryl Reichert M.D.</i></b>
Water						1		1	Mindy Nielsen
<b>Water Total</b>						<b>10</b>		<b>6</b>	
Wildlife								1	Jude Smith
Wildlife								1	Pat Helvey
<b>Wildlife Total</b>								<b>2</b>	
<b>Public Advocacy Groups</b>									
Responded but did not comment (MEIC did comment during RUS Scoping - see letter attached to RUS Scoping Summary)								1	<b><i>Montana Environmental Information Center</i></b>
<b>Agency Comments</b>									
Responded with copy of letter included in the RUS Scoping Summary								1	<b><i>U.S. Fish and Wildlife Service</i></b>
Traffic								1	Montana Department of Transportation
Right-of-way								1	Montana Department of Transportation
Water Rights Authorization								1	<b><i>Lewiston Water Resources Office</i></b>



May 6, 2005

Kathleen Johnson, MEPA Project Coordinator  
Montana Department of Environmental Quality  
PO Box 200901  
Helena, MT 59602-0901

Re: Highwood Generating Station EIS

Dear Ms. Johnson:

I am writing in support of the proposed Highwood Generating Station near Great Falls and urge the Department of Environmental Quality to grant the necessary permits, after sound considerations of any environmental impact the facility may have.

As a resident of Great Falls, I am pleased that the Highwood Station will use cleaner circulating fluidized bed coal technology. I enjoy Great Falls' clean air and water, so the plant's low emissions are a key reason for my support. It is my belief that any coal fired electric generation facilities should meet Best Available Control Technology (BACT) requirements for air emissions and recognize that this facility will employ advanced equipment to mitigate the impact on the region.

As a City Commissioner, I believe the economic impact that development of the plant will have on Great Falls is impressive. Projections show that the plant will create 400-500 construction jobs and 65-75 permanent operating and maintenance jobs. Moreover, bringing public power to Great Falls will create the long-awaited stable energy costs that Great Falls residents and businesses deserve.

Thank you for your consideration.

Sincerely,

Bill Beecher

**RECEIVED**

APR 26 2005

April 25, 2005

**DEQ  
DIRECTOR'S OFFICE**

Ms. Kathleen Johnson  
MEPA Coordinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

RE: SME's Highwood Generating Station EIS


Dear Ms. Johnson:

As a recipient of electric service in Billings, Montana from Yellowstone Valley Electric Cooperative, as supplied by Southern Montana Electric Generation & Transmission Cooperative, I have a significant interest in the Highwood Generating Station. A long-term supply of electricity with stable, cost-based rates should be uppermost in the minds of Montana's state officials. As we have seen with the sell-off of Montana Power Company's generation assets and the bankruptcy proceedings of NorthWestern over the past few years, stability should be a real concern for the financial well-being of our state and its citizens. The members of Southern Montana deserve due consideration for a project that will provide "just what the doctor ordered".

The Highwood Station will provide an environmentally efficient supply of electricity for many years into the future for a significant number of Montanans. The long-term effects of drought in our region and the loss of future power supplies from the Bonneville Power Administration require that we look ahead for affordable and reliable energy. Montana has the coal resources to greatly benefit itself. The last thing we need in Montana is to be reliant on outside, cost-based corporations that answer to their boards of directors' desire for increasing profits. Our rural electric cooperatives return the money they make to their members in the form of capital credits and I am truly more confident in the boards of directors of our member cooperatives taking care of my power supply.

Thank you.

Sincerely,



Warren Bickford  
1822 Chandelier Circle  
Billings, MT 59106

Kathleen Johnson, MEPA Coordinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 599620-0901

April 26, 2005

**RECEIVED**

APR 27 2005

Re: SME's Highwood Generating Station EIS

**DEQ  
DIRECTOR'S OFFICE**

To whom it may concern:

I am writing this letter to explain why my grandchildren and the citizens of Montana should not be subjected to the coal fired power plant being proposed for Great Falls, Montana. Much better and cleaner alternatives for power generation exist today and will become increasingly more practical and affordable with time.

Clean water is a finite resource, and is more valuable than gold. According to the scoping document provided by the Montana Department of Environmental Quality, the Southern Montana Electric Generation and Transmission Cooperative's power plant will devour 3200 gallons of our precious Missouri River every minute, approximately 4.6 million gallons a day. This is half of what the entire City of Great Falls uses on a typical winter day. This amount of water would fill 115,000 bathtubs a day. Almost all of this water will be lost to evaporation in the cooling towers; only 5% will be returned to the river. Ironically, the water will be removed before it can be used for generation of hydroelectric power at Morony Dam. It is foolhardy to spend a half billion of today's dollars for such an ill-conceived idea as a coal-fired power plant; it defies common sense to sell our City's ancient water rights (note the City is not only providing the water but also selling the water rights) and with it some of the long term prospects for future population growth.

Montana's Constitution guarantees our right to a "clean and healthful environment". Coal plants have long been notorious because of the havoc they wreak on hapless communities and environments. Coal is the most carbon intensive among fossil fuels,



emitting (29) percent more carbon per unit of energy than oil and (80) percent more than gas. Coal plants have long been identified by scientists the world over as major contributors to the atmospheric accumulation of greenhouse gases that are thought to be responsible for global warming and climate change. Toxic gases like nitrogen oxides and sulfur dioxide are infamous byproducts of coal plants which are responsible for acid rain and a host of serious lung diseases. Dioxins, a known human carcinogen, can also be formed when coal is burned, because most coal contains chlorine. In 1995 the US Environmental Protection Agency (EPA) reported that utility and industrial burning of coal is responsible for the sixth largest source of dioxin emissions to the air.

Nevertheless, proposals for new coal plants continue to emerge all over the West. In Helena, Montana, Patrick Judge, the energy policy director for the Montana Environmental Information Center, says, "There is a fear up here that we are becoming a kind of sacrifice zone for the rest of the nation." As reported by *High Country News* in Dec 2003, as many as nine coal plants are being proposed in Montana, a state that "is already a net exporter of electrical energy", according to Patrick Judge.

It is helpful to compare the proposed Great Falls facility with other coal-fired plants of similar size. If Nevco Energy Co. has its way, a 270-megawatt power plant could be on line in SIGURD, UTAH, a community close to Salt Lake City, as soon as 2008. The company, which is based in the Salt Lake community of Bountiful, says the plant will burn coal, using a technology called "Circulating Fluidized Bed Combustors" that sharply reduces most emissions as compared to older coal plants. This is the same "NEW" technology that is purposed for Great Falls.

Based upon proportional calculations from the emissions projected for the Utah plant (which plans to burn Powder River Wyoming coal) the purposed "CLEAN" 250 megawatt plant in Great Falls, Montana, using the 'Circulating Fluidized Bed Combustors' could produce approximately 1,183 tons of Carbon Monoxide, 987 tons of Nitrogen Oxides, 217 tons of Sulfur Dioxide, along with Lead and pounds of Mercury. (Western Roundup Dec. 2003) This is a wake up call for area grain farmers. Will

their crops be less productive or refused by the new barley “malting “ plant?

The deadly neurotoxin mercury is so dangerous that it only takes .002 of a POUND of MERCURY or .000125 of an ounce or 1 /70 of a teaspoon to contaminate a 25,981 acre lake to the point where fish in that lake are no longer safe for human consumption (Environment Canada Feb.2004). Mercury is capable of causing severe brain damage in developing fetuses and mild tremors, mental disorders, motor and emotional disturbances, even death, in exposed individuals (refer to April 20, 2005 issue of the Journal of American Medical Association, “The New Health Crisis of Neurological Disorders”). The exposure to mercury depends on its form, with mercury vapor and methyl mercury being the most deadly, since they are nearly completely absorbed into the body. Once mercury enters water – either directly or through deposition from the air – biological processes transform it into methyl mercury, a highly toxic form of mercury that bioaccumulates in fish and other animals or mammals that eat fish. When a substance bioaccumulates, its concentration increases as it moves through the food chain. Towns downwind that draw drinking water for community use will be subjected to the mercury from the atmosphere. This is also a wake up call for The Montana Fish and Game Dept.; what will become of fishing in the famous “Fort Peck” reservoir.

Coal fired power plants are currently the most significant source of atmospheric mercury emissions; the lack of reasonable governmental standards or regulations on mercury emissions from these facilities will surely be challenged by our constitutional right to a clean and healthful environment.

A recent report by more than two dozen climate scientists and engineers from Scripps Institute, The University of Washington, the Department of Energy, and the U.S. Geological Survey, predict that global warming will have a devastating effect on water

resources in the West. The report says that reservoir levels may drop by more than a third and hydropower generation will drop by as much as 40 percent. The report also found that increases in summer temperatures and decreases in summer humidity may cause a "substantial increase in fire danger over much of the West".

Why would the State Department of Environmental Quality or the Federal Environmental Protection Agency want to add to these problems by approving yet another coal fired plant?

The resurgence of coal was inevitable, says Janet Gellici, executive director of the Colorado-based American Coal Council, an industry advocacy group. Basically, the pendulum has swung so far to the natural gas side that we won't be able to meet future needs." Other industry insiders confide that energy companies saw the gas shortage coming. But rather than turning to alternative energy, like solar, wind, or fuel cells, they encouraged the crisis, knowing that it could revive coal, which utilities have shied away from in the last 20 years. President Bush's energy policy has lowered the environmental standards. The 1,700-page document details the upcoming emission requirements that should make coal a safe bet again, says Gellici. It also includes tax breaks for utilities using coal, and millions of dollars for large-scale coal fired plants in the Great Plains and Midwest.

At a time when things are looking up for our beautiful city of Great Falls why do we want to create numerous problems for our citizens and especially the people living downwind and downstream from us? Montana already exports power to other states, so our power needs are not critical. The City of Great Falls and its leaders need to look to the future using renewable energy sources.

Sincerely yours,

  
Charles Bocock

51 Prospect Drive  
Great Falls, MT 59405



RECEIVED

APR 08 2005

DEQ  
DIRECTOR'S OFFICE

April 7, 2005

Kathleen Johnson, MPEA Project Coordinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59602-0901

**Re: Highwood Generating Station EIS**

Dear Ms. Johnson:

We are in full support of Southern Montana Electric Generation and Transmission Cooperative, Inc.'s (SME) plans to build a coal-fired electrical generating facility east (Salem site) of Great Falls. The plant's design is environmentally responsible and well done. We also applaud the City of Great Falls' initiative to be involved with this project and its efforts to find a cost-effective alternative for the community's energy requirements.

Thank you for the opportunity to comment on this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "David F. Brown". The signature is written in a cursive style with a long horizontal flourish extending to the right.

David F. Brown, President  
(406) 761-6675

c: City of Great Falls

**RECEIVED**

APR 15 2005

**DEQ  
DIRECTOR'S OFFICE**

620 Riverview Dr. E.  
Great Falls, MT 59404  
April 12, 2005

Kathy Johnson  
Montana DEQ  
P.O. Box 200901  
Helena, MT 59620-0901

Dear Kathy and DEQ:

These are my written comments and questions on the proposed Highwood Generating Station. I have several concerns.

Does the plant have any additional pollution control devices that particularly remove mercury from the stack emissions? If not, what amount of mercury is captured as a side benefit of SOx and NOx pollution control?

I believe technology for specifically controlling mercury emissions is commercially available and could easily fit into the construction plans for the plant---right before the gases go up the stack. Pilot projects have shown this technology works. Mercury is a toxic enough substance that it should be specifically controlled, not just dealt with as a byproduct of other pollution controls.

Is there any technology to use the CO2 released in the process---re-circulate it to some beneficial use?

I believe in the design of the plant, there can be and should be technology which re-circulates and uses CO2, rather than releasing the gas. This was negotiated for the natural gas generating plant proposed for the GF area. CO2 is a major contributor to global warming. The steam (gas) can be used as an energy source for other industry.

Concerning the coal ash, where will it be stored? Will these dumping areas be lined and will there be ongoing ground water monitoring? What about the dust/ash blowing around---will the ash be covered or wet down? Where will this water go, if it is used to water down the waste heaps?

I believe that the waste disposal area should be lined, have ongoing ground water monitoring, and if left in a dry state, be covered to avoid the dust/ash blowing around the area. I believe that there should be a way to contain/clean the water used to water down

the ash if that is the plan. The ash will contain toxic elements that need to be monitored/contained.

These suggestions are not necessarily in state law but if SMG is a good neighbor company who cares about the human health and the clean environment of Cascade county, it should be willing to go beyond law. All technologies and waste treatment are affordable and commercially available.

Sincerely yours,

A handwritten signature in cursive script that reads "Sue Dickenson". The signature is fluid and elegant, with a prominent initial "S" and a long, sweeping underline.

Sue Dickenson

**Johnson, Kathy**

---

**From:** Aart Dolman [aart-dolman@bresnan.net]  
**Sent:** Saturday, April 30, 2005 9:36 AM  
**To:** Johnson, Kathy  
**Subject:** EIS Concerns about Gt Falls Coal fired Plant

Dear Kathleen attached is the document stating my concerns about the coal-fired electric generating plant.

Would you please attach them to the Scoping documentation. Thank you Aart Dolman.

To: Kathleen Johnson, MEPA Coordinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59602-0901

From: Aart Dolman  
3016 Central Avenue  
Great Falls, MT. 59401

Date: April 21, 2005

Re: Highwood Generation Station Unit #1 EIS

I am presenting my concerns as part of the EIS Scoping Process pertaining to the proposed Highwood Generation Station Unit #1, and they are as follows: absence of public participation in energy generation selection, presentation of incomplete information, and absence of a plan for the control of mercury (HG) in its waste products.

### **I. Absence of Public Participation in Energy Generation selection:**

This narration will address my concern that there was no public participation in the decision for choosing this type of electric generation. My concern is that this project might be in violation of our Montana Constitution for the public has not been given the opportunity to choose which type, or alternative, electric generation. The choice for a coal-fired electric generating plant was made by the Southern Montana Electric Generation and Transmission Cooperative (SME), and the public was presented with a "fait accompli" before the conclusion of an agreement with the City of Great Falls. The research for this plant was done by Stanley Consultants Inc. in the Alternative Evaluation Study, revision 1, published by SME, October 2004 and it was made available to the public during the October 13, 2004, "Open House." A contract between SME, a Non Governmental Organization (NGO), which is a nonprofit cooperative, had concluded a contract with the City of Great Falls, September 7, 2004, for the production of electricity.<sup>1</sup>

The public was informed about the details of the plants operation during the October 13, 2004 "Open House." Later during the following spring this plant was known as Highwood Generation Station Unit #1. Sometime during 2003, SME had come into existence as a nonprofit cooperative, and during the early summer of 2004 there had been press releases that a coal-fired electric generating plant would be built and located near Great Falls. The intent was to would provide a base for inexpensive electricity for members of the cooperative. The City of Great Falls had become a member of the nonprofit coop in September 2004.

The public was informed about its technical operations when SME sought the necessary federal permits for the operation of this proposed plant and the EPA held a formal "Open House" on October 13, 2004. The idea was that this plant would be an "environmentally friendly coal-fired electric generation facility" providing a "reliable, affordable and stable prices electricity to

---

<sup>1</sup>JOURNAL OF COMMISSION WORK SESSIONS, September 2, 2003, and JOURNAL OF COMMISSION PROCEEDINGS, September 7, 2004, Great Falls, Montana



the rural communities of Montana.”<sup>2</sup> During the “Open House” there were many questions about the supposed “clean burning process” and these concerns were rationalized away by the many experts. Concerns about the greenhouse effect of emissions, gasses, toxic mercury in its waste products, disposal of waste water, monitoring systems, etc. did not seem to be seriously treated by the experts. It was difficult because the project was dealing with very complex technologies. For instance, one of the experts stated that there would be a “small” amount of mercury in its waste products for most of it would be destroyed during the burning process. The Circulating Fluidized Bed coal (CFB) process was propagated as “clean burning” there was not sufficient knowledge to compose a concern caused by the presentation of a huge amount of technical information.<sup>3</sup>

Various members of the public did have concerns about the presence of toxins in the waste products. Sue Dickenson, member of the Montana House of Representatives, was told that mercury content in ash and emissions “varies widely, depending on the type of coal and burning technology used.” Larry Gatton, an expert engineer on coal burning, stated that the Great Falls-area plant would emit very little mercury. Tim Gregori, the generating co-op's general manager tried to minimize public concerns and told the legislator that “ash from the plant may be reused in road-building materials or even particle board.” Paul Stephens, a local Green party member and political activist, stated that it seemed odd to be advocating the use of coal at a time of growing concern about global warming. Stephens was told that the Great Falls plant would be the cleanest, most technologically advanced coal-fired plant in North America. The journalist Larcombe quoted City Manager John Lawton as saying that “when it is built, it will be the cleanest coal-fired plant in the United States” emphasizing that the plant would use the latest version of what is called “circulating fluid bed”(CFB) technology so that emissions would be greatly reduced.<sup>4</sup>

---

<sup>2</sup>ibid. Although the discussion centered around concluding a contract with SME, this agreement must not be confused with public participation in choosing this type of electric energy generation even though there was always the option of rejecting the contract.

See also James E. Larcombe, Business Editor “Plant backers tout technology for clean power in Great Falls,” Great Falls Tribune, October 13, 2004, and “Give Coal a Chance,” Opinion, Great Falls Tribune, June 29, 2004. The Larcombe article merely reiterated the position by the newspaper. The previous summer the editor had pleaded in an Opinion article to “Give Coal a Change.” The reporter quoted City Manager John Lawton, who reflected the sentiment in the community by stating that when it is built, “it will be the cleanest coal-fired plant in the United States.”

<sup>3</sup> Although the Environmental Protection Agency held a similar “Scoping” process for an EIS on October 13, 2004 in the Civic Center, Great Falls, MT, it was far from clear to the public that the public could make comments to this particular Federal Agency. See “Southern Montana Electric Cooperative, Inc.; Notice of Intent To Hold a Public Scoping Meeting and Prepare an Environmental Impact Statement,” Federal Register, September 24, 2004, Volume 69, Number 185.

<sup>4</sup> James Labercombe, Business Editor, “Plant backers tout new technology for clean power,” Great Falls Tribune, 10/13/2004

On the morning of the October “Open House,” the journalist James Larcombe quoted Larry Gatton, an engineer with Alstom Power, stated to Larcombe that “it is not unusual for coal-fired plants to have stacks with no visible emissions.” The engineer continued to say that “emissions of nitrogen, sulfur, carbon dioxide and very small amounts of mercury are often concerns with coal-fired plants” but “new technology that will burn coal at lower temperatures and use limestone to cut sulfur emissions should greatly reduce traditional concerns about emissions.” Alstom Power was building also the boiler for the new plant in eastern Kentucky near Maysville and it would be a model for the Great Falls-area. According to Gatton the new technology of the CFB electric generating system “releases 95 percent less nitrogen than old-style coal-fired plants,” and that “more than 98 percent of the sulfur has been removed from emissions at the plant.”<sup>5</sup>

Again information presented to the public during the second “Open House” April 18, 2005, held in the Civic Center in Great Falls, cannot be construed as “public” participation in the choice for an alternative in electricity generation. Even though the Montana Legislature and the City of Great Falls as governmental agencies have the authority to conclude agreements or contracts on behalf of its citizens, the decision by the City Commission of Great Falls to conclude a contract with SME cannot be considered to be public participation in the choice of this type of electric generating plant. Information about this plant was made public during the October 13, 2004 “Open House” for the EIS process and it was much too complex for the public to absorb so that it could make a sound decision. The reality is that the public was never given the opportunity to examine the alternatives for electric generation.

## **II. Incomplete information:**

Information about the technical operation of the proposed coal-fired electric generating plant, Highwood Generating Station Unit #1, can be found in various resource materials. The distribution of the publication researched by Stanley Consultants Inc. entitled Alternative Evaluation Study, revision 1, published by SME, October 2004, was the first available technological information for public examination. Some of this information about coal-fired electric generating plants was contradictory in content and has incomplete information, and other information did not go into depth of an issue. For instance, last winter it was learned in the local press that the proposed plant would produce 6 tons of ash per hour. This is contradicted in the DEQ Scoping Document for the Preparation of an Environmental Impact Statement for Southern Montana Electric Generation and Transmission Cooperative’s Highwood Generating Station Unit #1, DEQ, April 18, 2005, which states that 120 tons of ash is produced per day. That is 8.75 tons per hour. It is not mentioned at all in the Stanley document. In public testimony held during the hearings of HB 48 by the House Subcommittee on Federal Relations, Energy, and Telecommunications, 2005 Legislature of the State of Montana the public discovered that there

---

<sup>5</sup>Ibid.

are no regulations pertaining to toxic mercury content in the emissions produced by coal-fired electric generating plants while Project Managers of this proposed plant vow that SME will adhere to emission standards.

Since there is only a short three-week time frame to state concerns for the current DEQ EIS process, it is an impossible task to develop all of my concerns about the proposed electric generating plant into a cohesive statement. Therefore, I have decided to limit my comments, and deal with the concern of toxic mercury in emissions from this proposed coal-fired electric generating plant into the atmosphere.

In the Alternative Generation Study by Stanley Consultants Inc. the presence of mercury (HG) in coal is mentioned but it does not provide additional information about coal. The problem is that various coal deposits in the United States have a different mercury content in its natural composition. Since this plant will emit 2.45 tons year of mercury (HG) a year, the presence of transformed mercury as the result of burning is a danger to human health. This mercury is distributed into the environment by way of its waste products such as ash and emissions. The presence of mercury (HG) as a toxin in emissions cannot be written off as insignificant. Since this document does not explore this subject, it is not known how much mercury (HG) is processed in this “clean burning” CFB system. What is known is that the volatility of coal burning produces gasified toxins for it changes the chemical composition from “natural” mercury into mercury (HG), and no information is presented how this toxin is removed from its waste products.<sup>6</sup>

---

<sup>6</sup> Shown in tables 2-12 and 2-13 of the Alternative Evaluation Study, the mercury content in both processes is the same in the more technological advanced CFBC system versus the “old” IGCC system. Yet, the Tampa Plant claims that their is power production requires 15 percent less fuel, achieving 10-12 percent more efficiency than normal generating stations. <http://www.tampaelectric.com/TEEVPowerPlantsIGCC.cfm>

The Alternative Evaluation Study does have two tables, 2-12 and 2-13, in which mercury (HG) is listed. But it is a comparison between the CFB with that of the IGCC processes. In both tables it is listed that it has a 0.05 mercury (HG) content. The traditional Tampa Polk Power Station integrated gasification-combined cycles (IGCC) has in its emissions a 0.05 mercury content. Statements such as a “more environmental friendly process” by Project Managers and City of Great Falls officials has to be doubted. Coal has a 0.05 mercury content and the burning process in the new CFB process does not destroy this metal any more than the “traditional” gasification method in older plants.

When I asked during the April 2005 "Open House" about mercury (HG) content in waste produced by the proposed plant, or what would happen to ash, one of the experts told me that it would be stored on a plastic base in the City of Great Falls garbage dump. This came as a surprise to me because I had understood that Mr. Gregory in Billings had made a statement earlier that ash could be used for a pavement of highways or even for wall board in houses, and I had assumed that this ash would be used for manufacture a product. What would happen when it rains? I was told that the ash would turn into concrete and any mercury would be sealed. But knowing that this toxin it is soluble in water, I asked "What would happen if rain and snow water flowed over the banks would liquid mercury also flow out of this type of container?" I received no answer and the message was that it was an unknown for SME had not applied for an ash disposal permit.<sup>7</sup>

Needless to state, the April 18, 2005 "Open House" was a disappointment for it provided not much information for me. Also, there was no public discussion about the CFB process and its waste products. Although Mr. Gregory and his staff were given the opportunity to address those present for more than a half hour, the public was told that they could meet with various representatives at the individual level after the SME briefing. I had wanted to ask Mr. Gregory a public question but was told before the meeting that he could speak with me after the presentation of SME information for I wanted to know if my assumption of mercury content in emissions was correct or incorrect. I am puzzled that this proposed plant produces some 60 tons of emissions a year with a mercury content of 0.05%. That would mean that these emissions would produce 2.45 tons of mercury per year? Is there a plan that this proposed plant would meet President Bush's restrictions on mercury emissions by 2020?<sup>8</sup>

Reviewing the maps and wind charts presented during the April 2005 "Open House," the expert by the SME table listened to my concern about the geographic choice of site selection and its relationship to wind direction. A glance at the map, showed that emissions from the proposed plant's 400 feet stack would flow most of the time in a northeasterly direction. Often from that direction there are strong winds. The emissions would be expelled from the high stacks and be placed in the atmosphere and follow the course of these winds. They cross Belt Creek, which flows into the Missouri river, and several communities and farms before they reach the Highwood Mountains. In addition, there are several communities below the point where Belt Creek enters the Missouri river and they use river water for drinking. It would seem that an effective monitoring system would be necessary to measure unacceptable levels of mercury (HG). What happens when there is an unacceptable level of mercury (HG) exceeding federal standards?

---

<sup>7</sup>For residents in North Central Montana are very familiar with the Zortman-Landusky Goldmine problem. This mine used also a "plastic" base, and there is a continual problem with acid seepage into the groundwater.

<sup>8</sup>When Paul Stephens, a member of the audience, protested that he could not ask questions, he was told to "consult with his legislators."

In March 2005, the EPA has placed restrictions on coal-fired electric generating plant's emissions. Toxic airborne emissions from the proposed plant will flow to the base of the Highwood Mountains and will be placed in the atmosphere. When I asked an expert, during the April 2005 "Open House," about the effect mercury (HG) coming from rain out of the atmosphere, he pleaded ignorance. I had to explain about a three-year-old California Study which had traced the mercury contained rain on its west coast had come from China. This research, entitled "Mercury in California Rainwater Traced to Industrial Emissions in Asia," Science Daily, 12/20/02, provides valuable information on the behavior mercury (HG) in the atmosphere. It had found that the presence of mercury (HG) in California coastal rivers was traced to industrial emissions from China and had come down in the form of raindrops. Since mercury (HG) tends to evaporate it behaves as a gas in the atmosphere, it attaches itself to the rain drops. The emission flow from the proposed plant will become part of the up and down drafts in the Highwood Mountains and deposit with mercury (HG) far away from its origin into an ever widening pattern as SME's wind charts show.<sup>9</sup>

Even though research about toxic emissions is relatively a new public interest dating back for only a decade, it began in 1994 when scientists had been concerned about the rapid growth in autism by children. In a study by the Department of Developmental Services (DDS), which regularly reports all new cases, had found that there were 633 new cases of DSM IV autism. This type of autism is different from other types because of different causation such as genetic. Within five years (1999), the DDS had a number of new cases which had risen to 1,944 or six new cases a day. And then there were 2,725 cases of autism added to the system in 2001. The following year there were 3,577 more children a day with autism. The growth of DSM IV autism had become an explosion.<sup>10</sup>

A study in Brick Township, New Jersey made a strong connection between mercury (HG) affecting individuals to a spectrum of complex and lifelong disorders present. The culprit was thought to come from the atmosphere. Individuals stricken with autism have problems with social interactions and communication skills including a tendency toward restrictive or repetitive interests and behaviors. Autism Spectrum Disorders (ASD) is a term used to describe the

---

<sup>9</sup>"Mercury In California Rainwater Traced To Industrial Emissions In Asia," Science Daily, 12/20/02, <http://www.sciencedaily.com/releases/2002/12/021220075156.htm>

It is important to note that the Alternative Evaluation Study does not deal with the effects of mercury (HG) as a potent neurological toxin even in very small doses in emissions. Since a small amount of this poison affects the brain and nervous system in humans by way of inhaling, or breathing, it is absorbed into the blood stream through the alveoli. It is also fat soluble and readily crosses the blood-brain barrier and placenta. That is the reason that pregnant women in Montana are advised not to eat fish caught in its streams because the fetus is particularly susceptible to mercury (HG) exposure.

<sup>10</sup>E. Edward Yazbak, M.D., F.A.A.P, "Autism in the U.S.: a perspective, Journal of American Physicians and Surgeons, Vol 8., No 4, Winter 2003.

continuum of functioning among persons suffering from this disease.<sup>11</sup> Another study in Leominster, Massachusetts, concluded that there was indeed a suspected link between the presence of mercury in coal-fired emissions and autism. For several years there had been a growing suspicion that mercury toxins found in the atmosphere could lead to autism which seemed to have a high prevalence of that dreaded disease. It was traced back to the factory which manufacturing sunglasses. This plant, once located in the town itself, had the highest proportion of autism cases in homes located downwind from the factory smokestacks.<sup>12</sup>

After years of public debate of a nationwide explosion in autism, scientists thought that it was related to a mercury-based preservative used in vaccines and in dental coatings. In March Dr. Raymond Palmer, University of Texas Health Science Center, San Antonio, found mercury from coal-burning power plants was an additional suspect to the recent and rapid explosion in autism. Studying school districts in Texas, he found that on the "average, for every 1000 pounds of environmentally released mercury, there was a 43% increase in the rate of special education services and a 61% increase in the rate of autism. Districts with the highest levels of mercury in the environment also had the highest rates of special education students with autism diagnosis. Palmer stated that this study was the first to examine a relationship between potentially chronic, low-dose exposure to mercury and developmental disorders such as autism. The study suggested that there is a link and that it does not prove causation for this is "a preliminary study that needs further study," stated Dr. Palmer and added "if corroborated, it would have very severe implications for policy."<sup>13</sup>

Statements by proponents that the CFB system of burning coal claim that it is "cheapest form" of electricity production must be questioned, it might be much more costly than is stated in the Alternative Generation Study or by Project Managers. It might be cheaper at the beginning of production in comparison with other alternative electric generation but the long range cost of

---

<sup>11</sup>See "Investigation of the Prevalence of Autism in Brick Township: A Community Report," Fact Sheet, Center for Disease Control, Washington D.C.

ASD includes autistic disorder, pervasive developmental disorder - not otherwise specified, and Asperger's disorder as defined by the American Psychiatric Association's Diagnostic and Statistical Manual - Fourth Edition (DSM-IV)

<sup>12</sup>Stephen M. Edelson, Ph.D., Center for the Study of Autism, Salem, Oregon, 1995, <http://www.geocities.com/arnfl/overview.html>

The effects of Mercury on the development of autism in humans was first determined with the crematoria which vaporized tooth fillings through emissions contributed some 16% of the total air pollution in the United Kingdom.

<sup>13</sup>Todd Ackerman, "Texas study Links Mercury from Power Plants to Autism," Houston Chronicle, March 18, 2005

coal-fired electric generation plants must be closely examined. Such plants do have a long term cost, for instance, associated with public health. This is exactly the point of a study published by the Harvard Center for Risk Analysis, March 2005. This research, commissioned and paid for by the EPA, concluded that mercury control and regulation in the coal-fired power plant emissions could save nearly five Billion dollars a year through reduced neurological and cardiac harm. What it really implied was that the five billion dollars represented a staggering amount of human suffering. And, it is important to note, they had measured only a fraction of the total mercury being released into the atmosphere and global winds.<sup>14</sup>

Even though it is recognized that both the Harvard and Dr. Palmer studies are the beginning of scientific research into dangerous emissions as the result of coal-fired electric generating plants, the State of Montana must deal sooner or later with emissions from coal-fired electric generating plants within its borders. At least it has this moral responsibility to future generations. Yet, it has no rules or regulations for mercury (HG) present in emissions from in coal-fired electric generating plants. In the case of Highwood Generating Station Unit #1, which is planned to go on line, within ten years of operations it must meet Federal standards. This cannot be ignored. The Federal Government demands, at the moment, the curtailment of mercury (HG) by the year 2020 and because of public pressure this time frame might even be shortened. As the Harvard Study suggests the public will respond to the increased health costs, therefore the DEQ must insist on strong stipulations before it issues an emission permit. It is no accident that the Legislature of the State of Colorado, last winter, was considering legislation to force surcharges on consumers as the result of the emissions from coal-fired electric generating plants near Boulder.<sup>15</sup>

No one seems to know the human cost of the 2.45 tons of mercury (HG) emissions a year going into the atmosphere. Statements by SME Project Manager, Mr. Gregori that "So far, the test shows that the technology we will use can meet or exceed current and pending air quality standards" or that toxic emissions are fewer and mercury in the ash that the plants produce is less

---

<sup>14</sup>Economic Valuation of Human Health Benefits of Controlling Mercury Emissions from U.S. Coal-Fired Power Plants, Harvard University, February 2005.  
<http://66.102.7.104/custom?q=cache:1pkLHtRMZyQJ:bronze.nescaum.org/airtopics/mercury/rpt050315mercuryhealth.pdf+Mercury+and+Harvard+Study&hl=en&ie=UTF-8>

<sup>15</sup>This winter, 2005, the Colorado state Legislature was considering a bill to reduce emissions at the Valmont Power Plant east of Boulder by 90 percent. This new law that would tack a surcharge onto utility bills for Xcel Energy residential customers because it needed to install scrubbers on smokestacks at Xcel plants in Denver, Pueblo and Brush. This legislation would generate \$130 million to modernize three power plants with smokestack scrubbers that reduce sulfur dioxide and nitrogen oxide emissions. These compounds that harm everything from fish to crops to the paint on your car. If this bill would become law, all Colorado residential customers will pay an additional 60 cents each month. Brad Turner, "Xcel surcharge would clean up Colorado coal plants: Legislature considers resurrecting measure," The Daily Times-Call, February 20, 2005.

of a threat because its “handled dry” does little to reassure and satisfy public uneasiness about the behavior of corporations even if they are nonprofit.<sup>16</sup> The silence about public health is a huge concern. The fact is that the proponents of this project provide information to the public which must be questioned. Even the local newspaper has charged that “Some environmentalists already are blasting the project simply because it involves coal.” Adding to the misleading information of a “clean” plant by stating that “it's true that coal isn't the cleanest source of energy. But it's also true that technology is improving.” Not a single thought was given in this article about the possibility of health hazards produced by these type of plants.<sup>17</sup>

### **III. Absence of a plan for the control of mercury (HG) in waste products.**

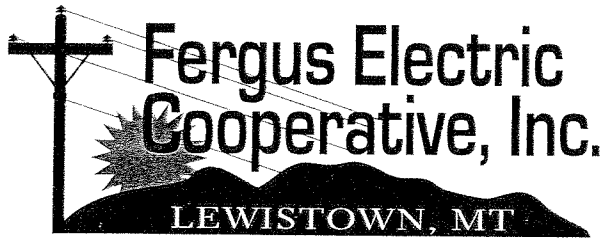
It would have been helpful in writing my concerns that SME had submitted to the April 2005 “Open House” an addendum to the Alternative Energy Study explaining how it would meet the forthcoming EPA standards published in March 2005. I find it difficult to imagine that a well-known research corporation such as Stanley Consultants Inc. with its excellent reputation would not have informed SME about the forthcoming EPA standards for emissions. Or is it related to my conversation with the expert during the April “Open House” in which I was told that they were insignificant and weak? In any case, my concern is that the public should be informed of how this plant will meet future EPA standards.

---

<sup>16</sup>Jo Dee Black, “Power plant inches forward,” Great Falls Tribune, 04/27/05, and Scoping meeting, Great Falls Civic Center, 04/18/05.

<sup>17</sup>See “Opinion”, Great Falls Tribune, June 29, 2004,






**RECEIVED**

APR 27 2005

DEQ  
DIRECTOR'S OFFICE

Your Touchstone Energy® Partner 

April 26, 2005

Kathleen Johnson, MEPA Coordinator  
Montana DEQ  
PO Box 200901  
Helena, MT 59620-0901

Re: SME Highwood Generator EIS

Dear Ms. Johnson:

You asked for comments about the project. I consider this grass-roots driven, self-help project to be one of Montana's finest ever pioneering, visionary efforts. America and Montana have for decades, requested Energy Policy. Political, environmental and industry road blocks have stopped each initiative since the late 1970's.

Socio-economic analysis seems to have waned greatly over the past 25 years of EIS. Yet, those considerations are paramount in importance to the 125-150,000 people to be served by this Montana fueled, generated, transmissioned and distributed electric power.

As a possible note of interest to you, I served as one of seven appointees (Schwinden) on the Super-Collider Task Force. Our promotional product followed the NEPA process closely and was judged as the first choice of all competing U.S. States. Texas was ultimately picked by President George H. W. Bush.

That massive report (several volumes) should still reside on Montana library shelves. The socio-economic component is still largely pertinent and can be used in this EIS.

Thank you.

Sincerely,



Alan D. Evans  
Chairman of the Board

**Johnson, Kathy**

---

**From:** Bob & Ann Evans [bobe@3rivers.net]  
**Sent:** Thursday, April 28, 2005 9:16 AM  
**To:** Johnson, Kathy  
**Subject:** Fw: Highwood Generating Station EIS

----- Original Message -----

**From:** Bob & Ann Evans  
**To:** katjohnson@mt.gov  
**Sent:** Wednesday, April 27, 2005 9:26 PM  
**Subject:** Highwood Generating Station EIS

Dear Kati,

I am in support of the Highwood Generating Station. I live approximately 45 miles east-southeast of the proposed site.

The Highwood Station, if completed, will provide over 100,000 Montanan's with reliable, affordable power. I feel that the technology being used will cause minimal enviornmental impact. Thank you for your consideration.

Best regards,  
Robert D Evans Jr  
Vice President, Fergus Electric Cooperative

## Newton, Carl

---

**From:** jumpinjoho@netzero.com  
**Sent:** Thursday, May 05, 2005 10:18 AM  
**To:** Johnson, Kathy  
**Subject:** Environmental Quality

Please insist on the consideration of renewable energy whenever more electricity is needed. Relentless consumption of resources and burning of fossil fuels is sure to keep Montana relegated to third world status as it denegrates our our most valuable resource, our unspoiled natural surroundings. Thank You Joseph C. Femling 345 Custer Ave. Billings MT 59101 406-254-7151

3015 Acacia Way  
Great Falls, MT 59404  
May 1, 2005

**RECEIVED**

MAY 03 2005

**DEQ  
DIRECTOR'S OFFICE**

Kathleen Johnson, MEPA Coordinator  
SME's Highwood Generating Station EIS  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

Re: 250 MW Net Coal-Fired Generation Plant

I am concerned about the health issues related to the proposed coal-fired plant to be constructed east of Great Falls (GF). I am a survivor of **ovarian cancer** and try to minimize the threat of a reoccurrence of this disease. In addition to being a resident of **Great Falls**, I own a cabin at **Monarch** in the Little Belt Mountains.

Coal-fired power plants are the largest source of air toxins in the U.S. The scoping document uses the term "best available control technology (BACT)." I would like to see the EIS **compare the amount of emissions to health outcomes**. Terminology like BACT doesn't mean much to a citizen like me.

Our plant would be modeled after the 268 MW plant in Maysville, Kentucky. This plant produces 20% of the **nitrogen oxide** (NO) of conventional coal-powered plants, which is a step in the right direction. However, nitrogen oxide can irritate lungs, cause bronchitis and pneumonia, and decrease resistance to respiratory infections. Since I have had allergies all my life, this is a concern to me. Will the GF plant have to purchase "allowances" to emit any NO, or just purchase "allowances" over a certain amount? NO is a major cause of smog (along with hydrocarbon emissions). What type of weather would cause the Highwood Mountains to be obscured, when viewed from GF? It would be helpful to compare toxic chemical releases of the GF plant to other cities/locations in Montana to give the EIS some perspective.

When nitrogen oxide and nonmethane hydrocarbons react in the presence of heat and sunlight (which GF has a lot of), **ozone** is formed. Human exposure to ozone can produce shortness of breath and, over time, permanent lung damage. In addition, it can reduce crop yields. What is the likelihood of the GF plant causing these problems?

Sulfur oxides are produced by the oxidization of the available sulfur in the coal. Nitrogen oxides and sulfur oxides combine with water vapor in clouds to form sulfuric and nitric acids, i.e., acid rain. What will be the impact of acid rain on women's health in the surrounding area? Also, how will the ranch/wild animals and food crops be affected? The Hutterite colonies provide food for our Saturday market. Will their market share decline, because people will perceive that their food is polluted? Since the **sulfur dioxide** (SO) will damage forests, what does this mean for the Highwood and Little Belt

Mountains? I've been told there is a rare trout in the Little Belts. Will the acid rain affect this trout over time?

It is my understanding that **carbon dioxide** (CO) emissions can't be removed from the plant's exhaust. These emissions trap heat in the earth's atmosphere, and contribute to global warming; which I do not believe is in our best interest. An increase in drought conditions in our area will have a negative impact on our forests and ranchers. A recent study found that 75 percent of the ranchers have reduced the size of their cow herds due to drought. Since there are no regulations limiting CO, what controls on the GF plant will mitigate this problem?

Mercury, arsenic, lead, chromium and cadmium will also be generated from the GF plant. **Mercury** is a neurotoxin that can cause brain, vision, kidney, and cardiovascular damage and harm reproduction in women and wildlife. At [www.scorecard.org](http://www.scorecard.org) Cascade County already ranks high in air releases of recognized reproductive toxicants. To quote a Bozeman physician, a member of Physicians for Social Responsibility, "Mercury is a persistent, bio-accumulative toxin – which is to say, it does not go away and it only gets more concentrated over time." NRDC in its publication *Mercury Falling* quotes an EPA study which states that circulating fluidized bed boilers **do not** control any emissions of mercury.

How much mercury will be emitted? What does the cap-and-trade **mercury** limit for Montana (754 pounds a year) mean? Since Colstrip alone emitted 760 pounds in 2002, does that mean the GF plant can buy allowances to emit more? How will Montana's cap be allocated among the plants in the state? Montana already has 24 rivers and lakes with **mercury** advisories warning people to limit or avoid consumption of fish. Also, the EPA has issued a fish consumption advisory for more than three-quarters of Montana's lakes and reservoirs.

At [www.ucsusa.org](http://www.ucsusa.org) it states that while **western coal** may have less sulfur, it also has fewer btu's of energy, or a lower "heat rate." Power plants need to burn 50 percent more Western coal to match the power output from Eastern coal. The 268 MW Maysville plant uses 1.2 million tons of coal a year, and yet the scoping document says that the 250 MW GF plant will also use 1.2 million tons of coal a year. I question the scoping document figures. Is the Maysville plant using western coal?

Two times a week it is estimated 110 rail cars of coal will make deliveries. Railroad locomotives, which rely on diesel fuel, emit nearly 1 million tons of **nitrogen oxide** and 52,000 tons of coarse and small particles in the United States. In addition, coal dust blowing from coal trains contributes particulate matter to the air. Will the EIS address the downside of transportation issues?

**Water** supply needs are estimated at 2,500 gallons per minute and discharge at 175 gallons per minute. Montana already is concerned when the Corps of Engineers makes water downstream available for barges. What will be the further impact on this problem?

It seems that coal plant technology is not the best for an area originally named the "Desert Lands" by the federal government.

Is there a possibility that fish will become trapped against the intake structure? Also, how much will the water temperature be increased upon discharge and what effect will this have on the habitat of the Missouri? I've read that thermal pollution can decrease fertility and increase heart rates in fish. Heated water can upset the aquatic ecosystem. Typically, power plants also add chlorine or other chemicals to their cooling water to decrease algae growth. Would these chemicals be discharged back into the environment?

If the 210 tons of **ash** per day were to be buried on site, what impact would there be on Giant Springs and the aquifers coming from the Little Belt Mountains. Also, would an earth quake have any environmental impact on the ash storage facility?

No method exists for burning coal without producing dangerous levels of air pollution. The Union of Concerned Scientists states that typical coal plants are about 33 percent efficient. By the time the plant is built, could some **new technologies** be required by the State to make it more efficient and less toxic; such as cogeneration, coal gasification combustion turbines, running coal gas through fuel cells, or magneto hydrodynamics? Will the GF plant use technologies such as activated carbon injection and carbon filter beds, which can remove 90% of mercury from the plant? I understand the Hardin plant is designed to accommodate mercury control technology when it becomes available. Can this be required for the GF plant?

Wind power construction and generation costs are projected to fall dramatically in future years. The information given at the GF scoping meeting reflected current wind power costs very close to coal costs. The major difference I saw was in the reliability. It was reported that wind was less reliable. Can't the wind power be stored for future use or couldn't there be a combination of power sources? Will the power from the Judith Gap project be available to GF residents? If so, **I will pay the additional cost to use wind power.**

The State of Montana should not approve any new coal fired power plants until existing power plants control mercury emissions using the maximum achievable control technology (**MACT**). Adverse health effects from repeated doses of toxic substances over a prolonged period of time will cause medical costs to be greater than the monthly utility savings from the GF plant. Please include health and ecological risk assessments in the EIS document.

Sincerely,



Joanne Fisher

# MERCURY EXPOSURE & CLEAN AIR

## New Study Shows Impact of Mercury Pollution: \$8.7 Billion Lost Annually Due to Poisoning in the Womb

PSR activists have long warned that mercury, especially in the form of methylmercury, has detrimental, neurotoxic effects, especially to children's developing brains. At the end of February, *Environmental Health Perspectives* published a study exploring the economic costs of mercury exposure. The paper, entitled "Public Health and Economic Consequences of Methylmercury Toxicity to the Developing Brain," details some of the economic impact associated with neurological impairments and developmental delays produced when the developing brain is exposed to methylmercury.

Some mercury is released into the environment by natural sources, including volcanoes, but seventy percent of environmental mercury releases come from anthropogenic sources, which include waste incineration, various industrial activities and coal-fired electric power generation facilities. Mercury travels through the air and water and deposits in soil and sediment. Microorganisms ingest this elemental mercury and transform it into its organic form, methylmercury, which bioaccumulates in the marine food chain, leading to higher concentrations in large predator fish like shark and swordfish. Most human exposure to methylmercury results from consumption of contaminated fish, and PSR as well as other environmental and health organizations recommend limiting fish intake in order to limit exposure to methylmercury. Meth-

ylmercury can disrupt the healthy development of the brain leading to developmental delays and loss of intelligence.

Using data from the 1999-2000 National Health and Nutrition Examination Survey, investigators estimate that 316,588 to 637,233 babies are born each year with cord blood mercury levels greater than the level known to cause developmental effects. The relationship be-

sure. The IQ detriments ranged from a 0.76 decrement to the most highly exposed children losing 1.60-3.21 points. While these numbers may appear fairly inconsequential, subtle neurocognitive impairments have huge significance in the aggregate. The combined monetized productivity cost of loss in IQ resulting from in utero methylmercury exposure is estimated at \$8.7 billion annually, only taking into account mercury generated from human sources, with \$1.3 billion of that cost attributable to electric generation facilities alone.

In light of these figures, the recent decision to delay mercury emission clean-up from U.S. coal-fired power plants can be viewed as a very costly mistake, not only in terms of environmental and human health, but also economically. The one-time cost of installing stack filters to limit atmospheric releases of mercury pales in comparison with the costs calculated in this report. The environmental health community's fight to limit the mercury in our environment and especially in our children has been a long fight, but one that this paper helps to prove is well worth the cost.

*Leonardo Trasande, Philip J. Landrigan, Clyde Schechter. "Public Health and Economic Consequences of Methylmercury Toxicity to the Developing Brain." Doi: 10.1289/ehp.7743 (available at <http://dx.doi.org/>). Online 28 February 2005.*

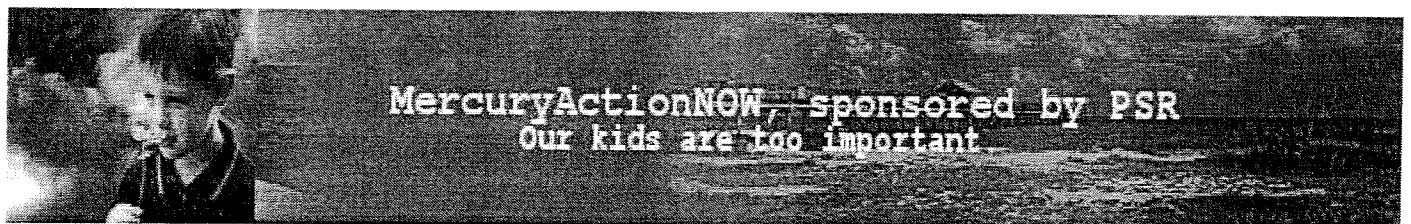


*Kids, especially, need clean air in order to develop and have fun!*

*Photo courtesy of Alice Teich.*

tween cord blood mercury levels and loss of intelligence quotient (IQ) has been substantiated in previous literature and building off these studies, the investigators calculated IQ detriments due to methyl mercury.

An average of 405,881 children born each year suffer IQ detriments resulting from fetal methylmercury expo-



## Appendix B: Ranked Exposure Profiles

Profiles for populations within 30 miles of coal-fired power plants.

State	Children w/ Asthma	Rank	Total Air Releases (tons)	Tons per Child	Air Releases (tons)	No. of Schools	Ranks	No. Children in Non-Attainment Areas
AK	406	47	0	0	44	0	48	0
AL	34,733	21	88,323,224	125	8	1,992	13	189,779
AR	14,090	30	28,644,100	110	29	841	26	0
AZ	13,952	31	47,135,216	201	17	232	35	188,021
CA	339	48	0	0	44	1	47	0
CO	50,336	17	40,535,866	50	19	713	28	524,240
CT	8,715	34	2,287,185	15	43	600	29	151,632
DC	5,244	36	0	0	44	389	32	0
DE	8,312	35	5,670,211	45	39	266	34	115,011
FL	90,859	8	77,702,956	58	10	1,723	17	0
GA	78,897	9	83,778,288	62	9	2,379	10	674,716
IA	30,470	22	40,512,642	70	20	1,016	24	0
ID	71	49	0	0	44	0	48	0
IL	157,659	2	92,931,607	33	6	7,464	1	1,906,193
IN	62,469	14	137,162,285	123	3	1,743	15	208,281
KS	18,157	25	39,717,525	109	22	1,051	23	0
KY	44,158	20	104,420,412	123	5	1,326	20	198,011
LA	17,199	27	24,287,341	68	31	568	30	121,999
MA	28,266	23	13,806,340	30	36	1,729	16	157,453
MD	66,360	12	32,503,474	0	28	2,075	12	800,609
ME	1,541	44	0	0	44	17	44	0
MI	106,194	5	75,587,293	41	11	3,079	7	0
MN	52,479	16	38,300,886	40	24	1,147	21	149,632
MO	65,728	13	71,722,251	63	13	4,630	4	73,998
MS	14,468	29	15,678,705	55	35	537	31	0
MT	2,553	41	17,955,967	417	34	163	39	34,708
NC	74,947	10	73,944,757	63	12	1,659	18	0
ND	1,943	43	37,382,883	996	25	172	38	0
NE	17,706	26	21,435,881	70	32	822	27	111,898
NH	12,630	32	4,706,364	19	40	190	37	86,198
NJ	99,488	6	9,815,066	5	38	1,421	19	1,577,955
NM	3,539	39	33,799,488	541	27	98	41	0
NV	929	45	20,289,092	1,645	33	12	45	5,454
NY	179,051	1	25,760,999	9	30	3,453	6	2,202,581
OH	139,029	4	137,570,633	54	2	7,107	2	479,445
OK	16,611	28	38,849,383	126	23	348	33	0
OR	761	46	4,021,645	316	42	12	46	0
PA	140,949	3	112,280,946	46	4	5,117	3	1,560,240
RI	11,966	33	0	0	44	64	42	0
SC	48,567	19	41,015,630	41	18	3,885	5	0
SD	2,327	42	4,159,081	82	41	159	40	0
TN	49,941	18	65,294,367	68	14	2,817	9	226,307
TX	92,386	7	163,298,619	107	1	1,059	22	682,338
UT	2,603	40	37,118,861	822	26	48	43	3,576
VA	73,891	11	39,780,790	30	21	2,136	11	350,362
VT	0	50	0	0	44	0	48	0
WA	5,116	37	10,451,134	142	37	894	25	56,376
WI	60,829	15	51,081,291	46	16	1,832	14	512,883
WV	19,642	24	92,265,497	235	7	2,987	8	14,165
WY	3,880	38	51,357,490	723	15	190	36	0
U.S. Total	1,968,865		2,154,343,671	57		69,097		12,986,262

Data: MSB Energy Associates



**RECEIVED**

MAY 04 2005

18 April 2005  
3015 Acacia Way  
Great Falls, Montana 59404-3692

**DEQ  
DIRECTOR'S OFFICE**

Kathleen Johnson  
MEPA Project Coordinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, Montana 59602-0901

RE: Highwood Generation Station Unit #1 Environmental Impact Study (EIS)

Dear Ms. Johnson:

I am deeply concerned about the health impact of the proposed coal fired Highwood Generation Station Unit #1. After studying the Scoping Document, I am alarmed at the potential, and probable, impact on the health of people, animals and environment. Even with the "best state-of-the-art" process, the likely harmful boiler emission pollutants and residual solid wastes is numbing to the sensibilities to the well-being of our future. No doubt the proposal may meet the "minimum standards," but if our society met only the minimum standards in our science, innovation, invention, creative, social, ethical, education, and health care systems, ours would be far less than a world class economic and social order.

I present the following questions to be answered in the EIS, and to which I request a response.

1. What are the tons/year space and time fall out concentric circles that the 2,595 tons/year (5,190,000 lbs/year) of emission pollutants will settle upon, thereby impacting air, water, soil, and habitat quality?
2. What will be the impact of the pollutant and waste residue on the water, air, soil, and habitat quality based upon the highest standards of science. Changes such as, but not limited to, air intake, drinking water, food chain, birth defects, breathing and respiratory viability, and all other known or suspected health impacts and/or complications?
3. Who are the federal, state and local human healthcare and food chain experts that are involved in assessing and contributing to the Environmental Impact Study? If there are none, why not? What changes will be made to include health care human, animal and agronomy experts in the decision making process?
4. What are the specific human health questions and scientific data that will be used in the final EIS decision?
5. If DEQ is not addressing human health standards and scientific data in the EIS, what authority is addressing these standards and what is the process being used?
6. What are the specific food chain standards, plant and animal, questions and scientific data that will be used in the final EIS decision?

7. If DEQ is not addressing food chain standards in the EIS, what authority is addressing these standards and what is the process being used?
8. What are the permitting process, safety standards and requirements for the disposal of the 76,650 tons/year (153,300,000 lbs/year) of solid waste materials? What are the lifetime storage requirements of particulate pollutants and solid waste residue that will assure citizens that they and their ancestors will not be harmed?
9. If, for example, the life of the generator is 40 years, what are the long-term implications and requirements of 103,800 tons/40years of boiler emissions and 3,066,000 tons/40years of solid waste disposal?
10. What are the potential economic and social costs of healthcare as a result of the particulate emissions and solid waste disposal over the decades?

Your response to these questions will be appreciated as I contribute to this critical quality decision. Thank you.

Respectfully,

A handwritten signature in cursive script, appearing to read "Richard Fisher". The signature is written in black ink and is positioned below the word "Respectfully,".

Richard Fisher

Johnson, Kathy

---

**From:** Mert and Vicki Freyholtz [mervic@mtintouch.net]  
**Sent:** Monday, May 02, 2005 10:26 AM  
**To:** Johnson, Kathy  
**Subject:** RE: SME's Highwood Generating Station EIS

We have many questions concerning the proposed coal fired generating plant.

First let me state my objections to the manner in which the last meeting was held. I feel there should have been a public comment period either before or after the presentations by the staff. Public comment brings up issues that may not have been thought of by the rest of the people and makes for a better informed group. I also feel the meeting should not have been held until all the reporting information was available to the public.

I wonder why the plant isn't located next to the coal? It would be more economical, would eliminate some of the pollution and would eliminate the need for additional rail lines.

Since access to the site would be via Hwy # 89, Local Route 228 and county road, what provisions have you made for increased traffic on these roads? Are the roads built to accommodate the heavy loads of limestone that will be trucked in daily?

Has the city of Great falls considered its supply of water from the Missouri River? What future needs might there be and will you have enough in an extreme drought period? Will there be a need for increased water treatment in the future? Who will pay for that?

Is there a danger of slag build up behind the dams? Will the slag be toxic?

Will the Missouri River be essentially a mixing zone for the power plant? Will their discharge affect the water temperature of the river? What effect will this have on the fish and other aquatic life? How much water will be lost from intake to out take?

About 40 per cent of Montana's lakes, rivers, and streams have an advisory against eating too many of the fish found in the waters. These fish are found to have mercury in them. Since the power plant emissions contain mercury, what provisions have you made to eliminate or drastically reduce such emissions? Who will monitor this and how often will monitoring take place? Mercury has also been connected to increased cases of autism in children. If this is proven in court and law suits result who will be responsible to pay the damages? the state? the city? who?

It states in your information that the plant would have about 210 tons of ash a day. This site is right on the Missouri River! With the wind that we have in this country what is to keep the wind from blowing the ash directly into the river and all over the surrounding countryside for hundreds of miles? We have already seen at the Zortman Mine that lined pits often leak so what safeguards will be imposed to keep pits filled with ash from leaking or overflowing?

This plant can also burn other fuels than just coal. What guarantees do we have that they won't burn other, perhaps even more polluting fuels in the future?

If this plant is abandoned in the future, who is responsible for environmental clean up? What sort of bonds are required (if any)? Are they for a large enough amount so if for example water treatment were to be required forever the cost would be paid by the bonds and not the state or city?

What kind of enforcement can we expect for monitoring and enforcement of environmental laws? What kind of punishment would be handed out if such violations occur? How much leeway would the plant be given and how many chances would they be given to correct the situation before they are shut down?

Thank you for the opportunity to comment and ask our questions! We will be looking forward to receiving our answers and hearing the questions and answers of others at the next meeting.

Sincerely,

Mert & Vicki Freyholtz

P.O. Box 211  
Gildford, Mt. 59525

Gerhard W. Helm  
HC 32 Box 4161  
Miles City, MT. 59301

Miles City, MT.  
5-3-05

RECEIVED

MAY 06 2005

DEQ  
DIRECTOR'S OFFICE

Comments on S.M.E.'s proposed Highwood  
Generation Station #1

Firm electric power will be needed for  
Montana residents by the time this proposed  
coal fired plant can be built without any delays.

This plant will use Montana coals in  
a C.F.D. plant using the best technology  
available today.

It will be the cleanest plant in the U.S.

The folks building this plant live in the  
~~the~~ area and are committed to "doing it right"!  
Every step necessary to keep Montana clean  
will be taken to produce Firm electric  
energy for their and their children's &  
grandchildren's future energy needs at a  
reasonable cost.

S.M.E. is not a greedy out of state Corporation  
wanting to rape Montana.

S.M.E. is a locally owned, locally controlled  
group of customer owners planning for the  
electric energy needs for Montana.

Sincerely Gerhard W. Helm

Miles City, MT

**RECEIVED**

APR 25 2005

Kathleen Johnson  
MEPA Project Coordinator  
Re: Highwood Generating Station EIS  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901  
[katijohnson@mt.gov](mailto:katijohnson@mt.gov)

**DEQ  
DIRECTOR'S OFFICE**

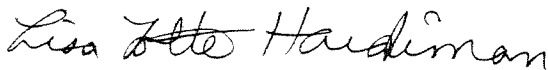
4/21/05

I am concerned about the coal generating power plant that is proposed to be built north of Great Falls. I think power cooperatives are great, but not with coal.

My concerns are:

1. Global warming. If we quit living in denial we can clearly see that the weather patterns are changing. There is mounting evidence that this is contributed to the emissions of fossil fuels which coal is.
2. Mercury has a tremendous effect on people. The EIS should clearly identify those areas where there are no environmental standards to be applied and therefore need to be determined. For example, mercury emission standards do not presently exist in Montana.
3. The city of Great Falls is proposing using its Missouri River water rights for the use of this power plant. Generation of electricity through a coal-fired plant uses more water per kilowatt produced than any other generating method except perhaps nuclear. Water flow is important as drought diminishes water quality in this area.
4. Air quality is a concern because particulate and gaseous emissions are far from harmless. The cumulative impacts are carbon dioxide, sulfur dioxide, nitrous oxides, and mercury in the land, water and air.
5. Coal ash is toxic. A bill for proper disposal of coal ash did not pass this last legislature. The effect of this project on the river is enormous and will distress all aquatic wildlife.
6. Economically, we act as if we are in a feudal society. We already have five dams on the river. It is a possibility to condemn these and own the power from PP&L.

Sincerely yours,



Lisa Lotte Hardiman  
3726 4<sup>th</sup> Ave. N.  
Great Falls, MT 59401  
406-455-6412

**RECEIVED**

APR 25 2005

Kathleen Johnson  
MEPA Project Coordinator  
Re: Highwood Generating Station EIS  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901  
[katjohnson@mt.gov](mailto:katjohnson@mt.gov)

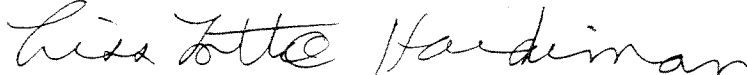
**DEQ**  
**DIRECTOR'S OFFICE**

Dear Kathleen Johnson:

I am concerned about the coal generating plant that is proposed to be built near Morony Dam north of GF. The consulting firm that the city hired to help the city purchase cheaper power as a cooperative (and this is a great idea) only does coal generating power plants. Any bills that were directed at MEPA to strengthen it again as it was gutted during the Martz administration did not pass this last legislation. As well, bills concerning water, air, solid waste did not pass as well. This plant could, for example, burn old tires. There is nothing protecting us. Also, after the meeting I learned that noise is a factor, too. Coal generating power plants when the power is over capacity let out tremendous sound. It would greatly affect water in the Missouri river as it is pumped out in large volumes and released though "treated" may be a higher temperature. The consulting company totally ruled out any kind of alternative plan for alternative energy.

Other concerns are: global warming, mercury (in the water, land and air), mercury has a tremendous effect on people too, and in CA, NJ, TX, and MA in areas of coal generating plants there were high numbers of autism in children. Another concern is water rights: The city of GF is proposing using some its Missouri River water rights for the use of this power plant. Generation of electricity through a coal-fired plant uses more water per kilowatt produced than any other generating method except perhaps nuclear. Water flow is important as drought and water quality diminishes in this area. Water quality: there are totally unanswered questions to the impact of water quality, but you and I both know that it will be tremendous. Air quality: particulate and gaseous emissions far from innocuous. Cumulative impacts: carbon dioxide, sulfur dioxide, nitrous oxides, and mercury. Economic viability of project: We already have five dams on the river. It is a possibility to condemn these and own the power from PP&L. Establishing environmental standards: the EIS should clearly identify those areas where there are no environmental standards to be applied and therefore need to be determined. For example: mercury emission standards apparently do not presently exist in MT. Solid Waste disposal: coal ash is toxic and nothing can grow where it is dumped. The effect of this project on the river is enormous as well as birds and aquatic wildlife.

Sincerely yours,



Lisa Lotte Hardiman  
3726 4<sup>th</sup> Ave. N.  
Great Falls, MT 59401  
406-455-6412

**HEBERLY AND ASSOCIATES**

Consulting Engineers

P.O. Box 1311  
521 Fourth Street  
Havre, Montana 59501  
Phone (406)265-6741  
Fax (406)265-6787

**RECEIVED**

APR 27 2005

**DEQ  
DIRECTOR'S OFFICE**

April 26, 2005

Kathleen Johnson  
MEPA Coordinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, Montana 59620-0901

Re: SME's Highwood Generating Station EIS

Dear Ms. Johnson:

I am writing this letter to support the above-mentioned project. As a native Montanan of 54 years, I have witnessed the decline of the economy in eastern Montana for the past 20 years. The population of most of eastern Montana is shrinking and many of the smaller schools are either consolidating or completely closing down. Because of continued drought and low commodity prices, the agricultural-based economy of eastern Montana continues to suffer.

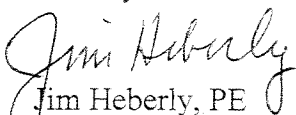
In my opinion, it is time we start to develop our natural resources to create some permanent high-paying jobs. We have an abundance of coal that could be mined and used to generate power. It is my understanding that this new circulating fluidized bed technology is capable of readily burning coal to produce electricity, while meeting stringent environmental requirements. If, indeed, this technology does meet or exceed all Federal and State SO<sub>2</sub>, NO, and CO<sub>2</sub> regulations, then I hope your department would look favorably on the EIS submitted by SME.

Please be advised that our engineering firm is not providing any services on this project so we have nothing to gain financially if it proceeds. I am supporting this project as a business owner and taxpayer of Montana in hopes that these types of projects can produce tax revenue for the state and increase the tax base of our rural counties. I also would like to state that I enjoy hunting and fishing in our state and don't want to see our quality of life diminished with polluting industries. However, it appears to me that this plant can operate efficiently and have no impact on our environment in Montana.

Good luck on your review process.

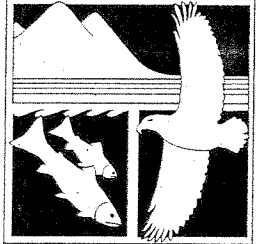
Very truly yours,

Heberly and Associates,

  
Jim Heberly, PE  
JH:tw



# MEIC



## MONTANA ENVIRONMENTAL INFORMATION CENTER

*"Working to Protect and Restore Montana's Natural Environment Since 1973"*

April 22, 2005

Kathleen Johnson, MEPA Corrdinator  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-1760

**RECEIVED**

APR 25 2005

**DEQ  
DIRECTOR'S OFFICE**

RE: SME's Highwood Generating Station EIS

Dear Ms. Johnson:

The Montana Environmental Information Center is extremely interested in the SME Highwood Generating Station project. We are unclear how the Department can conduct an environmental impact statement under the Montana Environmental Policy Act without having received a permit application. The information provided in the scoping document is wholly insufficient for evaluating this proposal and determining what impacts need further analysis. Indeed we believe it is impossible to conduct any further analysis without the benefit of a permit application.

We look forward to providing scoping comments when the permit application is available for review. Until that time we do not have the requisite information to make an informed decision about what issues need study under MEPA.

Please contact us when a permit application is submitted and upon the completion of its submittal we would be happy to provide comments to help you determine the scope of the analysis that needs to occur.

Sincerely,

A handwritten signature in cursive script that reads "Anne Hedges".

Anne Hedges  
Program Director

4-18-05

**RECEIVED**

APR 20 2005

DEQ  
DIRECTOR'S OFFICE

Dear Kathy Johnson:

Enclosed are some cuts concerning the negative consequences of producing energy with coal-burning plants. I think the two most objectionable by-products are carbon dioxide and dissolvable mercury.

While the idea of a city in Montana, the size of Great Falls, producing its own power is very appealing - how do we protect the air we must breathe and the fish stocks in lakes and rivers? I am fearful of what affects mercury from such a facility will have on infants and children let alone adult health.

Please reassure me that all emissions will be scrubbed free of mercury and carbon.

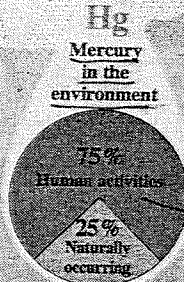
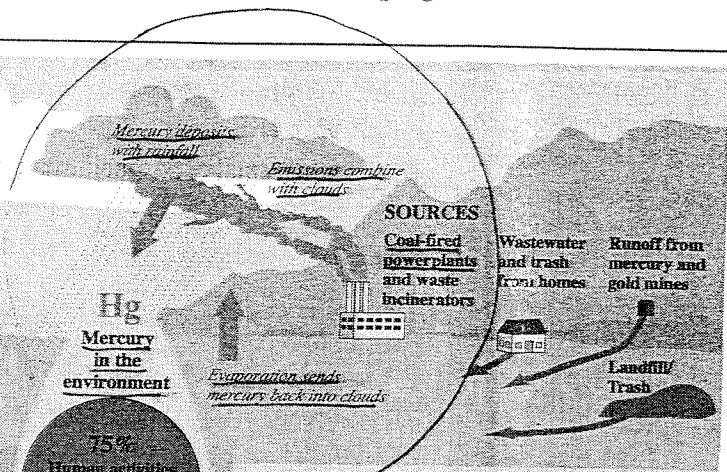
Sincerely,

Pat Helvey  
Box 4904 Helena 59604

# Mercury's danger

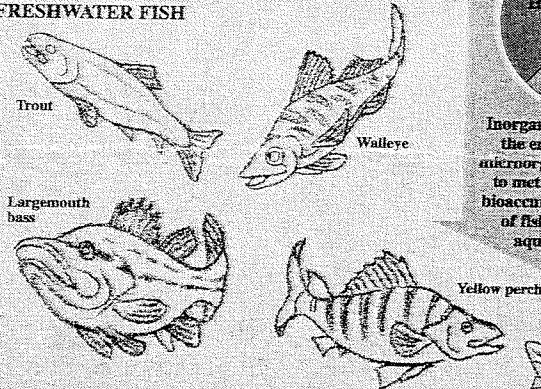
Mercury gets into the environment from a variety of human sources. The biggest is the burning of fossil fuels, with coal-fired power plants accounting for nearly a third of all industrial mercury emissions. Other sources include waste incinerators and runoff from abandoned gold and mercury mines.

Studies show mercury in the marine environment is increasing at a rate of up to 4.8 percent a year. Even if mercury discharges were stopped today, it would take 50 years for mercury levels to drop in fish.



Inorganic mercury flows to the environment where microorganisms transform it to methylmercury, which bioaccumulates in the tissue of fish at the top of the aquatic food chain.

## FRESHWATER FISH



## USES

- Dental amalgams
- Switches
- Electronic parts
- Thermostats
- Fluorescent lamps
- Mercuric oxide batteries
- Pharmaceutical preservative
- Anti-fungal wood preservative

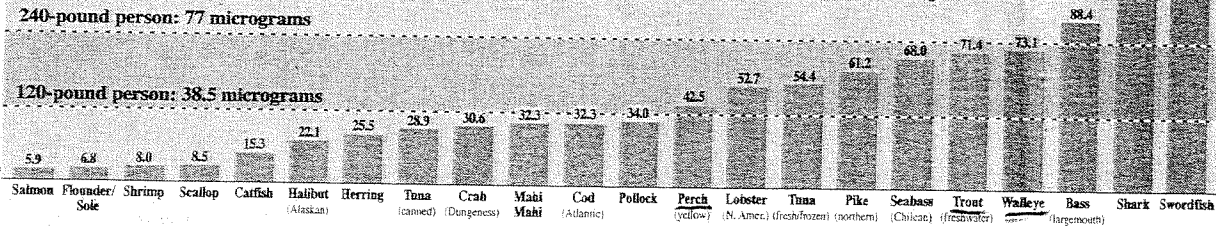
## HEALTH EFFECTS

**In infants and children**, even small amounts of mercury can affect learning ability, language, motor skills and, at elevated levels, cause permanent brain damage.

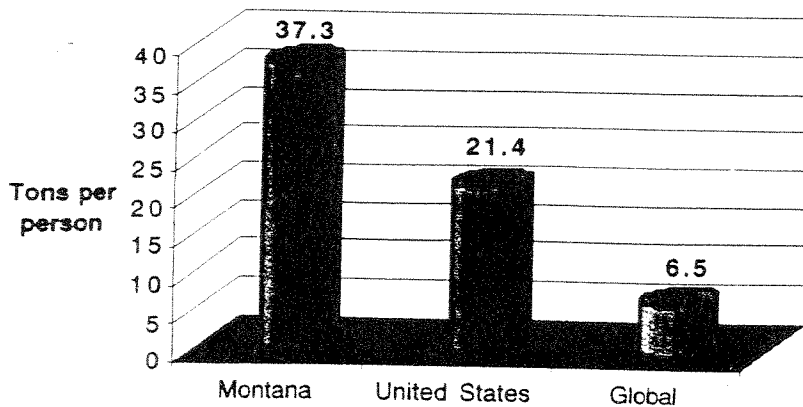
**In adults**, mercury can damage the nervous, cardiovascular, immune and reproductive systems. Symptoms include tremors, memory loss and fatigue.

## Mercury in your meal of fish

This chart shows the amount of mercury a 6 ounce serving of these fish would provide. The EPA has set a safe maximum weekly intake of 38.5 micrograms for a 120-pound person and 77 micrograms per week for a 240-pound person. You can adjust the microgram intake to fit your own weight.



Sources: U.S. Environmental Protection Agency, U.S. Food and Drug Administration, Frontier Geosciences Inc., South Carolina Department of Natural Resources, Annapolis Center for Science-Based Public Policy; [www.cfsan.fda.gov/~ff/sea-merHg.html](http://www.cfsan.fda.gov/~ff/sea-merHg.html); <http://www.epa.gov/os/fish/>; <http://www.natp.org/foodandhealth/home.cfm>



**Montana already emits 74% more tons of greenhouse gases per person than the United States average, and almost 6 times as much as the Global average. The Roundup Power Project alone will increase Montana's carbon dioxide emissions by 8,199,803 tons per year!**

*Mercury from coal-fired plants is something Montana can do without!*

*much of the apples to the persons plant at Great Falls.*

10. The haze from the plant will reduce visibility in Yellowstone National Park, the UL Bend Wildlife Refuge, the North Absaroka wilderness areas, and the Northern Cheyenne Reservation.
9. There are at least four more coal-fired power plants waiting their turn if the Roundup Power Project succeeds.
8. Wind power creates 40% more jobs per investment dollar than a coal-fired plant.
7. Since Montana already exports 47% of the electricity it produces, we ought not to become the "boiler room of the nation."
6. Montana will keep the pollution from the Roundup plant, but profits will go out-of-state.
5. The plant will emit vast amounts of greenhouse gases, which contribute to global warming.
- ★ 4. Mercury, which the plant will emit in dangerous quantities, causes birth defects, neurological damage, and lung and kidney failure.
3. If more electricity is needed, it should come from conservation and efficiency-improvement measures, not from the dirtiest source, coal.
2. The air quality permit violates state and federal clean air laws.
1. The Roundup Power Project violates your right to a clean and healthful environment.

*The Great Falls Coal-fired Plant*

**Johnson, Kathy**

---

**From:** Andy Johnson [andy.johnson@mse-ta.com]  
**Sent:** Friday, April 08, 2005 7:49 AM  
**To:** Johnson, Kathy  
**Subject:** Proposed Highwood Generation Facility near Great Falls

If it is supported by the Great Falls community, then I support the construction of this facility. It will produce revenues for the community, county, and State. It will provide well paying and meaningful employment for the community. No matter what all those whining so called "environmental" activists say, it will not pollute the atmosphere any more than fall burning of brush does. The good far outweigh the bad for this project, and I ask that you allow it to go forward as per the developer's schedule.

E. A. Johnson  
2905 Hanson Rd.  
Butte, 59701

## Newton, Carl

---

**From:** diane@sofast.net  
**Sent:** Friday, May 06, 2005 3:51 PM  
**To:** Johnson, Kathy  
**Subject:** From Diane

May 6, 2005

Kathleen Johnson, MEPA Project Coordinator  
Montana D.E.Q.  
PO Box 200901  
Helena, Montana 59602

Re: Highwood Generating Station Environmental Impact Statement

To Whom It May Concern:

The purpose of this letter is to express my support for the Highwood Station power plant near Great Falls. The development of a clean coal facility is a responsible and practical step in securing a reliable, affordable source of energy for folks in Great Falls and across Montana. Of our most valuable assets in Great Falls are our beautiful river and clean, fresh air. A main reason for my support of the plant is that it will use the latest technology to control SO<sub>2</sub>, NO, and CO<sub>2</sub> emissions to minimize the potential impact on our community and environment.

It seems to me that Southern Montana Electric G&T has been very diligent with environmental considerations, and I'm confident the Montana Department of Environmental Quality will verify this through the permitting process.

The plant will also be a strong economic boost to the community and surrounding area. By some calculations, the plant should bring \$75 million in construction wages and 65-75 permanent jobs to Great Falls.

The Highwood Generating Station is an important step in bringing public power to Great Falls and I am pleased that it will be done in an

6/7/2005

environmentally sound manner.

Respectfully submitted,

Dianne Jovick-Kuntz  
Great Falls City Commissioner

Southern Montana Electric Generation  
and Transmission Cooperative, Inc.

RECEIVED

Highwood Generating Station Unit #1

MAY 06 2005

DEQ  
DIRECTOR'S OFFICE

COMMENTS

Name	Craig M. LaCasse
Address or e-mail	727 33 B Ave NE Great Falls, MT 59404
Phone number	406-452-9335
Comments:	<p>I am concerned about the proposed plant's carbon dioxide emissions. Global warming is widely believed to be the most serious environmental problem we face, and the plant's greenhouse gas emissions will have devastating impacts on Montanans and people everywhere. Future generations will have no choice but to try to mitigate human-forced warming and in order to do so they will eliminate the worst offenders: coal fired plants. <del>that</del> This project does not make economic or environmental sense to me; therefore, I oppose it.</p>

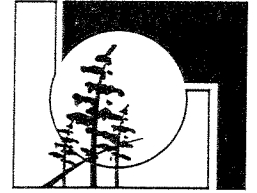
Please return your comments postmarked by May 6, 2005, to:

Kathleen Johnson, MEPA Project Coordinator  
Re: Highwood Generating Station EIS  
Montana Department of Environmental Quality  
PO Box 200901  
Helena, MT 59620-0901  
katjohnson@mt.gov



*Kathleen Johnson, MEPA Coordinator  
MT DEQ,  
P.O. Box 200901,  
Helena, MT 59620-901.*

**STUART LEWIN**  
*Attorney & Counsellor at Law*  
615 THIRD AVENUE NORTH  
GREAT FALLS, MONTANA, 59401  
PHONE, FAX, V-MAIL: 406-727-8464  
E-MAIL: STUARTLEWIN@WORLDNET.ATT.NET



Date: May 4, 2005

Re: Highwood Generation Station Unit #1 EIS - scoping

**RECEIVED**

MAY 05 2005

**DEQ  
DIRECTOR'S OFFICE**

Dear Ms Johnson,

Thank you for allowing me the opportunity to submit these scoping comments and questions on the proposed coal fired plant at Highwood.

1. **Global Warming** – In light of the fact that Montana already has a number of operating coal plants (with others proposed), causing the State of Montana to contribute an inordinate per capita amount of greenhouse gasses to the atmosphere, are we justified in even considering building more? What mitigation measures for CO2 admissions will the state of MT require for this plant and others? Are these mandatory? If not, how will they be enforced? If no enforcement, how can they be guaranteed? If no guarantees, then is the state meeting its obligations under the state Constitutional requirement for providing “a clean and healthy environment”?
2. **Mercury** – In light of the fact that very small amounts of mercury is known to be a dangerous pollutant which causes severe neurological deficits, What is going to be done about limiting (or eliminating) this coal plant’s contribution of this pollutant to the atmosphere, and water, and the land? We already have a state advisory on fish caught in our state’s rivers and lakes. This plant, situated as it is near the Missouri, and potentially returning an (undetermined) amount of effluent to the river, surely will have a negative impact on the mercury levels of the river.
3. **Emission Standards.** Since plan goes on line in 2010 and it has an operating life span of at least 30 years, how will plant meet EPA emission standards 2020?
4. **Autism** – In California, the observed rise in cases of autism in children as been attributed to increased mercury emissions from China’s coal plants. This is an unconscionable human loss because it would seem to be preventable in large part by reducing or eliminating exposure to environmental mercury. Some states and individuals are considering litigation to redress their losses. The EIS should consider the costs of potential litigation to the co-op, the City of Great Falls, and the State of Montana.

**5. Water Rights –**

A. The City of Great Falls is proposing using some its Missouri River water rights for the use of this power plant. Generation of electricity through a coal-fired plant uses more water per kilowatt produced than any other generating method (except perhaps nuclear; I am unsure of this). It is clear that Missouri River water and water rights become ever more important as water flows decrease due to the drought. . At some point, it may be essential to use Missouri River water rights to make Giant Springs water the source of Great Falls drinking water. The EIS process needs to provide a forum for weighing the various potential uses of Missouri River water rights to determine whether this project would be the highest and best use of those rights. Who is responsible for determining which use is more beneficial than another? The DNRC under their rules provides for changes in water rights as long as both uses are beneficial, without consideration of the relative merits of such uses. Even if Great Falls' water rights are more properly addressed by City government, this EIS may properly be a vehicle to motivate our local government to take this issue seriously.

B. When the giant springs water rights transfer of GF reserved rights was approved for the new malting plant, the DNRC has no records of any objection even though objections were raised in the EA process, why is there not a requirement that objections raised in the EA process be carried through and considered in the DNRC water rights transfer process?

C. How much water will the new plant use? The scoping document given out at the meeting in GF in April must give us the number of days of operation. Assuming that water use is 7 days a week, 52 weeks a year how much water will be used. How many GF municipal reserved rights will be available for other uses after water is supplied the plant pursuant to the water service agreement recently approved by the City of Great Falls?

**6. Standing to Raise Water Rights –** Are citizens of Great Falls considered “appropriators” under applicable water law, and therefore able to be objectors under the water rights transfer process? Can the City of Great Falls enter into a long-term supply contract to the coal plant committing Great Falls water rights without a meaningful public process? We request that the EIS analyze GF water rights, determine how many will be used to meet the supply contract and then determine how this will effect future growth of Great Falls.

**7. Water Quality --** Development along the Missouri upstream from Great Falls is resulting in ever more pollution into the river. The costs associated with cleaning Missouri River water for use in Great Falls may, in the future, become prohibitive. Further, it is probably true that there are many pollutants that are not being monitored. (See use of water rights in 5 above). Finally, the proposed power plant is bound to have an impact on water quality. Will the power plant be required to mitigate its contributions to water pollution, and will such mitigation

actually be acceptable in light of other threats to the quality of Missouri River water? Does the plant propose use of the Missouri River as a mixing zone for its return water? How will this effect downstream water systems such as Fort Benton. What about those who use MR water downstream for domestic and commercial use (cattle watering etc.). How can no-deg standards be determined if this stretch of the Missouri and Sun rivers do not have a current enforceable plan in place? What is the future impact on the Missouri of the five superfund cites located within the 1 mile Great Falls bend in the Missouri River. What will be the impact on water quality of slag sitting behind the PPL dams. How will the proposed power plant cumulatively affect the river considering these additional pollution sources when they empty into the river? The refinery in Great Falls has filed notice with the state of problems with its river discharge? Is its bonding adequate to pay for clean-up if it goes bankrupt? If not what will be the cumulative effect of the new proposed plant's discharges?

8. **Air Quality –**

A. A coal-fired plant makes power by burning coal, which results in an array of particulate and gaseous emissions, most of which are far from innocuous. Even if prevailing winds carry such emissions away from Great Falls, are we justified in producing such pollution for our neighbors downwind to breathe?

B. Further, we know that this power plant is designed to be able to burn other fuels besides coal, including so-called "biomass" and even, potentially, old tires. What are the impacts to air quality (at least) of such fuels? What steps are being taken to ensure that this plant will not resort to other fuels once it is up and running, which may result in unforeseen and unregulated emissions?

9. **Cumulative Impacts --** The cumulative impacts of the Great Falls power plant need to be considered in light of other power plants which exist and which are being proposed in Montana, in nearby states, and even in China. Among such impacts are many which have been mentioned above, such as carbon dioxide, sulfur dioxide, nitrous oxides, and mercury. We do not live in a vacuum, and the DEQ and its EIS may properly consider the impacts not of this plant by itself but in the region and planet as a whole.

10. **Economic Viability of Project –**

A. Depending on the environmental requirements determined by the EIS process, the bottom-line economics of the project must be considered and measured against other alternate sources of power, such as hydroelectric power from our local dams, (the question remains whether the City of Great Falls might be able to condemn the dams and own this power rather than be at the mercy of PP&L thus providing a much cheaper source of power than the proposed coal plant), wind power, natural gas-fired plants, solar power, or (probably the most effective) a combination of some or any of the above. The EIS needs to consider the

economic viability of these other sources of power and compare these to the proposed coal plant. It does not take a rocket scientist to question the efficacy of carrying coal from eastern Montana to create power for Great Falls when right here in Great Falls the dams are producing more power than our needs require, but it is not made available at the cost of production.

B. Further, if at some point emission controls become (properly) stringent, would this plant then be in violation of such requirements and what would be the cost of bringing it into compliance and if so would it then be economically viable?

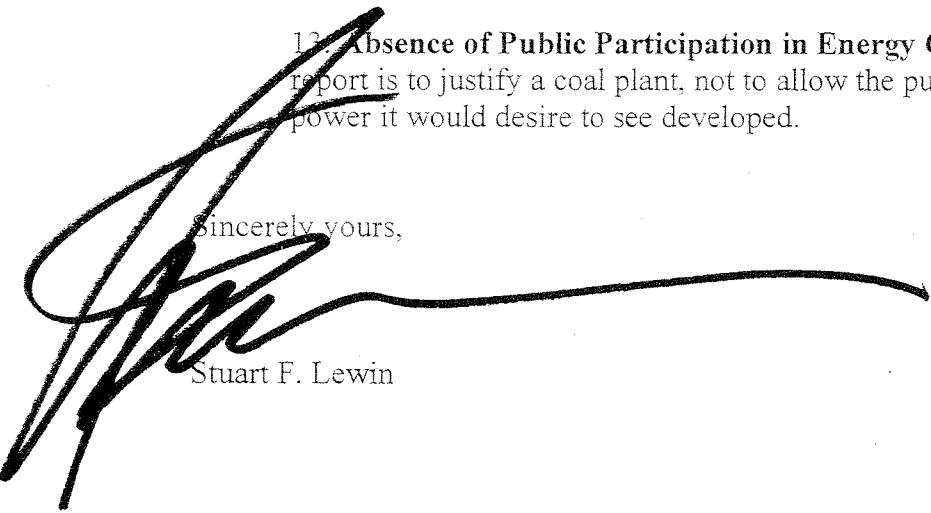
C. The plant will affect the air and water quality of the area. How will this affect the growth of this community? Other communities in Montana are experiencing increased growth because of the quality of their environment. Please quantify the negative economic impacts caused by the coal plant.

11. **Establishing Environmental Standards** -- This EIS should clearly identify those areas where there are no environmental standards to be applied and therefore need to be determined. Also, which agency of the State is best suited for making requirements part of practice in this State? For example, mercury emission standards apparently do not presently exist in Montana. What does the DEQ recommend as a standard, and does the department have the authority to create such standards in order to better meet its obligations under the Montana Constitution for a clean and healthful environment?

12. **Bonding and Reclamation** – the State Constitution requires reclamation when the environment is disturbed. We request that the EIS identify the costs associated with reclamation for the environmental impacts cause by the plant and set sufficient bonding amounts for the plant for full reclamation. This should include reclamation of the coal mining sites, transportation corridors for the coal and the power, water degradation and loss, ash disposal, and mothballing the plant if it becomes economically unviable. Since this is a co-op including a public governmental entity, how the bonding requirements will be enforced is also an issue, which should be spelled out.

13. **Absence of Public Participation in Energy Generation selection** – SME's report is to justify a coal plant, not to allow the public to determine what type of power it would desire to see developed.

Sincerely yours,



Stuart F. Lewin

Hilary Ransdell Lewin  
2304 Second Avenue South  
Great Falls, MT 59405  
406-771-0631  
hransdell@sofast.net

RECEIVED

MAY 06 2005

DEQ  
DIRECTOR'S OFFICE

May 5, 2005

Kathleen Johnson  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

RE: Highwood Coal Plant near Great Falls  
Scoping Comments

Dear Ms. Johnson:

Thank you for coming to speak to the Conservation Council in Great Falls.

I wish to enter my concerns into the record in regard to the coal-burning power plant that has been proposed to be built near Great Falls.

While I do believe that public power is a good thing, and I applaud the efforts of the City of Great Falls to ensure dependable and affordable power for its citizens, I believe this coal-burning plant is a serious mistake.

**Global Warming:** Many people have been misled into believing that global warming is a fraud and a hoax. I believe that all reasonable persons would agree that the human race (not to mention other life forms) cannot survive on the planet with a potentially disastrously degraded environment. It is therefore prudent (if not essential) to err on the side of caution. The burning of fossil fuels *must* be curtailed and eventually abandoned as a viable source for energy. Individuals from both sides of the political aisle are becoming convinced of this. Montana already has a huge coal-burning plant at Colstrip; we already produced more than our fair share, *per capita*, of greenhouse gasses. To propose a new coal-burning plant is irresponsible.

The United States presently has an administration that is conducting its policies in reckless disregard for the environment, but the present administration will be out of office long before this proposed coal plant comes online. The possibility exists that the SME co-op (of which the City of Great Falls is a member) may be stuck with a boondoggle, as fossil-fuel burning plants may be decommissioned as illegal.

**Pollution of Air, Land, and Water:** Even though this power plant is said to be "clean," the burning of coal is far from clean. We have been told repeatedly that this plant will comply with "all applicable regulations," but I do not believe that this is good enough. Again, the present administration has gutted and rolled back many standards; it is *not*

Kathleen Johnson, DEQ  
May 5, 2004  
RE: Highwood Coal-Burning Plant

---

good enough to comply with regulations. Neither do I have any confidence in the assurances of an entity which as a matter of course will seek to minimize its costs. Cleaning emissions always takes money.

One of the worst pollutants to come from burning coal is mercury. Montana already has a standing warning against eating the fish from our (what used to be) blue-ribbon streams because of the danger of ingesting mercury. It is irresponsible of us to contemplate adding more of this dangerous neurotoxin to our environment.

I have been told that the ash from this plant will be "innocuous." I am not convinced that this is the case, and from what I have seen it may be possible for this project to fall between the cracks of state regulations when it comes to disposal of its ash. Furthermore, the whole idea of creating several acres full of this cement-like ash is reprehensible to me. Quite aside from esthetic and environmental degradation created by such a thing, the site of this ash "disposal" is very likely to be nothing more than a Superfund site that we will be stuck with.

This plant will create water effluent as well. What are the *guarantees* that this water will not harm the Missouri River, to which it will be returned?

**Water Rights:** I am very concerned with the fact that the City of Great Falls has promised some of our city's water rights to this plant. We already gave precious water from Giant Springs to a local malting plant. The City has already signed the water supply contract with SME committing use of Great Falls reserved water rights. Where was the due process in this decision? This plant will use prodigious amounts of water, most of which will simply evaporate. We are currently in the seventh year of drought; the reservoirs on the Missouri are at an all-time low. We do not know if the drought is a cyclic aberration or an irreversible result of global warming. We do not know what our water needs will be in the future. It borders on recklessness to use this precious resource in such a prodigal manner.

**Due Process:** I feel that public input and debate has been purposely avoided in regard to this project. We have been presented with a coal plant as the only alternative energy source for our city, and the project is presented as a *fait accompli* in such a polished manner that citizens are left speechless and feeling deprived of any input. I have attended a number of presentations on this project, and I still have the feeling of being railroaded, and that nothing I have to say will be taken seriously. I am hoping that by writing this letter, my opinions in this matter will be heard in a meaningful way.

Sincerely,



Hilary Ransdel Lewin

**RECEIVED**

MAY 04 2005 *for*

May 3, 2005

Ms. Kathy Johnson  
Montana DEQ  
PO Box 200901  
Helena, MT 59620-901

**DEQ  
DIRECTOR'S OFFICE**

Dear Ms. Johnson:

These comments are directed at the proposed coal-fired electric power generating plant to be located east of Great Falls. I have serious reservations on several issues. First, the amount of ash produced by the plant is large and disposal will be a problem. Associated with that is the amount of contaminants in the ash. In particular, my understanding is that mercury would be present in the ash and would also be released into the air making a serious problem for people downwind from the plant. Mercury has been implicated in the increase of autism in recent years. This issue of toxic mercury released into the air needs to be address in a serious fashion and not just dismissed as I feel was done by the proponents in meetings that have been held. Another problem is the carbon emissions that will add to the greenhouse gases and contribute to global warming.

In general, coal-fired plants, even "state-of-the-art" ones, present serious problems of contaminants and must be addressed. While I understand both the need for the power generating capacity and the desired by Great Falls official to have the city with its own power generating capacity, the issue of contaminants - especially the very toxic ones - must be addressed in a responsible way before the plan for the plant gets approval.

Thanks for considering my concerns.

Sincerely,



Ronald M. Mathsen

Ronald M. Mathsen  
122 Treasure State Drive  
Great Falls, MT 59404-3402

RECEIVED

MAY 04 2005

MT Dept. Environmental Quality  
Permitting & Compliance Division  
Air Resources Management Bureau

MT Dept. of Environmental Quality,

RECEIVED

MAY 08 2005

D.E.Q.

4-26-2005

Re: Understand you are accepting comment regarding impact of the proposed Highwood generating station, (East of Great Falls - Coal fired) Comment period until 5-15-05,

RECEIVED

MAY 04 2005

DEQ  
DIRECTOR'S OFFICE

I would like to mention certain issues:

- ① Toxic emissions are always a potential problem.
- ② It appears that the project will be built on some of the best farmland in the state, not beneficial to our state to destroy such lands.
- ③ Numerous coal trains traveling long distance will impact and endanger motorists at many Highway/rail crossings throughout the state. Furthermore..... (see #4)
- ④ It doesn't make business sense (is not cost efficient) to transport coal several hundred miles, to Great Falls, when the plant could be built near the coal source, (wherever that is - Colstrip, etc?) This, especially since the cost of diesel for trains is now at (or near) an all time high and seems likely to stay there.
- ⑤ It is unlikely that electricity from this plant will sell at a competitive price. It probably will sell above market rates.

(Cont.)



⑥ How much precious water will this plant (with a junior water right) draw from the Missouri River? (already at low levels) Would senior water rights be properly protected?

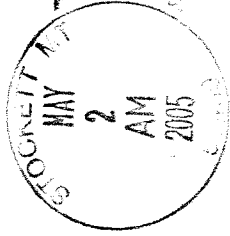
⑦ If the plant is built, the company should be required to dedicate an equal number of acres to conservation purposes. (Conservation easements, Agricultural easements, Wildlife habitat, park land, other types of mitigation.)

⑧ Use of taxpayer money to help fund this private project is not acceptable!

Sincerely;

Stephen B. Magernick

Stephen V. Mayernik  
128 Lone Spring Rd  
Stockell, MT 59480



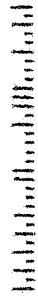
MT. Dept. of Environmental Quality

1520 East 6th Ave,

P.O. Box 200901

Hebena, MT

59620



ACMB?  
~~1988~~  
2005

in, Command Impact, Highway Construction,

## Newton, Carl

---

**From:** Mindy [nielsenm@imt.net]  
**Sent:** Wednesday, May 04, 2005 11:20 AM  
**To:** Johnson, Kathy  
**Subject:** Fw: [aeroenergytf] Major Bank Banks on Renewables

Kathleen,  
Much more viable to start making change to efficiency and renewables.  
Mindy Nielsen

----- Original Message -----

From: james barngrover  
To: AERO Energy Task Force  
Sent: Wednesday, May 04, 2005 10:09 AM  
Subject: [aeroenergytf] Major Bank Banks on Renewables

HSBC Bank Ups Renewable Energy Commitment to 30%  
Source: GreenBiz.com

WILMINGTON, Del., April 25, 2005 - HSBC Bank USA has pledged to meet 30% of its needs for electricity through wind power. The bank will offset nearly a third of its carbon emissions by purchasing 45,454 MWh of wind energy certificates -- one of the largest retail renewable energy purchases made in North America.

Last December HSBC became the world's first major bank to commit to carbon neutrality.

Electricity production is the leading cause of greenhouse gas emissions that contribute to global climate change. The bank's new annual commitment which will offset 30% of its emissions and will prevent the release of over 36,000,000 pounds of carbon dioxide (CO<sub>2</sub>), a leading global warming gas.

"We want to be the first bank in the world to have zero greenhouse gas emissions," said HSBC Bank USA president and CEO Martin Glynn. "A cornerstone of this effort is powering our branches and offices with 30% clean, natural wind power."

HSBC has purchased Green-e certified tradable renewable energy certificates (RECs) from new wind projects in California and Minnesota. RECs represent the environmental benefits of clean energy production that serve to take the place of other non-renewable sources from the regional or national electric grid. HSBC's investment will contribute to further the development of new wind energy generation necessary for a clean energy future.

"This sizeable purchase puts HSBC into the ranks of America's leaders in green power purchasing," said Kurt Johnson, Director of the U.S. EPA Green Power Partnership. "HSBC is setting a high standard for the financial sector and the broader business community." The Bank has joined the Green Power Partnership, an EPA voluntary program working to standardize green power procurement as part of best practice in corporate environmental management.

Globally, HSBC was named as one of the top fifty companies in the Climate Leadership Index at the launch of the Carbon Disclosure Project's (CDP) second report on climate change and shareholder value

## Newton, Carl

---

**From:** Mindy [nielsenm@imt.net]  
**Sent:** Wednesday, May 04, 2005 11:03 AM  
**To:** Johnson, Kathy  
**Subject:** Re: Highwood Generating Station EIS

Kathleen Johnson,  
Hello! Quickly, regarding the Highwood Generating Station EIS:

Mainly I want to see energy efficiency implemented and more renewable energy such as windmills in Judith Gap. There is no trade off a little renewable and look the other way on more coal thermal generating plants or more dams for electricity! The later are thoroughly pollutive and waste of time and energy for Montanans to pursue.

My other concerns:

Air quality: particulate and gaseous emissions far from innocuous. Cumulative impacts: carbon dioxide, sulfur dioxide, nitrous oxides, and mercury.

Economic viability of project: We already have five dams on the river.  
Establishing environmental standards: the EIS should clearly identify those areas where there are no environmental standards to be applied and therefore need to be determined.

Is it true that mercury emission standards do not presently exist in MT?  
global warming: one more coal plant instead of energy efficiency and renewable energy?  
mercury (in the water, land and air): mercury has a tremendous effect on people too, and in CA, NJ, TX, and MA in areas of coal generating plants there were high numbers of autism in children. And last years study stating mercury in all of Montanans streams and lakes.

Solid Waste disposal: coal ash is toxic and nothing can grow where it is dumped.

water rights: ( The city of Great Falls is proposing using some its Missouri River water rights for the use of this power plant. Generation of electricity through a coal-fired plant uses more water per kilowatt produced than any other generating method except perhaps nuclear. Water flow is important as drought and water quality diminishes in this area.)

Water quality: How will this affect the water quality?

No more coal plants please. Thank you.

Mindy Nielsen  
1228 AVE F  
BILLINGS MT59102-3246

Attn: Kathy Johnson  
Montana Department of Environmental Quality  
P. O. Box 200901  
Helena, MT 59620-0901  
May 5, 2005

Dear Ms. Johnson:

The Billings Outpost published a notice that you were accepting public comments on the preparation of an Environmental Impact Statement for the proposed Highwood Generation Station coal-fired electrical generation facility near Great Falls, MT. Southern Montana Electric G & T Cooperative plans to build and operate the plant. I am assuming that these comments are in the nature of scoping comments to determine the breadth of concerns that may be addressed in the environmental impact statement.

I am a customer of both Yellowstone Valley Electric Cooperative and Fergus Electric Cooperative. I have an interest in keeping my costs down for electricity, as well as ensuring a consistent supply for that electricity which I must use.

I have seen a distinct difference in operation between Yellowstone Valley and Fergus over the years. Yellowstone Valley has had a number of programs to encourage energy conservation, including super-insulated off-peak water heater programs and ground source heat pump programs. Other than steadily increasing costs, I have seen no conservation programs from Fergus. I do not know if the other coops involved in Southern Montana Electric G & T have had any conservation programs or not. From what I hear the cheapest electricity is the electricity conserved. I hate to see coal mined and burned without any conservation done before hand. There are many side effects from mining and burning coal, and I think coal-fired plants should be kept to a minimum. .

One of the areas that should be addressed in the EIS is what kinds of effective conservation programs the local coops could encourage their members to do. The Coops put out a monthly magazine on a statewide basis with inserts for the locals. YVEC has run conservation notices; Fergus never has. However, those notices and programs should be in every month.

We have a proposed coal plant permitted about 5 miles northwest of us. There is talk of another proposed plant at Broadview 25 miles to the west. Both of those would be coal-fired. The cumulative air effects of all the proposed plants in Montana should be considered in the EIS. There is current research from Colorado State University's Agricultural Research Service (plant physiologist Jack A. Morgan, researcher) which indicates that increased Carbon Dioxide emissions decreased the fertility and forage quality of grass species in Eastern Colorado. Some of those same species are important in Montana, and some of the less desirable ones that come in are some of the same increasers in Montana.

There has been a mind set to ignore the effects of pollution on native grass when considering the affects of pollution areas surrounding these plants. The rate of return on capital on a grass ranch these days is one per cent according to high priced real estate appraisers. A reduction in the production of grass in areas in the path of pollution is a serious matter both for the ranch affected, and ultimately for the state, as pollution spreads from numerous proposed plants. The reduction in forage could be the final economic push to negative financial balance.

Until the coops involved in this project have done a great deal more towards improved conservation programs with their members, I cannot favor this. I may not be able to afford the increased power costs resulting from this proposed generation plant.

Submitted by:  
Ellen Pfister  
P. O. Box 330  
Shepherd, MT 406-947-5931



DR. CHERYL REICHERT M.D., PH.D.

Pathologist • 51 Prospect Drive

Great Falls, MT 59405

Home Phone (406) 727-1964

*file copy*

November 4, 2004

Nurul Islam, Environmental Protection Specialist  
Rural Utility Service, Engineering and Environmental Staff  
1400 Independence Ave. S.W., Stop 1571  
Washington D.C. 20250-1571

Dear N. Islam,

I am writing to express my concerns about a proposed 250 megawatt coal-fired electric generating plant to be constructed by Alston Power Inc. at a location northeast of Great Falls, Montana. While I laud Great Falls City Manager John Lawton and other members of the Southern Montana Electric Cooperative for their foresight in developing an independent regional electric generation facility, I am dismayed that an estimated \$470 million is going to be spent on a facility that relies on coal instead of a nonpolluting, renewable, futuristic energy source such as wind power.

My concerns are several fold:

1) **Generation of greenhouse gases.** As reported by the *Washington Post*, a recently completed international assessment of Arctic climate change has documented "unprecedented increases in temperature, glacial melting, and weather pattern changes, with most of these changes attributable to greenhouse gases from automobiles, **power plants**, and other sources". Global warming is also thought to increase the incidence and severity of forest fires.

2) **Mercury contamination.** The mercury emitted by coal plants eventually enters our waterways, contaminating drinking water and fish and entering the food chain. Mercury is a toxin and is especially damaging to nervous system of children and can also damage the kidneys. While there is currently no governmental emission standard for mercury, this contentious matter is likely to be addressed before the facility is built. When the new standards are established, the plant should expect to become compliant and not "grandfathered" in perpetuity. While Alston Power Inc. claims that its new circulating fluid bed technology boilers reduce acid rain by reducing emissions of sulfur and nitrogen, the company does not provide quantitative data for mercury emissions. The amount of mercury produced by the facility is dependent upon the source of the coal. The environmental assessment should be based on the actual coal source, which has been stated in the *Great Falls Tribune* as originating in southeastern Montana (and not upon theoretical data from surrogate coal fields containing better quality coals).

3) **Aerosols of particulate matter.** Not only may particulate matter create hazy veils over our beautiful blue skies, but also adversely affect the health of residents with breathing disorders such as chronic bronchitis and asthma. The electric blackout of August 2003 in northeastern United States provided an opportunity for researchers to evaluate air quality over Pennsylvania 24 hours after the grid shut down. The scientists were impressed by the magnitude of the improvements, with a 90% reduction in sulfur dioxide, 50% reduction in smog, and increased visibility by 20 miles due to less particulate matter in the air. The scientists reported that emissions from power plants can contaminate the air hundreds of miles downwind.

Reichert p.2, continued...

4) **The potential for "Bait and Switch"**. The circulating fluid bed technology is stated to be "fuel flexible". A comprehensive environmental assessment for the Great Falls facility should evaluate noxious and hazardous wastes from all likely fuel sources, and specific exclusions should be indicated. For example, the 294 megawatt coal fired plant that is currently being built by Alston in Maysville, Kentucky, is cited as an example for the comparably sized facility near Great Falls. According to the company literature, the Kentucky plant is also designed to burn "approximately 5 million waste tires" per year. Burned tires are reported to release styrene, butadiene, toxic heavy metals such as lead, mercury, and cadmium, and chlorinated compounds such as carcinogenic dioxins and furans. Another example of the "bait and switch" tactic comes from Thompson Falls, Montana, where irate local citizens discovered that after the plant went through the Montana Department of Environmental Quality permitting process in 2001, Thompson River Co-Gen LL changed its predominant energy source from biomass/wood to coal. According to a March 26, 2004, article that the *Missoulian*, legal challenges by the Thompson Falls citizen's group are likely.

5) **Adequacy of environmental safeguards**. Who will monitor the emissions of the electric generating plant? How will the monitoring be done? Will there be detectors mounted in the stacks? Will there be ambient air monitoring and monitoring of the plume by airplanes? Who will obtain baseline levels of contaminants now present in the water and soils and fish so that there can be future legal recourse if the company does not meet environmental standards? The technology is being "sold" to the community as the newest and cleanest, but the company literature indicates that "for the majority of applications and fuels, in-furnace control is sufficient to meet regulatory requirements". For a price, "additional SO2 removal is possible with Alstom's tail end Flash Dry Absorber, which activates and further utilizes unreacted bed material". Is this option included in the plant proposed for Great Falls? Because of the spiraling costs of steel and transportation, there are likely to be cost overruns; what guarantees that the optional scrubbers will be installed and maintained?

The Southern Montana Electric cooperative does not have the right to pollute the air and water of our downwind and downstream neighbors. Recently reelected Montana Supreme Court Justice James Nelson has stated that he thinks that Montana's Legislature has a duty to pass laws enforcing Montana's constitutional guarantee of "a clean and healthful environment". Montanans need electricity, but we also need clean air and water.

Sincerely yours,

Cheryl M. Reichert, M.D., Ph.D. (Biological Chemistry)  
reichert@sofast.net

copy: Cheryl Patton, Assistant City Manager, Great Falls  
Randy Gray, Mayor of Great Falls  
Brian Schweitzer, Montana Governor-elect  
George Golie, Representative, Montana House District #20  
Bryony Schwan, Women's Voices of the Earth  
Kris Thomas, Montanans Against Toxic Burning  
Missouri River Citizens  
Montana Environmental Information Center  
Citizens Coal Council



DR. CHERYL REICHERT M.D., PH.D.

Pathologist • 51 Prospect Drive

Great Falls, MT 59405

Home Phone (406) 727-1964

April 17, 2005

Kathleen Johnson, MEPA Coordinator  
re: SME'S Highwood Generating Station EIS  
Montana Department of Environmental Quality  
PO Box 200901  
Helena, MT 59620-0901

Dear Ms. Johnson:

I am writing to add to my growing concerns about a proposed 250 megawatt coal-fired electric generating plant to be constructed by Alston Power Inc. near Great Falls, Montana. While I laud the City of Great Falls and the Southern Montana Electric Cooperative for their foresight in developing an independent regional electric generation facility, I am dismayed that an estimated \$470 million is going to be spent on a facility that relies on coal instead of a nonpolluting, renewable, futuristic energy source such as wind power.

In addition to the concerns listed in my letter of Nov. 4, 2004 (copy enclosed), I would like to add **water use**. According to your Scoping Document, the coal plant will need up to 3200 gallons of water per minute or approximately **4.6 million gallons a day**. At a time when some cities in the West are so desperate for water that they are buying ranches solely to obtain water rights, how can the City of Great Falls agree to sell its future growth potential? *There needs to be a vigorous and open debate about the sale of this precious resource. The public has not been made aware of this important hidden cost of the coal fired plant.*

Sincerely yours,

Cheryl M. Reichert, M.D., Ph.D. (Biological Chemistry)  
reichert@sofast.net

*encl: letter to EPA, sent 11/04/04*



## Johnson, Kathy

---

**From:** Duncan Riley [driley@email.unc.edu]  
**Sent:** Friday, April 08, 2005 3:15 PM  
**To:** Johnson, Kathy  
**Subject:** Great Falls coal fired electrical generation.

Mrs Johnson,

I saw the request for comments on the coal fired electrical generation plant being proposed near Great Falls in the Billings Gazette.

Have any "clean coal" alternatives been considered?

Rentech Inc out of Denver Colorado has a process of coal gassification that can produce electricity and clean burning deisel fuel.

There should be federal monies available for clean coal projects.

I won't waste much of your time. I just wanted to comment and ask if new alternatives have been considered.

Duncan Riley

3721 7<sup>th</sup> Avenue North  
Great Falls, Montana 59401-2222  
May 5, 2005

**RECEIVED**  
MAY 06 2005  
DEQ  
DIRECTOR'S OFFICE

Kathy Johnson,  
MT DEQ,  
PO Box 200901  
Helena. MT 59620-901.


Dear Ms. Johnson,

I am writing to express my support for the coal fired electrical generation plant project proposed for construction east of Great Falls in the Salem area. I am confident that the appropriate use of fluidized bed processes for burning the coal fuel will deal with most any concern about combustion by-products creating unacceptable degradation of the environment in any meaningfully measurable extent.

I am concerned that mercury compounds may be a more difficult product to deal with and would expect that the environmental study will address this aspect of the process in a thorough manner, using the best current science in the area of treating mercury byproduct wastes.

Thank you for the opportunity to comment on this effort.

Sincerely,



Guy D. Schmidt

**RECEIVED**

MAY 02 2005

**DEQ  
DIRECTOR'S OFFICE**

April 28, 2005

Kathy Johnson, MEPA Coordinator  
Montana DEQ  
PO Box 200901  
Helena, MT 59620-0901

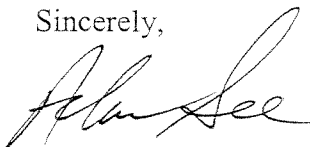
Re: SME Highwood Generating Station EIS

Dear Ms. Johnson:

Please accept this letter with my comments regarding SME's project near Great Falls. I am very much in favor of the project proceeding as quickly as possible through the EIS process to allow construction of this environmentally engineered and controlled coal fired power plant.

Allowing projects to be built and using environmental controls exhibited by true scientific research to be necessary is in the best interest of people world wide as well as Montanans in particular. This should be very beneficial project for all Montanans as it is currently presented.

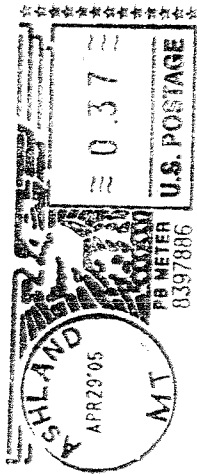
Sincerely,



Alan See,

jdk

ALAN SEE  
PO BOX 138  
ASHLAND, MT 59003-0138



MONTANA DEQ  
ATTN: KATHY JOHNSON, MEPA COORDINATOR  
PO BOX 200901  
HELLENA, MT 59620-0901

59620-0901



Johnson, Kathy

---

**From:** Jude [jusmith@mtlib.org]  
**Sent:** Friday, April 22, 2005 9:24 AM  
**To:** Johnson, Kathy  
**Subject:** Highwood Generating Station EIS

I am writing to you today as a concerned citizen. I am against the proposed coal plant in Great Falls. With the information I've seen, much of it coming from engineers whose studies favor the plant, I am alarmed. I am alarmed at the risk we are putting on our environment, the river, the air, the aquatic life. I am alarmed at the possible risk we are posing to our own health. I am an asthmatic and have managed this disease symptom free for many years partially due to the area in which I live. I am alarmed that my own breath, not to mention that of everyone else, will be in jeopardy. The amount of mercury, carbon dioxide, sulphur dioxide, and nitrous oxides released into the environment can't have anything but a negative impact on quality of life. Who is going to want to live in a place that is going feudal.

I understand the need to jumpstart our sagging economy. But to forsake the environment and our health to do so is unacceptable to me. If this is to take place, I will be looking for a new home more favorable to living in a healthy way.

Thank you for listening to my concerns.

Jude Smith  
1208 7th Ave. North  
Great Falls, MT 59401  
406 452-0808

**Johnson, Kathy**

---

**From:** Diane Stinger [jeslondi@imt.net]  
**Sent:** Sunday, May 01, 2005 1:51 PM  
**To:** Johnson, Kathy  
**Subject:** Highwood Generating Station EIS

Kathleen Johnson  
MEPA Project Coordinator  
Montana Department of Environmental Quality  
Helena, MT 59620-0901  
Re: Highwood Generating Station

Dear Ms. Johnson and the good people of the State of Montana,

I am very opposed to a coal fired power plant in our area. Coal fired power plants are one of the greatest contributors to global warming. Emissions from coal fired power plants include carbon dioxide, sulfur dioxide, nitrous oxides, and mercury, which damage water, air and soils. Global warming is having a serious negative effect on agriculture in Montana.

A coal fired plant is a short term, ineffective solution to our energy problem, with long term negative consequences. We would do better building an energy infrastructure that is environmentally sustainable and contributes to the long term health of our agricultural base, our water supply, our air, ourselves.

We must not allow a few profiteers to destroy our environment. Let's build structures we are proud to pass on to our children, rather than sacrificing their health for a few kilowatts of electricity. Those who polluted Montana in the past did not understand what they were doing, and can perhaps be forgiven as we struggle to clean up their mess. It cannot be said for us that we do not know exactly what consequences this sort of pollution will have. There is no excuse. A coal fire power plant is unethical, immoral, and creates a huge mess for our children to clean up.

Sincerely,  
Diane Stinger  
1400 4<sup>th</sup> Avenue NW  
Great Falls, MT 59404

**RECEIVED**

May 5, 2005

MAY 09 2005

Ms. Kathleen Johnson  
MEPA Project Coordinator  
Re: Highwood Generating Station EIS  
Montana Dept of Environmental Quality  
P.O. Box 200901  
Helena, MT 59602-0901

**DEQ  
DIRECTOR'S OFFICE**

Dear Ms. Johnson,

I do like the idea of public power. And I hope we can establish such a system.

However, I am very leery of a coal-fired generating plant for two reasons: its emissions and its use of a non-renewable resource.

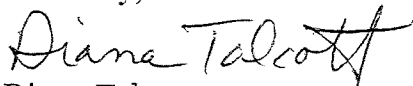
I have a nephew who has autism. It is thought that one of the causes of autism is exposure to mercury in the environment. Pregnant women and children are told not to eat fish from various lakes and rivers in Montana due to the mercury concentrations in the fish. Mercury is known to cause severe neurological damage to humans and other animals. The technology of this plant does not eliminate mercury emissions. Do we have the right to contaminate the environment? I think not. I believe we have the obligation to protect the quality of our air and waters. And, of course, there will be other emissions from the proposed plant, which also are not healthy.

Coal is a non-renewable resource. It makes more sense to me to build a power plant that uses inputs that will continue to be available (i.e. wind, solar).

Please consider the toxic emissions in your analysis, which I am sure you will, and require that this project not degrade our environment.

Thank you for your consideration.

Sincerely,



Diana Talcott  
2004 1<sup>st</sup> Ave S  
Great Falls, MT 59401

**RECEIVED**

MAY 06 2005

DEQ  
DIRECTOR'S OFFICE

Dennis Tighe  
717 13<sup>th</sup> St. S.W.  
Great Falls, Montana 59404

May 4, 2005

Kathy Johnson  
Montana DEQ  
P. O. Box 200901  
Helena, Montana 59620-0901

Re: Proposed Coal Fired Generating Plant in Cascade County

Dear Ms. Johnson,

I am writing in response to the DEQ's request for public input on the proposed coal fired generating plant for Cascade County. Please make my comments part of the official record, and please include my name on your mailing list regarding further notices on this project.

Emissions and Health Hazards

The purpose and need for this project should be measured against the environmental harm. In order to measure the harm, an economic analysis of the value of the current environmental state must be completed. What is the value to central Montana of clean air, clean water and clear skies? Without a study of the economic benefit of nonimpaired water, air and soil, the purpose and need for this project is examined in a vacuum. The public is entitled to know that environmental harm produces economic harm.

Power plant pollution has inflicted huge health damages on the public in other parts of the country. It is estimated that power plant emissions cause \$61 billion per year in health costs on the American public. How does the purpose and need of the proposed power plant establish that its economic value is greater than the health costs imposed on the citizens of central Montana?

Sulfur dioxide and nitrogen oxide emissions from power plants create dangerous concentrations of fine particles and ozone in the air. Power plants cannot eliminate this pollution, and continually look for ways to avoid having to reduce this pollution. Moreover, federal standards are too lax and, if the so-called "Clear Skies" legislation is past, standards will not get any better. The DEQ should insist that these emissions are restricted to the lowest concentrations possible with best available technology. Further, the generating plant should have a plan in place and funded that will use whatever means necessary to further reduce emissions over time.



This proposed power plant boasts of its new technology. The DEQ should require the company to back up its boast with a long term plan that further reduces emissions by requiring up to date pollution control devices as they become available. The goal here should be to limit avoid turning the clean air of central Montana into polluted air.

The cost of reducing emissions should not be an excuse for not doing it. What is the value of one early death caused by power plant air pollution emissions or of one additional asthma attack?

The EIS must investigate the potential for health problems on populations in central Montana. How many people will suffer from health problems related to power plant emissions?

The public will need to view maps of where, when and how much pollution will travel in the air and how much will be deposited on the ground and in the water.

What safeguards will be in place for wind events from the east that will push emissions over the City of Great Falls? How much soot will fall on Great Falls if the wind blows from the east?

What liability will the State of Montana have if downwind states claim that pollution from this proposed plant is affecting them.

What are the ambient air quality standards for fine particulates, ozone and emissions in Great Falls, Cascade County, the Upper Missouri River Breaks National Monument, the wilderness study areas in the Little Belt Mountains, Big Snowy Mountains, the 6 WSA's in the Upper Missouri River Breaks National Monument and in the Charles M. Russell Game Preserve? How will the generating plant affect the air in these locales?

How will the plant affect Class I airsheds in Glacier, the Bob Marshall Wilderness and other Class I areas?

How will the emissions affect visibility? Will the big sky of Montana suffer the same overcast smog and pollution that blankets parts of the East? How will the plant prevent or minimize the effects on visibility? How will the plant eliminate the dust from the coal trains that will deliver to the site? What effect will the coal dust have on workers and communities where the wind will carry it?

### Mercury

If you have lived in the East and gone fishing, then you have seen the signs that warn against consuming fish that have been exposed to mercury pollution. Mercury pollution has been linked to many neurologic disorders. How does the energy plant intend to limit or prevent mercury pollution? What is a safe level of mercury pollution given the fact that it is cumulative in the environment? What other plants and animals ingest and store mercury so that it will enter the human food chain?

## Water

How much water will the plant use? How will the water use affect the future growth of Great Falls? How will the water use affect downstream fisheries and communities? What is the plan for recycling water? How much will be discharged and does the discharge contain pollutants? Will discharged water be held for reuse or discharged into a watercourse? Who will provide the water to the plant?

## Light Pollution

Light pollution is a serious problem. The glow from the city and neighborhoods changes the nighttime environment and washes out the night sky. The plant should not have any outdoor lights that add to the glare and glow that harms our view of the heavens. Efficient and simple outdoor lighting can function without adding to light pollution.

## Carbon Dioxide

Global warming is a problem that has built-in inertia. It is hard to halt it. What is Montana doing to help manage the global warming problem? How will this generating plant address CO2 emissions? Will the plant use the best available technology to reduce CO2 emissions? What plan does the plant have for capturing CO2 so that it can be kept out of the atmosphere? Has it considered using CO2 in oil recovery operations? What is the cumulative effect on the discharge of CO2 of all the power generating plants in Montana?

## Solid Waste

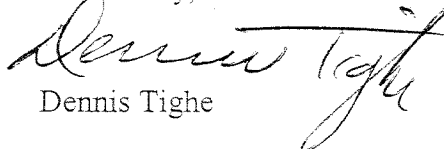
How and where will solid waste be stored? What safeguards will be used to prevent leaching of heavy metals and toxic waste into the ground? How many acres of land will be needed for solid waste disposal? How will the solid waste be transported to the sites? Will the waste be blown by wind during transport or disposal and, if so, who will be affected by the soot, ash and other solid wastes blown by the wind. How will the particulates affect visibility?

## Limestone

If the plant uses limestone, where will it be mined? Is the mining of the limestone part of the EIS for the project? If not, why not?

Thank you for the opportunity to speak out on this important issue.

Yours truly,



Dennis Tighe

**RECEIVED**

May 5, 2005

MAY 09 2005

Attn: Kathy Johnson  
Montana Department of Environmental Quality  
P. O. Box 200901 - Helena, MT 59620-0901

**DEQ  
DIRECTOR'S OFFICE**

Dear Ms. Johnson:

I am responding to your notice (which I saw in the Billings Outpost as well as from various online sources) to comment prior to your Environmental Impact Statement for the proposed Highwood coal-fired electrical generation facility near Great Falls, Montana.

(1) We don't need another coal-fired generating plant in Montana. No matter how "clean" or "efficient" this proposed plant supposedly is, it will still pollute our air, water and soils with oxides of sulfur and nitrogen, with fly ash, heavy metals and mercury. I live downwind from this proposed plant, and this prospect makes me angry and sad. Coal generation also uses an enormous amount of water. Water in better times is scarce in our semi-arid climate, and in worse times, as now, in our extended drought, water is beginning to look not merely scarce, but rare.

(2) The cost of electricity from new coal plants is much higher than the cost of equivalent power from a clean and abundant renewable energy source, windpower. To be precise, new coal power is coming online in the range of 5 to 6 cents per kilowatt hour (or even more), while new windpower is coming online at 4 cents per kilowatt hour (or even less). The 20-year contract for power from the Judith Gap Wind Farm -- once it is built -- will average about 3.16 cents per kilowatt hour, and Northwestern Energy currently is buying power from smaller scale windpower sites at Two Dot, Martinsdale and elsewhere for 3-27 cents per kilowatt hour. Even with "firming" and other ancillary costs, windpower will come in much cheaper than new coal power -- in the range of 3.4 to 3.7 cents per kilowatt hour -- which is quite competitive with existing coal power (as from Colstrip -- this of course assumes Congress once again will extend the federal production tax credit for wind and other renewable energy sources). There are strong hints that certain co-op managers involved in the Highwood Plant are beginning to notice that this is a very expensive deal compared to windpower, and beyond the price comparisons there are those deeper and longer-term cost savings from windpower: no use of water, no pollution, and the "fuel" is free. Windpower also can come online much faster than coal, in smaller increments, making it less of a burden to finance, since the money need not be raised all at once, as with a single large centralized facility.

(3) Even more impressive than the cost of generating power with wind is the cost saving from displacing the need for new power, through intelligent investments in energy conservation and efficiency. In its various forms, energy conservation ranges from 1 to 2 cents per kilowatt hour.

(4) Montana's rural electric cooperatives are in an excellent position to forego enormous capital investments in expensive, polluting, centralized fossil fuel generating plants and invest, instead, in energy conservation measures, then next in decentralized, smaller scale, diverse renewable energy facilities. Second-hand wind generators in the 65 kilowatt range are available and could be financed by the co-ops for installation by their own customers on farms, ranches and in small towns. Co-ops ultimately could produce all the power they need from a variety of decentralized renewable sources, as long as they continue to invest in energy conservation. The Yellowstone Valley Electric Co-op already has begun investing in ground source heat pumps and is looking at other innovative, appropriately scaled technologies. Even solar electric generation -- still quite expensive -- is economically appropriate for new co-op customers whose home sites are a few miles removed from existing power lines and otherwise would require expensive extensions of power lines to those sites.

The Department of Environmental Quality has an obligation to point out this eminently sensible conservation and renewable energy scenario to those who persist in their fixation with coal, a costly, destructive technology whose time has surely passed.

Sincerely,

*Wilbur Wood*

Wilbur Wood  
P.O. Box 12  
Roundup, Montana 59072

## Appendix L

### Agency Letters

Johnson, Kathy

---

From: Sierra\_Harris@fws.gov  
Sent: Thursday, April 14, 2005 11:53 AM  
To: Johnson, Kathy  
Cc: Mark\_Wilson@fws.gov  
Subject: Comments on Highwood Generation Station Unit #1



Southern MT  
Electric Comment L.

Ms. Johnson;

This email responds to your correspondence received in our office on April 7, 2005 and your request for U.S. Fish and Wildlife Service's comments on the proposed plan for the Southern Montana Electric G and T Cooperative's Highwood Generation Station Unit #1. According to the documentation provided to us, I believe that our office has already commented on this project in November of 2004.

Subsequently, we have also met with Patrick Farmer of WESTECH Environmental Services, Inc. and Jeffrey T. Chaffee of Bison Engineering, Inc. to further discuss impacts to threatened and endangered species near the proposed project area.

I am attaching our return correspondence letter that was sent to Mr. Islam of Stanley Consultants, Inc. on November 9, 2004. This letter will serve as our comment letter to MDEQ as well.

Please feel free to contact me if you have any additional questions or concerns.

(See attached file: Southern MT Electric Comment Letter 11\_04.doc)

Sincerely,

Sierra K. Harris  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
100 N. Park Ave., Suite 320  
Helena, MT 59601  
phone: 406/449-5225 ext. 202  
fax: 406/449-5339  
sierra\_harris@fws.gov

Johnson, Kathy

---

From: Sierra\_Harris@fws.gov  
Sent: Thursday, April 14, 2005 12:01 PM  
To: Johnson, Kathy  
Subject: Follow up to comment letter



Southern MT  
Electric Comment L.

Ms. Johnson,

I am attaching an additional letter to this email to add to your records for comments from the U.S. Fish and Wildlife Service. This is a scanned version of the previous letter that I sent you. This letter has been signed by our field supervisor, Mark Wilson, and also has a copy of the enclosure that was sent with the letter on November 9, 2004.

Please feel free to contact me if you have any further questions or comments.

(See attached file: Southern MT Electric Comment Letter 4\_05.pdf)

Sincerely,

Sierra K. Harris  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
100 N. Park Ave., Suite 320  
Helena, MT 59601  
phone: 406/449-5225 ext. 202  
fax: 406/449-5339  
sierra\_harris@fws.gov

April 14, 2005

Kathleen Johnson  
MEPA Project Coordinator  
Re: Highwood Generating Station EIS  
Montana Dept. of Environmental Quality  
PO Box 200901  
Helena, MT 59602-0901

Dear Ms. Johnson,

The Department of Natural Resources and Conservation, Water Resources Division, submits this comment on SME's Highwood Generating Station EIS.

The scoping document indicates SME will purchase water rights from the City of Great Falls, and total planned water use is 3200 gpm. However, nowhere in the permitting section of the document is DNRC's water right authorization process reflected.

Please be advised that SME's water use will require authorization from DNRC to change Great Fall's water right or reservation. It is unclear to me which water right or reservation SME plans to purchase, and this could have a significant effect on the length and intensity of the application process, and the level of scrutiny given by my Department and the public.

Thank you, and I may be reached at (406)538-7459.

Scott Irvin, Regional Manager  
Lewistown Water Resources Office  
Dept. of Natural Resources & Conservation  
613 NE Main St, Suite E  
Lewistown, MT 59457

**Johnson, Kathy**

---

**From:** Martin, Dan  
**Sent:** Friday, April 15, 2005 1:36 PM  
**To:** Johnson, Kathy  
**Cc:** Martin, Dan  
**Subject:** Montana Department of Transportation Comments on the Highwood Generation Station Scoping Document

Kathy,

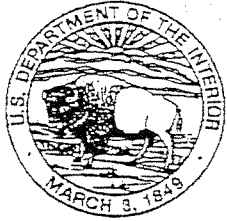
We have reviewed the subject Scoping Document and our comments and concerns would be the encroachment and the associated impacts of railroad spurs or power lines into the right-of-way of state roadways. Also, increased traffic volumes on our highway system as a result of this type of development is something we would want to review. Thanks

Dan Martin, Planner  
Program and Policy Analysis Bureau  
Rail, Transit and Planning Division  
Montana Department of Transportation  
444-6303



United States Department of the Interior

FISH AND WILDLIFE SERVICE



ECOLOGICAL SERVICES  
MONTANA FIELD OFFICE  
100 N. PARK, SUITE 320  
HELENA, MONTANA 59601  
PHONE (406) 449-5225, FAX (406) 449-5339

M30-REA (I)  
Southern Montana Electric Cooperative

November 9, 2004

Stanley Consultants, Inc.  
Mr. Rural Islam  
1400 Independence Ave., SW, Stop 1571  
Room 2240  
Washington, DC 20250-1571

Dear Mr. Islam:

This letter responds to your correspondence received in our office on October 25, 2004 and your request for the U.S. Fish and Wildlife Service's (Service) comments on your proposed plan for the Southern Montana Electric G&T Cooperative coal fired circulating fluidized bed project. According to the documentation provided to us the proposed project will be located in Cascade County within the vicinity of Great Falls, Montana.

In accordance with section 7(c) of the Act, the Service has determined that the following listed species may be present in the action area:

CASCADE COUNTY

<i>Haliaeetus leucocephalus</i>	Bald Eagle	LT
<i>Lynx canadensis</i>	Canada Lynx	LT

LT = Listed Threatened

An additional table containing more specific species information is also enclosed with this letter. This data was collected within a 10 mile radius of the City of Great Falls. The information provided in this table was found at the Natural Resources Inventory System (NRIS) under interactive maps and data applications (<http://nr.is.state.mt.us/>).

The Service is providing this information to assist you in determining possible impacts to species of federal concern. There may be state species of concern in the vicinity of the project and we recommend contacting Montana Fish, Wildlife and Parks at 1420 East Sixth Avenue, P.O. Box 200701, Helena, Montana 59620-0701, 406-444-2535 or the Montana Natural Heritage Program, 1515 East Sixth Avenue, P.O. Box 201800, Helena, Montana 59620-1800, 406-444-5354.

For those actions wherein a biological assessment is required, the assessment should be completed within 180 days of initiation. This time frame can be extended by mutual agreement between the federal agency or its designated non-federal representative and the Service. If an

assessment is not initiated. Within 90 days, this list of threatened and endangered species should be verified with the Service prior to initiation of the assessment. The biological assessment may be undertaken as part of the federal agency's compliance of section 102 of the NEPA and incorporated into the NEPA documents.

We recommend that biological assessments include the following:

1. A description of the project.
2. A description of the specific area that may be affected by the action.
3. The current status, habitat use, and behavior of T/E species in the project area.
4. Discussion of the methods used to determine the information in Item 3.
5. An analysis of the affects of the action on listed species and proposed species and their habitats, including an analysis of any cumulative effects.
6. Coordination/mitigation measures that will reduce/eliminate adverse impacts to T/E species.
7. The expected status of T/E species in the future (short and long term) during and after project completion.
8. A determination of "May affect, likely to adversely affect" or "May affect, not likely to adversely affect" for listed species.
9. A determination of "is likely to jeopardize" or "is not likely to jeopardize" for proposed species.
10. Citation of literature and personal contacts used in developing the assessment.

If it is determined a proposed program or project "is likely to adversely affect" any listed species, formal consultation should be initiated with this office. If it is concluded the project "is not likely to adversely affect" listed species, the Service should be asked to review the assessment and concur with the determination of no adverse effect.

A federal agency may designate a non-federal representative to conduct informal consultation or prepare biological assessments. However, the ultimate responsibility for section 7 compliance remains with the federal agency and written notice should be provided to the Service upon such a designation. We recommend federal agencies provide their non-federal representatives with proper guidance and oversight during preparation of biological assessments and evaluation of potential impacts to listed species.

Section 7(d) of the Act requires that the federal agency and permit/license applicant shall not make any irreversible or irretrievable commitment of resources which would preclude the formulation of reasonable and prudent alternatives until consultation on listed species is completed.

If wetlands may be impacted by this project, Corps of Engineers Section 404 permits may be required. The Service suggests the proposed project be designed to avoid and minimize impacts to any wetland areas, stream channels and surrounding vegetation to the greatest extent possible.

Where feasible, minimize the area necessary for construction to reduce direct habitat impacts. The applicant should analyze direct, indirect and cumulative impacts along with future activities required to maintain these improvements.

The Service's Billings, Montana Sub Office has spoken recently with Ray Walters, also with Stanley Consultants, Inc., and plans to provide comments on the proposed project's Draft Environmental Impact Statement once it is released for public comment. The comments contained within this letter are to be considered part of the early informal consultation process.



NRIS Species of Concern Data within a 10 mile Radius of Great Falls, Montana

Scientific Name	Common Name	Species Type	Global Rank	State Rank	Western Wildlife Service Status	US Forest Service Status	US Fish and Wildlife Service Status	First Observation	Last Observation	
<i>Althene cunicularia</i>	Burrowing Owl	Animal	G4	S2B				SENSITIVE	1988	1988
<i>Buteo regalis</i>	Ferruginous Hawk	Animal	G4	S2B				SENSITIVE	1984-05	1997-05
<i>Chlidonias niger</i>	Black Tern	Animal	G4	S3B				SENSITIVE	1943	7/7/1986
<i>Haliaeetus leucocephalus</i>	Bald Eagle	Animal	G4	S3	PS:LT,PDL	THREATENED		SPECIAL STATUS		
<i>Larus pipixcan</i>	Franklin's Gull	Animal	G4G5	S3B				SENSITIVE	1965	6/10/1994
<i>Nycticorax nycticorax</i>	Black-crowned Night-heron	Animal	G5	S3B					1979	6/29/1988
<i>Plegadis chihli</i>	White-faced Ibis	Animal	G5	S1B				SENSITIVE	1981	1988
<i>Sterna hirundo</i>	Common Tern	Animal	G5	S3B					1988-06	1988-06
<i>Bacopa rotundifolia</i>	Roundleaf Water-hyssop	Plant	G5	S1				WATCH	1891	1891-09-08
<i>Carex sycnocephala</i>	Many-headed Sedge	Plant	G4	S1					1890	1891-09-08
<i>Centunculus minimus</i>	Chaffweed	Plant	G5	S2				WATCH	1891	1891-09-10
<i>Entosthodon rubiginosus</i>		Plant	G1G3	SH					1887-06	1887-06
<i>Funaria americana</i>		Plant	G2G3	SH					1902	1902
<i>Najas guadalupensis</i>	Guadalupe Water-nymph	Plant	G5	S1				WATCH	1891	1891-08-25
<i>Psilocarphus brevissimus</i>	Dwarf Woolly heads	Plant	G4	S2			SENSITIVE	WATCH	1891	1891-08-13

Global / State Ranking Key

G1 S1	At high risk because of extremely limited and/or rapidly declining numbers, range, and/or habitat, making it highly vulnerable to global extinction or extirpated in the state.
G2 S2	At risk because of very limited and/or declining numbers, range, and/or habitat, making it vulnerable to global extinction or extirpated in the state.
G3 S3	Potentially at risk because of limited and/or declining numbers, range, and/or habitat, even though it may be abundant in some areas.
G4 S4	Uncommon but not rare (although it may be rare in parts of its range), and usually widespread. Apparently not vulnerable in most of its range, but possibly cause for long-term concern.
G5 S5	Common, widespread, and abundant (although rare in parts of its range). Not vulnerable in most of its range.
FWS - LT	Listed Threatened Species

This document is a reproduction of the original document. It is not a certified copy. The original document is the only authoritative source for the information contained herein.