Appendix C Consolidated Scoping Comments

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EPTP Consolidated Scoping Comments

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The following set of tables includes each of the comments made during scoping, reproduced exactly as they were received by Western. No attempt has been made to correct spelling or grammar errors. Some comments are reproduced under several topics because they address more than one topic. For some comments, introductory sentences have been included to maintain the context in which the comment was made. The order of comments within a topic is random and is not meant to imply importance or level of consideration in the EIS.

Access and Transportation

- Access issues If line is to the E of existing 115 kV- crop damage will be greater
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternate transportation routes for all hazardous materials to avoid populated areas.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the applicant to guarantee maintenance schedules of the additional infrastructure requirements through commitment to a mitigation fund for resurfacing and repair of local roads from damage by heavy vehicles serving the project.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the construction of an overpass of the rail tracks to allow local traffic to pass when trains are on the track.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop detailed traffic control plans on local roads during construction and operation of the project. Please consider requiring the applicant to carry all cost of any local infrastructure development related to the project, e.g., curb upgrades, additional parking, additional traffic controls, additional sidewalks, and additional lanes.
- Board of commissioners of Cheyenne county have constituents coming to them worried about the location of the proposed Tri-State transmission lines that will possibly be running thru Cheyenne County, Colorado in the future. The original map that the board has seen showed one of the proposed lines running west of Highway 385 north to Kit Carson, but recently a constituent saw a map showing one of the lines running east of Highway 385. county.
- crossing through rough terrain
- Erosion problems with G-7 will be very difficult to control, disturbing these sandy pastures are difficult now and that's with ranchers taking very careful care not to disturb much. Access roads plus the instulation in the first place will be very expensive and difficult to control the erosion
- fences around your lines
- I operate aircraft out of my property and any power lines along the ridge south of Simla may be a factor in southerly departures of my aircraft, especially on high density altitude days.
- In addition to the direct personal impact of the #1 siting out of Limon, it appears that this routing is about 8% longer than the #2 routing, which would apparently follow an existing power line right of way. The #2 routing also seems to make more sense from a construction and maintenance standpoint, since access is already there, wholly or in part.
- Need to expand rail service to the Lowe and Big Lowe intersection
- Other than coal cars, please consider the number of daily train trips, if any, required for both project construction and operation and the impacts of those trips.
- Please consider the number of coal cars needed daily to haul coal to the plants and the impacts of those cars on all communities along their route from the Powder River Basin to the proposed plant sites (500+ miles).

Access and Transportation

- Please consider the number of daily truck trips required for both project construction and operation including a break down of that traffic by number and types of vehicles per day, including large trucks, buses, and automobiles and the impacts of those trips.
- Please consider whether those coal cars will pass through Holcomb and Garden City, either inbound or outbound to the plant, or both and the impacts of those trips.
- Proposal J9 on our ranch in T.55-57W and T45-57W runs over some very rough land along the Beaver Creek
- Restraining accessibility of general public after completion of project.
- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.
- Traffic flow congestion during construction.
- Traffic on private property.
- trucks ruining pastures for grazing
- Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. ROW development activities, such as electric transmission and pipeline corridors, can cause such disturbances.
- Studies show that new roads and pipeline/utility ROWs can become a pathway for the spread of invasive plants; therefore, we suggest that the vegetation management plan address control of such plant intrusions. As this project follows many existing ROWs, the current trend for weed infestations in the affected project area should be evaluated for mitigation effectiveness and improvements if warranted. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. There are a number of prevention measures available such as reseeding disturbed areas as soon as possible and cleaning equipment and tires prior to transportation to an un-infested area. Should an infestation occur or already be present, EPA supports integrated weed management (e.g. effective mix of cultural, education and prevention, biological, mechanical, chemical management, etc.). However, we encourage prioritization of management techniques that focus on non-chemical treatments first, with reliance on herbicides being the last resort. We recommend implementing yearly review and planning activity requirements for the above concerns, including evaluation of effectiveness to date.
- The EIS should evaluate effects of any proposed road improvements, new road construction, and general ROW construction and operation activities on the area. The evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. Dust particulates from construction, and ongoing operations on roadways are important concerns. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Please include detailed specific plans for addressing dust control for the project. Items in the plan should include, though not necessarily limited to, dust suppression methods, inspection schedules, and documentation and accountability processes. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. Consideration should be given to asphalt or concrete roadways instead of dirt or gravel roads.

Agriculture

- Also owns center-pivots adjacent to W side of feed lot
- Also working [farming around] w/ two parallel lines will be very difficult.
- and they (transmission lines) should be on the north side of cattle pastures. If they are on the south side of a cattle pasture they would interfere with windbreakers protecting the cattle from snow and ice.
- Another concern was a possible loss of crop production due to the inability to apply pesticides and herbicides to his crops (wheat, milo, and corn) by aerial spraying. He said he doesn't do this every year but on occasion he needs to spray. If he can't apply sprays from a crop duster airplane he will suffer a crop loss and he asked if that will be compensated.
- Are you going to pay for the crop lost because it can't be sprayed with a airplane for insects?
- Concerned route might impact his crop-spraying operations.
- Consider alternative route from Big Sandy to Green Valley in Arapahoe and Elbert county that is 2-4 miles east of I-70
- Construct along section lines especially on farmland. It's hard enough to work around the poles or towers when they are at the edge of fields, but are really a problem when they are located out in the interior of the fields.
- Construct on pasture land because stock can graze around towers easier than farmers can till, spray, plant, and harvest around towers
- Crossing through irrigated ground
- Difficulty in farming around poles.
- Every consideration should be made to make this project as least invasive to farmground as possible. Farming is our livelyhood. We're already dealing with a drought of several years, don't make it worse on us.
- For harm to crops and to threatened or endangered species, please assess the harm, in terms of the aggregate of lost value-per-year and remediation cost-per-year, that air pollutant emissions resulting directly or indirectly from each option would inflict or cause to be inflicted on crops and cultivated soil within 500 miles of each power plant.
- For harm to crops and to threatened or endangered species, please perform additional, cumulative versions of these assessments that account for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals.
- Harvestores, Irrigation systems, effect on farm operations.
- He stated concern about cattle drinking from stock tanks under the line. I (Robert Pearson) said if they are drinking from a pond or a metal tank the water should be adequately grounded. He asked about a concrete tank. I said that it may have to be grounded to prevent shocks to any livestock drinking from them.
- High voltage causes abortion in cows
- How will power lines affect large metal buildings housing hogs?
- I have built excellent 4-wire pasture fencing between SE and NE Sec. 30 with a 14-foot access gate. Another such gate is on the northernly side of Sand Creek. Once the towers would be in place, those gates might be used by maintainence crews. But pasture fence would have to be breached in the constructing of the towers. I would like to discuss with the initial right-of-way land services agent whether a hinged, swinging barbed-wire property fence could be construction across Sand Creek to separate the livestock from Sec. 30 and Sec. 29. We had attempted such an endeavor, but this was washed out in 2001. I think I have seen a better, viable design, and would like to see it constructed at that point.
- I have heard from farmers that even single wire electric fences under even a 115kV line can cause problems. A 345kV line is worse. What about a 500kV line?
- I simply plead with you to not cut through our cultivated fields and across our rough pasture.

Agriculture

- I was delighted when Matt thought it might be possible to place the pathway on the easterly property line of Section 30 and Sec. 29. I can't speak for my neighbor, David Horner, who owns SE/4 of Sec. 30, but it seems to me this might also be the most acceptable pathway from their point of view. Such a pathway---the transmission line right-of-way still on Sec. 30--but bordering the property line with Sec. 29 would not be traversing cropland, but rather CRP and brief pastureland either side of Sand Creek.
- If J1 is selected it should be placed west of the section line. There's already a line on the east side of the section line that we have had to farm around for many years. We shouldn't need to give up anymore ground to this project.
- If the lines go over spring, pond, or watering systems for livestock what problem ar(e) caused?
- If these lines have to be placed on our property, pasture land needs to be the first consideration. It is a lot easier for cattle to graze around these lines than it is to do all of our farming operations around them.
- In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- In Arapahoe County our main concerns are environmental, topographical, agricultural, visual
- In eastern Arapahoe Counties there are agricultural operation
- It appears that the Energy Center to Big Sandy segments G7 and G6 both go through our ranch. Is there anyone that can provide us more details on what this entails?
- It should be a primary consideration to place the lines next to existing roads and along field lines. They should not be placed on/in the interior of a field, farm ground, etc. It is imperative that these lines not be placed on farm ground.
- Limits our ability to expand the elevator and crop production centers
- Lines run next to large hog buildings
- Loss of productive agricultural land when water is sold from the land for use in the coal fired plant
- Most all of the land in Lincoln County on the G7 leg is through Sandhills pastures.
- No consideration is given to the devaluation of a cultivated field that is cut in half by large transmission towers. It is devastating to diagonally cut through a cultivated field What happens to the valuation of a home if a hog feed lot is near by. There is much concern about that and rightly so, but no one considers what happens to a piece of farm land that is cut up with numerous overhead utility limes, pump stations etc. That is exactly what has already happened to the piece of property that I own that is now considered as one of the routes for this proposed lime.
- Place along existing section lines and county roads, this should enable pole spacings to work for either 1/4 mile sprinklers and 1/2 mile sprinklers.
- Please consider all impacts on vegetation, including locally grown alfalfa and native vegetation from all plant operations and project construction.
- Please consider impacts to human health, wildlife, and domestic animals caused by electromagnetic forces created by the proposed transmission lines.
- Please consider revegetation, dust control, and weed infestation of stripped agricultural lands due to decreased water availability and air emissions impacts.
- sheep feeding near lines- would effect-won't graze under them
- Stay away from feedlots
- The effects of the lines on the production of the farm ground will be felt for many years. If these lines are necessary and they are placed on our land, it will permanently affect our farming/ ranching operations forever.
- The farmers of the Garden City Co-op ask you to consider the following concerns as they relate to our elevator and crop production center

Agriculture

- The largest part of the land that-you would go through from the Greeley county line to Sharon Springs is prime irrigated land. Most of it sells for over $1000 an acre when sold. The rest is top quality dryland.
- The lines will run next to our hog farms. We are concerned about stray voltage and the effects on hog production.
- The proposal shows this line going by our Harvestore Facilities. We have 10 grain bins in that area and safety is a very strong issue at that location. These grain bins are all steel and they are all on concrete
- The proposed east transmission line was shown jogging west around our irrigated circles. We would prefer this type of configuration rather than going through the middle of the irrigated circles
- trucks ruining pastures for grazing
- Two [towers] next to each other-make it much more difficult to farm around
- We have several irrigation wells that will be under or very close to this line. Will power be shut off so that these wells can be pulled and worked on
- We have sprinkler systems in place and others that will be added. Can the towers be set so we can set either 1/4 or 1/2 mile systems in place
- We own and operate a large farm south of Burlington and are very concerned about where this will be located
- what problems may be caused to the water table if the tower supports go through it. Also the ground water in my area is very shallow. Will you be putting in the towers deep enough to effect my well water due to punching holes thru the water table.

Air Quality

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Neither the Western's August 2, 2006 "Notice of Intent" nor the materials made available at the public scoping meetings identified any air pollution control measures that Tri-State has committed to implement at its proposed power stations. It is thus impossible, at this stage, for any member of the public to identify the appropriate air pollution mitigation measures that are "not already included in the proposed action." 40 C.F.R. § 1502.14(f). To the extent, however, that Tri-State does not propose to implement the following mitigation measures, all of which are feasible at its proposed power stations, we request that Western include them as "appropriate mitigation measures" in the EIS: continuous operation, all year, of those add-on pollution control devices that Tri-State proposes to implement; activated carbon injection, operated continuously and all year; fabric filters with FGD control, operated continuously and all year; circulating dry scrubbers, operated continuously and all year; and circulating fluidized bed technology.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether any mercury control credits under the new EPA mercury rule will be used as an alternative to controlling mercury emissions. If yes, please consider the level of credits to be purchased.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether Tri-State is willing to accept the same BACT limits proposed for the Desert Rock, NM coal plant project.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the amount of mercury per year to be emitted into the air and the amount of mercury to remain as residual in fly ash or other plant waste material. Please consider the applicant's proposed disposal method and all viable alternative disposal methods. Please consider the applicant's proposed disposal location(s) and alternative location(s).

Air Quality

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the applicant's proposed mercury emission control technology to be used in the plant and all viable alternative mercury emission control technologies.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the pollution controls that would be used at each plant and their inlet and outlet emission levels in lb/hr or lb/MMBtu for each pollution control device.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the proposed BACT limits for NOx, SO2, PM/PM10, sulfuric acid mist, and fluorides for the PC boilers including the proposed emission rates and the associated averaging time, e.g., 0.06 lb/MMBtu NOx based on a 24-hour average.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the use of coal washing to minimize SO2, PM/PM10 emissions, and HAP emissions.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether the proposed control equipment design includes bypasses of the pollution control system, and, if so, under what conditions bypass will occur.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine by what percentage mercury is to be controlled, including the basis for this value (i.e., pollution control train proposed for criteria pollutants, or are you adding carbon injections or other mercury specific control). Please specify all mercury control.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project triggers MACT? If so, please determine which constituents and what MACT controls apply. If not, please analyze and provide the supporting HAP emission calculations?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project will require emission offsets. If yes, please determine the source of the offsets.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to prevent significant deterioration of air quality in the vicinity of the plant.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide all supporting documentation to substantiate Tri-State's claim that the Kansas and Colorado coal plants will use state-of-the-art emission control technologies.

Air Quality

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require an air quality permit to construct and a permit to operate prior to issuance of the DEIS.
- Another human health issue arises along the entire route the train runs as emissions from the engines will be released into the air.
- Bad idea, not thought out, no regard to reducing CO2 emissions
- For consumption of air quality increments, please assess the amount of any Class II PSD (Prevention of Significant Deterioration) increment and the amount of any Class I increment – for any pollutant and for any area – that emissions resulting directly or indirectly from each option would consume.
- For consumption of air quality increments, please perform an additional, cumulative version of this assessment that accounts for the existing emissions and the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For decreased visibility in scenic areas, please assess the ten highest hourly visibility degradations, the ten highest daily visibility degradations, and the average annual visibility degradation that pollutant emissions resulting directly or indirectly from each option would cause (1) within a ten-mile radius of the facilities, (2) in each Class I area containing land that lies within 300 kilometers of the facilities, and (3) in each Class II area containing land that lies within 300 kilometers of the facilities.
- For decreased visibility in scenic areas, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For harm to crops and to threatened or endangered species, please also assess the harm that air pollutant emissions resulting directly and indirectly from each option would inflict or cause to be inflicted on any populations of any threatened or endangered species of plant or animal.
- For harm to crops and to threatened or endangered species, please assess the harm, in terms of the aggregate of lost value-per-year and remediation cost-per-year, that air pollutant emissions resulting directly or indirectly from each option would inflict or cause to be inflicted on crops and cultivated soil within 500 miles of each power plant.
- For harm to crops and to threatened or endangered species, please perform additional, cumulative versions of these assessments that account for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased concentrations of various air pollutants, please assess the amount by which each option would directly or indirectly increase the concentration, in the ambient air, of each hazardous air pollutant, each criteria air pollutant (including the impact of criteria air pollutant precursors) in (1) each county in Kansas and Colorado, (2) each nonattainment, maintenance, or unclassifiable area in the Western half of the United States, and (3) each Class I area in the Western half of the United States.
- For increased concentrations of various air pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. For increased deposition of various pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased emissions of various air pollutants, please assess both the amount by which each option would directly increase those emissions and the amount by which each option would indirectly increase those emissions. Ways in which an option may indirectly increase emissions include, but are not limited to, (1) necessitating the construction and operation of ancillary air pollution sources and (2) stimulating the construction and operation of new air pollution sources.

Air Quality

- For increased emissions of various air pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would increase the emissions of each hazardous air pollutant, each criteria air pollutant, and each criteria air pollutant precursor from all aspects of the Project, including from the proposed coal plants.
- For increased incidence of human disease and other impairment, please assess the number-per-year by which air pollutant emissions resulting directly or indirectly from each option would increase the incidence of negative human health impacts – including asthma attacks, missed school or work days, emergency room visits, hospital admissions, cancer cases, heart attacks, and premature deaths – within (1) five miles of the facilities, (2) fifty miles of the facilities, (3) 100 miles of the facilities, and (4) 500 miles of the facilities.
- For increased incidence of human disease and other impairment, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased incidence of human disease and other impairment, please provide separate counts for (1) all humans, (2) children, and (3) humans aged sixty-five years and over. For increased toxicity of fish eaten by humans, please assess the amount by which air pollutant emissions resulting directly or indirectly from each option would directly or indirectly increase the concentrations of various toxic chemicals, including mercury and dioxin, in the flesh of freshwater fish caught and eaten by humans within 500 miles of each facility.
- For increased toxicity of fish eaten by humans, please compare the resulting toxicity levels with the levels identified in federal and state health advisories.
- For increased toxicity of fish eaten by humans, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please assess – notwithstanding the assessment of PSD increment consumption – the extent to which emissions resulting directly or indirectly from each option would interfere with any area's maintenance of – or progress toward attaining – any national ambient air quality standard.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: Please add representative background concentrations to the modeling results in NAAQS analyses. See section 9.2. of 40 C.F.R. part 51, appendix W. Please base any on-site monitoring data used for background concentration on properly sited ambient monitoring systems (pursuant to 40 C.F.R. §58.12) and complete, quality-assured monitoring data (pursuant to 40 C.F.R. §52.21(m)(3) and part 58, appendix B).

Air Quality

- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: Please ensure the analyses are based on an adequate and thorough meteorological record pursuant to 40 C.F.R. part 51, appendix W, section 9.3.1. If available, please use one year of on-site meteorological data in any near-field analysis. Please base any on-site meteorological data on monitoring that is consistent with EPA requirements discussed in section 9.3.3. of 40 C.F.R. part 51, appendix W for proper location and operation of the meteorological monitoring system. If adequate on-site meteorological data is not available, then five years of National Weather Service data should be used. (See section 9.3.1.2 of 40 C.F.R. part 51, appendix W). For far-field assessments, at least three years of mesoscale meteorological data or at least five years of National Weather Service data should be used. (See section 9.3.1.2.d. of 40 C.F.R. part 51, appendix W). It is imperative that an adequate record of meteorological data be used to represent worst case meteorological conditions. EPA's guidance indicates that the variability in the model estimates due to meteorology is adequately reduced if at least five years of meteorological data are used. (Section 9.3.1.1. of appendix W, 40 C.F.R. part 51).
- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: The modeling of maximum emission rates (i.e., potential to emit considering federally enforceable controls) of each pollutant to be emitted by the power plant and associated emission sources, as well as from other reasonably foreseeable sources, that could occur over the averaging time of the standard with which compliance is being assessed. For visibility modeling, please model the maximum hourly average emissions and maximum 24-hour average emissions. Further, please model existing sources at the maximum actual emission rates occurring over the averaging time of the standard with which compliance is being assessed. See section 9.1.2. of 40 C.F.R. part 51, appendix W.
- How much additional haze will result? What and who will it impact? What will the environmental and health effects of additional mercury, carbon dioxide, sulfur dioxide, and other powerful pollutants be?
- I am a resident here in S.W. Kansas and am vitally interested in the development of the discussion and ongoing environmental controversy that building the plant is..... (if you'll pardon the term)....generating. I felt my own skeptical opinion giving way at that recent meeting, especially as we were assured that the mercury toxicity of the new facility would be no more than the current plant produces. It seemed that the community leaders have given good marks to Sunflower as a corporate entity during its time here. That reputation is important to new listeners like me to hear favorably mentioned. But the greatest endorsement for me was from an unlikely source: Rep. Carl Holmes of Liberal. Holmes has been on the forefront of wind legislation in Kansas and a trusted advocate in Topeka. He got up and endorsed the Sunflower facility due to the "make it or break it" issue of finally overcoming the inertia of connecting the power grid across the Kansas state line into Colorado and possibly even further, as well as east and south toward Kansas City and Oklahoma.
- Please analyze the dust producing capabilities if the groundwater table is lowered and determine the salt and heavy metal content of that dust.
- Please analyze the impacts of atmospheric sulphur dioxide producing sulphuric acid and the resultant formation of atmospheric fog/haze during time of winter air inversions in the regional valleys. Please determine the impacts of long-term haze/fog to the regional climate.
- Please ascertain the SO2 to SO3 conversion rate of any SCR catalyst.
- Please consider emissions during startup and shutdown. Please identify the control equipment that will not be operational during startup and the load at which it becomes 100% effective.
- Please consider estimated construction emissions and operational emissions for all criteria pollutants, hazardous air pollutants ("HAPs"), and CO2 from all sources and project components including the pulverized coal ("PC") boilers, emergency generator, fire water pump, auxiliary boiler, material handling equipment, storage piles, and ancillary linear water or electrical transmission / interconnect lines.
- Please consider the amount of greenhouse gases such as methane, nitrous oxide, and CO2 that will be released from the plant, and how will it affect global warming.

Air Quality

- Please consider the source and the amount of lime, limestone, or other sorbent to be used in any SO2 scrubber.
- Please determine the amount of drawdown that will occur and determine whether the decreased capillary flow and exfiltration will cause more particulate air pollution from winds blowing across the land.
- Please include in the cumulative PSD increment analyses all increment consuming emissions, which would include all increases in emissions at existing major stationary sources since the PSD major source baseline date, all increases in emissions at other existing sources since the applicable PSD minor source baseline date, and all new sources of emissions that came into existence after the applicable minor source baseline date (including area and mobile sources) as well as reasonably foreseeable sources not yet in operation.
- Please provide an electronic copy of all of the meteorology and ambient air quality monitoring data collected thus far, and please provide all future air quality monitoring data.
- The EIS should evaluate effects of any proposed road improvements, new road construction, and general ROW construction and operation activities on the area. The evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. Dust particulates from construction, and ongoing operations on roadways are important concerns. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Please include detailed specific plans for addressing dust control for the project. Items in the plan should include, though not necessarily limited to, dust suppression methods, inspection schedules, and documentation and accountability processes. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. Consideration should be given to asphalt or concrete roadways instead of dirt or gravel roads.
- The non-use of any renewable energy as a power source in the project will again affect human health through air quality and global warming issues
- The protection of air quality should be addressed in the EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related VOC and NOx emissions, and any potential air toxics releases, should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities, and ongoing operation of the roadways are important concerns. The EIS should evaluate air quality impacts, and detail mitigation steps that will be taken to minimize associated impacts. This analysis should also address and disclose the project's potential affect on: all criteria pollutants under the National Ambient Air Quality Standards (NAAQS), including ozone; visibility impairment, and air quality related values (AQRV) in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.

Alternatives

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Construction, in a Western State, of an Integrated Coal Gasification Combined Cycle Generating Station With Carbon Dioxide Capture as an Alternative to Constructing any New Coal-Powered Generating Station. In light of the climate impact discussed above, we request that Western include the following two alternatives among those considered in the EIS: (1) a coal-fueled, integrated gasification combined cycle (IGCC) power plant with CCS in a Western State not Holcomb, Kansas, and (2) a coal-fueled IGCC power plant without CCS in a Western State not Holcomb, Kansas. An IGCC plant with CCS would emit none of the greenhouse gas, carbon dioxide, and would stimulate the use of IGCC and CCS at other new coal-fueled power plants. An IGCC plant without CCS at least could be retrofit with CCS later at much lower cost than a conventional coal combustion plant could, and it would stimulate the use of IGCC at other new coal-fueled plants. Reports prepared for the U.S. Department of Energy (DOE) indicate that a new coal-fueled IGCC power plant with CCS could well be feasible and profitable in the region and market that includes the proposed site of Tri-State's power station. See, e.g., Albert A. Herman, Jr., et al., Power Generation for California with CO2 Removed for Use in Enhanced Oil Recovery, Parsons Report No. EJ2002-10 (Oct. 2002) (prepared for DOE National Energy Technology Laboratory) (Enclosure 4); Patricia A. Rawls, et al., The Financial Prospects for a Coal-Based IGCC Plant with Carbon Capture Serving California, Paper 4A6 of the Third Annual DOE-NETL Carbon Capture and Sequestration Confab (May 2004) (Enclosure 5). The largest producer of coal-generated electricity in the United States, American Electric Power (AEP), recently testified that the net costs of an IGCC plant are "similar to a pulverized coal unit" when the option value of carbon capture and sequestration is factored in. Direct Testimony of Michael J. Mudd, AEP Program Manager of Technology Development (May 5, 2005), Public Utilities Commission of Ohio Case No. 05-376-EL-UNC (Enclosure 6) at 20. AEP further testified that IGCC is the "superior choice" from an economic standpoint when one considers "fuel flexibility, by-products and product flexibility, as well as furthering the commercialization and lowering the long run costs of the technology for future IGCC applications." Id. at 22. In fact, several IGCC plants are being proposed in the western United States, including by Xcel Energy in Colorado, by Southwestern Power in Bowie, Arizona, by Basin Electric in South Dakota, and by Northwest Energy in Washington state. The air agencies of at least eleven states have concluded that IGCC is an available method for controlling air pollution from coal-fueled power plants. Letter from the New Mexico Environment Department (NMED) to Mustang Energy Corporation (Aug. 29, 2003); Letter from NMED to Mustang Energy Corporation (Dec. 23, 2002); Amicus Brief of Northeast States for Coordinated Air Use Management (Nov. 30, 2004); Findings of Fact, Conclusions of Law, and Order in the Matter of the Air Quality Permit for the Roundup Power Project, Case No. 2003-04 AQ, Board of Environmental Review of the State of Montana (issued June 11, 2003 and approved June 23, 2003); Letter from Illinois Environmental Protection Agency to U.S. Environmental Protection Agency, Region 5 (Mar. 19, 2003); Letter from Illinois Division of Air Pollution Control to Indeck-Elwood, LLC (Mar. 8, 2003); Letter from NMED to U.S. Environmental Protection Agency, Region 9 (Oct. 8, 2004). Even the National Coal Council, a federal advisory committee reporting to the U.S. Secretary of Energy, agrees that IGCC "has become a viable, commercially available technology." National Coal Council, Increasing Electricity Availability from Coal-Fired Generation in the Near Term (May 2001). Moreover, two of the largest power producers in the United States have announced that they will begin operating new coal-fueled IGCC power plants in the United States by the time Tri-State could begin operating a power station in Kansas or Colorado. Kate McCann, "AEP Plans to Build 'Clean Coal' Plant," Associated Press (Sept. 1, 2004); CINERGY, Air Issues Report to Stakeholders (Dec. 1. 2004), at 2 (available at http://www.cinergy.com/pdfs/AIRS_12012004_final.pdf). These authorities are more than adequate to demonstrate that a coal-fueled IGCC power plant with CCS and a coal-fueled IGCC plant without CCS in other portions of the West are "reasonable courses of actions" that must be considered in the EIS for Tri-State's proposed coal plants. 40 C.F.R. § 1508.25(b)(2).

Alternatives

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Increased Generation of Electricity from Natural Gas as an Alternative to Constructing any New Coal-Powered Generating Station. The Department of Energy indicates that 900 of the next 1000 power plants will use natural gas readily available to end-users through the existing utility infrastructure. See <http://www.doe.gov/engine/content.do?BT_CODE=NATURAL GAS>. Through LNG imports and other relatively abundant local reserves, the world availability of natural gas in 2003 was approximately 60 times the volume of gas consumed in the same year. Liquefied Natural Gas (LNG), Natural Gas Facts, U.S. Department of Energy, Office of Fossil Energy, National Energy Technology Laboratory. Natural gas is clean burning, emitting fewer pollutants than other fossil fuels, especially coal. According to the Energy Information Administration of the Department of Energy, natural gas power generation provides emissions at approximately 50% the level of coal for carbon dioxide, 20% for both carbon monoxide and nitrogen oxides, 0.03% for sulfur dioxide, and 0.25% for particulates. Similarly, natural gas emits negligible quantities of mercury compared to coal usage. Natural Gas 1998: Issues and Trends, April 1999, Energy Information Administration, Office of Oil and Gas, U.S. Department of Energy. Interest in limiting carbon emissions may further shift focus onto natural gas. The Energy Information Administration identified natural gas as "projected to play a large role in meeting targets associated with the reduction of greenhouse gases." Id. at 2. The increase in use of natural gas in the electric utility sector is attributed largely to lower capital costs and shorter construction lead times than conventional coal-fired plants. Id. Similarly, the natural gas production, transmission, and distribution network provides quality and flexibility of service. Id. Recent booms in pipeline expansion continue to increase the interconnectivity of the grid, and companies continue to file applications for pipeline expansions with the Federal Energy Regulatory Commission with at least six new LNG or pipeline expansion projects in California, Nevada, Arizona, and Utah alone presently in various stages of certification. See Projects Near You available at <http://www.ferc.gov/forcitizens/projectsearch/SearchProjects.aspx?Region=Southwest >. Western should evaluate existing, proposed, and possible gas-fired electric generating plants contracted to take capacity from these and other pipes in the western states in analyzing this alternative. Please rigorously explore and objectively evaluate all other reasonable and viable natural gas alternatives to the coal plants proposed by Tri-State.
- (Follow) along field lines
- [Prefer that lines follow] roads
- [Preferred placement along existing roads and field lines] Yes- to create less land disturbance
- 22 Rd 4 miles north of that [E Rd]
- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.
- Absolute desire that if the transmission line must be near or on our property that it be placed adjacent to existing public roads. Not along field lines as these change periodically as crops and fallow ground vary to control weeds and erosion
- According to the map the line will be placed across the road or on our private land and we ARE opposed to either situation.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Neither the Western's August 2, 2006 "Notice of Intent" nor the materials made available at the public scoping meetings identified any air pollution control measures that Tri-State has committed to implement at its proposed power stations. It is thus impossible, at this stage, for any member of the public to identify the appropriate air pollution mitigation measures that are "not already included in the proposed action." 40 C.F.R. § 1502.14(f). To the extent, however, that Tri-State does not propose to implement the following mitigation measures, all of which are feasible at its proposed power stations, we request that Western include them as "appropriate mitigation measures" in the EIS: continuous operation, all year, of those add-on pollution control devices that Tri-State proposes to implement; activated carbon injection, operated continuously and all year; fabric filters with FGD control, operated continuously and all year; circulating dry scrubbers, operated continuously and all year; and circulating fluidized bed technology.

Alternatives

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether any mercury control credits under the new EPA mercury rule will be used as an alternative to controlling mercury emissions. If yes, please consider the level of credits to be purchased.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether Tri-State is willing to accept the same BACT limits proposed for the Desert Rock, NM coal plant project.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative disposal site(s) for ash and alternative modes of transportation to the disposal site(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative disposal site(s) for scrubber wastes and alternative modes of transportation to the disposal site(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative sites and/or energy generation options and provide all documentation of Western consideration of those alternatives in the EIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the applicant to guarantee maintenance schedules of the additional infrastructure requirements through commitment to a mitigation fund for resurfacing and repair of local roads from damage by heavy vehicles serving the project.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the amount of mercury per year to be emitted into the air and the amount of mercury to remain as residual in fly ash or other plant waste material. Please consider the applicant's proposed disposal method and all viable alternative disposal methods. Please consider the applicant's proposed disposal location(s) and alternative location(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the applicant's proposed mercury emission control technology to be used in the plant and all viable alternative mercury emission control technologies.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the pollution controls that would be used at each plant and their inlet and outlet emission levels in lb/hr or lb/MMBtu for each pollution control device.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the type of drift eliminators on cooling towers that will be used and evaluate their drift efficiency.

Alternatives

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the use of coal washing to minimize SO2, PM/PM10 emissions, and HAP emissions.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider Tri-State's proposed methods that will be used to control dust from storage piles, conveyors, crushers, pulverizers, and storage bins and their control efficiency?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether the proposed control equipment design includes bypasses of the pollution control system, and, if so, under what conditions bypass will occur.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine by what percentage mercury is to be controlled, including the basis for this value (i.e., pollution control train proposed for criteria pollutants, or are you adding carbon injections or other mercury specific control). Please specify all mercury control.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project triggers MACT? If so, please determine which constituents and what MACT controls apply. If not, please analyze and provide the supporting HAP emission calculations?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop a detailed maintenance schedule for the project and associated facilities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop extensive and detailed emergency management plan(s) including the amount of fuel that will be used for emergency engines, e.g., fire water pumps, emergency generators, and fuel sulfur content and any requisite air emission permits for those sources. Please include responsibility assignments for clean up efforts and inspection and oversight.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to prevent significant deterioration of air quality in the vicinity of the plant.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide all supporting documentation to substantiate Tri-State's claim that the Kansas and Colorado coal plants will use state-of-the-art emission control technologies.

Alternatives

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require the development of a Risk Management Plan that evaluates worst case scenarios and responses for environmental accidents and make that information public as soon as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. With respect to the coal that will be burned at the plants, if it is to be Powder River Basin coal, then: Please indicate what specific dust control measures will be used to account for the high friability of this coal; Please consider whether the project will conduct dust control audit(s) to assess the performance of dust collection and provide the designs for the dust control audit(s) as they become available; Please consider whether the project will develop measures to prevent explosions and fires as have been experienced by other plants using PRB coal such as the explosion at the Sooner Power Plant on 2/16/04; Please consider whether the project will include a permanent wash down system in the plant design and make public that design and the amount of water the system will use annually; Please evaluate the number of access ports contained in the applicant's present design plan and the levels at which these access ports will be installed; Please consider whether the plant's coal handling facilities will use CO, Thermal and Infrared scanning monitoring equipment and provide the plans for such monitoring equipment; Please evaluate Fire Hazard Mitigation systems inside bunkers or silos, and provide the plans for such systems.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Development of Renewable Sources of Energy for Electricity Generation Combined With More Efficient Electricity Use as an Alternative to Constructing any Large New Fossil Fuel-Powered Generating Station. To the extent additional generating capacity is a definite need for the identified end-users including customers of Western, the demand can also be partially met by implementing energy efficiency programs in the contracted markets for this electricity. Additionally, energy efficiency has minimal additional environmental impacts. A specific demand analysis incorporating end-use energy efficiency improvements and use of combined heat and power should be conducted in those markets where the power is to be sold. In addition, there is great potential for development of renewable sources of energy as an alternative to Tri-State's three proposed coal plants. These alternative energy sources include wind, solar, and biomass. Please consider each of these alternatives resources in your analysis of alternatives to the three proposed coal plants.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. No action. In its Notice of Intent to Prepare EIS (71 FR 43733, 34), Western states that "[u]nder the no action alternative, Western would not participate in the Project." The Coalition is concerned that this incorrect statement presumes that the Project will proceed regardless of Western's participation and thus the "no action alternative" will have the same impacts as full construction and implementation of the proposed Project. Western admits that its actions include "construction planning and management for approximately 1,000 miles of high voltage transmission lines, and acquiring rights-of-way for transmission lines, access roads, and other facilities…the Project [also] includes four new substations; expansions of approximately eight existing substations; and installing fiber optic communications system for transmission lines." 71 FR 43733, 34. Thus, the proper baseline for the "no action alternative" is that these facilities are never constructed. As such, not constructing the Project would therefore represent the least harmful alternative. If Western does not analyze the "no Project construction alternative", there will be no basis in the administrative record for concluding the Project's impacts are appropriate or necessary. The Coalition considers the Project to include all impacts associated with Tri-State's three proposed coal plants that will be serviced by the EPTP. Consequently, please conduct the requisite analyses and consider the no action alternative described herein in the EIS.
- along field lines
- along field lines
- Along section lines or roads, Forget about M3
- Also by using the G7 leg instead of the G8, you will be crossing a lot of miles of fragile sandhills pasture land.
- Also own a ranch 6 miles west of Limon, Proposed lines M1M2-M3-M4 would cross this land which is also grassland.

Alternatives

- amount of land used or consumed by the towers
- An EIS must “inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.” 40 C.F.R. § 1502.1. To that end, the range of alternatives considered in an EIS must include (1) no action, (2) all other reasonable courses of action, and (3) mitigation measures. Id. § 1508.25(b). Western must “rigorously explore and objectively evaluate all reasonable alternatives.” Id. § 1502.14(a) (emphasis added). It therefore must “[i]nclude reasonable alternatives not within the jurisdiction of the lead agency” as well as “appropriate mitigation measures not already included in the proposed action or alternatives.” Id. § 1502.14(c), (f). and they (transmission lines) should be on the north side of cattle pastures. If they are on the south side of a cattle pasture they would interfere with windbreakers protecting the cattle from snow and ice.
- Area labeled A9 and A10- Move corridor 1.5 - 2 miles west to avoid houses as marked map 40-T13S, R36W.
- Area north of Burlington on RD48 6 miles north of Burlington (area to be aware of)
- As a landowner whose land is potentially crossed by the transmission lines in the area of B4, I found it valuable to discuss rerouting possibilities, if the B4 route should be chosen. I have given my detailed comments on how such transmission lines might best transverse my property in a separate communique.
- At the point this line turns and goes north on Little Lowe Rd the city has in its long range plans and zoning to expand to that area. That line will be right where Holcomb can expand to. We don't need that restriction in the way for future development. Be it commercial or residential.
- Based on our concerns described above, we believe the most environmentally benign and wildlife friendly routes are A1-A3-A5-A11-A14 for the northern route. Portions of this route appear to follow an existing power line right-of-way. Other northern routes are acceptable with the exception of A8, A9, and A10 which cross major tracts of native grassland where Lesser Prairie Chickens have been documented.
- Between the A3 and B7 lines, you have a possibility of going thru [sic] 8 quarter sections. Only one field even has a road beside it, so field lines.
- Board of commissioners of Cheyenne county have constituents coming to them worried about the location of the proposed Tri-State transmission lines that will possibly be running thru Cheyenne County, Colorado in the future. The original map that the board has seen showed one of the proposed lines running west of Highway 385 north to Kit Carson, but recently a constituent saw a map showing one of the lines running east of Highway 385. county.
- Burlington- Big Sandy line is north of I-70. There are significantly less farms to the south of I-70, and much more grassland. Why was the line proposed to the north?
- Concerned about the siting of the Rolling Hills/Energy Center line near his new home. Home is located in the SE quarter of Section 9, T22, R36W. Prefers B9 segment over B5, B6, B7 and B8.
- Construct along section lines especially on farmland. It's hard enough to work around the poles or towers when they are at the edge of fields, but are really a problem when they are located out in the interior of the fields.
- Construct on pasture land because stock can graze around towers easier than farmers can till, spray, plant, and harvest around towers
- Could be moved east of Bradberry/Crebs Rd and won't be effecting property values and health.
- Crossing through farm fields instead of following roads
- Do you need to put two lines near each other
- Due to the environmentally sensitive nature of this area and the potential for contamination of the aquifer, we have a strong preference for the eastern most alternative for this new transmission line.
- either would be ok
- EPA encourages the use of a NEPA/404 permit merger process for this proposal and recommends concurrence points between BLM, the Corps and the resource agencies on (1) purpose and need, (2) alternatives and alternatives analysis, (3) preferred alternative and mitigation measures to be implemented. Extend G8-Stay N of Wildhorse-harder ground, G6, G4, G5 S of Wil
- Feedlots to E of H5, next to US 385 on W. side, NE 26.5 Rd. Avoid feed lots. Would want line located off of feed lots
- Flight obstruction
- follow existing roads and lines

Alternatives

- For consumption of air quality increments, please assess the amount of any Class II PSD (Prevention of Significant Deterioration) increment and the amount of any Class I increment – for any pollutant and for any area – that emissions resulting directly or indirectly from each option would consume.
- For consumption of air quality increments, please perform an additional, cumulative version of this assessment that accounts for the existing emissions and the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For decreased visibility in scenic areas, please assess the ten highest hourly visibility degradations, the ten highest daily visibility degradations, and the average annual visibility degradation that pollutant emissions resulting directly or indirectly from each option would cause (1) within a ten-mile radius of the facilities, (2) in each Class I area containing land that lies within 300 kilometers of the facilities, and (3) in each Class II area containing land that lies within 300 kilometers of the facilities.
- For decreased visibility in scenic areas, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For each unit of the proposed coal plants, please ensure, consider the impacts of, and make the information public regarding: the megawatt size of each unit; the number of units to be constructed; the summer and winter megawatt rating of each; the type of burner technology to be used in each unit; and the type of emission controls to be used by each unit.
- For harm to crops and to threatened or endangered species, please also assess the harm that air pollutant emissions resulting directly and indirectly from each option would inflict or cause to be inflicted on any populations of any threatened or endangered species of plant or animal.
- For harm to crops and to threatened or endangered species, please assess the harm, in terms of the aggregate of lost value-per-year and remediation cost-per-year, that air pollutant emissions resulting directly or indirectly from each option would inflict or cause to be inflicted on crops and cultivated soil within 500 miles of each power plant.
- For harm to crops and to threatened or endangered species, please perform additional, cumulative versions of these assessments that account for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased concentrations of various air pollutants, please assess the amount by which each option would directly or indirectly increase the concentration, in the ambient air, of each hazardous air pollutant, each criteria air pollutant (including the impact of criteria air pollutant precursors) in (1) each county in Kansas and Colorado, (2) each nonattainment, maintenance, or unclassifiable area in the Western half of the United States, and (3) each Class I area in the Western half of the United States.
- For increased concentrations of various air pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. For increased deposition of various pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased emissions of various air pollutants, please assess both the amount by which each option would directly increase those emissions and the amount by which each option would indirectly increase those emissions. Ways in which an option may indirectly increase emissions include, but are not limited to, (1) necessitating the construction and operation of ancillary air pollution sources and (2) stimulating the construction and operation of new air pollution sources.
- For increased emissions of various air pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would increase the emissions of each hazardous air pollutant, each criteria air pollutant, and each criteria air pollutant precursor from all aspects of the Project, including from the proposed coal plants.

Alternatives

- For increased incidence of human disease and other impairment, please assess the number-per-year by which air pollutant emissions resulting directly or indirectly from each option would increase the incidence of negative human health impacts – including asthma attacks, missed school or work days, emergency room visits, hospital admissions, cancer cases, heart attacks, and premature deaths – within (1) five miles of the facilities, (2) fifty miles of the facilities, (3) 100 miles of the facilities, and (4) 500 miles of the facilities.
- For increased toxicity of fish eaten by humans, please assess the amount by which air pollutant emissions resulting directly or indirectly from each option would directly or indirectly increase the concentrations of various toxic chemicals, including mercury and dioxin, in the flesh of freshwater fish caught and eaten by humans within 500 miles of each facility.
- For increased toxicity of fish eaten by humans, please compare the resulting toxicity levels with the levels identified in federal and state health advisories.
- For increased toxicity of fish eaten by humans, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please assess – notwithstanding the assessment of PSD increment consumption – the extent to which emissions resulting directly or indirectly from each option would interfere with any area's maintenance of – or progress toward attaining – any national ambient air quality standard.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For the coal that will be burned at each proposed coal plant, please ensure data collection and consideration of each of the following and make the information public as it becomes available: tons of coal burned annually by each unit of the plant; type of coal to be burned; heat rate of the coal burned; mercury content of the coal; ash content of the coal; sulfur content of the coal; and content of other impurities including chlorine, fluorine, selenium, and arsenic.
- Frontage land along I-70- winters place-something [illegible] you can do better with land
- G7- N of 94- very sandy. G8 G12 G9- ottoman?
- Have 6 miles along present Brush to Limon line starting 4 miles south of 36 highway in Washington County. This is 2 miles west of Hwy 71. I would prefer that J8 line follow the present line. This is all grassland
- He does not want this transmission line AT ALL on his property or near it.
- His client (Frontier Sportsman Group) has concerns about the preliminary proposed route. Sections 15 and 22, 16S, 64W.
- I am not in favor of the B13 line or any lines.
- I am potentially effected by 4 segments: J1, K2, I5, and J12 therefore I am very concerned about their exact location.
- I believe that the other North-South route is less populated and is straight north of the substation
- I do not want two power lines within one mile of my house. B7 would do that.
- I like N4 for an alternative or around to the west and north of N3
- I was delighted when Matt thought it might be possible to place the pathway on the easterly property line of Section 30 and Sec. 29. I can't speak for my neighbor, David Horner, who owns SE/4 of Sec. 30, but it seems to me this might also be the most acceptable pathway from their point of view. Such a pathway---the transmission line right-of-way still on Sec. 30--but bordering the property line with Sec. 29 would not be traversing cropland, but rather CRP and brief pastureland either side of Sand Creek.
- I would like to see J1 constructed on the other side (west) of the section lines than the current line that runs from Big Sandy to Beaver Creek.
- I would like to see K3 chosen over K2 because it effects less farm land in the area north and northwest of Limon.
- I would like to see this line go other direction. Go to the west and then go north. Run through a area that is less populated and for sure less irrigation.

Alternatives

- I would prefer it placed adjacent to existing roads if N-4 is the branch chosen; however, I would most prefer if branches N-1 or N-2 are chosen rather than N-4
- I would prefer that you use the G8 leg on the map to put the line on further north running adjacent to Hwy 287 and drop the idea of the G7 leg.
- I would prefer they be placed along fencelines
- I(n) all consideration for the city of Holcomb and the current residences and the future residences and/or future commercial development this line location would be much less of a problem if it were west of Holcomb.
- I1 farm land, snow loads, ice, noxious weeds a big problem.
- I1 needs to stay further south (closer) to the old line between Burlington and Big Sandy. It doesn't make sense to angle off to the northwest and the east end and then have to angle to the southwest at the west end.
- Id. § 1502.16. Western bears a heightened responsibility to assess environmental impacts if the project at issue involves the use of public land. See id. § 2800.0-2 (“Protect the natural resources associated with the public lands and adjacent private or other lands administered by a government agency”; “Prevent unnecessary or undue environmental damage to the lands and resources.”). Accordingly, we request that the EIS (1) assess the degree to which the project envisioned by Western/Tri-State would have each of the following types of impact; (2) assess the degree to which each of the reasonable alternatives identified in the next section of these comments would have each of those types of impact; and (3) compare the impacts of the project envisioned by Western/Tri-State to the impacts of the alternatives: [list of impacts to be addressed listed as individual comments]
- If J1 is selected it should be placed west of the section line. There's already a line on the east side of the section line that we have had to farm around for many years. We shouldn't need to give up anymore ground to this project.
- If K12 is used, please consider moving it a little farther south to run between 112th and 104th where it would impact fewer residences.
- In addition to the direct personal impact of the #1 siting out of Limon, it appears that this routing is about 8% longer than the #2 routing, which would apparently follow an existing powerline right of way. The #2 routing also seems to make more sense from a construction and maintenance standpoint, since access is already there, wholly or in part.
- It appears that the Energy Center to Big Sandy segments G7 and G6 both go through our ranch. Is there anyone that can provide us more details on what this entails?
- It seems that all of the proposed lines North of Limon will affect us in some way. We would prefer K3 over K2 because it would effect less farmground
- It should be a primary consideration to place the lines next to existing roads and along field lines. They should not be placed on/in the interior of a field, farm ground, etc. It is imperative that these lines not be placed on farm ground.
- it would be best to route the lines across cropland, avoiding native prairie as much as possible.
- It would be ok on the propose route. Also we would like to have the line come through our land. Thank you.
- J1 should be placed west of the section line
- J8 [illegible)- grassland- don't want it torn up, very sandy the drier it is the worse it is.
- J8 is very sandy- needed to use helicopter to construct. What is process for paying damages? It takes 5-7 years to reclaim the land because of the sandy soil
- J8 N of 1.00 Rd E of K.00 Rd Beaver Creek Sub? Underground line on E side of "Beaver line" (the existing 115kV line). The bureau paid $10 per pole [illegible] value
- J9 26.00 Rd- E-3 miles-1/2 mile of crossings Sandy soils-easily damaged
- K2-move line along highway-out of center of field
- Lincoln County, sec 128-Map 21, 48RD and 3MRD, Line 12. Look at paralleling existing line. That line is a result of lots of work and negotiation already to avoid houses, etc.
- Mr. Coan is requesting that the transmission line be constructed along the same corridor where the two existing Excel transmission lines are located and west of the reservoir. This alignment is shown in blue on the attached map.
- My house is within 1/8 mile from I4, I would prefer you use I1 or I2 Route

Alternatives

- My property lies 2-1/2 mi west of Lakin within B4 according to your mapping setup, right where the transmission line turns northward and intersects Hiway 50. The legals are: N/2 & S.W.14 of Section 30-24-36. The proposed transmission pathway is drawn as going through the middle of Section 30. I've argued for the flexibility to move the pathway to the eastern border of Section 30. I would wish to avoid degrading the view of my farmstead and going through the most scenic area of my farm, which I have named Owl's Canyon. next to roads.
- Of the three alternatives for this project segment we would like to identify some environmental concerns associated with the western two alternatives. These alternatives are proposed to go through T2N, R56W and T2N, R57W and then south to Big Sandy. While these routes do not appear to directly impact City owned property they do go through a large shallow naturally sand-filtered aquifer. This aquifer is the same one that is the sole water source for the City of Brush.
- On the Big Sandy/ Green Valley T.L. north of Limon section on map K3- along Hwy 71 avoid well in & stay west of corridor
- Own property in T8 R6W section 17, Prefer to have alignment I5 along north side of the existing line
- Place the lines along major highways and interstate highways to avoid going through fields and pastures. Existing roads and major roads like U.S. highways and interstates since the land the highways cover is already being used for highways and this would make the lines easier to take care of and less offensive to look at.
- Please avoid B1 and B2.
- Please conduct studies of and consider the available capacity on existing transmission lines to which EPTP will connect.
- Please consider all mobile equipment that will be used on site, e.g., cranes, dozers, front-end loads and annual fuel use for each and make that information public as it becomes available.
- Please consider any and all applicant plans to build and construct with union labor.
- Please consider impacts to specific mines that would supply the coal. Please consider also contractual and supply stability by including in the EIS specific mines from which coal is to be acquired and completed contracts for coal acquisition.
- Please consider noise levels of steam blows and proposed and alternative noise reduction control measures.
- Please consider number, duration, and type of startups (hot, cold, warm) to occur each year.
- Please consider proposed and alternative pumping rates for individual wells or well fields.
- Please consider public necessity of the plant through an analysis of all entities contracted to purchase power from the proposed coal plants.
- Please consider the "plumbing" of Tri-State's proposed power plants, including well field locations, surface water POD's, location of spreading basins/injection wells, pipeline routing, etc.
- Please consider the amount and characteristics of any wastewater discharged from plant operation processes and during project construction. Please consider proposed and alternate discharge locations, e.g., evaporation pond, local creek, etc.
- Please consider the anticipated frequency of soot blowing to keep boiler tubes clean and to keep selective catalytic reduction ("SCR") catalyst clean.
- Please consider the mercury and other impurities content at maximum value.
- Please consider the northern K13 route - possibly even moving it a little closer to 144th.
- Please consider the number, location, and purpose of any coal or other material storage piles including precise dimensions and the amount of material that will be stored.
- Please consider the percent of the feed coal sulfur that is: (1) removed in feed preparation prior to the boilers and (2) removed with the ash.
- Please consider the projected average plant capacity factor.
- Please consider the quantity and source of energy needed to construct the project including specific details of how this energy will be obtained and all associated environmental impacts.
- Please consider the quantity of renewable energy to be developed by Tri-State for delivery on the EPTP including the megawatts, megawatts hours, and the types of renewables, construction dates, locations, and operational timelines.

Alternatives

- Please include an approved interconnect permit for any existing transmission line.
- Please include in the cumulative PSD increment analyses all increment consuming emissions, which would include all increases in emissions at existing major stationary sources since the PSD major source baseline date, all increases in emissions at other existing sources since the applicable PSD minor source baseline date, and all new sources of emissions that came into existence after the applicable minor source baseline date (including area and mobile sources) as well as reasonably foreseeable sources not yet in operation.
- Please include in the EIS a notice of approved capacity on any existing transmission line to which EPTP will be connected.
- Please make all information on the selection of waste disposal sites and alternative sites public as the material becomes available.
- Please move it further east of us & take it down (west) on 144th where no one lives
- Please state how many megawatts of coal fired electricity Western plans to purchase from Tri-State's proposed coal plants and assess all environmental impacts associated with these purchases.
- Prefer J9 or J12
- Prefer not to come straight S. out of substation- prefer to go SE
- Prefer that it follow existing roads.
- Preferred route for Rolling Hills to Burlington A1-A3-A5-A11-A12-A14-A15. Rolling Hills to EC, prefers route B3, B7, and B12.
- Preferred route for Rolling Hills to Burlington A1-A3-A5-A11-A12-A14-A15. Rolling Hills to EC, prefers route B3, B7, and B12.
- Prefers J12
- Prefers J12.
- Prefers using the grasslines alignment north of 3N rd.
- Probably along field lines as this would put it further from our home. The farther west the along the proposed corridor the better.
- Proposal J9 on our ranch in T.55-57W and T45-57W runs over some very rough land along the Beaver Creek
- Put the new power line next to the one already there
- Recommend that we analyze an alternative South of I-70 approx 3 miles. Recommend S of the breaks that are approx 3 mi S of I-70. Fewer landowners, cheaper land (grassland) less icing, less snow.
- Regarding the northerly continuation of the transmission pathway upon crossing Hiway 50, there are two residences on W/2 of Sec 20-24-36 and the Kearny Co. Sanitary Landfill is located on the extreme S/E, corner, of Sec. 18-24-36 with only non-residential CRP or pasture located on E/2 of Sec. 19, as well as most of Sec. 18 (except for the landfill and the extreme westernly part of .Sec 18. Thus, if the transmission lines were to border Sec 30 and Sec 29, as I've mentioned above, then I might suggest that, upon crossing Hiway 50, it would seem plausible to veer the pathway diagonally NW through Sec 19 and Sec 18 to pick up the due northerly pathway showing on your proposed map. Such a route would conveniently lie west of the landfill, again where no residences are too close.
- Regarding the transmission line options, K-2 which travels near the Deer Trail area is a better option that the K-3 option, which will run much close to out residence and those of our neighbors along County Road 42. Please consider K-2 as the preferred option for this line. Thank You!
- Right after the EPTP EIS Public Scoping meetings a meeting between Colo. Springs Utilities and the EPTP Route Selection Team should be conducted. Need to share corresponding alternative corridor data to coordinate route refinement. CSU data will be downloaded on a disc for data share.
- Road 2W- 12 mi S of Burlington Runs of N side all the way [w] to Hugo. H frame existing
- Route of line
- See map 7- follow K2- approx 8 miles N then go west
- Segment J3 goes near a house- if it was located a mile North there would be no houses except a historical church. South a mile would also be free of homes

Alternatives

- Since the Tri-State power plants will be owned by its shareholders, the customers of Tri-State's 44 electric cooperatives, please conduct an analysis of the potential financial impacts on the owners. This should include the financial liability placed on each consumer within the cooperative system as a result of this proposed capital expenditure, as well as the additional liability that would be incurred when and if carbon emissions limitations are imposed in the future, a reasonably foreseeable future action. This analysis should include the possibility that the plants may become obsolete and unusable decades earlier than planned if they are unable to economically retrofit to foreseeable new regulations, resulting in sunk costs to the shareholders.
- Specifically requested that we avoid B1 and B2
- Spider webbing out of substation- get a lot of landowners impacted
- Stay at least 1/2 mile from headquarters- corrals, houses, etc.
- stay on pastures when possible, stay along section lines, avoid farmland
- Surely there is a way to avoid the populated rural areas and high valued farm land in southern Wallace County. Please consider our requests.
- The current notice of intent to prepare an EIS did not sufficiently address specific possible alternatives but stated only that "a range of alternatives would be developed with input from the scoping process." The possible alternatives include energy conservation measures that could obviate the need for the EPTP, alternative energy generation resources such as solar, wind, and biomass; and cleaner methods of fossil fuel electrical generation such as gas, or Integrated Gasification Combined Cycle (IGCC). Each of these alternatives must be considered.
- The EIS should provide a detailed and accurate description of the various components of the proposed Eastern Plains project. Besides locating all transmission and fiber optic lines, all individual components (e.g., buildings, equipment, and project foot print) that make up a substation, maintenance/service center, or any other project facility or infrastructure, should be identified. In addition, the EIS should include detailed project location maps that delineate the proposed new transmission line work in relation to existing rights-of-way and proposed new rights-of-way.
- The G7 corridor will be in extremely sandy soil, which already has many blowouts. The blowouts are unexcessible to most vehicles, a present only ATVs can get in or on them now, most ranchers use horses or don't mess with them as they are very hard to control. Any line through them would bring severe hardships and almost impossible to control
- The N-4 branch of the Big Sandy to Midway station cuts through part of my farm/ranch. Will all three branches of this line be used (i.e. N-1, N-2, and N-4) or will only one branch be chosen at a later date? Will the entire width of this line be needed or will only a small section of it?
- The placement of the power line should be on CRP land. I think risk of crop dusters is to great when there is choices available, meaning not placing them on farmland
- The potential land affected would be portion of sections 20, 29, 30, and 31 of township 12 south & range 57 west of Elbert county. At least this is based on my interpretation of your map if the N-4 branch is chosen
- The power lines should be place(d) as far away from dwellings as possible, at least over a half mile.
- The proposed east transmission line was shown jogging west around our irrigated circles. We would prefer this type of configuration rather than going through the middle of the irrigated circles
- The Purpose and Need for a proposal is the basis for identifying all feasible alternatives that undergo environmental impact analyses in a NEPA document. All feasible alternatives that would satisfy the Purpose and Need should be given equal consideration and analysis. The alternatives analysis "should present the environmental impacts of the proposed action and the alternatives in comparable form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public" (40 C.F.R. 1502.14). At least one alternative should emphasize conservation of natural resources, particularly those deemed significant, rare, and/or of high public value. The EIS should include, but not be limited to, a "no-build" alternative and, if feasible, consider alternatives that utilize existing rights-of-way, whether they are owned by the applicant or not. The alternatives analysis discussion should include justification for any proposed deviation from utilizing existing utility rights-of-way.
- The soil in the G-8 and G-9 corridors is much more stable soil which should not erode near as easily and does not have as many elevation drops and climbs as the G-7 corridor has.
- The transmission line already in place near County Road C is the better choice as it only crosses Adobe Creek. A line near County Road J would have to cross two branches of Adobe Creek plus Mustang Creek, Sand Arroyo Creek, and John Creek which all run into adobe creek.

Alternatives

- Then three miles south of Sharon Springs it is a conglomeration of already exiting transmission limes and underground public and private gas lines, city water line, domestic water lines and crude oil lines. There is an existing above ground right of way contract on these crude oil lines that prohibit the building of any permanent structure on the right of way. The other lines also must be avoided to provide access to any necessary repairs.
- There are at least twelve residences to avoid from the county line north. It is obvious no one wants to live near a high voltage transmission or distribution line. We strongly urge you to find a less populated area with lower valued land to go through with this line.
- There are two grain elevators located at the intersection of Big Lowe and Lowe roads north of Holcomb, KS. Your drawing currently shows your power line running down the road between the elevators. Our concerns are:…..(continued in comments 7, 4, 5, 6)
- These power lines and WINDMILLS are using a lot of ground- therefore the windmills should be planned next to power lines
- Transmission lines should ideally be near existing roads.
- Try to follow present lines where possible
- Unlike verbal comments Western and Tri-State officials made at the scoping meetings in September, it is obvious from a review of the specifics of the contract between Western and Tri-State that the first transmission lines to be built connect the Holcomb facility to Lamar, Colorado. Without the existence of the coal plants in Kansas, the transmission system as designed would not be required (Ref. - Exhibit A to Contract No. TS-05-0045 (Western Contract No. 05-RMR-1583) between Tri-State Generation and Transmission Association, Inc. and United States Department of Energy Western Area Power Administration, Rocky Mountain Region, Loveland Area Projects, for Participation in the Eastern Plains Transmission Project).
- Use existing roads and lines
- Use I-70 corridor.
- Use railroad ROW.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: [E]nvironmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: [H]istoric and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Energy requirements and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures.
- We already have power lines owned by Xcel going through our land which makes the land harder to farm and less attractive for residential development in the future. More lines, such as this, will hurt future development of the land. Please keep it as far away from our land as far as possible. T4S R59 W s/2 1/4 6 -S 1/2 Sec. 5 N 1/2 Sec 8 n4 of sections 7 & 18.
- We are suggesting two alternate routes that will cause a minor re-routing of your proposed power line (See map.) One takes your line father east, out of immediate view of the 1-25 corridor, along the route Xcel is proposing for their power line across ("our") State land. The other route follows the existing power lines just south of the El Paso County line and then west and north to the Midway Station. Either of these alternate routes are not the 'best case' for us but they would eliminate interference with our ranching operations, somewhat reduce visibility from the 1-25 corridor, lesson intrusion into potential recreational areas and not proscribe any ecologically sustainable development that may be possible in the future.
- We have sprinkler systems in place and others that will be added. Can the towers be set so we can set either 1/4 or 1/2 mile systems in place.
- We suggest the southern route follow B3, B7, B12.

Alternatives

- We would prefer it be placed along existing high voltage lines or better yet upgrade the existing line to accommodate the increased capacity.
- West of the 115kV lines on Alternative J8. Intersection of County road E and 25, West side of E. High grade road, quonset and grain bins. Want to know exactly where to go Shops, Grain bins, Quonset huts, old homesteads.
- Why not considering south of I-70 route where there are fewer people
- Why not go along the existing 230-kV line between Burlington and Big Sandy-Reference Map #21
- Within the past year, Wheatland Electric has approached our department in regards to the possibility of cooperative efforts in restoring a large portion of irrigated cropland south of the Holcomb plant back to sandsage prairie. This area, if restored, will increase viable habitat for the Lesser Prairie Chicken and other grassland obligate species. We are not supportive of routes B1 and B2 because of the location of this future restoration effort.
- Would like to see the line go beside the least amount of housing possible. Would prefer for the line to not go by house on A-11.
- Would suggest that you consider a new corridor that is 2-4 miles east of I-70 through Elbert and Arapahoe county for the Big Sandy-Green Valley connection
- Yes: use road easements such as I-70
- Your proposed line is parallel to the GCW's tracks when you are along Lowe Rd. Seems like that would not be a hazard for sure

Aquatic Species and Habitats

- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.
- Another concern that will need additional review once the final routes are defined, are the locations of ground disturbances in respect to the Designated Critical Habitat of the state-
- threatened Green Toad (Bufo debilis) and the federal threatened Topeka shiner (Notropis topeka). Disturbance of these species will be temporary and will be limited to on-the-ground construction and placement of the fiber optic regeneration facilities.
- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- EPA recommends that the EIS address specific requirements to: Maintain physical integrity of aquatic ecosystems; Assure an amount and distribution of woody debris sufficient to sustain physical and biological complexity; Assure adequate summer and winter thermal regulation; Assure appropriate amounts and distributions of source habitats for riparian- or wetland-dependent species; Restore or maintain water quality and hydrologic processes; and, Restore or maintain naturally functioning riparian vegetation communities.

Aquatic Species and Habitats

- In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- It appears from the NOI that this EIS and associated NEPA documentation will be used to address CWA Section 404(b)(l) Guidelines compliance. All wetlands and waters of the U.S. (e.g., streams, rivers, lakes) that would be crossed or otherwise impacted by the proposal should be identified. This should include the identification of "farmed wetlands" and "prior converted wetlands." Impacts to these resources should be thoroughly identified and discussed. This may include, but should not be limited to, a characterization of their existing conditions, and the identification and assessment of the direct, indirect and cumulative impacts to water quality/quantity, aquatic organisms and habitat. Details regarding the widths of proposed stream and river crossings and how the crossings will be accomplished should be identified and discussed. Where feasible, we recommend the use of low impact construction methods for all water crossings, including their associated floodplains, wetlands and forest lands. Where feasible, we recommend the use of directional drilling for all water crossings and their associated floodplains, wetlands and forest lands, for burying of the fiber optic cable.
- The EIS should show the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, large organic material supplies (woody debris), stream bank vegetation, and riparian habitats. The analysis should disclose whether projects could cause any reductions in habitat capability or impair designated uses. Other information relevant to the analysis, such as aquatic species habitat and the condition and productivity of that habitat, should also be included. Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation. Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts. Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.

Climate

- Have documentation and modeling been produced and submitted by Tri-State on how many millions of gallons of water per day that additional pulverized coal-produced electricity will use? Have drought and global warming projections been factored re water use? What is the source of the water? What populations, wildlife, and water resources will be affected?
- Human health and safety issues when more carbon is emitted into the atmosphere thus affecting the air quality and contributing to global warming
- I still feel that the green house gas issue is a huge problem for this facility as the country overcomes the legacy of the Bush Administration’s stalling on the global warming issue and finally gets down the urgency of the task. Presently we cannot address the issue with totally new and efficient “green” technologies. We must continue to use hydro and fossil fuel production to increase electrical production in the short term (say the next 15-20 years). However, a major new green house gas contributor such as your coal generating facility would do well to act as an earnest good faith player to emerge on the right side of the debate. Therefore, I am sending this New York Times article, suggesting that you allow space in your present plan for post-scenario capture equipment when this would become available
- Impact of additional coal generation on global warming.

Climate

- Please analyze the impacts of atmospheric sulphur dioxide producing sulphuric acid and the resultant formation of atmospheric fog/haze during time of winter air inversions in the regional valleys. Please determine the impacts of long-term haze/fog to the regional climate.
- Please consider that peer-reviewed studies indicate that in order for greenhouse gas concentrations to stabilize soon enough to prevent dangerous climate change, "as much as 98% of the capital stock of U.S. fossil power plants would need to be replaced with state-of-the-art carbon dioxide capture and storage (CCS)-enabled power plants by the year 2050." J.J. Dooley, et al., Accelerated Adoption of Carbon Dioxide Capture and Storage Within the United States Electric Utility Industry: The Impact of Stabilizing at 450 PPMV and 550 PPMV, Seventh International Conference on Greenhouse Gas Control Technologies ("GHGT7") (Dec. 3, 2004) (Enclosure 1), at 1.
- Please consider that the operational life of a coal-fueled power plant is fifty to sixty years long. Therefore, federal action on the new coal-fueled plants currently being proposed without CCS (and without technologies that facilitate implementation of CCS) will have a significant impact on the ability of the federal government to meet its stabilization commitment. Federal law requires the United States government, as a partial means of meeting that commitment, to "[t]ake climate change considerations into account" in its "social, economic and environmental policies and actions." UNFCCC, Art. 4, Para. 1, Cl. (f). As an organ of the federal government, Western is therefore obligated to factor climate change considerations into its EIS for the proposed Tri-State power plants.
- Please consider the amount of greenhouse gases such as methane, nitrous oxide, and CO2 that will be released from the plant, and how will it affect global warming.
- Please consider the climate impact of Tri-State's proposed coal plants. Federal law commits the United States government to return anthropogenic emissions of carbon dioxide and other greenhouse gases to 1990 levels. United Nations Framework Convention on Climate Change (UNFCCC), Art. 4, Para. 2, Cls. (a), (b); 138 Cong. Rec. 33521-27 (Oct. 7, 1992) (Senate ratification). President Bush has reaffirmed the federal government's commitment to "stabilize atmospheric greenhouse gas concentrations at a level that will prevent dangerous human interference with the climate." Address by President George W. Bush to the National Oceanic and Atmospheric Administration (Feb. 14, 2002).
- The non-use of any renewable energy as a power source in the project will again affect human health through air quality and global warming issues
- What research has been done, if any, in anticipation of future regs on pulverized coal plant emissions' role in global warming? Who will pay for the enormous costs of retrofitting to comply with the regs?

Cumulative Effects

- Already have one 115-kV line on the property
- At the point this line turns and goes north on Little Lowe Rd the city has in its long range plans and zoning to expand to that area. That line will be right where Holcomb can expand to. We don't need that restriction in the way for future development. Be it commercial or residential.
- Decreasing value of future home sights [sic]
- Development planned around area in future. Tristate, gas, highways, county roads, etc.
- Every consideration should be made to make this project as least invasive to farmground as possible. Farming is our livelyhood. We're already dealing with a drought of several years, don't make it worse on us.
- Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," signed in 1994, applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the EIS should disclose and evaluate any environmental justice aspects associated with impacts on rural low-income communities by either the proposed project, or the potential build-out for reasonably foreseeable development analysis. If there are no applicable environmental justice considerations, then that should be disclosed. EPA recommends close coordination with any potentially impacted Native American tribes.

Cumulative Effects

- Following is a listing of all the lines that have already been installed on the property that is one of the proposed routes for your line. One transmission line runs across the entire west edge of the property north and south. Another one diagonals across three half sections of the property northwest to southeast and a third that is adjacent on the north side of the properly for 1 1/2 miles. This line started a fire a number of years ago that burned part of the pasture just west of the farmstead. In addition there is a pump station in our field a half mile south of the farmstead. There is a cellular tower also across from our fence line. There is another service box fenced out above ground for the pump station that is in our pasture a mile west. There is a substation in the northwest corner adjacent to our property line. There is a cellular tower also across our fence line. There is an underground oil transmission line diagonal southeast to northwest across the property for a mile and a half. There is a second oil transmission line that runs diagonal across the property. These have an existing above ground right of way contract as previously mentioned. There is a public utility gas line that runs underground across the entire west half of the property north and south. There is another crude oil line that runs diagonal across the northwest half.
- For consumption of air quality increments, please perform an additional, cumulative version of this assessment that accounts for the existing emissions and the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For decreased visibility in scenic areas, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For harm to crops and to threatened or endangered species, please perform additional, cumulative versions of these assessments that account for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased concentrations of various air pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased deposition of various pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased incidence of human disease and other impairment, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased toxicity of fish eaten by humans, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: The modeling of maximum emission rates (i.e., potential to emit considering federally enforceable controls) of each pollutant to be emitted by the power plant and associated emission sources, as well as from other reasonably foreseeable sources, that could occur over the averaging time of the standard with which compliance is being assessed. For visibility modeling, please model the maximum hourly average emissions and maximum 24-hour average emissions. Further, please model existing sources at the maximum actual emission rates occurring over the averaging time of the standard with which compliance is being assessed. See section 9.1.2. of 40 C.F.R. part 51, appendix W.

Cumulative Effects

- Furthermore, there are two local projects of which you may not be aware: Our 2006 conservation easement will be the first of many in this area held by Colorado Open Lands in its Peak to Prairie Project which, in concert with The Nature Conservancy, GOCO, Colorado State Parks, and El Paso and Pueblo Counties, and Fort Carson, envisions saving one of the last unfragmented, ecologically functioning grasslands, providing habitat for innumerable species, as well as preserving ranchland and the local agricultural community. The Fountain Creek Crown Jewel Project, just announced by Senator Ken Salazar, is also interested in remedying Fountain Creek, preserving areas for Open Space and a green corridor between Pueblo and Colorado Springs, as well as recreational parks, camping, trails etc., all along the Fountain Creek watershed. Both of these projects envision retaining essential qualities of this last great landscape along the southern Front Range. The Frost Ranch just happens to be in the middle of it and we are completely supportive of both projects.
- He expressed concern that the substation at Limon is becoming so spider-webbed with transmission lines.
- However, the greater long-term impact of the facility itself greatly concerns me.
- Human health and safety issues when more carbon is emitted into the atmosphere thus affecting the air quality and contributing to global warming
- I do not want two power lines within one mile of my house. B7 would do that. Another power line would just make things worse. I know that no one wants the lines to go across their ground but why should anyone have to have 2 of them less than a mile form their house.
- I(n) all consideration for the city of Holcomb and the current residences and the future residences and/or future commercial development this line location would be much less of a problem if it were west of Holcomb.
- I'm not a Neanderthal, sitting here warming my hands around a fire, gathered from cow chips in the pasture. I like lots electricity available and I see that we have to find ways to meet ever-increasing needs for more. But I question whether this project is thinking much beyond the next 10 to 15 years, and the current economic realities and risks
- In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- In September, 2006, I find myself listed as a property owner in the 3 mile swath of the Super Slab. I am also on the map of a one mile swath of the Eastern Plains Transmission Project at the house that I now own.
- Is existing line- prefer not to have another
- It really seems that at times this property, that I feel is a trust to me to take care of in the best way possible, has been targeted by others as a dumping field of above and below lines that cross it in every direction.
- Let me know what my options are with communicating my concerns and suggestions. The electric line put in 3 years ago went across 4 of my fields. I have learned some things from that.
- No consideration is given to the devaluation of a cultivated field that is cut in half by large transmission towers. It is devastating to diagonally cut through a cultivated field What happens to the valuation of a home if a hog feed lot is near by. There is much concern about that and rightly so, but no one considers what happens to a piece of farm land that is cut up with numerous overhead utility limes, pump stations etc. That is exactly what has already happened to the piece of property that I own that is now considered as one of the routes for this proposed line.
- Our area will become overcome with powerlines.
- Please address future projects in the area and the effect the Project may or may not have on those developments.
- Please analyze the impacts of atmospheric sulphur dioxide producing sulphuric acid and the resultant formation of atmospheric fog/haze during time of winter air inversions in the regional valleys. Please determine the impacts of long-term haze/fog to the regional climate.

Cumulative Effects

- Please consider that peer-reviewed studies indicate that in order for greenhouse gas concentrations to stabilize soon enough to prevent dangerous climate change, “as much as 98% of the capital stock of U.S. fossil power plants would need to be replaced with state-of-the-art carbon dioxide capture and storage (CCS)-enabled power plants by the year 2050.” J.J. Dooley, et al., Accelerated Adoption of Carbon Dioxide Capture and Storage Within the United States Electric Utility Industry: The Impact of Stabilizing at 450 PPMV and 550 PPMV, Seventh International Conference on Greenhouse Gas Control Technologies (“GHGT7”) (Dec. 3, 2004) (Enclosure 1), at 1.
- Please consider that the operational life of a coal-fueled power plant is fifty to sixty years long. Therefore, federal action on the new coal-fueled plants currently being proposed without CCS (and without technologies that facilitate implementation of CCS) will have a significant impact on the ability of the federal government to meet its stabilization commitment. Federal law requires the United States government, as a partial means of meeting that commitment, to “[t]ake climate change considerations into account” in its “social, economic and environmental policies and actions.” UNFCCC, Art. 4, Para. 1, Cl. (f). As an organ of the federal government, Western is therefore obligated to factor climate change considerations into its EIS for the proposed Tri-State power plants.
- Please consider the amount of greenhouse gases such as methane, nitrous oxide, and CO2 that will be released from the plant, and how will it affect global warming.
- Please consider the climate impact of Tri-State’s proposed coal plants. Federal law commits the United States government to return anthropogenic emissions of carbon dioxide and other greenhouse gases to 1990 levels. United Nations Framework Convention on Climate Change (UNFCCC), Art. 4, Para. 2, Cls. (a), (b); 138 Cong. Rec. 33521-27 (Oct. 7, 1992) (Senate ratification). President Bush has reaffirmed the federal government’s commitment to “stabilize atmospheric greenhouse gas concentrations at a level that will prevent dangerous human interference with the climate.” Address by President George W. Bush to the National Oceanic and Atmospheric Administration (Feb. 14, 2002).
- Please include in the cumulative PSD increment analyses all increment consuming emissions, which would include all increases in emissions at existing major stationary sources since the PSD major source baseline date, all increases in emissions at other existing sources since the applicable PSD minor source baseline date, and all new sources of emissions that came into existence after the applicable minor source baseline date (including area and mobile sources) as well as reasonably foreseeable sources not yet in operation.
- Potential development or conservation easements
- proliferation of lines in corridor
- Rolling Hills expansion should be designed as a state-of-the-art facility and incorporate innovative (even showcasing newer, cleaner, and cutting edge techniques such as gasification of coal generation). It isn't going to happen, is it? Why not? Too expensive as we view it in 2007? Too risky for the investors? Once we go down this road, will the not-to-distant future judge the Rolling Hills facility as a perilous liability which was conceived during a political climate where the concept of global warming was reviled and environmental initiatives were suppressed?
- S of Big Sandy substation trouble w/ first time line was placed on property. Would hate to have more lines on property.
- Since the Tri-State power plants will be owned by its shareholders, the customers of Tri-State’s 44 electric cooperatives, please conduct an analysis of the potential financial impacts on the owners. This should include the financial liability placed on each consumer within the cooperative system as a result of this proposed capital expenditure, as well as the additional liability that would be incurred when and if carbon emissions limitations are imposed in the future, a reasonably foreseeable future action. This analysis should include the possibility that the plants may become obsolete and unusable decades earlier than planned if they are unable to economically retrofit to foreseeable new regulations, resulting in sunk costs to the shareholders.
- Southern Delivery Water Project CSU/BuRec (map attached)
- Spider webbing out of substation- get a lot of landowners impacted
- Surely there is a better way to organize meeting your needs to provide electricity to consumers and those same consumers' other needs for open space, recreation, and clean water than to stretch these powerlines like a spiders' web across this area?

Cumulative Effects

- The appropriate area of consideration and the time frame to use when assessing cumulative impacts will vary for each resource under consideration. For example, forested wetland loss is probably best considered in the context of historical forested wetland losses in a particular watershed. Incremental forested wetland losses due to past, present, and reasonably foreseeable future actions when viewed in a cumulative context may result in a significant impact due to the time it takes to replicate a forested wetland. Consequently, impacts to a forested wetland resource, no matter how small for a particular proposal, may be significant. This would dictate that all efforts be made to avoid and minimize impacts to forested wetlands, and require adequate mitigation for any unavoidable loss.
- The non-use of any renewable energy as a power source in the project will again affect human health through air quality and global warming issues
- the previous ones [utilities] have not followed thru on maintance on their lines. Maintenance on the lines is of utmost concern. We would like the erosion to be a minimum, and the grass reseeded.
- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.
- The scoping notice admits that Western's purpose and need for the EPTP is "to provide Western with improved access to alternative resources and suppliers by expanding the capacity and geographic reach of the transmission system. It would increase Western's options for purchasing energy to meet contractual requirements." 71 FR 43733. In other words, Western will be purchasing coal fired electricity from Tri-State's three new coal plants to serve Western's customers. "It would be irresponsible for [Western] to approve a project of this scope without first examining the effects that may occur as a result of the reasonably foreseeable increase in coal consumption" and combustion. Mid States Coalition for Progress v. Surface Transportation Board, 2003 WL 22251298 (8th Cir. 2003). Accordingly, all impacts related to the coal plants must be considered as part of the EIS for this project.
- The Western's Notice of Intent to Prepare an EIS, published August 2, 2006 (71 FR 43733), mentions only the construction, operation and maintenance of approximately 1,000 miles of high voltage transmission lines, access roads, and other facilities" and " "four new substations; expansion of approximately eight existing substations; and installing fiber optic communications system for transmission lines". Conspicuously absent from the scoping notice is any specific identification of the construction of three new coal fired power plant units that will be the source of the electricity to be carried by the proposed transmission lines and facilities. These new coal plants are being proposed by Tri-State and its partners in Holcomb, Kansas and southeastern Colorado. These three new pulverized coal plants account for approximately 2,100 MW of new coal fired electricity that will be transmitted by the EPTP. These three new coal units must be considered when assessing the direct, connected, and cumulative impacts of Western's proposed action. See, 40 C.F.R. 1508.25(a)(1) & 1508(a)(2). See also, Mid States Coalition for Progress v. Surface Transportation Board, 2003 WL 22251298 (8th Cir. 2003).
- Then three miles south of Sharon Springs it is a conglomeration of already exiting transmission limes and underground public and private gas lines, city water line, domestic water lines and crude oil lines. There is an existing above ground right of way contract on these crude oil lines that prohibit the building of any permanent structure on the right of way. The other lines also must be avoided to provide access to any necessary repairs.
- There is a private owned gas line that runs from the southwest corner to the east for about a mile before cutting off to the south. The city water line runs along the south edge of the property for about a half mile. There is a domestic water line across the south west one third that runs on a diagonal from northwest to southeast. There is a domestic water line that runs diagonal across the properly from southwest to southeast for about a mile and a half. There is also several buried irrigation pipe lines on the middle and west half. There our three irrigation wells over 200 feet deep on the property not including the farmstead. There is a sand pit in the pasture. There are two residences on the east one half and a third resident adjacent to the north. There is another residence across the road west of our property.

Cumulative Effects

- There is also a proposed relocation of some parts of Highway 27 just south of Sharon Springs and widening of the highway to the Greeley county line to take place as soon as Sherman county is finished.
- There is currently a high voltage line about 3/4 mile from us which was there already. We obviously accept that. We went to a meeting about the new proposal and suggested the new one run with the old one which has been there for 35+ years.
- Us landowners east of that line have had to contend with poles for probably 50 years. I would hate to see our problems compounded with a second line parallel to the current line on the east side of it.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: [E]nvironmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: [H]istoric and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Energy requirements and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. We already have powerlines owned by Xcel going through our land which makes the land harder to farm and less attractive for residential development in the future. More lines, such as this, will hurt future development of the land. Please keep it as far away from our land as far as possible. T4S R59 W s/2 1/4 6 -S 1/2 Sec. 5 N 1/2 Sec 8 n4 of sections 7 & 18. We are suggesting two alternate routes that will cause a minor re-routing of your proposed powerline (See map.) One takes your line father east, out of immediate view of the 1-25 corridor, along the route Xcel is proposing for their powerline across ("our") State land. The other route follows the existing powerlines just south of the El Paso County line and then west and north to the Midway Station. Either of these alternate routes are not the 'best case' for us but they would eliminate interference with our ranching operations, somewhat reduce visibility from the 1-25 corridor, lesson intrusion into potential recreational areas and not proscribe any ecologically sustainable development that may be possible in the future. You have proposed A3 and B7 that will affect my land. Excel already has put a 345 kv line 1/8 mile from my house. I have the noise, tv interference, visual effect, and have to farm around it. If you put in your A3 and B7 lines, I would have 3 larger power lines in a 3 mile area. Everyone should share the burden of these ugly lines covering my open spaces. The B7 line is my biggest concern. It would make my house sit between 2 larger power lines 1 mile apart.

Electrical Characteristics

- static electricity causes fences to be hot.
- A good portion of the cultivated fields south of Sharon Springs now use ground spray rigs, some with 90' booms. Manuvering a spray rig with a 90' boom down a field avoiding transmissions lines can be dangerous.
- An issue that must be addressed is the safety of humans and livestock near the high voltage line. A known factor is alternating voltage current induces a field about a wire that builds and collapses alternately at the rate of 60 cycles/second. This field will induce a voltage charge in a wire located within the field, a pasture fence, irrigation pipe or any metallic conductor, which then can kill or damage anything touching it. This has already been experienced with the existing lines.
- Auto steering. Powe [sic] lines, GPS. What effect. GPS
- Distances to low points of sag, can power be turned on and off
- Effects of high voltage lines

Electrical Characteristics

- Electromagnetic effects
- EMF
- He also asked about a regular three strand barbed wire fence on metal fence posts under a transmission line. He has seen these fences that shocked people.
- He asked if a GPS unit on his tractor would be affected by the new lines. I (Robert Pearson) said I didn't think so since they operate on a much different frequency. He said he is aware of another farmer who has had difficulty in using GPS near another transmission line (possibly due to difficulty in acquiring the satellite signals under the overhead metal conductors.)
- He stated concern about cattle drinking from stock tanks under the line. I (Robert Pearson) said if they are drinking from a pond or a metal tank the water should be adequately grounded. He asked about a concrete tank. I said that it may have to be grounded to prevent shocks to any livestock drinking from them.
- High voltage causes abortion in cows
- How does this effect our local distribution system
- How will power lines affect large metal buildings housing hogs?
- I have heard from farmers that even single wire electric fences under even a 115kV line can cause problems. A 345kV line is worse. What about a 500kV line?
- If the lines go over spring, pond, or watering systems for livestock what problem ar(e) caused?
- Is there documentation that the public health and the environment will not be harmed by EMF's and noise from the proposed lines?
- It also seems and was pondered that the new line could be upgraded to carry the existing as well as the new voltage. Seems that would be more cost-effective also. I guess I should add that at the meeting the proposed lines would not cross our property, we just hope to keep it from doing so.
- My business band 2-way radios already have limited use beside Excel 345 kv line.
- Place along existing section lines and county roads, this should enable pole spacings to work for either ¼ mile sprinklers and ½ mile sprinklers.
- Please consider impacts to human health, wildlife, and domestic animals caused by electromagnetic forces created by the proposed transmission lines.
- Static electricity or stray voltage causing safety or electrical control problems
- The inconvenience plus the out right danger is evident.
- The lines will run next to our hog farms. We are concerned about stray voltage and the effects on hog production.
- This line would come much to close for comfort to three residences. I have great concern living this close to transmission lines.
- What does the line do to GPS system on the farm equipment
- what does this system do
- What size will this transmission line be? (230 kV, 345 kV, 500 kV, etc.)?

Environmental Justice

- Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," signed in 1994, applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the EIS should disclose and evaluate any environmental justice aspects associated with impacts on rural low-income communities by either the proposed project, or the potential build-out for reasonably foreseeable development analysis. If there are no applicable environmental justice considerations, then that should be disclosed. EPA recommends close coordination with any potentially impacted Native American tribes.

Environmental Justice

- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.
- If the transmission plans as presented are followed, Baca County will be the only county in the entire southeastern Colorado to not be included in the transmission project. This leaves Baca County, who coincidently has some of the best wind in the US, with no chance to help improve the socioeconomics of their county, thus also helping to create more low income households. f the transmission plans as presented are followed, Baca County will be the only county in the entire southeastern Colorado to not be included in the transmission project. This leaves Baca county, who coincidently has some of the best wind in the US, with no chance to help improve the socioeconomics of their county, thus also helping to create more low income households
- Impact on rural versus urban areas
- Please address future projects in the area and the effect the Project may or may not have on those developments.
- Please assess the economic burden of medical costs and lost productivity on the members of all impacted communities.
- Please collect and consider all information related to consumption patterns of fish and wildlife within the impact zone(s) of the project.
- Please conduct and make public a detailed report of environmental and cultural impacts from the point of view of the communities in the immediate vicinity and within an 80 mile radius of the proposed plant locations.
- Please conduct epidemiological and clinical studies and other environmental human health analyses related to cumulative and synergistic exposure to all hazardous and criteria pollutants emitted from the proposed coal plants.
- Please consider traditional and historic land use patterns.
- Please make a factual finding that the following communities do or do not fit the definition of an environmental justice community: Holcomb; Garden City; Lamar; Las Animas; La Junta; Pueblo; and any other affected community not listed here.
- Please make a factual finding that the Project and related coal plants will or will not have a disproportionately high and adverse human health or environmental effects on minority and low income populations.
- Please make independent experts available to the communities and other interested entities for review of permit applications, technical reports, and other project requirements and components.
- Please provide public training on the permitting and NEPA process to all communities designated as environmental justice communities.
- Please use health-based statistics in permit evaluation.
- Some of you guys are going to make a lot of money on this and kill the little guys like us.
- Would this produce more households with low-income status.

Fiber-optic Cable

- I continue to wish, however, that a pilot project (fiber optic cable instead of powerlines) might be initiated perhaps in southern Colorado or specifically Las Animas county which might test this potential
- It appears from the NOI that this EIS and associated NEPA documentation will be used to address CWA Section 404(b)(l) Guidelines compliance. All wetlands and waters of the U.S. (e.g., streams, rivers, lakes) that would be crossed or otherwise impacted by the proposal should be identified. This should include the identification of “farmed wetlands” and “prior converted wetlands.” Impacts to these resources should be thoroughly identified and discussed. This may include, but should not be limited to, a characterization of their existing conditions, and the identification and assessment of the direct, indirect and cumulative impacts to water quality/quantity, aquatic organisms and habitat. Details regarding the widths of proposed stream and river crossings and how the crossings will be accomplished should be identified and discussed. Where feasible, we recommend the use of low impact construction methods for all water crossings, including their associated floodplains, wetlands and forest lands. Where feasible, we recommend the use of directional drilling for all water crossings and their associated floodplains, wetlands and forest lands, for burying of the fiber optic cable.

Floodplains and Wetlands

- Proposed mitigation that will be taken to minimize or eliminate adverse impacts should be presented. EPA recommends close, and early, coordination with the U.S. Fish and Wildlife Service on these and all other wildlife-related issues. Concerning the Greater Sage-grouse, please detail the project's adherence to BLM’s "National Sage-Grouse Habitat Conservation Strategy" - November 2004, and the States' own criteria. As a minimum, the mitigation plans detailed in the EIS should be in compliance with those requirements. Generally, to effectively lessen impact to some wildlife, it may be necessary to provide additional "buffer zones" around the specific critical areas. For example, a recent study done at University of Wyoming indicates decline in breeding males at leks located within approximately 3 miles of drilling rigs in the Pinedale Anticline and Jonah natural gas fields in western Wyoming. Please provide additional information on where and how much buffer zone will be provided, as applicable. The EIS evaluations should include the above issues, among other area specific concerns, and detail mitigation steps that will be taken to minimize or eliminate adverse impacts. There may also be concerns related to the loss of upland resources associated with pipeline and associated facilities construction. An inventory of any high quality or locally and regionally rare habitats or plant communities, such as remnant prairie, should be included in the documentation. This would also include forested or treed areas. A description and the aerial extent of each site should be presented in the inventory. These resources should be avoided, if possible. If they can not be reasonably avoided then mitigation for their loss should be identified. We recommend replacement trees be planted to offset any unavoidable tree loss. We generally recommend that native saplings be used, if practicable, at a minimum ration of 1:1. In general, replacement trees should be planted close to where the loss occurred. However, mitigation might also include assisting county, state, or federal agencies with any ongoing or planned forest or tree reclamation projects in the watersheds affected. We recommend that the proponents commit to voluntary tree mitigation, if applicable, in the EIS and provide, as detailed as possible, a conceptual mitigation plan that compensates for any unavoidable tree loss. Equipment and materials should not be placed or stored in any environmentally sensitive areas. Where possible, excavation should be done from non-sensitive areas. Site preparation and construction activities should be timed to avoid disturbing plants and animals during crucial seasons in their life cycle. The specific BMPs that will be utilized for the Eastern Plains project should be identified in the EIS

Floodplains and Wetlands

- A wetlands mitigation plan should be provided with the EIS. Due to the time it can take to adequately reclaim some disturbed wetlands, it is suggested that Western require mitigation of wetland disturbance during the project operating time, and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance, or even prior to project construction, if possible. As studies indicate that traditional mitigation is generally not successful in fully restoring wetland function, it is suggested that Western require a two-to-one mitigation of wetland disturbance. Mitigation requirements under 40 CFR Section 230 address the replacement of the wetland functions and values that are unavoidably lost, and any additional DOE, State and local mitigation requirements should be adhered to. The mitigation plan should include, but not be limited to: commitments to acquire and start mitigation work prior to project construction; detailed schedules of pipeline and wetland creation/restoration work; detailed construction plans; a detailed mitigation monitoring plan, including a time table; detailed performance criteria to measure success; detailed specifications and commitments for corrective measures to be taken if performance criteria are not met; detailed specifications and commitments to control invasive species; and, commitments to the establishment of a protection and management plan in perpetuity (i.e., legal surveys of the specific boundaries with buffers and conservation easements that are given to a land conservancy organization) for all mitigation areas.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider impacts to existing wells, springs, wetlands, wildlife, etc., including a detailed mitigation plan that includes avoidance as a mitigation strategy. Please make that information public as it becomes available.
- Another concern that will need additional review once the final routes are defined, are the locations of ground disturbances in respect to the Designated Critical Habitat of the state-threatened Green Toad (Bufo debilis) and the federal threatened Topeka shiner (Notropis topeka). Disturbance of these species will be temporary and will be limited to on-the-ground construction and placement of the fiber optic regeneration facilities.
- Because this project may take water from wetlands, springs, seeps and streams to use for power plant cooling, please analyze the impacts of losing these ecological resources. Please also go beyond determining the effects of development on flows, fluxes and water levels to translating these effects into declines to the biotic components in the environment.
- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- EPA encourages the use of a NEPA/404 permit merger process for this proposal and recommends concurrence points between BLM, the Corps and the resource agencies on (1) purpose and need, (2) alternatives and alternatives analysis,
- (3) preferred alternative and mitigation measures to be implemented. EPA recommends that the EIS address specific requirements to: Maintain physical integrity of aquatic ecosystems; Assure an amount and distribution of woody debris sufficient to sustain physical and biological complexity; Assure adequate summer and winter thermal regulation; Assure appropriate amounts and distributions of source habitats for riparian- or wetland-dependent species; Restore or maintain water quality and hydrologic processes; and, Restore or maintain naturally functioning riparian vegetation communities.
- If mitigation cannot be performed within the same watersheds where wetland impacts occur, and mitigation banking is proposed as an option, then details on mitigation bank(s), or other similar compensation programs, should be included in the EIS. This information should include, but not be limited to, the location of the mitigation bank(s) and the respective service area(s), description of the bank's landscape setting (geomorphology), water source(s), vegetative structure and composition, identification of the bank owner, total acreage to be purchased, the amount of each type of wetland to be purchased, and the amount of each wetland type available, cost, and an explanation of how the functions and values of the wetlands lost are replaced by the proposed mitigation.

Floodplains and Wetlands

- Impact to wetland and riparian areas, and other waters of the U.S. will occur for this project. Executive Order 1 1990, "Protection of Wetlands," signed in 1978 and amended in 1988, addresses potential long and short-term adverse impacts associated with the destruction or modification of wetlands. In addition, the national wetlands policy has established an interim goal of "No Overall Net Loss of the Nation's Remaining Wetlands" and a long-term goal of increasing quantity/quality of the Nation's wetlands resource base. ("Presidential Wetland Policy of 1993" website: http://www.usace.army.mil/inet/functions/cw/cecwo/reg/aug93w et.htm). In accordance with the intent of the order and national policy, EPA suggests a mitigation commitment that indirect draining of, or direct disturbance of, wetland areas will be avoided if at all possible, and a commitment to replace in kind such unavoidably impacted wetlands. EPA also suggests that Western require complete avoidance of disturbance to any fen wetland (a Category I resource). The EIS should consider a variety of means to protect wetlands and riparian areas, especially those areas with perennial streams which also serve as water supply for area communities. In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- It appears from the NOI that this EIS and associated NEPA documentation will be used to address CWA Section 404(b)(l) Guidelines compliance. All wetlands and waters of the U.S. (e.g., streams, rivers, lakes) that would be crossed or otherwise impacted by the proposal should be identified. This should include the identification of "farmed wetlands" and "prior converted wetlands." Impacts to these resources should be thoroughly identified and discussed. This may include, but should not be limited to, a characterization of their existing conditions, and the identification and assessment of the direct, indirect and cumulative impacts to water quality/quantity, aquatic organisms and habitat. Details regarding the widths of proposed stream and river crossings and how the crossings will be accomplished should be identified and discussed. Where feasible, we recommend the use of low impact construction methods for all water crossings, including their associated floodplains, wetlands and forest lands. Where feasible, we recommend the use of directional drilling for all water crossings and their associated floodplains, wetlands and forest lands, for burying of the fiber optic cable.
- Placement of these facilities and roads will also need to avoid ephemeral wetlands known as playa lakes which are important stopover points for migrating waterfowl and shorebirds. These concerns will need to be addressed as the project progresses and routes are selected and may warrant an Action Permit from this department in the future.
- Please consider impacts to wetland and riparian vegetation from decreased water and increased air emissions.
- The appropriate area of consideration and the time frame to use when assessing cumulative impacts will vary for each resource under consideration. For example, forested wetland loss is probably best considered in the context of historical forested wetland losses in a particular watershed. Incremental forested wetland losses due to past, present, and reasonably foreseeable future actions when viewed in a cumulative context may result in a significant impact due to the time it takes to replicate a forested wetland. Consequently, impacts to a forested wetland resource, no matter how small for a particular proposal, may be significant. This would dictate that all efforts be made to avoid and minimize impacts to forested wetlands, and require adequate mitigation for any unavoidable loss.
- The effects of the Eastern Plains project activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the EIS. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth jeopardizing reclamation efforts or post-project land use; any adverse impacts to Federal/State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or Wetlands and Riparian Zones. Important wildlife issues include: compliance with Federal or State game and fish wildlife management objectives; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, BLM sensitive wildlife or fish species, or other State-listed species. Potential impacts to the above that may occur in the project area should be identified and discussed.

Floodplains and Wetlands

- The transmission line already in place near County Road C is the better choice as it only crosses Adobe Creek. A line near County Road J would have to cross two branches of Adobe Creek plus Mustang Creek, Sand Arroyo Creek, and John Creek which all run into adobe creek.
- We encourage Western to require delineation and marking of perennial seeps and springs and wetlands on maps and on the ground before activity development so industry employees will be able to avoid them. We recommend establishment of wetland and riparian habitat buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. We recommend a 100-foot buffer of native vegetation be provided around each mitigation site to help enhance wildlife habitat and protect the site from sediment buildup that could result from land use practices immediately outside the buffer area. If stream bank disturbances result, then we suggest stabilizing stream banks using soil bioengineering techniques.
- While wetland enhancement can be a valuable means of providing compensatory mitigation, EPA does not consider enhancement to have occurred unless a suite of wetland functions have been enhanced (rather than only one). Wetland restoration is preferred to wetland creation or enhancement because it has a higher rate of success. Regardless of the mitigation option chosen, it is critical to establish baseline conditions for the proposed mitigation site, and to develop quantitative success criteria based on local reference wetland conditions.

Generation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Construction, in a Western State, of an Integrated Coal Gasification Combined Cycle Generating Station With Carbon Dioxide Capture as an Alternative to Constructing any New Coal-Powered Generating Station. In light of the climate impact discussed above, we request that Western include the following two alternatives among those considered in the EIS: (1) a coal-fueled, integrated gasification combined cycle (IGCC) power plant with CCS in a Western State not Holcomb, Kansas, and (2) a coal-fueled IGCC power plant without CCS in a Western State not Holcomb, Kansas. An IGCC plant with CCS would emit none of the greenhouse gas, carbon dioxide, and would stimulate the use of IGCC and CCS at other new coal-fueled power plants. An IGCC plant without CCS at least could be retrofit with CCS later at much lower cost than a conventional coal combustion plant could, and it would stimulate the use of IGCC at other new coal-fueled plants. Reports prepared for the U.S. Department of Energy (DOE) indicate that a new coal-fueled IGCC power plant with CCS could well be feasible and profitable in the region and market that includes the proposed site of Tri-State's power station. See, e.g., Albert A. Herman, Jr., et al., Power Generation for California with CO2 Removed for Use in Enhanced Oil Recovery, Parsons Report No. EJ2002-10 (Oct. 2002) (prepared for DOE National Energy Technology Laboratory) (Enclosure 4); Patricia A. Rawls, et al., The Financial Prospects for a Coal-Based IGCC Plant with Carbon Capture Serving California, Paper 4A6 of the Third Annual DOE-NETL Carbon Capture and Sequestration Confab (May 2004) (Enclosure 5). The largest producer of coal-generated electricity in the United States, American Electric Power (AEP), recently testified that the net costs of an IGCC plant are "similar to a pulverized coal unit" when the option value of carbon capture and sequestration is factored in. Direct Testimony of Michael J. Mudd, AEP Program Manager of Technology Development (May 5, 2005), Public Utilities Commission of Ohio Case No. 05-376-EL-UNC (Enclosure 6) at 20. AEP further testified that IGCC is the "superior choice" from an economic standpoint when one considers "fuel flexibility, by-products and product flexibility, as well as furthering the commercialization and lowering the long run costs of the technology for future IGCC applications." Id. At 22. In fact, several IGCC plants are being proposed in the western United States, including by Xcel Energy in Colorado, by Southwestern Power in Bowie, Arizona, by Basin Electric in South Dakota, and by Northwest Energy in Washington state. The air agencies of at least eleven states have concluded that IGCC is an available method for controlling air pollution from coal-fueled power plants. Letter from the New Mexico Environment Department (NMED) to Mustang Energy Corporation (Aug. 29, 2003); Letter from NMED to Mustang Energy Corporation (Dec. 23, 2002); Amicus Brief of Northeast States for Coordinated Air Use Management (Nov. 30, 2004); Findings of Fact, Conclusions of Law, and Order in the Matter of the Air Quality Permit for the Roundup Power Project, Case No. 2003-04 AQ, Board of Environmental Review of the State of Montana (issued June 11, 2003 and approved June 23, 2003); Letter from Illinois Environmental Protection Agency to U.S. Environmental Protection Agency, Region 5 (Mar. 19, 2003); Letter from Illinois Division of Air Pollution Control to Indeck-Elwood, LLC (Mar. 8, 2003); Letter from NMED to U.S. Environmental Protection Agency, Region 9 (Oct. 8, 2004). Even the National Coal Council, a federal advisory committee reporting to the U.S. Secretary of Energy, agrees that IGCC "has become a viable, commercially available technology." National Coal Council, Increasing Electricity Availability from Coal-Fired Generation in the Near Term (May 2001). Moreover, two of the largest power producers in the United States have announced that they will begin operating new coal-fueled IGCC power plants in the United States by the time Tri-State could begin operating a power station in Kansas or Colorado. Kate McCann, "AEP Plans to Build 'Clean Coal' Plant," Associated Press (Sept. 1, 2004); CINERGY, Air Issues Report to Stakeholders (Dec. 1. 2004), at 2 (available at http://www.cinergy.com/pdfs/AIRS_12012004_final.pdf). These authorities are more than adequate to demonstrate that a coal-fueled IGCC power plant with CCS and a coal-fueled IGCC plant without CCS in other portions of the West are "reasonable courses of actions" that must be considered in the EIS for Tri-State's proposed coal plants. 40 C.F.R. § 1508.25(b)(2).

Generation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Increased Generation of Electricity from Natural Gas as an Alternative to Constructing any New Coal-Powered Generating Station. The Department of Energy indicates that 900 of the next 1000 power plants will use natural gas readily available to end-users through the existing utility infrastructure. See <http://www.doe.gov/engine/content.do?BT_CODE=NATURAL GAS>. Through LNG imports and other relatively abundant local reserves, the world availability of natural gas in 2003 was approximately 60 times the volume of gas consumed in the same year. Liquefied Natural Gas (LNG), Natural Gas Facts, U.S. Department of Energy, Office of Fossil Energy, National Energy Technology Laboratory. Natural gas is clean burning, emitting fewer pollutants than other fossil fuels, especially coal. According to the Energy Information Administration of the Department of Energy, natural gas power generation provides emissions at approximately 50% the level of coal for carbon dioxide, 20% for both carbon monoxide and nitrogen oxides, 0.03% for sulfur dioxide, and 0.25% for particulates. Similarly, natural gas emits negligible quantities of mercury compared to coal usage. Natural Gas 1998: Issues and Trends, April 1999, Energy Information Administration, Office of Oil and Gas, U.S. Department of Energy. Interest in limiting carbon emissions may further shift focus onto natural gas. The Energy Information Administration identified natural gas as "projected to play a large role in meeting targets associated with the reduction of greenhouse gases." Id. At 2. The increase in use of natural gas in the electric utility sector is attributed largely to lower capital costs and shorter construction lead times than conventional coal-fired plants. Id. Similarly, the natural gas production, transmission, and distribution network provides quality and flexibility of service. Id. Recent booms in pipeline expansion continue to increase the interconnectivity of the grid, and companies continue to file applications for pipeline expansions with the Federal Energy Regulatory Commission with at least six new LNG or pipeline expansion projects in California, Nevada, Arizona, and Utah alone presently in various stages of certification. See Projects Near You available at <http://www.ferc.gov/forcitizens/projectsearch/SearchProjects.aspx?Region=Southwest >. Western should evaluate existing, proposed, and possible gas-fired electric generating plants contracted to take capacity from these and other pipes in the western states in analyzing this alternative. Please rigorously explore and objectively evaluate all other reasonable and viable natural gas alternatives to the coal plants proposed by Tri-State.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Neither the Western's August 2, 2006 "Notice of Intent" nor the materials made available at the public scoping meetings identified any air pollution control measures that Tri-State has committed to implement at its proposed power stations. It is thus impossible, at this stage, for any member of the public to identify the appropriate air pollution mitigation measures that are "not already included in the proposed action." 40 C.F.R. § 1502.14(f). To the extent, however, that Tri-State does not propose to implement the following mitigation measures, all of which are feasible at its proposed power stations, we request that Western include them as "appropriate mitigation measures" in the EIS: continuous operation, all year, of those add-on pollution control devices that Tri-State proposes to implement; activated carbon injection, operated continuously and all year; fabric filters with FGD control, operated continuously and all year; circulating dry scrubbers, operated continuously and all year; and circulating fluidized bed technology.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please analyze any proposed use of Adaptive Resource Management (ARM).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether any mercury control credits under the new EPA mercury rule will be used as an alternative to controlling mercury emissions. If yes, please consider the level of credits to be purchased.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether Tri-State is willing to accept the same BACT limits proposed for the Desert Rock, NM coal plant project.

Generation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please attach environmental health funds to permits and/or otherwise make funding available to all communities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternate transportation routes for all hazardous materials to avoid populated areas.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative disposal site(s) for ash and alternative modes of transportation to the disposal site(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative disposal site(s) for scrubber wastes and alternative modes of transportation to the disposal site(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative sites and/or energy generation options and provide all documentation of Western consideration of those alternatives in the EIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider impacts to existing wells, springs, wetlands, wildlife, etc., including a detailed mitigation plan that includes avoidance as a mitigation strategy. Please make that information public as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider measures for protecting water at the source for use by wildlife.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider proposed and alternate plans to prevent interference with wildlife migration routes.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider proposed and alternative water consumption rates and amounts and include an analysis of proposed and alternative recycling methods.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the applicant to guarantee maintenance schedules of the additional infrastructure requirements through commitment to a mitigation fund for resurfacing and repair of local roads from damage by heavy vehicles serving the project.

Generation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the construction of an overpass of the rail tracks to allow local traffic to pass when trains are on the track.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the amount of mercury per year to be emitted into the air and the amount of mercury to remain as residual in fly ash or other plant waste material. Please consider the applicant's proposed disposal method and all viable alternative disposal methods. Please consider the applicant's proposed disposal location(s) and alternative location(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the applicant's proposed mercury emission control technology to be used in the plant and all viable alternative mercury emission control technologies.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the pollution controls that would be used at each plant and their inlet and outlet emission levels in lb/hr or lb/MMBtu for each pollution control device.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the proposed BACT limits for Nox, SO2, PM/PM10, sulfuric acid mist, and fluorides for the PC boilers including the proposed emission rates and the associated averaging time, e.g., 0.06 lb/MMBtu Nox based on a 24-hour average.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the type of drift eliminators on cooling towers that will be used and evaluate their drift efficiency.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the use of coal washing to minimize SO2, PM/PM10 emissions, and HAP emissions.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider Tri-State's proposed methods that will be used to control dust from storage piles, conveyors, crushers, pulverizers, and storage bins and their control efficiency?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether any pretreatment of water will be required before it is used at the plants.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether the proposed control equipment design includes bypasses of the pollution control system, and, if so, under what conditions bypass will occur.

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- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consult with the State Historic Preservation Officer and any Indian Tribe ascribing historic and traditional affiliation to the region regarding mitigation of impacts to significant historic properties.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine by what percentage mercury is to be controlled, including the basis for this value (i.e., pollution control train proposed for criteria pollutants, or are you adding carbon injections or other mercury specific control). Please specify all mercury control.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project triggers MACT? If so, please determine which constituents and what MACT controls apply. If not, please analyze and provide the supporting HAP emission calculations?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project will require emission offsets. If yes, please determine the source of the offsets.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop a detailed maintenance schedule for the project and associated facilities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop detailed traffic control plans on local roads during construction and operation of the project. Please consider requiring the applicant to carry all cost of any local infrastructure development related to the project, e.g., curb upgrades, additional parking, additional traffic controls, additional sidewalks, and additional lanes.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop extensive and detailed emergency management plan(s) including the amount of fuel that will be used for emergency engines, e.g., fire water pumps, emergency generators, and fuel sulfur content and any requisite air emission permits for those sources. Please include responsibility assignments for clean up efforts and inspection and oversight.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to control the cancer and noncancer health impacts from emissions and discharge.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to manage wilderness study areas so as to ensure they retain wilderness characteristics.

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- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to prevent significant deterioration of air quality in the vicinity of the plant.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop precautionary measures to keep birds safe from the evaporation pond(s) and all other facilities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop specific measures to minimize Legionella outbreaks from cooling tower emissions.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please include measures to keep wildlife away from waste ponds, disposal sites, other relevant plant operation facilities, and throughout all project construction activities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide all supporting documentation to substantiate Tri-State's claim that the Kansas and Colorado coal plants will use state-of-the-art emission control technologies.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide for a staffed complaint hotline to address neighborhood problems, e.g., noise, odor, dust, traffic, vibration, and a plan to resolve any identified problems.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide plans to assist local agencies with infrastructure issues related to the work force of the project construction and plant operation, e.g., water, sewerage, fire fighting, hospitals, schools, roads, etc. Please include cost estimates associated with these infrastructure additions or estimates of those infrastructure addition requirements.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require adjudication of all water rights prior to issuance of DEIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require an air quality permit to construct and a permit to operate prior to issuance of the DEIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require site fencing and make public the plot plan showing the fenced boundary as it becomes available.

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- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require the development of a Risk Management Plan that evaluates worst case scenarios and responses for environmental accidents and make that information public as soon as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. With respect to the coal that will be burned at the plants, if it is to be Powder River Basin coal, then: Please indicate what specific dust control measures will be used to account for the high friability of this coal; Please consider whether the project will conduct dust control audit(s) to assess the performance of dust collection and provide the designs for the dust control audit(s) as they become available; Please consider whether the project will develop measures to prevent explosions and fires as have been experienced by other plants using PRB coal such as the explosion at the Sooner Power Plant on 2/16/04; Please consider whether the project will include a permanent wash down system in the plant design and make public that design and the amount of water the system will use annually; Please evaluate the number of access ports contained in the applicant's present design plan and the levels at which these access ports will be installed; Please consider whether the plant's coal handling facilities will use CO, Thermal and Infrared scanning monitoring equipment and provide the plans for such monitoring equipment; Please evaluate Fire Hazard Mitigation systems inside bunkers or silos, and provide the plans for such systems.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Development of Renewable Sources of Energy for Electricity Generation Combined With More Efficient Electricity Use as an Alternative to Constructing any Large New Fossil Fuel-Powered Generating Station. To the extent additional generating capacity is a definite need for the identified end-users including customers of Western, the demand can also be partially met by implementing energy efficiency programs in the contracted markets for this electricity. Additionally, energy efficiency has minimal additional environmental impacts. A specific demand analysis incorporating end-use energy efficiency improvements and use of combined heat and power should be conducted in those markets where the power is to be sold. In addition, there is great potential for development of renewable sources of energy as an alternative to Tri-State's three proposed coal plants. These alternative energy sources include wind, solar, and biomass. Please consider each of these alternatives resources in your analysis of alternatives to the three proposed coal plants.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. No action. In its Notice of Intent to Prepare EIS (71 FR 43733, 34), Western states that "[u]nder the no action alternative, Western would not participate in the Project." The Coalition is concerned that this incorrect statement presumes that the Project will proceed regardless of Western's participation and thus the "no action alternative" will have the same impacts as full construction and implementation of the proposed Project. Western admits that its actions include "construction planning and management for approximately 1,000 miles of high voltage transmission lines, and acquiring rights-of-way for transmission lines, access roads, and other facilities…the Project [also] includes four new substations; expansions of approximately eight existing substations; and installing fiber optic communications system for transmission lines." 71 FR 43733, 34. Thus, the proper baseline for the "no action alternative" is that these facilities are never constructed. As such, not constructing the Project would therefore represent the least harmful alternative. If Western does not analyze the "no Project construction alternative", there will be no basis in the administrative record for concluding the Project's impacts are appropriate or necessary. The Coalition considers the Project to include all impacts associated with Tri-State's three proposed coal plants that will be serviced by the EPTP. Consequently, please conduct the requisite analyses and consider the no action alternative described herein in the EIS.
- Alternatives to coal power
- Although Hydro has wet years and dry years. Even in dry years Hydro can peak generate at any appropriate time (peak dispatchable power).
- An Xcel VIP is quoted in testimony before a US Senate committee several weeks ago that Xcel has had to spend an additional "tens of millions of dollars" to replace coal because of not enough track from Powder River basin to transport their coal supply. What will Tri-State do about the track problem? How much will that increase costs? Who pays? What will be used to replace coal? Who will pay for new tracks? Are their enough coal cars available?

Generation

- Another human health issue arises along the entire route the train runs as emissions from the engines will be released into the air.
- Bad idea, not thought out, no regard to reducing CO2 emissions
- Because this project may take water from wetlands, springs, seeps and streams to use for power plant cooling, please analyze the impacts of losing these ecological resources. Please also go beyond determining the effects of development on flows, fluxes and water levels to translating these effects into declines to the biotic components in the environment.
- Cost of wind vs. coal. Pollution thru coal lifecycle. Pollution from wind vs. coal. Socioeconomic benefits of wind vs. coal.
- Efficiency of long-distance transmission of electricity vs. local, decentralized electricity generation
- For consumption of air quality increments, please assess the amount of any Class II PSD (Prevention of Significant Deterioration) increment and the amount of any Class I increment – for any pollutant and for any area – that emissions resulting directly or indirectly from each option would consume.
- For consumption of air quality increments, please perform an additional, cumulative version of this assessment that accounts for the existing emissions and the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For decreased visibility in scenic areas, please assess the ten highest hourly visibility degradations, the ten highest daily visibility degradations, and the average annual visibility degradation that pollutant emissions resulting directly or indirectly from each option would cause (1) within a ten-mile radius of the facilities, (2) in each Class I area containing land that lies within 300 kilometers of the facilities, and (3) in each Class II area containing land that lies within 300 kilometers of the facilities.
- For decreased visibility in scenic areas, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For each unit of the proposed coal plants, please ensure, consider the impacts of, and make the information public regarding: the megawatt size of each unit; the number of units to be constructed; the summer and winter megawatt rating of each; the type of burner technology to be used in each unit; and the type of emission controls to be used by each unit.
- For harm to crops and to threatened or endangered species, please also assess the harm that air pollutant emissions resulting directly and indirectly from each option would inflict or cause to be inflicted on any populations of any threatened or endangered species of plant or animal.
- For harm to crops and to threatened or endangered species, please assess the harm, in terms of the aggregate of lost value-per-year and remediation cost-per-year, that air pollutant emissions resulting directly or indirectly from each option would inflict or cause to be inflicted on crops and cultivated soil within 500 miles of each power plant.
- For harm to crops and to threatened or endangered species, please perform additional, cumulative versions of these assessments that account for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased concentrations of various air pollutants, please assess the amount by which each option would directly or indirectly increase the concentration, in the ambient air, of each hazardous air pollutant, each criteria air pollutant (including the impact of criteria air pollutant precursors) in (1) each county in Kansas and Colorado, (2) each nonattainment, maintenance, or unclassifiable area in the Western half of the United States, and (3) each Class I area in the Western half of the United States.
- For increased concentrations of various air pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.

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- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. For increased deposition of various pollutants, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased emissions of various air pollutants, please assess both the amount by which each option would directly increase those emissions and the amount by which each option would indirectly increase those emissions. Ways in which an option may indirectly increase emissions include, but are not limited to, (1) necessitating the construction and operation of ancillary air pollution sources and (2) stimulating the construction and operation of new air pollution sources.
- For increased emissions of various air pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would increase the emissions of each hazardous air pollutant, each criteria air pollutant, and each criteria air pollutant precursor from all aspects of the Project, including from the proposed coal plants.
- For increased incidence of human disease and other impairment, please assess the number-per-year by which air pollutant emissions resulting directly or indirectly from each option would increase the incidence of negative human health impacts – including asthma attacks, missed school or work days, emergency room visits, hospital admissions, cancer cases, heart attacks, and premature deaths – within (1) five miles of the facilities, (2) fifty miles of the facilities, (3) 100 miles of the facilities, and (4) 500 miles of the facilities.
- For increased incidence of human disease and other impairment, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased incidence of human disease and other impairment, please provide separate counts for (1) all humans, (2) children, and (3) humans aged sixty-five years and over. For increased toxicity of fish eaten by humans, please assess the amount by which air pollutant emissions resulting directly or indirectly from each option would directly or indirectly increase the concentrations of various toxic chemicals, including mercury and dioxin, in the flesh of freshwater fish caught and eaten by humans within 500 miles of each facility.
- For increased toxicity of fish eaten by humans, please compare the resulting toxicity levels with the levels identified in federal and state health advisories.
- For increased toxicity of fish eaten by humans, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please assess – notwithstanding the assessment of PSD increment consumption – the extent to which emissions resulting directly or indirectly from each option would interfere with any area's maintenance of – or progress toward attaining – any national ambient air quality standard.
- For interference with attainment or maintenance of National Ambient Air Quality Standards, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.

Generation

- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: Please add representative background concentrations to the modeling results in NAAQS analyses. See section 9.2. of 40 C.F.R. part 51, appendix W. Please base any on-site monitoring data used for background concentration on properly sited ambient monitoring systems (pursuant to 40 C.F.R. §58.12) and complete, quality-assured monitoring data (pursuant to 40 C.F.R. §52.21(m)(3) and part 58, appendix B). For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: Please ensure the analyses are based on an adequate and thorough meteorological record pursuant to 40 C.F.R. part 51, appendix W, section 9.3.1. If available, please use one year of on-site meteorological data in any near-field analysis. Please base any on-site meteorological data on monitoring that is consistent with EPA requirements discussed in section 9.3.3. of 40 C.F.R. part 51, appendix W for proper location and operation of the meteorological monitoring system. If adequate on-site meteorological data is not available, then five years of National Weather Service data should be used. (See section 9.3.1.2 of 40 C.F.R. part 51, appendix W). For far-field assessments, at least three years of mesoscale meteorological data or at least five years of National Weather Service data should be used. (See section 9.3.1.2.d. of 40 C.F.R. part 51, appendix W). It is imperative that an adequate record of meteorological data be used to represent worst case meteorological conditions. EPA's guidance indicates that the variability in the model estimates due to meteorology is adequately reduced if at least five years of meteorological data are used. (Section 9.3.1.1. of appendix W, 40 C.F.R. part 51).
- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: The modeling of maximum emission rates (i.e., potential to emit considering federally enforceable controls) of each pollutant to be emitted by the power plant and associated emission sources, as well as from other reasonably foreseeable sources, that could occur over the averaging time of the standard with which compliance is being assessed. For visibility modeling, please model the maximum hourly average emissions and maximum 24-hour average emissions. Further, please model existing sources at the maximum actual emission rates occurring over the averaging time of the standard with which compliance is being assessed. See section 9.1.2. of 40 C.F.R. part 51, appendix W.
- For the coal that will be burned at each proposed coal plant, please ensure data collection and consideration of each of the following and make the information public as it becomes available: tons of coal burned annually by each unit of the plant; type of coal to be burned; heat rate of the coal burned; mercury content of the coal; ash content of the coal; sulfur content of the coal; and content of other impurities including chlorine, fluorine, selenium, and arsenic.
- Global warming is reemerging as a legitimate and urgent concern for everyone, but western Kansas stands on the verge of becoming the largest new source of C02 in the U.S. (according to the US Public Interest Research Group). We all agree that more electrical capacity is needed. However, Sunflower Electric's proposal to expand its facilities would continue to utilize highly polluting coal. Coal-fired generation expels mercury into the atmosphere and would require huge drains on the Ogallala Aquifer. Global warming will have a serious impact on Kansas. Models predict that western Kansas will be subject to increasing drought. Soil moisture levels will decline throughout the state, and crops will require more irrigation water. Groundwater supplies will decline even faster than now. Sunflower will be using a conventional coal burning technology that will make capture of carbon dioxide impractical. This plant will be pouring out greenhouse gases for the next 50 to 75 years. We should consider Wind Power in combination with conventional sources. If coal is to be used, the state of Kansas should require that new technology "scrubbers" be installed to minimize air pollution and a 25 year planned ''phase out" of the facility.

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- Have documentation and modeling been produced and submitted by Tri-State on how many millions of gallons of water per day that additional pulverized coal-produced electricity will use? Have drought and global warming projections been factored re water use? What is the source of the water? What populations, wildlife, and water resources will be affected?
- Have you computer-modeled and documented conservation in lieu of transmitting more power by Western and generating and transmitting more by Tri-State for submission to the appropriate agencies? What were your findings?.
- How much additional haze will result? What and who will it impact? What will the environmental and health effects of additional mercury, carbon dioxide, sulfur dioxide, and other powerful pollutants be?
- How much land in terms of quarters (160A) has been already obtained for water-right already and how much is projected to be ultimately needed for the expansion?
- How will this project provide you with more economical, diverse or reliable power when there will only be one source of power on this project
- However, the greater long-term impact of the facility itself greatly concerns me.
- I am a resident here in S.W. Kansas and am vitally interested in the development of the discussion and ongoing environmental controversy that building the plant is..... (if you'll pardon the term)....generating. I felt my own skeptical opinion giving way at that recent meeting, especially as we were assured that the mercury toxicity of the new facility would be no more than the current plant produces. It seemed that the community leaders have given good marks to Sunflower as a corporate entity during its time here. That reputation is important to new listeners like me to hear favorably mentioned. But the greatest endorsement for me was from an unlikely source: Rep. Carl Holmes of Liberal. Holmes has been on the forefront of wind legislation in Kansas and a trusted advocate in Topeka. He got up and endorsed the Sunflower facility due to the "make it or break it" issue of finally overcoming the inertia of connecting the power grid across the Kansas state line into Colorado and possibly even further, as well as east and south toward Kansas City and Oklahoma.
- I am very opposed to Tri-state building more coal burning plants
- I appeal to you and Western to help loosen the strangle hold that Tri-State has developed over the years with their co-op's so that those co-ops could have a great deal more latitude to deal with renewable energy projects such as the one that is struggling to get off the ground in this rural community, the Surface creek valley. Thank you for your consideration.
- I still feel that the green house gas issue is a huge problem for this facility as the country overcomes the legacy of the Bush Administration's stalling on the global warming issue and finally gets down the urgency of the task. Presently we cannot address the issue with totally new and efficient "green" technologies. We must continue to use hydro and fossil fuel production to increase electrical production in the short term (say the next 15-20 years). However, a major new green house gas contributor such as your coal generating facility would do well to act as an earnest good faith player to emerge on the right side of the debate. Therefore, I am sending this New York Times article, suggesting that you allow space in your present plan for post-scenario capture equipment when this would become available
- I think coal is a great national resource and that TS is correct in developing it further.
- If global warming assumes center stage, could you envision a "Phase-out?' scenario where the coal-powered Rolling Hills Facility might be intentionally retired after a number of years, with the facility having generated sufficient revenue during its life to have justified investor return? i.e, at what point in your financial planning, as best you can see, would be Rolling Hills Facility be at the "break-even" point financially speaking?
- If the Colorado PUC forced tri-state to engage in integrated resource planning, there is no way they could justify building $5 billion worth of plants
- Impact of additional coal generation on global warming.
- Impact of building new non-renewable CO electricity generation on state university and Front Range efforts to develop renewable energy "hub" in our region.
- Impact of for-profit electrical generation vs. municipal generation. Impact of for-profit generation vs. cooperative generation.
- Impact of increased generation for military facilities.
- In terms of those units, what would be the total project water requirements for the Rolling Hills expansion?

Generation

- Is there modeling on Concentrating Solar Power? On wind energy? On biomass? On IGCC? On incentives for home and business PV systems? What are the benefits of alternative energies considering dollar costs, health costs, environmental costs, and national security costs when using Middle East oil as fuel for transporting coal?
- It is our understanding that the administration has a goal of becoming less dependent on foreign oil. By having to purchase more diesel fuel to run more trains from Wyoming to Kansas, it would seem this project is adding to dependency on foreign oil when renewable fuel sources are readily available in the area.
- Loss of productive agricultural land when water is sold from the land for use in the coal fired plant
- No regard for the jobs that could be created in rural areas through RE(renewable energy) generation
- Other than coal cars, please consider the number of daily train trips, if any, required for both project construction and operation and the impacts of those trips.
- Participants were specifically told at the public meetings that the new proposed coal plants were not within the scope of the EPTP. This is factually and legally incorrect. These statements make clear that Western has already inappropriately pre-judged the scope of the EPTP before even considering any public input. Thus, Western's scoping process has been arbitrary and capricious. We request that Western reissue a new notice of intent to prepare an EIS and specifically identify the three new coal plants as part of the scope of this project to be considered.
- Please account for the lack of sufficient local medical facilities to address health impacts to workers and local residents.
- Please address future projects in the area and the effect the Project may or may not have on those developments.
- Please analyze a detailed breakdown of the acre-feet ("AF") water demand for each coal plant including how much will be used for each process of the project operation and construction and any proposed or anticipated AF demand changes throughout the course of plant operation and maintenance.
- Please analyze impacts to adjacent water basins, if water is overdrafted from the basin.
- Please analyze impacts to Quivira National Waterfowl Refuge and Cimarron National Grasslands.
- Please analyze the dust producing capabilities if the groundwater table is lowered and determine the salt and heavy metal content of that dust.
- Please analyze the impacts of atmospheric sulphur dioxide producing sulphuric acid and the resultant formation of atmospheric fog/haze during time of winter air inversions in the regional valleys. Please determine the impacts of long-term haze/fog to the regional climate.
- Please answer the follow questions: How is the Montezuma Wind farm integrated into the grid, since the current Rolling Hills coal-burning facility must accommodate the uncertainties of the Montezuma Wind farm?
- Please ascertain the SO2 to SO3 conversion rate of any SCR catalyst.
- Please assess the economic burden of medical costs and lost productivity on the members of all impacted communities.
- Please collect and consider all information related to consumption patterns of fish and wildlife within the impact zone(s) of the project.
- Please complete and make public comprehensive water resource stud(ies) for the project and associated facilities.
- Please conduct an inventory of seeps and springs impacted or utilized by the proposed project. Please make public the permit/proof number or legal description of each seep or spring to be used as the information becomes available.
- Please conduct and make public a detailed report of environmental and cultural impacts from the point of view of the communities in the immediate vicinity and within an 80 mile radius of the proposed plant locations.
- Please conduct at least a 0.25 mile survey corridor for all rights-of-way and a 0.25 mile radius survey beyond the main plant sites for all environmental, natural resource, and cultural resource investigations.
- Please conduct baseline noise monitoring through a permanent noise monitoring station that continuously collects and records noise data.
- Please conduct economic and/or socio-economic studies regarding the project and provide those studies as they become available.

Generation

- Please conduct epidemiological and clinical studies and other environmental human health analyses related to cumulative and synergistic exposure to all hazardous and criteria pollutants emitted from the proposed coal plants.
- Please consider acid deposition, especially H2SO4, HCI, and HF.
- Please consider all impacts from the construction and operation of the Tri-State coal plants including decreased water levels and increased mercury content.
- Please consider all impacts on vegetation, including locally grown alfalfa and native vegetation from all plant operations and project construction.
- Please consider all impacts relative to the maximum anticipated project life, e.g. if project were to operate at maximum capacity for 50+ years.
- Please consider all impacts to lands caused by the project, including the proposed coal plants.
- Please consider all mobile equipment that will be used on site, e.g., cranes, dozers, front-end loads and annual fuel use for each and make that information public as it becomes available.
- Please consider all visual impacts caused by the proposed transmission lines, related facilities, and the coal plants.
- Please consider all water quality impacts of the project.
- Please consider any and all applicant plans to build and construct with union labor.
- Please consider any plans to pipe water from any other basin to support the need for water for any aspect of the project and make public all information regarding those plans as it becomes available.
- Please consider basin surface & ground water balance with respect to any proposed conjunctive use of surface/ground water.
- Please consider design conditions for the peak day, e.g., dry bulb and wet bulb temperature, humidity, and site elevation.
- Please consider emissions during startup and shutdown. Please identify the control equipment that will not be operational during startup and the load at which it becomes 100% effective.
- Please consider estimated construction emissions and operational emissions for all criteria pollutants, hazardous air pollutants (“HAPs”), and CO2 from all sources and project components including the pulverized coal (“PC”) boilers, emergency generator, fire water pump, auxiliary boiler, material handling equipment, storage piles, and ancillary linear water or electrical transmission / interconnect lines.
- Please consider how the ammonia be transported to the proposed coal plants. If it is transported by truck, please consider the number of trucks per day that will be required to transport the ammonia to site and consider precautions to be taken to protect neighbors from accidental releases during transport, unloading, storage and use.
- Please consider impacts of decreased recharge and assess whether flow will infiltrate or whether proposed recovery, if any, of recharge water will actually pump groundwater.
- Please consider impacts to local and regional recreation.
- Please consider impacts to specific mines that would supply the coal. Please consider also contractual and supply stability by including in the EIS specific mines from which coal is to be acquired and completed contracts for coal acquisition.
- Please consider impacts to wetland and riparian vegetation from decreased water and increased air emissions.
- Please consider interbasin flow. If a connection is found or assumed, please consider changes to interbasin flow.
- Please consider noise levels of steam blows and proposed and alternative noise reduction control measures.
- Please consider number, duration, and type of startups (hot, cold, warm) to occur each year.
- Please consider proposed and alternative pumping rates for individual wells or well fields.
- Please consider public necessity of the plant through an analysis of all entities contracted to purchase power from the proposed coal plants.
- Please consider revegetation, dust control, and weed infestation of stripped agricultural lands due to decreased water availability and air emissions impacts.
- Please consider site-specific precipitation measurement modifications.

Generation

- Please consider that peer-reviewed studies indicate that in order for greenhouse gas concentrations to stabilize soon enough to prevent dangerous climate change, "as much as 98% of the capital stock of U.S. fossil power plants would need to be replaced with state-of-the-art carbon dioxide capture and storage (CCS)-enabled power plants by the year 2050." J.J. Dooley, et al., Accelerated Adoption of Carbon Dioxide Capture and Storage Within the United States Electric Utility Industry: The Impact of Stabilizing at 450 PPMV and 550 PPMV, Seventh International Conference on Greenhouse Gas Control Technologies ("GHGT7") (Dec. 3, 2004) (Enclosure 1), at 1.
- Please consider that the operational life of a coal-fueled power plant is fifty to sixty years long. Therefore, federal action on the new coal-fueled plants currently being proposed without CCS (and without technologies that facilitate implementation of CCS) will have a significant impact on the ability of the federal government to meet its stabilization commitment. Federal law requires the United States government, as a partial means of meeting that commitment, to "[t]ake climate change considerations into account" in its "social, economic and environmental policies and actions." UNFCCC, Art. 4, Para. 1, Cl. (f). As an organ of the federal government, Western is therefore obligated to factor climate change considerations into its EIS for the proposed Tri-State power plants.
- Please consider the "plumbing" of Tri-State's proposed power plants, including well field locations, surface water POD's, location of spreading basins/injection wells, pipeline routing, etc.
- Please consider the amount and characteristics of any wastewater discharged from plant operation processes and during project construction. Please consider proposed and alternate discharge locations, e.g., evaporation pond, local creek, etc.
- Please consider the amount of ammonia that will be stored at the proposed coal plants and the proposed and alternate storage locations.
- Please consider the amount of ash, proposed disposal site(s) and modes of transportation to the sites. If waste is to be transported to the disposal site(s) by truck, please consider how many trucks per day will be required to transport material from the plants.
- Please consider the amount of greenhouse gases such as methane, nitrous oxide, and CO2 that will be released from the plant, and how will it affect global warming.
- Please consider the amount of scrubber wastes, proposed disposal site(s) and modes of transportation to the proposed coal plants. If waste is to be transported to the disposal site(s) by truck, please consider how many trucks per day will be required to transport material from the plants.
- Please consider the anticipated frequency of soot blowing to keep boiler tubes clean and to keep selective catalytic reduction ("SCR") catalyst clean.
- Please consider the cancer and noncancer health impacts from emissions and discharge.
- Please consider the climate impact of Tri-State's proposed coal plants. Federal law commits the United States government to return anthropogenic emissions of carbon dioxide and other greenhouse gases to 1990 levels. United Nations Framework Convention on Climate Change (UNFCCC), Art. 4, Para. 2, Cls. (a), (b); 138 Cong. Rec. 33521-27 (Oct. 7, 1992) (Senate ratification). President Bush has reaffirmed the federal government's commitment to "stabilize atmospheric greenhouse gas concentrations at a level that will prevent dangerous human interference with the climate." Address by President George W. Bush to the National Oceanic and Atmospheric Administration (Feb. 14, 2002).
- Please consider the frequency, extent, and duration of flooding that occurs as a result of surface runoff and determine how that affects the estimated discharge from the groundwater.
- Please consider the impacts of changing the period of use of the water rights that may decrease or eliminate the natural recovery period.
- Please consider the mercury and other impurities content at maximum value.
- Please consider the metal uptake by plants from emissions from the plant, specifically B, F, As, and Se. Please consider the translocation to mammals.
- Please consider the number of coal cars needed daily to haul coal to the plants and the impacts of those cars on all communities along their route from the Powder River Basin to the proposed plant sites (500+ miles).
- Please consider the number of daily truck trips required for both project construction and operation including a break down of that traffic by number and types of vehicles per day, including large trucks, buses, and automobiles and the impacts of those trips.
- Please consider the number of significant historic properties identified in the Project areas.

Generation

- Please consider the number, location, and purpose of any coal or other material storage piles including precise dimensions and the amount of material that will be stored.
- Please consider the percent of the feed coal sulfur that is: (1) removed in feed preparation prior to the boilers and (2) removed with the ash.
- Please consider the projected average plant capacity factor.
- Please consider the projected peak and 1-hour average and maximum noise levels at the fence line of the coal plants in noise analyses.
- Please consider the quantity and source of energy needed to construct the project including specific details of how this energy will be obtained and all associated environmental impacts.
- Please consider the quantity of renewable energy to be developed by Tri-State for delivery on the EPTP including the megawatts, megawatts hours, and the types of renewables, construction dates, locations, and operational timelines.
- Please consider the seasonal water demand of the project.
- Please consider the source and the amount of lime, limestone, or other sorbent to be used in any SO2 scrubber.
- Please consider the total water consumption for all units of the project including a break down of consumption by all individual uses including, but not limited to, cooling towers, blowdown water, and coal dust pile.
- Please consider threatened & endangered species on and around the plant site and all related project components.
- Please consider traditional and historic land use patterns.
- Please consider water consumption by individual source, e.g., evaporation at cooling tower, scrubber, makeup to boilers, dust control, sanitary uses, and all others not listed here.
- Please consider water demand as both annual average and peak day.
- Please consider whether the combined use of surface and groundwater rights counts water twice. For example, groundwater rights are limited by the perennial yield but the perennial yield depends on recharge from stream flow that may not occur because of surface flow diversions.
- Please consider whether the project is dependent upon acquisition of all existing water rights in the basin, and, if not, what percentage Tri-State will need to acquire.
- Please consider whether those coal cars will pass through Holcomb and Garden City, either inbound or outbound to the plant, or both and the impacts of those trips.
- Please consult with all Native American groups claiming historic and traditional affiliation with the region on all project components in addition to identifying Traditional Cultural Places (“TCPs”).
- Please determine the amount of drawdown that will occur and determine whether the decreased capillary flow and exfiltration will cause more particulate air pollution from winds blowing across the land.
- Please determine what plans, if any, exist for subdivisions in and around Holcomb and Garden City, Kansas and make copies of those plans public as they become available and include in the EIS scope.
- Please ensure the groundwater model developed for the basin adequately models the various fluxes such as spring flow and total ET loss. Please include at least two years of detailed study data.
- Please ensure Tri-State has or will have committed sufficient capital expenditures over the next 5 to 7 years to construct the Project and related coal plants.
- Please identify all hazardous materials that will be used at the Project sites, the amount that is used and stored, and the mode of transport to the sites.
- Please impose the transient simulations of the project on the seasonal changes in the basin. Please consider seasonal water demand and recharge and seasonal head levels in boundaries. Because of the magnitude of this project and because drought will maximize the impacts, please consider multi-year dry periods in the modeling.
- Please include an approved interconnect permit for any existing transmission line.
- Please include any plans for construction and operator work force housing and any permit applications necessary.

Generation

- Please include in the cumulative PSD increment analyses all increment consuming emissions, which would include all increases in emissions at existing major stationary sources since the PSD major source baseline date, all increases in emissions at other existing sources since the applicable PSD minor source baseline date, and all new sources of emissions that came into existence after the applicable minor source baseline date (including area and mobile sources) as well as reasonably foreseeable sources not yet in operation.
- Please include simulated water level draw-down contour maps for the basin at time steps of 6 months and years 1, 2, 5, 10, 15, 20, project life in the EIS analysis. Please also include water level contour maps for these time steps and direction of ground water flow. Please make these maps public as they become available.
- Please make a factual finding that the following communities do or do not fit the definition of an environmental justice community: Holcomb; Garden City; Lamar; Las Animas; La Junta; Pueblo; and any other affected community not listed here.
- Please make a factual finding that the Project and related coal plants will or will not have a disproportionately high and adverse human health or environmental effects on minority and low income populations.
- Please make all information on the selection of waste disposal sites and alternative sites public as the material becomes available.
- Please make independent experts available to the communities and other interested entities for review of permit applications, technical reports, and other project requirements and components.
- Please make public the water Tri-State claims to hold under option for the proposed project, including the name of the current water user, the current water rights amounts, type of use, and place of use as they become available.
- Please model evapotranspiration (“ET”) for both the steady state and developed conditions. It is not necessary for the water table to drop a certain level for effects to occur. The impacts occur even if just the gradient of the water table changes.
- Please model the actual points of recharge. Please evenly spread recharge across the basin or distribute according to the elevation zones from the Maxey-Eakin (“M-E”) method. The ME method does not consider the hydraulic conductivity of the lithology in each of the zones. Additionally, most recharge occurs at canyon mouths due to runoff and recharge into alluvial fans. Because the effects of this project will be concentrated, please consider localized effects.
- Please obtain all Clean Water Act discharge or fill permits and make public the nature of the discharge and/or fill and all permit applications as they become available.
- Please perform a detailed water right abstract of the basin to identify the existing and supplemental nature of surface, groundwater, and spring water rights.
- Please perform a human health and ecological risk assessment to evaluate the impacts of the project on residents and wildlife including diesel exhaust from trucks, trains, and on-site mobile equipment and all criteria pollutants.
- Please provide a detailed map showing all points of study including, but not limited to, test holes, production wells, monitor wells/piezometers, ET measurement sites, stream/spring flow measurement locations, weather measurements, geophysical measurement locations, etc. as they become available.
- Please provide an electronic copy of all of the meteorology and ambient air quality monitoring data collected thus far, and please provide all future air quality monitoring data.
- Please provide public training on the permitting and NEPA process to all communities designated as environmental justice communities.
- Please publicize the names, titles, addresses, phone numbers, and job descriptions of all Tri-State employees, and outside consultants and contractors who are currently performing any work on the EPTP and related power generation facilities or who are anticipated to perform such work throughout the development of the EIS.
- Please reassess recharge accounting for losses to interbasin flow and evaporation from the riparian areas of some of the tributaries.
- Please simulate groundwater flow from plateau of the west with general head boundaries and examine the fluxes against reality. Please consider flux to the basin fill aquifer both temporally and spatially.
- Please state how many megawatts of coal fired electricity Western plans to purchase from Tri-State’s proposed coal plants and assess all environmental impacts associated with these purchases.
- Please use health-based statistics in permit evaluation.

Generation

- Pollution due to coal.
- Remoteness from power generation
- Renewable hybrid plants using solar, wind and bio-mass can beat the price tri-state will have to pay
- Rolling Hills expansion should be designed as a state-of-the-art facility and incorporate innovative (even showcasing newer, cleaner, and cutting edge techniques such as gasification of coal generation). It isn't going to happen, is it? Why not? Too expensive as we view it in 2007? Too risky for the investors? Once we go down this road, will the not-to-distant future judge the Rolling Hills facility as a perilous liability which was conceived during a political climate where the concept of global warming was reviled and environmental initiatives were suppressed?
- Since the Tri-State power plants will be owned by its shareholders, the customers of Tri-State's 44 electric cooperatives, please conduct an analysis of the potential financial impacts on the owners. This should include the financial liability placed on each consumer within the cooperative system as a result of this proposed capital expenditure, as well as the additional liability that would be incurred when and if carbon emissions limitations are imposed in the future, a reasonably foreseeable future action. This analysis should include the possibility that the plants may become obsolete and unusable decades earlier than planned if they are unable to economically retrofit to foreseeable new regulations, resulting in sunk costs to the shareholders.
- spend money on re-newable power
- The scope of the EIS must also consider the alternatives and their impacts that would be compared to the construction of the EPTP and three new coal plants. The possible alternatives include energy conservation measures, alternative energy generation resources such as solar, wind, and biomass; and cleaner methods of fossil fuel electrical generation such as gas or IGCC. He Scope of the EIS must also consider the alternatives and their impacts that would be compared to the construction of the EPTP and three new coal plants. The possible alternatives include energy conservation measures, alternative energy generation resources such as solar, wind, and biomass; and cleaner methods of fossil fuel electrical generation such as gas or IGCC. The scope of the EIS must also consider the alternatives and their impacts that would be compared to the construction of the EPTP and three new coal plants. The possible alternatives include energy conservation measures, alternative energy generation resources such as solar, wind, and biomass; and cleaner methods of fossil fuel electrical generation such as gas or IGCC. Scope of the EIS must also consider the alternatives and their impacts that would be compared to the construction of the EPTP and three new coal plants. The possible alternatives include energy conservation measures, alternative energy generation resources such as solar, wind, and biomass; and cleaner methods of fossil fuel electrical generation such as gas or IGCC.
- The scoping notice admits that Western's purpose and need for the EPTP is "to provide Western with improved access to alternative resources and suppliers by expanding the capacity and geographic reach of the transmission system. It would increase Western's options for purchasing energy to meet contractual requirements." 71 FR 43733. In other words, Western will be purchasing coal fired electricity from Tri-State's three new coal plants to serve Western's customers. "It would be irresponsible for [Western] to approve a project of this scope without first examining the effects that may occur as a result of the reasonably foreseeable increase in coal consumption" and combustion. Mid States Coalition for Progress v. Surface Transportation Board, 2003 WL 22251298 (8th Cir. 2003). Accordingly, all impacts related to the coal plants must be considered as part of the EIS for this project.
- The Western's Notice of Intent to Prepare an EIS, published August 2, 2006 (71 FR 43733), mentions only the construction, operation and maintenance of approximately 1,000 miles of high voltage transmission lines, access roads, and other facilities" and " "four new substations; expansion of approximately eight existing substations; and installing fiber optic communications system for transmission lines". Conspicuously absent from the scoping notice is any specific identification of the construction of three new coal fired power plant units that will be the source of the electricity to be carried by the proposed transmission lines and facilities. These new coal plants are being proposed by Tri-State and its partners in Holcomb, Kansas and southeastern Colorado. These three new pulverized coal plants account for approximately 2,100 MW of new coal fired electricity that will be transmitted by the EPTP. These three new coal units must be considered when assessing the direct, connected, and cumulative impacts of Western's proposed action. See, 40 C.F.R. 1508.25(a)(1) & 1508(a)(2). See also, Mid States Coalition for Progress v. Surface Transportation Board, 2003 WL 22251298 (8th Cir. 2003).
- There is a proposal to build "the Grand Mesa Project" on the western slope near Cedaredge. The Grand Mesa Project would provide additional storage on Surface Creek and might also generate an average of 52 million KWH annually to help pay for it.

Generation

- Through the Tri-State and Western staff, I gained further understanding of the technology and the project's conception of feasibility of more innovative gasification methods of coal-burning. Basically, I learned that---unlike hydro-electric or natural gas-powered generation–coal-fire generation cannot be quickly regulated to be incorporated into a system whereby Wind generation could play a significant role. Environmental groups who have looked at Wind acknowledge the problem of the erratic nature of Wind generation, which needs to be immediately accommodated into the grid. In those cases, the conventional sources of generation (in this case natural gas or coal generation) then need to be moderated or increased, depending on the Wind-generated input to the grid. While the ideal system would be free of such erratic generation that Wind introduces into the system, it has been estimated that a maximum of 20% of generated electricity could be utilized from wind, assuming that the conventional source was flexible in responding to the Wind generated input. Your people have stated that coal – unlike gas or hydro-lacks that kind of flexibility. Therefore, the Wind generated option is an untenable option, if a coal-fired plant is the principle conventional source.
- Tri-State Generation and Transmission (Tri-State) representatives were present officially at the scoping meetings. Tri-State is proposing to build at least 2,100 MW of pulverized coal plants in Kansas and Colorado that is the main purpose of building the EPTP. At the same time, Western officials stated at public meetings that these proposed coal plants were outside the scope of the EPTP EIS process. These statements made clear that Western has already inappropriately pre-judged the scope of the EPTP EIS process. It was also inappropriate to have Tri-State assist with the scoping meetings when they serve to benefit from the EPTP. The Coalition makes the following request to cure these deficiencies in the Western scoping process for this project. These requests are not meant as an exhaustive list of remedies for the problems discussed herein: Western should conduct all public meetings in a question and answer, open format with a facilitator and have all questions, comments, and answers recorded and/or transcribed.
- Tri-State Generation and Transmission (Tri-State) representatives were present officially at the scoping meetings. Tri-State is proposing to build at least 2,100 MW of pulverized coal plants in Kansas and Colorado that is the main purpose of building the EPTP. At the same time, Western officials stated at public meetings that these proposed coal plants were outside the scope of the EPTP EIS process. These statements made clear that Western has already inappropriately pre-judged the scope of the EPTP EIS process. It was also inappropriate to have Tri-State assist with the scoping meetings when they serve to benefit from the EPTP. The Coalition makes the following request to cure these deficiencies in the Western scoping process for this project. These requests are not meant as an exhaustive list of remedies for the problems discussed herein: Western should disallow any future Tri-State involvement in public meetings. If, however, Tri-State continues to fulfill an official role in public meetings, the Coalition is requesting one as well.
- Unlike verbal comments Western and Tri-State officials made at the scoping meetings in September, it is obvious from a review of the specifics of the contract between Western and Tri-State that the first transmission lines to be built connect the Holcomb facility to Lamar, Colorado. Without the existence of the coal plants in Kansas, the transmission system as designed would not be required (Ref. – Exhibit A to Contract No. TS-05-0045 (Western Contract No. 05-RMR-1583) between Tri-State Generation and Transmission Association, Inc. and United States Department of Energy Western Area Power Administration, Rocky Mountain Region, Loveland Area Projects, for Participation in the Eastern Plains Transmission Project).
- Western's EIS must assess all impacts of the EPTP, including any associated energy generation facilities—such as Tri-State's proposed 1,400 MW of new coal plants in Holcomb, Kansas and the proposed 700 MW facility in Southeast Colorado. 40 C.F.R. §§ 1502.14, 1502.16. Specifically, the EIS must "present the environmental impacts of the proposal and the alternatives in a comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public." Id. § 1502.14. In order to assess adequately the environmental impacts of the project and of reasonable alternatives to the proposed project (including, but not limited to, the proposed project plus additional mitigation measures), Western's EIS must assess the direct, indirect, and cumulative impacts that the proposed project and each alternative would have. In defining the scope of the EIS, Western must, accordingly, identify each type of impact that will be assessed and each alternative that will be considered. Id. § 1508.25.
- Western's Notice of Intent to Prepare and EIS (published August 2, 2006) does not mention or identify the construction of three new coal-fired power plants units that will be the source of the electricity to be carried by the proposed transmission lines and facilities. These three new pulverized coal plants, proposed by Tri-State, account for approximately 2,100 MW of new coal fired electricity that will be transmitted by the EPTP. The Rocky Mountain Farmers Union believes these three new coal units must be identified and considered in the EIS in order to properly assess the impacts of Western's proposed action.

Generation

- We believe the scoping meetings too narrowly defined what people could comment on and failed to identify the proposed new coal plants. Our members attending the scoping meetings were told the three new coal plants were not within the scope of the EPTP or open for discussion at the tables with Western staff.
- We request that Western reissue a new notice of intent to prepare an EIS and specifically identify the three new coal plants as part of the scope of this project to be considered.
- What do you say to the claim made by environmental groups that 8% of the electrical generation will actually be used in Kansas, but yet Kansas (including eastern Kansas) will receive the brunt of the pollution? (i.e. carbon dioxide and wind-carried mercury emissions precipitating into its lakes and streams via eastern Kansas' more plentiful rainfall).
- What is the expected life of the new facility?
- What is the unit used when speaking of the facility's water needs?
- What research has been done, if any, in anticipation of future regs on pulverized coal plant emissions' role in global warming? Who will pay for the enormous costs of retrofitting to comply with the regs?
- What scenarios have been considered in the event that greenhouse C02 emissions become an issue in the future with more enlightened environmental regulations that could be put in place when the current Republican Administration is swept from power? Are you relying on simply being "grandfathered in" or do you envision a buying tokens in a "Swap Program" where generators who are not polluting substantially are allowed to have their "points" exchanged with polluting facilities?
- What will happen if the coal trains are disrupted and cannot deliver the coal to the plants
- Will wind be able to tie into this system. I want wind on my land but tri-state is obviously not interested in wind energy.

Geology

- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.

Hazardous Materials and Solid Waste

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternate transportation routes for all hazardous materials to avoid populated areas.
- Events such as vehicular spills of hazardous or toxic materials could result in significantly more adverse habitat and water quality impacts. For project activities which may result in contamination of water resources, the EIS should: discuss the frequency or likelihood of such events; and, describe the spill and release response capabilities (i.e. available response equipment, personnel, expected response times, etc.).
- Please consider acid deposition, especially H2SO4, HCI, and HF.
- Please consider how the ammonia be transported to the proposed coal plants. If it is transported by truck, please consider the number of trucks per day that will be required to transport the ammonia to site and consider precautions to be taken to protect neighbors from accidental releases during transport, unloading, storage and use.
- Please consider impacts of unintentional contaminant leaks such as PCBs (polychlorinated biphenyls) from new or upgraded sub-stations.

Hazardous Materials and Solid Waste

- Please consider the amount of ammonia that will be stored at the proposed coal plants and the proposed and alternate storage locations.
- Please consider the amount of ash, proposed disposal site(s) and modes of transportation to the sites. If waste is to be transported to the disposal site(s) by truck, please consider how many trucks per day will be required to transport material from the plants.
- Please consider the amount of scrubber wastes, proposed disposal site(s) and modes of transportation to the proposed coal plants. If waste is to be transported to the disposal site(s) by truck, please consider how many trucks per day will be required to transport material from the plants.
- Please identify all hazardous materials that will be used at the Project sites, the amount that is used and stored, and the mode of transport to the sites.
- Please make all information on the selection of waste disposal sites and alternative sites public as the material becomes available.
- The EIS should evaluate storm water management. To protect water quality from storm water runoff, including contaminated runoff from construction, operation, and maintenance activities, specific practices should be implemented. These practices include the following: Preserve existing vegetation during clearing and grading; Divert upland runoff around exposed soils; Use sediment barriers to trap soil in runoff where sheet flows occur; Protect slopes and channels from gullying; Install sediment traps and settling basins to reduce the velocity of channeled runoff; Store chemicals for project activities in covered containers in a specific location; Identify areas and procedures for fueling, and provide a protected vehicle washout; Preserve vegetation near all waterways; Ensure materials and education for cleaning up spills and leaks; and, Inspect the effectiveness of best management practices.
- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.

Health and Safety

- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.
- A good portion of the cultivated fields south of Sharon Springs now use ground spray rigs, some with 90' booms. Manuvering a spray rig with a 90' boom down a field avoiding transmissions lines can be dangerous.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please attach environmental health funds to permits and/or otherwise make funding available to all communities.

Health and Safety

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to control the cancer and noncancer health impacts from emissions and discharge.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop specific measures to minimize Legionella outbreaks from cooling tower emissions.
- affects [sic] on a newborn?
- An issue that must be addressed is the safety of humans and livestock near the high voltage line. A known factor is alternating voltage current induces a field about a wire that builds and collapses alternately at the rate of 60 cycles/second. This field will induce a voltage charge in a wire located within the field, a pasture fence, irrigation pipe or any metallic conductor, which then can kill or damage anything touching it. This has already been experienced with the existing lines.
- Another human health issue arises along the entire route the train runs as emissions from the engines will be released into the air.
- Could be moved east of Bradberry/Crebs Rd and won't be effecting property values and health.
- Decreased quality of life.
- EMF health concerns
- For increased incidence of human disease and other impairment, please assess the number-per-year by which air pollutant emissions resulting directly or indirectly from each option would increase the incidence of negative human health impacts – including asthma attacks, missed school or work days, emergency room visits, hospital admissions, cancer cases, heart attacks, and premature deaths – within (1) five miles of the facilities, (2) fifty miles of the facilities, (3) 100 miles of the facilities, and (4) 500 miles of the facilities.
- For increased incidence of human disease and other impairment, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased incidence of human disease and other impairment, please provide separate counts for (1) all humans, (2) children, and (3) humans aged sixty-five years and over. For increased toxicity of fish eaten by humans, please assess the amount by which air pollutant emissions resulting directly or indirectly from each option would directly or indirectly increase the concentrations of various toxic chemicals, including mercury and dioxin, in the flesh of freshwater fish caught and eaten by humans within 500 miles of each facility.
- For increased toxicity of fish eaten by humans, please compare the resulting toxicity levels with the levels identified in federal and state health advisories.
- For increased toxicity of fish eaten by humans, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- G-7 corridor passes in very close proximity to my house and it concerns me of what type of health issues it will effect.
- Have documentation and modeling been produced and submitted by Tri-State on how many millions of gallons of water per day that additional pulverized coal-produced electricity will use? Have drought and global warming projections been factored re water use? What is the source of the water? What populations, wildlife, and water resources will be affected?
- Health & safty [sic]
- Health Effects
- Health of people close by
- High voltage causes abortion in cows

Health and Safety

- Human health and safety issues when more carbon is emitted into the atmosphere thus affecting the air quality and contributing to global warming
- I (Robert Pearsons CH2MHill) spoke to him personally in Lakin about his concern that an electrified fence running under another transmission line carried a charge that kept shocking his farm hands when they were working on the fence. He was asking for a method to handle this concern on a fence that cannot be grounded in the usual way because it is electrified. He restated his concern for a way to keep an electrified fence from shocking someone when they are working on the fence and the fence charger is turned off.
- I am also concerned about future health problems.
- I am worried about the health effects
- I operate aircraft out of my property and any powerlines along the ridge south of Simla may be a factor in southerly departures of my aircraft, especially on high density altitude days.
- Is there documentation that the public health and the environment will not be harmed by EMF's and noise from the proposed lines?
- My wife and I are a young couple with a little girl on the way in December '06. The last thing I want is for her to become ill due to an unknown source!
- No regard for public health
- Please account for the lack of sufficient local medical facilities to address health impacts to workers and local residents.
- Please conduct epidemiological and clinical studies and other environmental human health analyses related to cumulative and synergistic exposure to all hazardous and criteria pollutants emitted from the proposed coal plants.
- Please consider impacts to human health, wildlife, and domestic animals caused by electromagnetic forces created by the proposed transmission lines.
- Please consider the cancer and noncancer health impacts from emissions and discharge.
- Please perform a human health and ecological risk assessment to evaluate the impacts of the project on residents and wildlife including diesel exhaust from trucks, trains, and on-site mobile equipment and all criteria pollutants.
- Please use health-based statistics in permit evaluation.
- Safety issues livestock and humans
- Static electricity or stray voltage causing safety or electrical control problems
- The inconvenience plus the out right danger is evident.
- The protection of air quality should be addressed in the EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related VOC and Nox emissions, and any potential air toxics releases, should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities, and ongoing operation of the roadways are important concerns. The EIS should evaluate air quality impacts, and detail mitigation steps that will be taken to minimize associated impacts. This analysis should also address and disclose the project's potential affect on: all criteria pollutants under the National Ambient Air Quality Standards (NAAQS), including ozone; visibility impairment, and air quality related values (AQRV) in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.
- There should be much thought into the fact there are homes along the proposed line north of Burlington and the health hazards it could cause as well as other issues addressed on page 1.
- This line would come much to close for comfort to three residences. I have great concern living this close to transmission lines.
- Your proposed line is parallel to the GCW's tracks when you are along Lowe Rd. Seems like that would not be a hazard for sure

Historic and Cultural Resources

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consult with the State Historic Preservation Officer and any Indian Tribe ascribing historic and traditional affiliation to the region regarding mitigation of impacts to significant historic properties.
- At this time, the Comanche Nation has no immediate concerns or issues regarding this project; however, please keep us informed as your planning proceeds. We look forward to receiving any project reports, archaeological reports or other information that is derived from the planning, preparation, and construction work.
- Disturbance of Native Amer. Graves. Disturbance of Nat. Amer. Cultural sites. Disturbance of Nat. Amer. Historical sites.
- Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," signed in 1994, applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the EIS should disclose and evaluate any environmental justice aspects associated with impacts on rural low-income communities by either the proposed project, or the potential build-out for reasonably foreseeable development analysis. If there are no applicable environmental justice considerations, then that should be disclosed. EPA recommends close coordination with any potentially impacted Native American tribes.
- If in the process of the project human remains or archaeological items are discovered, we request that you immediately cease the project work and notify us so that we may discuss appropriate disposition with you and the other Tribal Nations that may be affected by such discoveries. We look forward to your reports as activities proceed.
- In review of the area shown on the accompanying maps of your proposed undertaking we do have sites listed in our data base. This does preclude the possibility of a site of heritage importance being located by forest personnel or an archaeological contractor that may have an oral reference among the Rosebud people.
- No concerns about project, but alerting that sites of some heritage importance are listed in tribal database.
- Please consider the number of significant historic properties identified in the Project areas.
- Please consult with all Native American groups claiming historic and traditional affiliation with the region on all project components in addition to identifying Traditional Cultural Places (“TCPs”).
- The EIS should confirm that appropriate National Historic Preservation Act Section 106 consultation with the Colorado and Kansas State Historic Preservation Officers (SHPOs) has taken place. This documentation would be in the form of letters from the SHPOs.
- Western’s EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: [H]istoric and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.
- Western’s EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.

Land Use

- This is a great concern to this one particular individual because he runs and owns the only airport facility in Cheyenne County that is used from various people and entities, i.e., oil & gas companies, the National Guard, Keefe Memorial Hospital, Division of Wildlife, harvesters, the nursing home, private sectors, doctors, etc. The location of the airport is in the SE quarter of section 14, Township 14, Range 44 W.
- (Follow) along field lines
- According to the map the line will be placed across the road or on our private land and we ARE opposed to either situation.

Land Use

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to manage wilderness study areas so as to ensure they retain wilderness characteristics.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide for a staffed complaint hotline to address neighborhood problems, e.g., noise, odor, dust, traffic, vibration, and a plan to resolve any identified problems.
- Already have one 115-kV line on the property
- Also, at this time, it appears that all possible routes are not likely to affect any public land under our authority unless major revisions are made.
- Area north of Burlington on RD48 6 miles north of Burlington (area to be aware of)
- At the point this line turns and goes north on Little Lowe Rd the city has in its long range plans and zoning to expand to that area. That line will be right where Holcomb can expand to. We don't need that restriction in the way for future development. Be it commercial or residential.
- cntr "e" & "25" at the corner homestead quonset and quonset of road E. Section 34
- County land use
- Development planned around area in future. Tristate, gas, highways, county roads, etc.
- Don't want it near my property
- Environmental effects on property
- Feed lots
- Frontage land along I-70- winters place-something [illegible] you can do better with land
- He expressed concern that the substation at Limon is becoming so spider-webbed with transmission lines.
- I am a western Kansas landowner, who is environmentally concerned. I have some comments on the environmental impact which follows in a separate email. I discovered that my farmstead was included in the path of one of the two potential transmission lines from the Rolling Hills facility.
- I attended your informational meeting on the Eastern Plains Transmission Project in Fountain on September 5, 2006. I must say that I was deeply dismayed by the prospect. For almost 50 years the Frost family has tended 28,000 acres of land that constitute the Frost Ranch, ten miles south of Fountain; 23,000 acres of which is State leased land that has been awarded coveted Stewardship status. By the end of 2006 we will have put 800 acres of our best producing land under a Conservation Easement to protect it from development in perpetuity.
- I did not realize until this morning that you had a dead line of September 30th to turn the response in. I have several fields included in your proposed route and have great issue on several locations. I was waiting until I had time to sit down and write my concerns to you.
- I have built excellent 4-wire pasture fencing between SE and NE Sec. 30 with a 14-foot access gate. Another such gate is on the northernly side of Sand Creek. Once the towers would be in place, those gates might be used by maintainence crews. But pasture fence would have to be breached in the constructing of the towers. I would like to discuss with the initial right-of-way land services agent whether a hinged, swinging barbed-wire property fence could be construction across Sand Creek to separate the livestock from Sec. 30 and Sec. 29. We had attempted such an endeavor, but this was washed out in 2001. I think I have seen a better, viable design, and would like to see it constructed at that point.
- I operate aircraft out of my property and any powerlines along the ridge south of Simla may be a factor in southerly departures of my aircraft, especially on high density altitude days.
- Impact of any use of eminent domain on the economic viability of impacted farms/ranches.
- Impact on state public lands
- Landing strip
- Limits our ability to expand the elevator and crop production centers

Land Use

- Need to expand rail service to the Lowe and Big Lowe intersection
- No concern
- Our business is grazing and farming on our land. This concern always comes first
- Please analyze impacts to Quivira National Waterfowl Refuge and Cimarron National Grasslands.
- Please consider all impacts to lands caused by the project, including the proposed coal plants.
- Please consider traditional and historic land use patterns.
- Please determine what plans, if any, exist for subdivisions in and around Holcomb and Garden City, Kansas and make copies of those plans public as they become available and include in the EIS scope.
- Potential development or conservation easements
- Prefers not to have another line to work around
- Proximity to business
- railroad tracks
- Regarding the northerly continuation of the transmission pathway upon crossing Hiway 50, there are two residences on W/2 of Sec 20-24-36 and the Kearny Co. Sanitary Landfill is located on the extreme S/E, corner, of Sec. 18-24-36 with only non-residential CRP or pasture located on E/2 of Sec. 19, as well as most of Sec. 18 (except for the landfill and the extreme westernly part of .Sec 18. Thus, if the transmission lines were to border Sec 30 and Sec 29, as I've mentioned above, then I might suggest that, upon crossing Hiway 50, it would seem plausible to veer the pathway diagonally NW through Sec 19 and Sec 18 to pick up the due northerly pathway showing on your proposed map. Such a route would conveniently lie west of the landfill, again where no residences are too close.
- Right –Of- Way issues etc.
- Road will be upgraded [E Rd] graveled [county high grade]
- Some time in the future we intend to develop other areas of the ranch in an ecologically sustainable way, by limiting numbers, building "Green" and allowing for large wildlife corridors. One of the prime attractions for people who will value living in such a place will be the gorgeous scenery and large vistas.
- stay on pastures when possible, stay along section lines, avoid farmland
- The G-7 corridor passes directly through hills comprised of extremely sandy soil which will eroded [sic] very easily if disturbed. The G-7 corridor will pass directly thru hills that are comprised of blow sand which will begin blowing and eroding very easily if it is disturbed. Reseeding the pastures has got a small chance of working due to the drought we are experiencing. The hills also have great differences of elevation in very short distances. How many more towers will be needed due to the many elevation changes on the G-7 corridor southwest of Hugo.
- The land in question has about as many uses as it can stand. The number one use of this land was intended for farming and helps provide a living for two families involving 6 people. But the last number of years it has been virtually invaded by utility companies that have criss-crossed it with overhead and underground lines. It simply cannot stand any more invasion and still be considered a farmable piece of land.
- The N-4 branch of the Big Sandy to Midway station cuts through part of my farm/ranch. Will all three branches of this line be used (i.e. N-1, N-2, and N-4) or will only one branch be chosen at a later date? Will the entire width of this line be needed or will only a small section of it?
- The placement of the powerline should be on CRP land. I think risk of crop dusters is to great when there is choices available, meaning not placeing them on farmland
- There is an underground gas line and existing electrical lines going across.
- These power lines and WINDMILLS are using a lot of ground- therefore the windmills should be planned next to powerlines
- Traffic on private property.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25l. For example, the EIS must consider: Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.

Land Use

- We already have powerlines owned by Xcel going through our land which makes the land harder to farm and less attractive for residential development in the future. More lines, such as this, will hurt future development of the land. Please keep it as far away from our land as far as possible. T4S R59 W s/2 ¼ 6 –S ½ Sec. 5 N ½ Sec 8 n4 of sections 7 & 18.
- We are suggesting two alternate routes that will cause a minor re-routing of your proposed powerline (See map.) One takes your line father east, out of immediate view of the 1-25 corridor, along the route Xcel is proposing for their powerline across ("our") State land. The other route follows the existing powerlines just south of the El Paso County line and then west and north to the Midway Station. Either of these alternate routes are not the 'best case' for us but they would eliminate interference with our ranching operations, somewhat reduce visibility from the 1-25 corridor, lesson intrusion into potential recreational areas and not proscribe any ecologically sustainable development that may be possible in the future.
- We can not and will not give an easement to build this line through the Blackwolf Creek land, specifically in 2S 44W of Yuma County. This land includes the NW ¼ of Sec. 11 and N ½ of Section 12 and is restricted by a conservation easement mandated by Governor Owens. This conservation easement does not allow this type of construction and we wish to make you aware of this potential situation.
- We own and operate a large farm sount of Burlington and are very concerned about where this will be located
- West of the 115kV lines on Alternative J8. Intersection of County road E and 25, West side of E. High grade road, quonset and grain bins. Want to know exactly where to go Shops, Grain bins, Quonset huts, old homesteads.
- Worried about line interference w/ property use. Angled across corners straight out of 3 or 4 old homesteads, angled back E road E. SHOPS
- Would suggest that you consider single poles for 345kV lines and possibly 500kV lines to reduce the amount of land that is used by transmission towers
- You have proposed A3 and B7 that will affect my land. Excel already has put a 345 kv line 1/8 mile from my house. I have the noise, tv interference, visual effect, and have to farm around it. If you put in I3 and B7 lines, I would have 3 larger power lines in a 3 mile area. Everyone should share the burden of these ugly lines covering my open spaces. The B7 line is my biggest concern. It would make my house sit between 2 larger power lines 1 mile apart.
- zoned for expansion

Mitigation

- Proposed mitigation that will be taken to minimize or eliminate adverse impacts should be presented. EPA recommends close, and early, coordination with the U.S. Fish and Wildlife Service on these and all other wildlife-related issues. Concerning the Greater Sage-grouse, please detail the project's adherence to BLM's "National Sage-Grouse Habitat Conservation Strategy" - November 2004, and the States' own criteria. As a minimum, the mitigation plans detailed in the EIS should be in compliance with those requirements. Generally, to effectively lessen impact to some wildlife, it may be necessary to provide additional "buffer zones" around the specific critical areas. For example, a recent study done at University of Wyoming indicates decline in breeding males at leks located within approximately 3 miles of drilling rigs in the Pinedale Anticline and Jonah natural gas fields in western Wyoming. Please provide additional information on where and how much buffer zone will be provided, as applicable. The EIS evaluations should include the above issues, among other area specific concerns, and detail mitigation steps that will be taken to minimize or eliminate adverse impacts. There may also be concerns related to the loss of upland resources associated with pipeline and associated facilities construction. An inventory of any high quality or locally and regionally rare habitats or plant communities, such as remnant prairie, should be included in the documentation. This would also include forested or treed areas. A description and the aerial extent of each site should be presented in the inventory. These resources should be avoided, if possible. If they can not be reasonably avoided then mitigation for their loss should be identified. We recommend replacement trees be planted to offset any unavoidable tree loss. We generally recommend that native saplings be used, if practicable, at a minimum ration of 1:1. In general, replacement trees should be planted close to where the loss occurred. However, mitigation might also include assisting county, state, or federal agencies with any ongoing or planned forest or tree reclamation projects in the watersheds affected. We recommend that the proponents commit to voluntary tree mitigation, if applicable, in the EIS and provide, as detailed as possible, a conceptual mitigation plan that compensates for any unavoidable tree loss. Equipment and materials should not be placed or stored in any environmentally sensitive areas. Where possible, excavation should be done from non-sensitive areas. Site preparation and construction activities should be timed to avoid disturbing plants and animals during crucial seasons in their life cycle. The specific BMPs that will be utilized for the Eastern Plains project should be identified in the EIS.
- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.
- A wetlands mitigation plan should be provided with the EIS. Due to the time it can take to adequately reclaim some disturbed wetlands, it is suggested that Western require mitigation of wetland disturbance during the project operating time, and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance, or even prior to project construction, if possible. As studies indicate that traditional mitigation is generally not successful in fully restoring wetland function, it is suggested that Western require a two-to-one mitigation of wetland disturbance. Mitigation requirements under 40 CFR Section 230 address the replacement of the wetland functions and values that are unavoidably lost, and any additional DOE, State and local mitigation requirements should be adhered to. The mitigation plan should include, but not be limited to: commitments to acquire and start mitigation work prior to project construction; detailed schedules of pipeline and wetland creation/restoration work; detailed construction plans; a detailed mitigation monitoring plan, including a time table; detailed performance criteria to measure success; detailed specifications and commitments for corrective measures to be taken if performance criteria are not met; detailed specifications and commitments to control invasive species; and, commitments to the establishment of a protection and management plan in perpetuity (i.e., legal surveys of the specific boundaries with buffers and conservation easements that are given to a land conservancy organization) for all mitigation areas.

Mitigation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Neither the Western's August 2, 2006 "Notice of Intent" nor the materials made available at the public scoping meetings identified any air pollution control measures that Tri-State has committed to implement at its proposed power stations. It is thus impossible, at this stage, for any member of the public to identify the appropriate air pollution mitigation measures that are "not already included in the proposed action." 40 C.F.R. § 1502.14(f). To the extent, however, that Tri-State does not propose to implement the following mitigation measures, all of which are feasible at its proposed power stations, we request that Western include them as "appropriate mitigation measures" in the EIS: continuous operation, all year, of those add-on pollution control devices that Tri-State proposes to implement; activated carbon injection, operated continuously and all year; fabric filters with FGD control, operated continuously and all year; circulating dry scrubbers, operated continuously and all year; and circulating fluidized bed technology.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please analyze any proposed use of Adaptive Resource Management (ARM).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether any mercury control credits under the new EPA mercury rule will be used as an alternative to controlling mercury emissions. If yes, please consider the level of credits to be purchased.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please ascertain whether Tri-State is willing to accept the same BACT limits proposed for the Desert Rock, NM coal plant project.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please attach environmental health funds to permits and/or otherwise make funding available to all communities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternate transportation routes for all hazardous materials to avoid populated areas.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative disposal site(s) for ash and alternative modes of transportation to the disposal site(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative disposal site(s) for scrubber wastes and alternative modes of transportation to the disposal site(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative sites and/or energy generation options and provide all documentation of Western consideration of those alternatives in the EIS.

Mitigation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider impacts to existing wells, springs, wetlands, wildlife, etc., including a detailed mitigation plan that includes avoidance as a mitigation strategy. Please make that information public as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider measures for protecting water at the source for use by wildlife.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider proposed and alternate plans to prevent interference with wildlife migration routes.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider proposed and alternative water consumption rates and amounts and include an analysis of proposed and alternative recycling methods.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the applicant to guarantee maintenance schedules of the additional infrastructure requirements through commitment to a mitigation fund for resurfacing and repair of local roads from damage by heavy vehicles serving the project.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider requiring the construction of an overpass of the rail tracks to allow local traffic to pass when trains are on the track.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the amount of mercury per year to be emitted into the air and the amount of mercury to remain as residual in fly ash or other plant waste material. Please consider the applicant's proposed disposal method and all viable alternative disposal methods. Please consider the applicant's proposed disposal location(s) and alternative location(s).
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the applicant's proposed mercury emission control technology to be used in the plant and all viable alternative mercury emission control technologies.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the pollution controls that would be used at each plant and their inlet and outlet emission levels in lb/hr or lb/MMBtu for each pollution control device.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the proposed BACT limits for NOx, SO2, PM/PM10, sulfuric acid mist, and fluorides for the PC boilers including the proposed emission rates and the associated averaging time, e.g., 0.06 lb/MMBtu NOx based on a 24-hour average.

Mitigation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the type of drift eliminators on cooling towers that will be used and evaluate their drift efficiency.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider the use of coal washing to minimize SO2, PM/PM10 emissions, and HAP emissions.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider Tri-State's proposed methods that will be used to control dust from storage piles, conveyors, crushers, pulverizers, and storage bins and their control efficiency?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether any pretreatment of water will be required before it is used at the plants.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether the proposed control equipment design includes bypasses of the pollution control system, and, if so, under what conditions bypass will occur.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consult with the State Historic Preservation Officer and any Indian Tribe ascribing historic and traditional affiliation to the region regarding mitigation of impacts to significant historic properties.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine by what percentage mercury is to be controlled, including the basis for this value (i.e., pollution control train proposed for criteria pollutants, or are you adding carbon injections or other mercury specific control). Please specify all mercury control.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project triggers MACT? If so, please determine which constituents and what MACT controls apply. If not, please analyze and provide the supporting HAP emission calculations?
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please determine whether the project will require emission offsets. If yes, please determine the source of the offsets.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop a detailed maintenance schedule for the project and associated facilities.

Mitigation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop detailed traffic control plans on local roads during construction and operation of the project. Please consider requiring the applicant to carry all cost of any local infrastructure development related to the project, e.g., curb upgrades, additional parking, additional traffic controls, additional sidewalks, and additional lanes.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop extensive and detailed emergency management plan(s) including the amount of fuel that will be used for emergency engines, e.g., fire water pumps, emergency generators, and fuel sulfur content and any requisite air emission permits for those sources. Please include responsibility assignments for clean up efforts and inspection and oversight.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop measures to prevent bird collisions with transmission lines.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to control the cancer and noncancer health impacts from emissions and discharge.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to manage wilderness study areas so as to ensure they retain wilderness characteristics.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop plans to prevent significant deterioration of air quality in the vicinity of the plant.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop precautionary measures to keep birds safe from the evaporation pond(s) and all other facilities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop specific measures to minimize Legionella outbreaks from cooling tower emissions.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please include measures to keep wildlife away from waste ponds, disposal sites, other relevant plant operation facilities, and throughout all project construction activities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide all supporting documentation to substantiate Tri-State's claim that the Kansas and Colorado coal plants will use state-of-the-art emission control technologies.

Mitigation

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide for a staffed complaint hotline to address neighborhood problems, e.g., noise, odor, dust, traffic, vibration, and a plan to resolve any identified problems.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide plans to assist local agencies with infrastructure issues related to the work force of the project construction and plant operation, e.g., water, sewerage, fire fighting, hospitals, schools, roads, etc. Please include cost estimates associated with these infrastructure additions or estimates of those infrastructure addition requirements.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require adjudication of all water rights prior to issuance of DEIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require an air quality permit to construct and a permit to operate prior to issuance of the DEIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require site fencing and make public the plot plan showing the fenced boundary as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require the development of a Risk Management Plan that evaluates worst case scenarios and responses for environmental accidents and make that information public as soon as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. With respect to the coal that will be burned at the plants, if it is to be Powder River Basin coal, then: Please indicate what specific dust control measures will be used to account for the high friability of this coal; Please consider whether the project will conduct dust control audit(s) to assess the performance of dust collection and provide the designs for the dust control audit(s) as they become available; Please consider whether the project will develop measures to prevent explosions and fires as have been experienced by other plants using PRB coal such as the explosion at the Sooner Power Plant on 2/16/04; Please consider whether the project will include a permanent wash down system in the plant design and make public that design and the amount of water the system will use annually; Please evaluate the number of access ports contained in the applicant's present design plan and the levels at which these access ports will be installed; Please consider whether the plant's coal handling facilities will use CO, Thermal and Infrared scanning monitoring equipment and provide the plans for such monitoring equipment; Please evaluate Fire Hazard Mitigation systems inside bunkers or silos, and provide the plans for such systems.
- An EIS must "inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40

Mitigation

- C.F.R. § 1502.1. To that end, the range of alternatives considered in an EIS must include (1) no action, (2) all other reasonable courses of action, and (3) mitigation measures. Id. § 1508.25(b). Western must “rigorously explore and objectively evaluate all reasonable alternatives.” Id. § 1502.14(a) (emphasis added). It therefore must “[i]nclude reasonable alternatives not within the jurisdiction of the lead agency” as well as “appropriate mitigation measures not already included in the proposed action or alternatives.” Id. § 1502.14(c), (f). Construction and/or operational activities associated with the transmission line and facilities, such as substations, may cause an increase in local noise levels. The EIS should identify and discuss the sources of short-term and long-term noise pollution. The document should identify and provide details of the mitigation measures that will be implemented. Mitigation measures may include, but are not limited to, the use of noise barriers, placement of trees and shrubs, sound-proofing structures, and the use of equipment that emit the lowest levels of noise possible.
- EPA encourages the use of a NEPA/404 permit merger process for this proposal and recommends concurrence points between BLM, the Corps and the resource agencies on (1) purpose and need, (2) alternatives and alternatives analysis, (3) preferred alternative and mitigation measures to be implemented. Events such as vehicular spills of hazardous or toxic materials could result in significantly more adverse habitat and water quality impacts. For project activities which may result in contamination of water resources, the EIS should: discuss the frequency or likelihood of such events; and, describe the spill and release response capabilities (i.e. available response equipment, personnel, expected response times, etc.).
- I really appreciated the opportunity to visit with you and all other people on board at the scoping meeting in Sharon Springs. In addition to the information gained from the scoping meeting, I have also been in contact with our field staff and have compiled a comprehensive list of concerns and points of information I will include in our review.
- If mitigation cannot be performed within the same watersheds where wetland impacts occur, and mitigation banking is proposed as an option, then details on mitigation bank(s), or other similar compensation programs, should be included in the EIS. This information should include, but not be limited to, the location of the mitigation bank(s) and the respective service area(s), description of the bank's landscape setting (geomorphology), water source(s), vegetative structure and composition, identification of the bank owner, total acreage to be purchased, the amount of each type of wetland to be purchased, and the amount of each wetland type available, cost, and an explanation of how the functions and values of the wetlands lost are replaced by the proposed mitigation.
- Impact to wetland and riparian areas, and other waters of the U.S. will occur for this project. Executive Order 1 1990, "Protection of Wetlands," signed in 1978 and amended in 1988, addresses potential long and short-term adverse impacts associated with the destruction or modification of wetlands. In addition, the national wetlands policy has established an interim goal of "No Overall Net Loss of the Nation's Remaining Wetlands" and a long-term goal of increasing quantity/quality of the Nation's wetlands resource base. ("Presidential Wetland Policy of 1993" website: http://www.usace.army.mil/inet/functions/cw/cecwo/reg/aug93w et.htm). In accordance with the intent of the order and national policy, EPA suggests a mitigation commitment that indirect draining of, or direct disturbance of, wetland areas will be avoided if at all possible, and a commitment to replace in kind such unavoidably impacted wetlands. EPA also suggests that Western require complete avoidance of disturbance to any fen wetland (a Category I resource). The EIS should consider a variety of means to protect wetlands and riparian areas, especially those areas with perennial streams which also serve as water supply for area communities. In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- Please conduct an exhaustive analysis of Tri-State and all REA’s, coops, parent and sister companies’ environmental compliance history.
- Please consider noise levels of steam blows and proposed and alternative noise reduction control measures.
- Please consider revegetation, dust control, and weed infestation of stripped agricultural lands due to decreased water availability and air emissions impacts.

Mitigation

- Studies show that new roads and pipeline/utility ROWs can become a pathway for the spread of invasive plants; therefore, we suggest that the vegetation management plan address control of such plant intrusions. As this project follows many existing ROWs, the current trend for weed infestations in the affected project area should be evaluated for mitigation effectiveness and improvements if warranted. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. There are a number of prevention measures available such as reseeding disturbed areas as soon as possible and cleaning equipment and tires prior to transportation to an un-infested area. Should an infestation occur or already be present, EPA supports integrated weed management (e.g. effective mix of cultural, education and prevention, biological, mechanical, chemical management, etc.). However, we encourage prioritization of management techniques that focus on non-chemical treatments first, with reliance on herbicides being the last resort. We recommend implementing yearly review and planning activity requirements for the above concerns, including evaluation of effectiveness to date.
- The appropriate area of consideration and the time frame to use when assessing cumulative impacts will vary for each resource under consideration. For example, forested wetland loss is probably best considered in the context of historical forested wetland losses in a particular watershed. Incremental forested wetland losses due to past, present, and reasonably foreseeable future actions when viewed in a cumulative context may result in a significant impact due to the time it takes to replicate a forested wetland. Consequently, impacts to a forested wetland resource, no matter how small for a particular proposal, may be significant. This would dictate that all efforts be made to avoid and minimize impacts to forested wetlands, and require adequate mitigation for any unavoidable loss.
- The EIS should address the issue of light pollution. Poorly designed lighting can waste energy and impact the view of the night sky. These problems can be addressed with efficient lighting systems designed to illuminate the ground or work area for safety and utility without causing glare, upward shine, or wasting energy. EPA suggests that the EIS address these issues and detail mitigation requirements, consistent with OSHA or other applicable safety requirements, for implementation by the proponent.
- The EIS should evaluate effects of any proposed road improvements, new road construction, and general ROW construction and operation activities on the area. The evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. Dust particulates from construction, and ongoing operations on roadways are important concerns. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Please include detailed specific plans for addressing dust control for the project. Items in the plan should include, though not necessarily limited to, dust suppression methods, inspection schedules, and documentation and accountability processes. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. Consideration should be given to asphalt or concrete roadways instead of dirt or gravel roads.
- The EIS should evaluate storm water management. To protect water quality from storm water runoff, including contaminated runoff from construction, operation, and maintenance activities, specific practices should be implemented. These practices include the following: Preserve existing vegetation during clearing and grading; Divert upland runoff around exposed soils; Use sediment barriers to trap soil in runoff where sheet flows occur; Protect slopes and channels from gullying; Install sediment traps and settling basins to reduce the velocity of channeled runoff; Store chemicals for project activities in covered containers in a specific location; Identify areas and procedures for fueling, and provide a protected vehicle washout; Preserve vegetation near all waterways; Ensure materials and education for cleaning up spills and leaks; and, Inspect the effectiveness of best management practices.
- The EIS will need to analyze potential impacts to surface water, groundwater, and other existing and potential drinking water sources, including specifically any function and water quality impacts to aquifers. The analysis should also include water quality, quantity, and any adverse change to current water quality of the any rivers, streams and their tributaries. BMPs and mitigation measures should be used to protect these resources. EPA suggests ensuring that plans for any activities with the potential to impact any potential drinking water sources should be coordinated with the states and be evaluated for compatibility with the State's Source water Protection plans.

Mitigation

- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.
- The protection of air quality should be addressed in the EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related VOC and NOx emissions, and any potential air toxics releases, should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities, and ongoing operation of the roadways are important concerns. The EIS should evaluate air quality impacts, and detail mitigation steps that will be taken to minimize associated impacts. This analysis should also address and disclose the project's potential affect on: all criteria pollutants under the National Ambient Air Quality Standards (NAAQS), including ozone; visibility impairment, and air quality related values (AQRV) in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.
- The scope of the EIS should include the Integrated Resource Plan soon to be submitted by the Tri-State Generation and Transmission Association to the Western Area Power Administration. Resource decisions directly affect transmission requirements and the Rocky Mountain Farmers Union believes the scope of the EIS must encompass both. Federal regulations at 40CFR1500.2© specifically require integration of other planning procedures: "Federal agencies shall to the fullest extent possible: Integrate the requirements of NEPA with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively."
- Visual impacts associated with project construction and operation activities may affect the visual character and scenic resources of an area, including the aesthetic and/or functional quality of recreational experiences. This may include the introduction of impacts out of character with the setting and the visual impact of equipment and crews during construction and later operational/maintenance activities. The severity of these effects depends on a number of factors, including: can the surrounding landscape integrate visual changes without attracting attention; how far from, or visible to, sensitive viewing areas and/or roadways are the activities; how much disturbance will occur; what mitigation efforts are put forth to integrate activities and structures with the area; and/or what is the potential to reclaim disturbed landscapes? The EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.
- Western’s EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: [H]istoric and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.
- Western’s EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Energy requirements and conservation potential of various alternatives and mitigation measures.
- Western’s EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25(c). For example, the EIS must consider: Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures.
- We also note that hay can be a source of noxious weed seed. Hay/straw is used as mulch to slow erosion and encourage seed germination, and used to feed horses in hunting and recreation camps, and as wildlife feed during harsh winters. Cattle that are released on grazing allotments or horses used on public lands can transport undigested weed seed and spread it in their manure. Western should consider requiring use of certified weed free hay in mitigation.

Mitigation

- We encourage Western to require delineation and marking of perennial seeps and springs and wetlands on maps and on the ground before activity development so industry employees will be able to avoid them. We recommend establishment of wetland and riparian habitat buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. We recommend a 100-foot buffer of native vegetation be provided around each mitigation site to help enhance wildlife habitat and protect the site from sediment buildup that could result from land use practices immediately outside the buffer area. If stream bank disturbances result, then we suggest stabilizing stream banks using soil bioengineering techniques.
- We have reviewed the information provided for the construction of approximately 220 miles of new high-voltage transmission lines in western Kansas. Additional review will be needed for the siting of the ground level fiber optic regeneration facilities and access roads as the final route becomes more apparent. The project was reviewed for potential impacts on crucial wildlife habitats, current state-listed threatened and endangered species and species in need of conservation, and public recreation areas for which this agency has some administrative authority.
- While wetland enhancement can be a valuable means of providing compensatory mitigation, EPA does not consider enhancement to have occurred unless a suite of wetland functions have been enhanced (rather than only one). Wetland restoration is preferred to wetland creation or enhancement because it has a higher rate of success. Regardless of the mitigation option chosen, it is critical to establish baseline conditions for the proposed mitigation site, and to develop quantitative success criteria based on local reference wetland conditions.
- With projects such as the Eastern Plains, there are many activities requiring management, mitigation, and monitoring of construction and operational project impacts, as well as reclamation status and effectiveness. Proper BMP and other mitigation measures implementation and maintenance are very important, and various impacts can be minimized or potentially eliminated if BMPs and other mitigation measures are properly implemented. Details should be provided for accomplishing these activities in the EIS. Also, it is important to specifically designate what entity (e.g., Western, contractors, resource organizations, or some combination) will be in charge of which activities, and which will have specific enforceable accountability. In addition, the BMPs, mitigation measures and other related activities require inspection, documentation and record keeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. It may be appropriate for the proponents to fund an account from which 3rd party contractors can be contracted to perform inspections and monitoring, and/or the implementation of some of the mitigation measures. Please provide details on the issues discussed above in the EIS, preferably in a separate monitoring plan. It may be appropriate to have commitment for these activities placed in the ROD.
- Within the past year, Wheatland Electric has approached our department in regards to the possibility of cooperative efforts in restoring a large portion of irrigated cropland south of the Holcomb plant back to sandsage prairie. This area, if restored, will increase viable habitat for the Lesser Prairie Chicken and other grassland obligate species. We are not supportive of routes B1 and B2 because of the location of this future restoration effort.

Noise

- Construction and/or operational activities associated with the transmission line and facilities, such as substations, may cause an increase in local noise levels. The EIS should identify and discuss the sources of short-term and long-term noise pollution. The document should identify and provide details of the mitigation measures that will be implemented. Mitigation measures may include, but are not limited to, the use of noise barriers, placement of trees and shrubs, sound-proofing structures, and the use of equipment that emit the lowest levels of noise possible.
- esp. of construction
- Noise
- Please conduct baseline noise monitoring through a permanent noise monitoring station that continuously collects and records noise data.
- Please consider all noise impacts from the operation and construction of the transmission lines.
- Please consider noise levels of steam blows and proposed and alternative noise reduction control measures.
- Please consider the projected peak and 1-hour average and maximum noise levels at the fence line of the coal plants in noise analyses.

Process

- The scoping meetings held in September included little effective provision for public comment. After viewing posters describing Western's project and having an "open house" opportunity to meet with Western officials, the public had no opportunity for direct comment, questions, and in-depth discussion, thus blunting the results of the meeting. Many community members expected an opportunity to stand up and express comments or concerns as in a town hall meeting. Neither the public nor members of the press had any opportunity to hear or know other citizens' concerns about the project. There was no interaction between community members. If the purpose of a scoping process is to generate comment, having the opportunity to hear your neighbors' concerns may spark others of your own and vice versa. The open house, tabletop format did not allow all public comments to be recorded. Community members who expressed concerns to Western representatives at each tabletop station really did not actually lodge an official comment. Again, if the purpose of the scoping meetings is to assist Western in defining the scope of the EIS and identify potential alternatives, it does not improve the process to have valuable comments lost in the distance from tabletop discussion to the "write your comments here" table. There are perhaps elderly or under-educated community members in ANY public scoping meeting for whom a written comment requirement effectively eliminates their opportunity to be heard. Citizens that made the rounds in the tabletop forum were often told that a particular problem was "not in my area." It is doubtful too many of the commenters eventually found the person who was responsible for that area. In a town hall forum, the responsible person would be sitting on the panel, able to answer the question immediately. Western ineffectively communicated what was supposed to happen in their tabletop format. The format prohibited the press from effectively communicating the breadth of the public's concern to the community. If the forum had allowed the press to adequately communicate to the larger community the range of concerns of those present that could have prompted further written scoping comments from those community members unable to attend your meeting. Now such additional comments will never come forth.
- If the Colorado PUC forced tri-state to engage in integrated resource planning, there is no way they could justify building $5 billion worth of plants
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider alternative sites and/or energy generation options and provide all documentation of Western consideration of those alternatives in the EIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider impacts to existing wells, springs, wetlands, wildlife, etc., including a detailed mitigation plan that includes avoidance as a mitigation strategy. Please make that information public as it becomes available.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require site fencing and make public the plot plan showing the fenced boundary as it becomes available.

Process

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. No action. In its Notice of Intent to Prepare EIS (71 FR 43733, 34), Western states that "[u]nder the no action alternative, Western would not participate in the Project." The Coalition is concerned that this incorrect statement presumes that the Project will proceed regardless of Western's participation and thus the "no action alternative" will have the same impacts as full construction and implementation of the proposed Project. Western admits that its actions include "construction planning and management for approximately 1,000 miles of high voltage transmission lines, and acquiring rights-of-way for transmission lines, access roads, and other facilities…the Project [also] includes four new substations; expansions of approximately eight existing substations; and installing fiber optic communications system for transmission lines." 71 FR 43733, 34. Thus, the proper baseline for the "no action alternative" is that these facilities are never constructed. As such, not constructing the Project would therefore represent the least harmful alternative. If Western does not analyze the "no Project construction alternative", there will be no basis in the administrative record for concluding the Project's impacts are appropriate or necessary. The Coalition considers the Project to include all impacts associated with Tri-State's three proposed coal plants that will be serviced by the EPTP. Consequently, please conduct the requisite analyses and consider the no action alternative described herein in the EIS.
- An EIS must "inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. § 1502.1. To that end, the range of alternatives considered in an EIS must include (1) no action, (2) all other reasonable courses of action, and (3) mitigation measures. Id. § 1508.25(b). Western must "rigorously explore and objectively evaluate all reasonable alternatives." Id. § 1502.14(a) (emphasis added). It therefore must "[i]nclude reasonable alternatives not within the jurisdiction of the lead agency" as well as "appropriate mitigation measures not already included in the proposed action or alternatives." Id. § 1502.14(c), (f). EPA encourages the use of a NEPA/404 permit merger process for this proposal and recommends concurrence points between BLM, the Corps and the resource agencies on (1) purpose and need, (2) alternatives and alternatives analysis, (3) preferred alternative and mitigation measures to be implemented.
- Even if not specifically stated in the comment, please make all information public as it becomes available, including hard copy(ies) to local and regional libraries and at the Western field and state offices in Kansas, Colorado, Nebraska, and New Mexico and in electronic format to a public website. Please create a public website or FTP site separate for this purpose. "As it/they become(s) available" means prior to publication of the Draft Environmental Impact Statement ("DEIS").
- Federal Regulations at 40CFR1500.2© specifically requires integration of other planning procedures: "Federal agencies shall to the fullest extent possible: Integrate the requirements of NEPA with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively." How does Western plan to integrate the IRP and EIS requirements?
- Id. § 1502.16. Western bears a heightened responsibility to assess environmental impacts if the project at issue involves the use of public land. See id. § 2800.0-2 ("Protect the natural resources associated with the public lands and adjacent private or other lands administered by a government agency"; "Prevent unnecessary or undue environmental damage to the lands and resources."). Accordingly, we request that the EIS (1) assess the degree to which the project envisioned by Western/Tri-State would have each of the following types of impact; (2) assess the degree to which each of the reasonable alternatives identified in the next section of these comments would have each of those types of impact; and (3) compare the impacts of the project envisioned by Western/Tri-State to the impacts of the alternatives: [list of impacts to be addressed listed as individual comments]
- In order for the public and agency reviewers to understand the degree of direct, indirect and cumulative impacts (impacts) of the project, the EIS should include a detailed characterization of the affected environment. This would include, but is not limited to, providing detailed descriptions of the resources in the study area supported with photos and figures/maps that depict the various alternatives in relation to the study area resources. This information should include, but need not be limited to, the identification of all wetlands, streams/rivers, lakes, floodplains, farmland, forested or treed land, environmental justice communities, residences, Native American tribe and resource concerns, and historic/cultural resources.

Process

- It appears from the NOI that this EIS and associated NEPA documentation will be used to address CWA Section 404(b)(l) Guidelines compliance. All wetlands and waters of the U.S. (e.g., streams, rivers, lakes) that would be crossed or otherwise impacted by the proposal should be identified. This should include the identification of "farmed wetlands" and "prior converted wetlands." Impacts to these resources should be thoroughly identified and discussed. This may include, but should not be limited to, a characterization of their existing conditions, and the identification and assessment of the direct, indirect and cumulative impacts to water quality/quantity, aquatic organisms and habitat. Details regarding the widths of proposed stream and river crossings and how the crossings will be accomplished should be identified and discussed. Where feasible, we recommend the use of low impact construction methods for all water crossings, including their associated floodplains, wetlands and forest lands. Where feasible, we recommend the use of directional drilling for all water crossings and their associated floodplains, wetlands and forest lands, for burying of the fiber optic cable.
- Lack of need vs. adverse consequences
- Participants were specifically told at the public meetings that the new proposed coal plants were not within the scope of the EPTP. This is factually and legally incorrect. These statements make clear that Western has already inappropriately pre-judged the scope of the EPTP before even considering any public input. Thus, Western's scoping process has been arbitrary and capricious. We request that Western reissue a new notice of intent to prepare an EIS and specifically identify the three new coal plants as part of the scope of this project to be considered.
- Placement of these facilities and roads will also need to avoid ephemeral wetlands known as playa lakes which are important stopover points for migrating waterfowl and shorebirds. These concerns will need to be addressed as the project progresses and routes are selected and may warrant an Action Permit from this department in the future.
- Please conduct an exhaustive analysis of Tri-State and all REA's, coops, parent and sister companies' environmental compliance history.
- Please conduct an inventory of seeps and springs impacted or utilized by the proposed project. Please make public the permit/proof number or legal description of each seep or spring to be used as the information becomes available.
- Please conduct and make public a detailed report of environmental and cultural impacts from the point of view of the communities in the immediate vicinity and within an 80 mile radius of the proposed plant locations.
- Please conduct at least a 0.25 mile survey corridor for all rights-
- of-way and a 0.25 mile radius survey beyond the main plant sites for all environmental, natural resource, and cultural resource investigations.
- Please conduct economic and/or socio-economic studies regarding the project and provide those studies as they become available.
- Please consider all impacts relative to the maximum anticipated project life, e.g. if project were to operate at maximum capacity for 50+ years.
- Please consider any plans to pipe water from any other basin to support the need for water for any aspect of the project and make public all information regarding those plans as it becomes available.
- Please determine what plans, if any, exist for subdivisions in and around Holcomb and Garden City, Kansas and make copies of those plans public as they become available and include in the EIS scope.
- Please ensure Tri-State has or will have committed sufficient capital expenditures over the next 5 to 7 years to construct the Project and related coal plants.
- Please ensure Western/Tri-State has filed and has obtained approval for all requisite FERC certificate(s) for EPTP, if any.
- Please include simulated water level draw-down contour maps for the basin at time steps of 6 months and years 1, 2, 5, 10, 15, 20, project life in the EIS analysis. Please also include water level contour maps for these time steps and direction of ground water flow. Please make these maps public as they become available.
- Please make all correspondence on all permits submitted to any local, state or federal agency public as the materials become available.
- Please make all information on the selection of waste disposal sites and alternative sites public as the material becomes available.

Process

- Please make all studies and supporting documentation, including all third-party prepared environmental and cultural resources technical and evaluative reports available to all affected communities as they are completed and throughout the preparation of the DEIS and when the DEIS is published.
- Please make independent experts available to the communities and other interested entities for review of permit applications, technical reports, and other project requirements and components.
- Please make public the water Tri-State claims to hold under option for the proposed project, including the name of the current water user, the current water rights amounts, type of use, and place of use as they become available.
- Please obtain all Clean Water Act discharge or fill permits and make public the nature of the discharge and/or fill and all permit applications as they become available.
- Please provide a detailed map showing all points of study including, but not limited to, test holes, production wells, monitor wells/piezometers, ET measurement sites, stream/spring flow measurement locations, weather measurements, geophysical measurement locations, etc. as they become available.
- Please provide an electronic copy of all of the meteorology and ambient air quality monitoring data collected thus far, and please provide all future air quality monitoring data.
- Please provide public training on the permitting and NEPA process to all communities designated as environmental justice communities.
- Please publicize the names, titles, addresses, phone numbers, and job descriptions of all Tri-State employees, and outside consultants and contractors who are currently performing any work on the EPTP and related power generation facilities or who are anticipated to perform such work throughout the development of the EIS.
- Right after the EPTP EIS Public Scoping meetings a meeting between Colo. Springs Utilities and the EPTP Route Selection Team should be conducted. Need to share corresponding alternative corridor data to coordinate route refinement. CSU data will be downloaded on a disc for data share.
- The Coalition makes the following request for future public involvement and other procedural issues for this project. Please ensure federal, state, and local permitting agencies hold open format public meetings or hearings and establish a basis for ongoing credible dialogue for each permit application.
- The Coalition makes the following request for future public involvement and other procedural issues for this project. Please include a peer oversight process of DEIS environmental reports independent of Tri-State funding.
- The Coalition makes the following request for future public involvement and other procedural issues for this project. Please indicate in detail reasons for refusing each request included in these comments.
- The Coalition makes the following request for future public involvement and other procedural issues for this project. Please require Tri-State to swear under penalty of perjury that all information provided to the public as part of this process is complete and accurate.
- The Coalition makes the following request for future public involvement and other procedural issues for this project. The Coalition requests mailings of all project design changes for this action as soon as they are known as per 40 CFR 1506.6(b)(1).
- The Coalition makes the following request for future public involvement and other procedural issues for this project. This Coalition deems any change in the project as substantial bearing on the impacts of the project. See 40 CFR 1501.7©. Please conform to the requirements at 40 CFR 1501.7 and 1506.6(b)(3) after each design change.
- The EIS should confirm that appropriate National Historic Preservation Act Section 106 consultation with the Colorado and Kansas State Historic Preservation Officers (SHPOs) has taken place. This documentation would be in the form of letters from the SHPOs.
- The EIS should provide a detailed and accurate description of the various components of the proposed Eastern Plains project. Besides locating all transmission and fiber optic lines, all individual components (e.g., buildings, equipment, and project foot print) that make up a substation, maintenance/service center, or any other project facility or infrastructure, should be identified. In addition, the EIS should include detailed project location maps that delineate the proposed new transmission line work in relation to existing rights-of-way and proposed new rights-of-way.

Process

- The Purpose and Need for a proposal is the basis for identifying all feasible alternatives that undergo environmental impact analyses in a NEPA document. All feasible alternatives that would satisfy the Purpose and Need should be given equal consideration and analysis. The alternatives analysis "should present the environmental impacts of the proposed action and the alternatives in comparable form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public" (40 C.F.R. 1502.14). At least one alternative should emphasize conservation of natural resources, particularly those deemed significant, rare, and/or of high public value. The EIS should include, but not be limited to, a "no-build" alternative and, if feasible, consider alternatives that utilize existing rights-of-way, whether they are owned by the applicant or not. The alternatives analysis discussion should include justification for any proposed deviation from utilizing existing utility rights-of-way.
- The scoping meetings held in August and September lacked several provisions for public comment. The "open house" format did not provide a quality environment for direct comment, questions, or in-depth discussions on the EPTP. Our members did not have an opportunity to hear or know other citizens' concerns about the project or interact with other community members
- This project has been poorly publicized. Insufficient time has been allocated for initial public comments. The September 30, 2006 deadline should be extended.
- Tri-State Generation and Transmission (Tri-State) representatives were present officially at the scoping meetings. Tri-State is proposing to build at least 2,100 MW of pulverized coal plants in Kansas and Colorado that is the main purpose of building the EPTP. At the same time, Western officials stated at public meetings that these proposed coal plants were outside the scope of the EPTP EIS process. These statements made clear that Western has already inappropriately pre-judged the scope of the EPTP EIS process. It was also inappropriate to have Tri-State assist with the scoping meetings when they serve to benefit from the EPTP. The Coalition makes the following request to cure these deficiencies in the Western scoping process for this project. These requests are not meant as an exhaustive list of remedies for the problems discussed herein: Western should conduct all public meetings in a question and answer, open format with a facilitator and have all questions, comments, and answers recorded and/or transcribed.
- Tri-State Generation and Transmission (Tri-State) representatives were present officially at the scoping meetings. Tri-State is proposing to build at least 2,100 MW of pulverized coal plants in Kansas and Colorado that is the main purpose of building the EPTP. At the same time, Western officials stated at public meetings that these proposed coal plants were outside the scope of the EPTP EIS process. These statements made clear that Western has already inappropriately pre-judged the scope of the EPTP EIS process. It was also inappropriate to have Tri-State assist with the scoping meetings when they serve to benefit from the EPTP. The Coalition makes the following request to cure these deficiencies in the Western scoping process for this project. These requests are not meant as an exhaustive list of remedies for the problems discussed herein: Western should disallow any future Tri-State involvement in public meetings. If, however, Tri-State continues to fulfill an official role in public meetings, the Coalition is requesting one as well.
- Unless otherwise stated, "Project" means the coal-fired power plants, railroad spurs, power lines, transmission links, transmission upgrades, buffer zone areas, water pipelines, evaporation ponds, camps, access roads, waste fill site(s), and all other project facilities and components not listed here.
- Western's EIS must assess all impacts of the EPTP, including any associated energy generation facilities—such as Tri-State's proposed 1,400 MW of new coal plants in Holcomb, Kansas and the proposed 700 MW facility in Southeast Colorado. 40 C.F.R. §§ 1502.14, 1502.16. Specifically, the EIS must "present the environmental impacts of the proposal and the alternatives in a comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public." Id. § 1502.14. In order to assess adequately the environmental impacts of the project and of reasonable alternatives to the proposed project (including, but not limited to, the proposed project plus additional mitigation measures), Western's EIS must assess the direct, indirect, and cumulative impacts that the proposed project and each alternative would have. In defining the scope of the EIS, Western must, accordingly, identify each type of impact that will be assessed and each alternative that will be considered. Id. § 1508.25.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25©. For example, the EIS must consider: [E]nvironmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented.

Process

- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25©. For example, the EIS must consider: [H]istoric and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25©. For example, the EIS must consider: Energy requirements and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25©. For example, the EIS must consider: Natural or actionable resource requirements and conservation potential of various alternatives and mitigation measures.
- Western's EIS must assess direct, indirect, and cumulative impacts. Id. § 1508.25©. For example, the EIS must consider: Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.
- Western's Notice of Intent to Prepare and EIS (published August 2, 2006) does not mention or identify the construction of three new coal-fired power plants units that will be the source of the electricity to be carried by the proposed transmission lines and facilities. These three new pulverized coal plants, proposed by Tri-State, account for approximately 2,100 MW of new coal fired electricity that will be transmitted by the EPTP. The Rocky Mountain Farmers Union believes these three new coal units must be identified and considered in the EIS in order to properly assess the impacts of Western's proposed action.
- We highly recommend that future planning for the EPTP should have local community meetings of landowners and other community stakeholders that will be impacted by the project. These meetings should allow all community members to ask questions that will be recorded and enable the community to hear the concerns of others.
- With projects such as the Eastern Plains, there are many activities requiring management, mitigation, and monitoring of construction and operational project impacts, as well as reclamation status and effectiveness. Proper BMP and other mitigation measures implementation and maintenance are very important, and various impacts can be minimized or potentially eliminated if BMPs and other mitigation measures are properly implemented. Details should be provided for accomplishing these activities in the EIS. Also, it is important to specifically designate what entity (e.g., Western, contractors, resource organizations, or some combination) will be in charge of which activities, and which will have specific enforceable accountability. In addition, the BMPs, mitigation measures and other related activities require inspection, documentation and record keeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. It may be appropriate for the proponents to fund an account from which 3rd party contractors can be contracted to perform inspections and monitoring, and/or the implementation of some of the mitigation measures. Please provide details on the issues discussed above in the EIS, preferably in a separate monitoring plan. It may be appropriate to have commitment for these activities placed in the ROD.

Public Involvement

- The scoping meetings held in September included little effective provision for public comment. After viewing posters describing Western's project and having an "open house" opportunity to meet with Western officials, the public had no opportunity for direct comment, questions, and in-depth discussion, thus blunting the results of the meeting. Many community members expected an opportunity to stand up and express comments or concerns as in a town hall meeting. Neither the public nor members of the press had any opportunity to hear or know other citizens' concerns about the project. There was no interaction between community members. If the purpose of a scoping process is to generate comment, having the opportunity to hear your neighbors' concerns may spark others of your own and vice versa. The open house, tabletop format did not allow all public comments to be recorded. Community members who expressed concerns to Western representatives at each tabletop station really did not actually lodge an official comment. Again, if the purpose of the scoping meetings is to assist Western in defining the scope of the EIS and identify potential alternatives, it does not improve the process to have valuable comments lost in the distance from tabletop discussion to the "write your comments here" table. There are perhaps elderly or under-educated community members in ANY public scoping meeting for whom a written comment requirement effectively eliminates their opportunity to be heard. Citizens that made the rounds in the tabletop forum were often told that a particular problem was "not in my area." It is doubtful too many of the commenters eventually found the person who was responsible for that area. In a town hall forum, the responsible person would be sitting on the panel, able to answer the question immediately. Western ineffectively communicated what was supposed to happen in their tabletop format. The format prohibited the press from effectively communicating the breadth of the public's concern to the community. If the forum had allowed the press to adequately communicate to the larger community the range of concerns of those present that could have prompted further written scoping comments from those community members unable to attend your meeting. Now such additional comments will never come forth.
- Also many land owners have no idea that you have proposed power lines over them, I discovered this when I talked to my neighbors under the proposed G-7 power line. I think you should go another step and make sure every body knows about thes [sic] power lines.
- Did a good job on his property [BC-HT line]
- Even if not specifically stated in the comment, please make all information public as it becomes available, including hard copy(ies) to local and regional libraries and at the Western field and state offices in Kansas, Colorado, Nebraska, and New Mexico and in electronic format to a public website. Please create a public website or FTP site separate for this purpose. "As it/they become(s) available" means prior to publication of the Draft Environmental Impact Statement ("DEIS").
- He has questions about the environmental process, about the routes, and wants to know why he wasn't notified. His phone number is (719)740-3340.
- I (Kristina Kampbell) received a phone call from a Mr. Ed Schifferns who lives in Arriba, CO (close to Limon.) Mr. Schifferns just found out that a power line may be built on his property and he never received a mailing about the first set of public meetings. He is pretty irate and would like someone to call him back a.s.a.p.
- I did not realize until this morning that you had a dead line of September 30th to turn the response in. I have several fields included in your proposed route and have great issue on several locations. I was waiting until I had time to sit down and write my concerns to you.
- I understand Public meetings are underway on Tri-State's capacity as it may relate to Renewable energy projects such as ours
- I was wondering why Western Resource Advocates excellent analysis and report challenging the need for this project was not included on your list of links at http://www.wapa.gov/transmisson/eptp.htm
- In Arapahoe County our main concerns are environmental, topographical, agricultural, visual
- Keep up the great job of keeping tribes informed.
- Let me know what my options are with communicating my concerns and suggestions. The electric line put in 3 years ago went across 4 of my fields. I have learned some things from that.
- Mr. Andersen asked if the routes were set yet. He asked for verification of additional scoping meeting sometime around January 2007, again I reaffirmed that there will be another round of scoping meetings sometime (shortly) after the new year. Lastly, he gave me property descriptions for his land and his neighbors land and asked that we send him overlaid maps.

Public Involvement

- Participants were specifically told at the public meetings that the new proposed coal plants were not within the scope of the EPTP. This is factually and legally incorrect. These statements make clear that Western has already inappropriately pre-judged the scope of the EPTP before even considering any public input. Thus, Western's scoping process has been arbitrary and capricious. We request that Western reissue a new notice of intent to prepare an EIS and specifically identify the three new coal plants as part of the scope of this project to be considered.
- Please make all correspondence on all permits submitted to any local, state or federal agency public as the materials become available.
- Please make all studies and supporting documentation, including all third-party prepared environmental and cultural resources technical and evaluative reports available to all affected communities as they are completed and throughout the preparation of the DEIS and when the DEIS is published.
- Please publicize the names, titles, addresses, phone numbers, and job descriptions of all Tri-State employees, and outside consultants and contractors who are currently performing any work on the EPTP and related power generation facilities or who are anticipated to perform such work throughout the development of the EIS.
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- Unlike verbal comments Western and Tri-State officials made at the scoping meetings in September, it is obvious from a review of the specifics of the contract between Western and Tri-State that the first transmission lines to be built connect the Holcomb facility to Lamar, Colorado. Without the existence of the coal plants in Kansas, the transmission system as designed would not be required (Ref. - Exhibit A to Contract No. TS-05-0045 (Western Contract No. 05-RMR-1583) between Tri-State Generation and Transmission Association, Inc. and United States Department of Energy Western Area Power Administration, Rocky Mountain Region, Loveland Area Projects, for Participation in the Eastern Plains Transmission Project).
- We believe the scoping meetings too narrowly defined what people could comment on and failed to identify the proposed new coal plants. Our members attending the scoping meetings were told the three new coal plants were not within the scope of the EPTP or open for discussion at the tables with Western staff.
- We highly recommend that future planning for the EPTP should have local community meetings of landowners and other community stakeholders that will be impacted by the project. These meetings should allow all community members to ask questions that will be recorded and enable the community to hear the concerns of others.

Radio or Television Interference

- GPS interference at auto steering machinery
- My business band 2-way radios already have limited use beside Excel 345 kv line.

Recreation

- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- Please consider impacts to local and regional recreation.

Recreation

- The effects of the Eastern Plains project activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the EIS. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth jeopardizing reclamation efforts or post-project land use; any adverse impacts to Federal/State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or Wetlands and Riparian Zones. Important wildlife issues include: compliance with Federal or State game and fish wildlife management objectives; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, BLM sensitive wildlife or fish species, or other State-listed species. Potential impacts to the above that may occur in the project area should be identified and discussed.
- Visual impacts associated with project construction and operation activities may affect the visual character and scenic resources of an area, including the aesthetic and/or functional quality of recreational experiences. This may include the introduction of impacts out of character with the setting and the visual impact of equipment and crews during construction and later operational/maintenance activities. The severity of these effects depends on a number of factors, including: can the surrounding landscape integrate visual changes without attracting attention; how far from, or visible to, sensitive viewing areas and/or roadways are the activities; how much disturbance will occur; what mitigation efforts are put forth to integrate activities and structures with the area; and/or what is the potential to reclaim disturbed landscapes? The EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.
- We are suggesting two alternate routes that will cause a minor re-routing of your proposed powerline (See map.) One takes your line father east, out of immediate view of the 1-25 corridor, along the route Xcel is proposing for their powerline across ("our") State land. The other route follows the existing powerlines just south of the El Paso County line and then west and north to the Midway Station. Either of these alternate routes are not the 'best case' for us but they would eliminate interference with our ranching operations, somewhat reduce visibility from the 1-25 corridor, lesson intrusion into potential recreational areas and not proscribe any ecologically sustainable development that may be possible in the future.
- We have Dove, Quall [quail], Deer, Antelope, and the sometimes lost Elk out here, but when you guys bring your trucks and equipment out here, they will leave and the hunting ground for hunters gets farther away
- We have reviewed the information provided for the construction of approximately 220 miles of new high-voltage transmission lines in western Kansas. Additional review will be needed for the siting of the ground level fiber optic regeneration facilities and access roads as the final route becomes more apparent. The project was reviewed for potential impacts on crucial wildlife habitats, current state-listed threatened and endangered species and species in need of conservation, and public recreation areas for which this agency has some administrative authority.

Residential

- (placement near roads?)No! there are residents very close or on the roads now
- According to the map the line will be placed across the road or on our private land and we ARE opposed to either situation.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide for a staffed complaint hotline to address neighborhood problems, e.g., noise, odor, dust, traffic, vibration, and a plan to resolve any identified problems.
- Area labeled A9 and A10- Move corridor 1.5 – 2 miles west to avoid houses as marked map 40-T13S, R36W.
- Concerned about the siting of the Rolling Hills/Energy Center line near his new home. Home is located in the SE quarter of Section 9, T22, R36W. Prefers B9 segment over B5, B6, B7 and B8.
- Consider the impact of the number of residences effected [sic] by K12 in the area of 112th and Trumball. Please use the K13 or farther north or south from K12.
- Distance or close proximity to farmsteads

Residential

- G-7 corridor passes in very close proximity to my house and it concerns me of what type of health issues it will effect.
- homes
- house locations
- I believe that the other North-South route is less populated and is straight north of the substation
- I do not want two power lines within one mile of my house. B7 would do that.
- I don't want it on or near my property. Where we live we chose because the powerlines were away from our house. I hope they are placed away from me and my neighbors
- Keep away from developed areas for all reasons checked-off on previous page
- My house is within 1/8 mile from I4, I would prefer you use I1 or I2 Route
- No – it would put it too close to residence.
- Please determine what plans, if any, exist for subdivisions in and around Holcomb and Garden City, Kansas and make copies of those plans public as they become available and include in the EIS scope.
- Please move it further east of us & take it down (west) on 144th where no one lives
- Probably along field lines as this would put it further from our home. The farther west the along the proposed corridor the better.
- Proximity to residences
- Regarding the northerly continuation of the transmission pathway upon crossing Hiway 50, there are two residences on W/2 of Sec 20-24-36 and the Kearny Co. Sanitary Landfill is located on the extreme S/E, corner, of Sec. 18-24-36 with only non-residential CRP or pasture located on E/2 of Sec. 19, as well as most of Sec. 18 (except for the landfill and the extreme westerly part of .Sec 18. Thus, if the transmission lines were to border Sec 30 and Sec 29, as I've mentioned above, then I might suggest that, upon crossing Hiway 50, it would seem plausible to veer the pathway diagonally NW through Sec 19 and Sec 18 to pick up the due northerly pathway showing on your proposed map. Such a route would conveniently lie west of the landfill, again where no residences are too close.
- Regarding the transmission line options, K-2 which travels near the Deer Trail area is a better option that the K-3 option, which will run much close to out residence and those of our neighbors along County Road 42. Please consider K-2 as the □referred option for this line. Thank You!
- Running the line down the road would bring it even closer to my residence.
- Segment J3 goes near a house- if it was located a mile North there would be no houses except a historical church. South a mile would also be free of homes
- The powerlines should be place(d) as far away from dwellings as possible, at least over a half mile.
- There are at least twelve residences to avoid from the county line north. It is obvious no one wants to live near a high voltage transmission or distribution line. We strongly urge you to find a less populated area with lower valued land to go through with this line.
- There is currently a high voltage line about ¾ mile from us which was there already. We obviously accept that. We went to a meeting about the new proposal and suggested the new one run with the old one which has been there for 35+ years. There should be much thought into the fact there are homes along the proposed line north of Burlington and the health hazards it could cause as well as other issues addressed on page 1.
- This line would come much to close for comfort to three residences. I have great concern living this close to transmission lines.
- We already have powerlines owned by Xcel going through our land which makes the land harder to farm and less attractive for residential development in the future. More lines, such as this, will hurt future development of the land. Please keep it as far away from our land as far as possible. T4S R59 W s/2 ¼ 6 –S ½ Sec. 5 N ½ Sec 8 n4 of sections 7 & 18.
- We would request that no lines be closer than one half mile from headquarters, homes, and corrals
- Would like to see the line go beside the least amount of housing possible. Would prefer for the line to not go by house on A-11.

Rights-of-Way Acquisition

- Do you practice the art of Emmenant [sic] Domain?
- How much ROW do you need?
- I have built excellent 4-wire pasture fencing between SE and NE Sec. 30 with a 14-foot access gate. Another such gate is on the northernly side of Sand Creek. Once the towers would be in place, those gates might be used by maintainence crews. But pasture fence would have to be breached in the constructing of the towers. I would like to discuss with the initial right-of-way land services agent whether a hinged, swinging barbed-wire property fence could be construction across Sand Creek to separate the livestock from Sec. 30 and Sec. 29. We had attempted such an endeavor, but this was washed out in 2001. I think I have seen a better, viable design, and would like to see it constructed at that point.
- The compensation for the purchase of the easement (up to 90% of the lands market value) and replacement of damaged crops and property will not make up for the years of inconvenience of farming, and ranching around. I also fear that we will never recoup decrease in property value due to construction on our land.
- Very populated area between Ellicott & Yoder, you guys buying everyone out?
- We can not and will not give an easement to build this line through the Blackwolf Creek land, specifically in 2S 44W of Yuma County. This land includes the NW 1/4 of Sec. 11 and N 1/2 of Section 12 and is restricted by a conservation easement mandated by Governor Owens. This conservation easement does not allow this type of construction and we wish to make you aware of this potential situation.
- Will you buy me out?

Social and Economic Values

- …and the property value of my small and humble ranch
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please provide plans to assist local agencies with infrastructure issues related to the work force of the project construction and plant operation, e.g., water, sewerage, fire fighting, hospitals, schools, roads, etc. Please include cost estimates associated with these infrastructure additions or estimates of those infrastructure addition requirements.
- An Xcel VIP is quoted in testimony before a US Senate committee several weeks ago that Xcel has had to spend an additional “tens of millions of dollars” to replace coal because of not enough track from Powder River basin to transport their coal supply. What will Tri-State do about the track problem? How much will that increase costs? Who pays? What will be used to replace coal? Who will pay for new tracks? Are their enough coal cars available?
- Another question was weed control near the towers; will that be taken care of by Western/Tri-State or himself? I (Robert Pearson) said probably him. He feels this will be a compensable cost to him.
- Are you going to pay for the crop lost because it can’t be sprayed with a airplane for insects?
- Brings down my property value!
- But DMEA has a contract with TriState that absolutely stops them from purchasing local renewable power sources. Yet this project, by itself, is too small (7 megawatts) for Tri-State’s high powered executives to dedicate much time to. Tri-State insists that all renewables be cost competitive with the avoided costs of coal generation.
- Citizen concerns
- Concerned route might impact his crop-spraying operations. Construction of this transmission line will also impact the value of the land that it crosses, most likely this will be negative.
- Cost of wind vs. coal. Pollution thru coal lifecycle. Pollution from wind vs. coal. Socioeconomic benefits of wind vs. coal.
- Decrease in property values
- Decrease in property values
- Decreased land value

Social and Economic Values

- Decreased property value
- Decreased property values
- Decreased quality of life.
- Decreasing value of future home sights [sic]
- Devaluation of farmland crossed
- Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," signed in 1994, applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the EIS should disclose and evaluate any environmental justice aspects associated with impacts on rural low-income communities by either the proposed project, or the potential build-out for reasonably foreseeable development analysis. If there are no applicable environmental justice considerations, then that should be disclosed. EPA recommends close coordination with any potentially impacted Native American tribes.
- Hendrick Realty [Burlington] has information on comparative land values on north and south sides of I-70
- How will the economics of the project work?
- However it is a big issue to say with certainty that we want Renewables but then, in the same breath, say there is not only no premium for renewables but not even a competitive market for them either.
- I would not object to this. In fact, I would be glad to have a major electrical transmission line in close proximity, provided these would not jeopardize certain views, characteristics, and values I have been building into my farm
- If the transmission plans as presented are followed, Baca County will be the only county in the entire southeastern Colorado to not be included in the transmission project. This leaves Baca county, who coincidently has some of the best wind in the US, with no chance to help improve the socioeconomics of their county, thus also helping to create more low income households
- Impact of any use of eminent domain on the economic viability of impacted farms/ranches.
- Is there modeling on Concentrating Solar Power? On wind energy? On biomass? On IGCC? On incentives for home and business PV systems? What are the benefits of alternative energies considering dollar costs, health costs, environmental costs, and national security costs when using Middle East oil as fuel for transporting coal?
- Land owner compensation
- Land value impacts
- Mr. Coan's concern is that if the transmission line is constructed east of the Prospect Valley reservoir in Sections 25 & 36, T.1N, R64W, the value of his lots will be negatively impacted by this "second corridor." His 6 lots are located in the W1/2N1/2 of Section 31.T.1N, R.63W. According to Mr. Coan other landowners in the area have also subdivided their property and one major selling point is that these lots come with an unobstructed view of the mountains from Pikes Peak to the Wyoming border.
- Mr. Schifferns is strongly opposed to the transmission line on his property. He stated that even along the proposal to the south of him (the existing Tri-State line) there is a lot of bad feelings in the area because at that time they offered only $50.00 per pole to cross property.
- No consideration is given to the devaluation of a cultivated field that is cut in half by large transmission towers. It is devastating to diagonally cut through a cultivated field What happens to the valuation of a home if a hog feed lot is near by. There is much concern about that and rightly so, but no one considers what happens to a piece of farm land that is cut up with numerous overhead utility limes, pump stations etc. That is exactly what has already happened to the piece of property that I own that is now considered as one of the routes for this proposed lime.
- No regard for the jobs that could be created in rural areas through RE(renewable energy) generation
- Opportunity costs for land use, water resources, and use of renewable energy (other than hydro).
- Please assess the economic burden of medical costs and lost productivity on the members of all impacted communities.
- Please conduct economic and/or socio-economic studies regarding the project and provide those studies as they become available.
- Please include any plans for construction and operator work force housing and any permit applications necessary.
- property values.

Social and Economic Values

- Renewables will never get off the ground if the power they generate can't be sold at the rate Co-ops have to pay Tri-State. [sic]
- Since the Tri-State power plants will be owned by its shareholders, the customers of Tri-State's 44 electric cooperatives, please conduct an analysis of the potential financial impacts on the owners. This should include the financial liability placed on each consumer within the cooperative system as a result of this proposed capital expenditure, as well as the additional liability that would be incurred when and if carbon emissions limitations are imposed in the future, a reasonably foreseeable future action. This analysis should include the possibility that the plants may become obsolete and unusable decades earlier than planned if they are unable to economically retrofit to foreseeable new regulations, resulting in sunk costs to the shareholders.
- Surely there is a way to avoid the populated rural areas and high valued farm land in southern Wallace County. Please consider our requests.
- That means the avoid cost of the coal itself. That's about 1.5 to 2 cents per KWH. In other words TS gives no credit for avoided capital cost because an individual renewable project is too small. But, in total, renewables have the potential to be significant. This is the chicken or the egg.
- The change in socioeconomics of the entire area when agricultural land is no longer productive.
- The compensation for the purchase of the easement (up to 90% of the lands market value) and replacement of damaged crops and property will not make up for the years of inconvenience of farming, and ranching around. I also fear that we will never recoup decrease in property value due to construction on our land.
- The price of progress is taking a toll on my dreams and fresh start. I commute 36 miles a day-one way-to have the privilege to live in eastern El Paso Co. I earn over $50,000 a year.
- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.
- The proposed transmission towers through Wallace County will not benefit residents of Wallace county but will have a profound affect on the environment and lives of some residents. Sharon Springs has no factories to help support the community. It is totally dependent upon the agricultural community. This county has struggled hard with seven years of drought affecting all sectors. Anything that hurts the ag sector affects the whole community and county.
- The same people that are going to take my in-laws historic ranch and many others
- There are at least twelve residences to avoid from the county line north. It is obvious no one wants to live near a high voltage transmission or distribution line. We strongly urge you to find a less populated area with lower valued land to go through with this line.
- To completely pay for this project, about 8 cents per KWH is required from all sources. Essential is that this project MUST get the wholesale cost of electricity, probably 6 cents by the time it would be built. The rest can come from Federal tax credits, Green Tags and grants.
- We realize that building and improving infrastructure is important to our economy and we are not against making these improvements. However, we don't believe that the compensation will pay for our losses that we will incur on the issues we outlined earlier.
- What research has been done, if any, in anticipation of future regs on pulverized coal plant emissions' role in global warming? Who will pay for the enormous costs of retrofitting to comply with the regs?
- Who exactly will be paying for the construction of this project? Will it be your customers or will it be tri-state customers?

Social and Economic Values

- Without an adequate market for the power generated, Farmers can't afford this project. However, if the project could just be paid the wholesale cost, the cost the local electric co-op, DMEA, must pay Tri-State, for power generated, that revenue might just more than pay for the project with even a slight surplus.
- Yet TS presently buys 300 megawatts at market prices, but their objective is to build enough coal fired capacity to be a net seller (beyond their local co-ops) of electricity. And when that capacity is built they will want to sell every Kilowatt of it to pay their capital cost just as we would want to sell every Hydro Kilowatt for the same reason. If nothing is done this essentially could freeze out renewables forever.
- You propose a powerline of 125 foot towers stretching across nearly three sections of our deeded land. There is no way that people in accord with the values we hold dear, will ever want to live by or under it.
- You will bring down my property value- what will you do about that?

Soils

- [However] we are very careful not to create disturbance on our property-especially in the middle of a drought
- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.
- Also by using the G7 leg instead of the G8, you will be crossing a lot of miles of fragile sandhills pasture land.
- As stated above - I want to express how extremely unstable the ground is under the proposed G-7 power line is. Ranchers have strugled [sic] for many many years trying to keep ground cover over these blow outs and sandy hills and it would take forever to try to undo the damages this power line would change. Also the access roads for line maintenance would just continue the erosion problems. Where you have proposed the G-7 power line, many land owners will not even try crossing with a 4 wheel drive pickup - they use horses and atvs to stop from disturbing the pastures.
- Erosion
- Erosion
- Erosion problems with G-7 will be very difficult to control, disturbing these sandy pastures are difficult now and that's with ranchers taking very careful care not to disturb much. Access roads plus the instulation in the first place will be very expensive and difficult to control the erosion
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. It has taken ranchers in this area many years to get these hills west and south of Hugo to stop blowing and eroding due to the extremely sandy soil, most will not even drive a 4x4 pickup thru them because of the chance of tearing up the pastures except in certain routes. Bringing in heavy cranes and all the support vehicles to errect [sic] the towers will tear up a great amount of pasture grass.
- J8 is very sandy- needed to use helicopter to construct. What is process for paying damages? It takes 5-7 years to reclaim the land because of the sandy soil
- J9 26.00 Rd- E-3 miles-1/2 mile of crossings Sandy soils-
- easily damaged
- Land disturbance
- Need to get sand wet to work with it- like when they put in the gasline
- Please remember that our land is in a severe drought- it is very hard to recover from disturbance
- Proposed site (south of Hwy 287) is through sand hills- too much damage and erosion.

Soils

- sandy soils on S side of major drainages [generally] harder soils to north of major drainages
- South of Rush Creek sandy. South side of major drainages generally sandy.
- The area just south and west of Sharon Springs also breaks off into rough breaks that are very prone to erosion. Damage to pasture land is very evident under the existing transmission line. Ruts are 12" or more deep under this line. There is simply no way of stopping it once the grass is killed out. Reseeding of grass with only 12" of rainfall often does not work. If a road way is put in, it also becomes a pathway of erosion through these breaks and gullies.
- The EIS should evaluate effects of any proposed road improvements, new road construction, and general ROW construction and operation activities on the area. The evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. Dust particulates from construction, and ongoing operations on roadways are important concerns. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Please include detailed specific plans for addressing dust control for the project. Items in the plan should include, though not necessarily limited to, dust suppression methods, inspection schedules, and documentation and accountability processes. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. Consideration should be given to asphalt or concrete roadways instead of dirt or gravel roads.
- The EIS should evaluate storm water management. To protect water quality from storm water runoff, including contaminated runoff from construction, operation, and maintenance activities, specific practices should be implemented. These practices include the following: Preserve existing vegetation during clearing and grading; Divert upland runoff around exposed soils; Use sediment barriers to trap soil in runoff where sheet flows occur; Protect slopes and channels from gullying; Install sediment traps and settling basins to reduce the velocity of channeled runoff; Store chemicals for project activities in covered containers in a specific location; Identify areas and procedures for fueling, and provide a protected vehicle washout; Preserve vegetation near all waterways; Ensure materials and education for cleaning up spills and leaks; and, Inspect the effectiveness of best management practices.
- the previous ones [utilities] have not followed thru on maintenance on their lines. Maintenance on the lines is of utmost concern. We would like the erosion to be a minimum, and the grass reseeded.
- The proposed transmission line G7 is over extremely sandy soil for many miles (50 miles plus). Landowners have worked for many years trying to stop wind erosion (blow outs) from growing and to put this powerline through here would cause a sever [sic] hardship for us.
- The soil in the G-8 and G-9 corridors is much more stable soil which should not erode near as easily and does not have as many elevation drops and climbs as the G-7 corridor has.
- Very sandy terrain with lots of blow-outs. We limit the usage of pasture to keep from creating excessive amounts of blowing sand. Every movement loosens the soil which results in more problems
- Would not want to tear the sandy areas up

Special Status Species

- Proposed mitigation that will be taken to minimize or eliminate adverse impacts should be presented. EPA recommends close, and early, coordination with the U.S. Fish and Wildlife Service on these and all other wildlife-related issues. Concerning the Greater Sage-grouse, please detail the project's adherence to BLM's "National Sage-Grouse Habitat Conservation Strategy" – November 2004, and the States' own criteria. As a minimum, the mitigation plans detailed in the EIS should be in compliance with those requirements. Generally, to effectively lessen impact to some wildlife, it may be necessary to provide additional "buffer zones" around the specific critical areas. For example, a recent study done at University of Wyoming indicates decline in breeding males at leks located within approximately 3 miles of drilling rigs in the Pinedale Anticline and Jonah natural gas fields in western Wyoming. Please provide additional information on where and how much buffer zone will be provided, as applicable. The EIS evaluations should include the above issues, among other area specific concerns, and detail mitigation steps that will be taken to minimize or eliminate adverse impacts. There may also be concerns related to the loss of upland resources associated with pipeline and associated facilities construction. An inventory of any high quality or locally and regionally rare habitats or plant communities, such as remnant prairie, should be included in the documentation. This would also include forested or treed areas. A description and the aerial extent of each site should be presented in the inventory. These resources should be avoided, if possible. If they can not be reasonably avoided then mitigation for their loss should be identified. We recommend replacement trees be planted to offset any unavoidable tree loss. We generally recommend that native saplings be used, if practicable, at a minimum ration of 1:1. In general, replacement trees should be planted close to where the loss occurred. However, mitigation might also include assisting county, state, or federal agencies with any ongoing or planned forest or tree reclamation projects in the watersheds affected. We recommend that the proponents commit to voluntary tree mitigation, if applicable, in the EIS and provide, as detailed as possible, a conceptual mitigation plan that compensates for any unavoidable tree loss. Equipment and materials should not be placed or stored in any environmentally sensitive areas. Where possible, excavation should be done from non-sensitive areas. Site preparation and construction activities should be timed to avoid disturbing plants and animals during crucial seasons in their life cycle. The specific BMPs that will be utilized for the Eastern Plains project should be identified in the EIS. Another concern that will need additional review once the final routes are defined, are the locations of ground disturbances in respect to the Designated Critical Habitat of the state-threatened Green Toad (Bufo debilis) and the federal threatened Topeka shiner (Notropis topeka). Disturbance of these species will be temporary and will be limited to on-the-ground construction and placement of the fiber optic regeneration facilities.
- Based on our concerns described above, we believe the most environmentally benign and wildlife friendly routes are A1-A3-A5-A11-A14 for the northern route. Portions of this route appear to follow an existing power line right-of-way. Other northern routes are acceptable with the exception of A8, A9, and A10 which cross major tracts of native grassland where Lesser Prairie Chickens have been documented.
- Currently, published data by Dr. Bob Rodel et al. show that nesting or brood rearing prairie chicken hens seldom nest nor raise their broods within 1,191 feet (a quarter-mile) of electrical transmission lines. Thus this could have serious implications upon reproduction and recruitment for the species in the limited suitable habitats that persist.
- For harm to crops and to threatened or endangered species, please also assess the harm that air pollutant emissions resulting directly and indirectly from each option would inflict or cause to be inflicted on any populations of any threatened or endangered species of plant or animal.
- For harm to crops and to threatened or endangered species, please assess the harm, in terms of the aggregate of lost value-per-year and remediation cost-per-year, that air pollutant emissions resulting directly or indirectly from each option would inflict or cause to be inflicted on crops and cultivated soil within 500 miles of each power plant.
- For harm to crops and to threatened or endangered species, please perform additional, cumulative versions of these assessments that account for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. Please consider threatened & endangered species on and around the plant site and all related project components.

Special Status Species

- The effects of the Eastern Plains project activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the EIS. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth jeopardizing reclamation efforts or post-project land use; any adverse impacts to Federal/State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or Wetlands and Riparian Zones. Important wildlife issues include: compliance with Federal or State game and fish wildlife management objectives; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, BLM sensitive wildlife or fish species, or other State-listed species. Potential impacts to the above that may occur in the project area should be identified and discussed.
- The Lesser Prairie Chicken (Tympanuchus pallidicinctus) is a candidate species for federal listing and has been documented in many locations throughout grasslands along the proposed alternative routes.
- The video specifically address the potential effects of large structures on the species…which is a “candidate” species for listing under the Endangered Species Act
- We have reviewed the information provided for the construction of approximately 220 miles of new high-voltage transmission lines in western Kansas. Additional review will be needed for the siting of the ground level fiber optic regeneration facilities and access roads as the final route becomes more apparent. The project was reviewed for potential impacts on crucial wildlife habitats, current state-listed threatened and endangered species and species in need of conservation, and public recreation areas for which this agency has some administrative authority.
- Within the past year, Wheatland Electric has approached our department in regards to the possibility of cooperative efforts in restoring a large portion of irrigated cropland south of the Holcomb plant back to sandsage prairie. This area, if restored, will increase viable habitat for the Lesser Prairie Chicken and other grassland obligate species. We are not supportive of routes B1 and B2 because of the location of this future restoration effort.

Vegetation

- Proposed mitigation that will be taken to minimize or eliminate adverse impacts should be presented. EPA recommends close, and early, coordination with the U.S. Fish and Wildlife Service on these and all other wildlife-related issues. Concerning the Greater Sage-grouse, please detail the project's adherence to BLM’s "National Sage-Grouse Habitat Conservation Strategy" - November 2004, and the States' own criteria. As a minimum, the mitigation plans detailed in the EIS should be in compliance with those requirements. Generally, to effectively lessen impact to some wildlife, it may be necessary to provide additional "buffer zones" around the specific critical areas. For example, a recent study done at University of Wyoming indicates decline in breeding males at leks located within approximately 3 miles of drilling rigs in the Pinedale Anticline and Jonah natural gas fields in western Wyoming. Please provide additional information on where and how much buffer zone will be provided, as applicable. The EIS evaluations should include the above issues, among other area specific concerns, and detail mitigation steps that will be taken to minimize or eliminate adverse impacts. There may also be concerns related to the loss of upland resources associated with pipeline and associated facilities construction. An inventory of any high quality or locally and regionally rare habitats or plant communities, such as remnant prairie, should be included in the documentation. This would also include forested or treed areas. A description and the aerial extent of each site should be presented in the inventory. These resources should be avoided, if possible. If they can not be reasonably avoided then mitigation for their loss should be identified. We recommend replacement trees be planted to offset any unavoidable tree loss. We generally recommend that native saplings be used, if practicable, at a minimum ration of 1:1. In general, replacement trees should be planted close to where the loss occurred. However, mitigation might also include assisting county, state, or federal agencies with any ongoing or planned forest or tree reclamation projects in the watersheds affected. We recommend that the proponents commit to voluntary tree mitigation, if applicable, in the EIS and provide, as detailed as possible, a conceptual mitigation plan that compensates for any unavoidable tree loss. Equipment and materials should not be placed or stored in any environmentally sensitive areas. Where possible, excavation should be done from non-sensitive areas. Site preparation and construction activities should be timed to avoid disturbing plants and animals during crucial seasons in their life cycle. The specific BMPs that will be utilized for the Eastern Plains project should be identified in the EIS.

Vegetation

- A wetlands mitigation plan should be provided with the EIS. Due to the time it can take to adequately reclaim some disturbed wetlands, it is suggested that Western require mitigation of wetland disturbance during the project operating time, and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance, or even prior to project construction, if possible. As studies indicate that traditional mitigation is generally not successful in fully restoring wetland function, it is suggested that Western require a two-to-one mitigation of wetland disturbance. Mitigation requirements under 40 CFR Section 230 address the replacement of the wetland functions and values that are unavoidably lost, and any additional DOE, State and local mitigation requirements should be adhered to. The mitigation plan should include, but not be limited to: commitments to acquire and start mitigation work prior to project construction; detailed schedules of pipeline and wetland creation/restoration work; detailed construction plans; a detailed mitigation monitoring plan, including a time table; detailed performance criteria to measure success; detailed specifications and commitments for corrective measures to be taken if performance criteria are not met; detailed specifications and commitments to control invasive species; and, commitments to the establishment of a protection and management plan in perpetuity (i.e., legal surveys of the specific boundaries with buffers and conservation easements that are given to a land conservancy organization) for all mitigation areas.
- Another concern that will need additional review once the final routes are defined, are the locations of ground disturbances in respect to the Designated Critical Habitat of the state-threatened Green Toad (Bufo debilis) and the federal threatened Topeka shiner (Notropis topeka). Disturbance of these species will be temporary and will be limited to on-the-ground construction and placement of the fiber optic regeneration facilities.
- Any effort to avoid large contiguous tracts of native grassland will successfully mitigate any major concerns with this species and other grassland obligate avian species.
- Cattle use structures for rubbing and keep the vegetation from growing back.
- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- EPA recommends that the EIS address specific requirements to: Maintain physical integrity of aquatic ecosystems; Assure an amount and distribution of woody debris sufficient to sustain physical and biological complexity; Assure adequate summer and winter thermal regulation; Assure appropriate amounts and distributions of source habitats for riparian- or wetland-dependent species; Restore or maintain water quality and hydrologic processes; and, Restore or maintain naturally functioning riparian vegetation communities.
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. it would be best to route the lines across cropland, avoiding native prairie as much as possible.
- J8 [illegible]-grassland- don't want it torn up, very sandy the drier it is the worse it is.
- Our primary concern is the effects of large vertical structures on or adjacent to contiguous tracts of native grassland.
- Please consider all impacts on vegetation, including locally grown alfalfa and native vegetation from all plant operations and project construction.
- Please consider impacts to wetland and riparian vegetation from decreased water and increased air emissions.
- Please consider revegetation, dust control, and weed infestation of stripped agricultural lands due to decreased water availability and air emissions impacts.
- Please consider the metal uptake by plants from emissions from the plant, specifically B, F, As, and Se. Please consider the translocation to mammals.

Vegetation

- Prefer to see just use the equipment without tearing up the vegetation
- The effects of the Eastern Plains project activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the EIS. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth jeopardizing reclamation efforts or post-project land use; any adverse impacts to Federal/State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or Wetlands and Riparian Zones. Important wildlife issues include: compliance with Federal or State game and fish wildlife management objectives; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, BLM sensitive wildlife or fish species, or other State-listed species. Potential impacts to the above that may occur in the project area should be identified and discussed.
- The EIS should show the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, large organic material supplies (woody debris), stream bank vegetation, and riparian habitats. The analysis should disclose whether projects could cause any reductions in habitat capability or impair designated uses. Other information relevant to the analysis, such as aquatic species habitat and the condition and productivity of that habitat, should also be included. Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation. Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts. Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.
- We encourage Western to require delineation and marking of perennial seeps and springs and wetlands on maps and on the ground before activity development so industry employees will be able to avoid them. We recommend establishment of wetland and riparian habitat buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. We recommend a 100-foot buffer of native vegetation be provided around each mitigation site to help enhance wildlife habitat and protect the site from sediment buildup that could result from land use practices immediately outside the buffer area. If stream bank disturbances result, then we suggest stabilizing stream banks using soil bioengineering techniques.
- We have reviewed the information provided for the construction of approximately 220 miles of new high-voltage transmission lines in western Kansas. Additional review will be needed for the siting of the ground level fiber optic regeneration facilities and access roads as the final route becomes more apparent. The project was reviewed for potential impacts on crucial wildlife habitats, current state-listed threatened and endangered species and species in need of conservation, and public recreation areas for which this agency has some administrative authority.
- Where this cuts across a pasture, grass has still not covered over after nearly fifteen years.

Visual Resources

- As a ranch owner near the northern most proposed routing (#1), I strongly object to the placement of high tension lines along and over Highway 24 and along the ridge south of Simla, Ramah, etc. The aesthetics of such placement will affect locals and visitors using highway 24 alike.
- Disruption of agricultural activities
- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- For decreased visibility in scenic areas, please assess the ten highest hourly visibility degradations, the ten highest daily visibility degradations, and the average annual visibility degradation that pollutant emissions resulting directly or indirectly from each option would cause (1) within a ten-mile radius of the facilities, (2) in each Class I area containing land that lies within 300 kilometers of the facilities, and (3) in each Class II area containing land that lies within 300 kilometers of the facilities.
- For decreased visibility in scenic areas, please perform an additional, cumulative version of this assessment that accounts for the emissions increases that would result directly or indirectly from the other new fossil fuel-fired power plants currently proposed for construction in the Western half of the United States.
- For standards for all air quality impact assessments, please ensure that all air quality impact assessments have professional and scientific integrity as required by 40 C.F.R. §1502.24. Thus, please make all analyses of impacts to Class I air quality related values consistent with the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000. Further, please ensure all modeling assessments are based on common practice and procedure for proper air quality analyses as detailed in EPA's Guidelines on Air Quality Modeling in 40 C.F.R. part 51, appendix W. These standards include following: The modeling of maximum emission rates (i.e., potential to emit considering federally enforceable controls) of each pollutant to be emitted by the power plant and associated emission sources, as well as from other reasonably foreseeable sources, that could occur over the averaging time of the standard with which compliance is being assessed. For visibility modeling, please model the maximum hourly average emissions and maximum 24-hour average emissions. Further, please model existing sources at the maximum actual emission rates occurring over the averaging time of the standard with which compliance is being assessed. See section 9.1.2. of 40 C.F.R. part 51, appendix W.
- I would not object to this. In fact, I would be glad to have a major electrical transmission line in close proximity, provided these would not jeopardize certain views, characteristics, and values I have been building into my farm
- In Arapahoe County our main concerns are environmental, topographical, agricultural, visual
- Line goes straight through yard and buildings
- Move Tri-state line from in front of his house
- Mr. Coan's concern is that if the transmission line is constructed east of the Prospect Valley reservoir in Sections 25 & 36, T.1N, R64W, the value of his lots will be negatively impacted by this "second corridor." His 6 lots are located in the W1/2N1/2 of Section 31.T.1N, R.63W. According to Mr. Coan other landowners in the area have also subdivided their property and one major selling point is that these lots come with an unobstructed view of the mountains from Pikes Peak to the Wyoming border.
- My property lies 2-1/2 mi west of Lakin within B4 according to your mapping setup, right where the transmission line turns northward and intersects Hiway 50. The legals are: N/2 & S.W.14 of Section 30-24-36. The proposed transmission pathway is drawn as going through the middle of Section 30. I've argued for the flexibility to move the pathway to the eastern border of Section 30. I would wish to avoid degrading the view of my farmstead and going through the most scenic area of my farm, which I have named Owl's Canyon. Our land is located on the G7 leg on the map. It looks like I will be looking @ the new line out my living room window.
- Please consider all visual impacts caused by the proposed transmission lines, related facilities, and the coal plants.
- sky lineing

Visual Resources

- Skyline visual impact
- The EIS should address the issue of light pollution. Poorly designed lighting can waste energy and impact the view of the night sky. These problems can be addressed with efficient lighting systems designed to illuminate the ground or work area for safety and utility without causing glare, upward shine, or wasting energy. EPA suggests that the EIS address these issues and detail mitigation requirements, consistent with OSHA or other applicable safety requirements, for implementation by the proponent.
- This is my land and I don't want to look in my pasture and see high voltage power lines.
- Visual clutter
- Visual impacts associated with project construction and operation activities may affect the visual character and scenic resources of an area, including the aesthetic and/or functional quality of recreational experiences. This may include the introduction of impacts out of character with the setting and the visual impact of equipment and crews during construction and later operational/maintenance activities. The severity of these effects depends on a number of factors, including: can the surrounding landscape integrate visual changes without attracting attention; how far from, or visible to, sensitive viewing areas and/or roadways are the activities; how much disturbance will occur; what mitigation efforts are put forth to integrate activities and structures with the area; and/or what is the potential to reclaim disturbed landscapes? The EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.
- We are suggesting two alternate routes that will cause a minor re-routing of your proposed powerline (See map.) One takes your line father east, out of immediate view of the 1-25 corridor, along the route Xcel is proposing for their powerline across ("our") State land. The other route follows the existing powerlines just south of the El Paso County line and then west and north to the Midway Station. Either of these alternate routes are not the 'best case' for us but they would eliminate interference with our ranching operations, somewhat reduce visibility from the 1-25 corridor, lesson intrusion into potential recreational areas and not proscribe any ecologically sustainable development that may be possible in the future.
- We purchased this land and have a home here. We really do not want this line on our land. Out land was purchased in part because of the great view of the front range and obviously a high power line would greatly affect that.
- We recently built our home on property that is somewhat unique for western Kansas. There are trees, hills, and a creek that provide a very beautiful setting. We chose this particular area because of these factors many years prior to building our home. We really don't want this spoiled by a Large Transmission Line running through our property.
- Who the hell wants to see this in their pasture?
- Would be concerned with my view of Pikes Peak as we purchased this 40 acres on the hill because of the view and built our new home for the view

Water Resources

- & streams & rivers
- [circled wells on checklist]
- A discussion of area geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat and other resources from the implementation of specific alternatives. Section 313 of the Clean Water Act requires that Federal agencies comply with State and Local pollution requirements. Therefore, the appropriate State-identified Best Management Practices (BMPs) to reduce potential non-point sources of pollution from this project's proposed activities should be designed into the alternatives under consideration and disclosed.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider impacts to existing wells, springs, wetlands, wildlife, etc., including a detailed mitigation plan that includes avoidance as a mitigation strategy. Please make that information public as it becomes available.

Water Resources

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider proposed and alternative water consumption rates and amounts and include an analysis of proposed and alternative recycling methods.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider whether any pretreatment of water will be required before it is used at the plants.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please require adjudication of all water rights prior to issuance of DEIS.
- Because this project may take water from wetlands, springs, seeps and streams to use for power plant cooling, please analyze the impacts of losing these ecological resources. Please also go beyond determining the effects of development on flows, fluxes and water levels to translating these effects into declines to the biotic components in the environment.
- Creosote into water- wells are shallow
- Due to the environmentally sensitive nature of this area and the potential for contamination of the aquifer, we have a strong preference for the eastern most alternative for this new transmission line.
- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- EPA recommends that the EIS address specific requirements to: Maintain physical integrity of aquatic ecosystems; Assure an amount and distribution of woody debris sufficient to sustain physical and biological complexity; Assure adequate summer and winter thermal regulation; Assure appropriate amounts and distributions of source habitats for riparian- or wetland-dependent species; Restore or maintain water quality and hydrologic processes; and, Restore or maintain naturally functioning riparian vegetation communities.
- Events such as vehicular spills of hazardous or toxic materials could result in significantly more adverse habitat and water quality impacts. For project activities which may result in contamination of water resources, the EIS should: discuss the frequency or likelihood of such events; and, describe the spill and release response capabilities (i.e. available response equipment, personnel, expected response times, etc.).
- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. Have documentation and modeling been produced and submitted by Tri-State on how many millions of gallons of water per day that additional pulverized coal-produced electricity will use? Have drought and global warming projections been factored re water use? What is the source of the water? What populations, wildlife, and water resources will be affected?

Water Resources

- Impact to wetland and riparian areas, and other waters of the U.S. will occur for this project. Executive Order 1 1990, "Protection of Wetlands," signed in 1978 and amended in 1988, addresses potential long and short-term adverse impacts associated with the destruction or modification of wetlands. In addition, the national wetlands policy has established an interim goal of "No Overall Net Loss of the Nation's Remaining Wetlands" and a long-term goal of increasing quantity/quality of the Nation's wetlands resource base. ("Presidential Wetland Policy of 1993" website: http://www.usace.army.mil/inet/functions/cw/cecwo/reg/aug93w et.htm). In accordance with the intent of the order and national policy, EPA suggests a mitigation commitment that indirect draining of, or direct disturbance of, wetland areas will be avoided if at all possible, and a commitment to replace in kind such unavoidably impacted wetlands. EPA also suggests that Western require complete avoidance of disturbance to any fen wetland (a Category I resource). The EIS should consider a variety of means to protect wetlands and riparian areas, especially those areas with perennial streams which also serve as water supply for area communities. In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- In eastern Arapahoe County there are environmentally sensitive drainages
- It appears from the NOI that this EIS and associated NEPA documentation will be used to address CWA Section 404(b)(l) Guidelines compliance. All wetlands and waters of the U.S. (e.g., streams, rivers, lakes) that would be crossed or otherwise impacted by the proposal should be identified. This should include the identification of "farmed wetlands" and "prior converted wetlands." Impacts to these resources should be thoroughly identified and discussed. This may include, but should not be limited to, a characterization of their existing conditions, and the identification and assessment of the direct, indirect and cumulative impacts to water quality/quantity, aquatic organisms and habitat. Details regarding the widths of proposed stream and river crossings and how the crossings will be accomplished should be identified and discussed. Where feasible, we recommend the use of low impact construction methods for all water crossings, including their associated floodplains, wetlands and forest lands. Where feasible, we recommend the use of directional drilling for all water crossings and their associated floodplains, wetlands and forest lands, for burying of the fiber optic cable.
- Loss of productive agricultural land when water is sold from the land for use in the coal fired plant
- Of the three alternatives for this project segment we would like to identify some environmental concerns associated with the western two alternatives. These alternatives are proposed to go through T2N, R56W and T2N, R57W and then south to Big Sandy. While these routes do not appear to directly impact City owned property they do go through a large shallow naturally sand-filtered aquifer. This aquifer is the same one that is the sole water source for the City of Brush.
- On the Big Sandy/ Green Valley T.L. north of Limon section on map K3- along Hwy 71 avoid well in & stay west of corridor
- Please analyze a detailed breakdown of the acre-feet (“AF”) water demand for each coal plant including how much will be used for each process of the project operation and construction and any proposed or anticipated AF demand changes throughout the course of plant operation and maintenance.
- Please analyze impacts to adjacent water basins, if water is overdrafted from the basin.
- Please complete and make public comprehensive water resource stud(ies) for the project and associated facilities.
- Please conduct an inventory of seeps and springs impacted or utilized by the proposed project. Please make public the permit/proof number or legal description of each seep or spring to be used as the information becomes available.
- Please consider all impacts from the construction and operation of the Tri-State coal plants including decreased water levels and increased mercury content.
- Please consider all water quality impacts of the project.

Water Resources

- Please consider any plans to pipe water from any other basin to support the need for water for any aspect of the project and make public all information regarding those plans as it becomes available.
- Please consider basin surface & ground water balance with respect to any proposed conjunctive use of surface/ground water.
- Please consider design conditions for the peak day, e.g., dry bulb and wet bulb temperature, humidity, and site elevation.
- Please consider impacts of decreased recharge and assess whether flow will infiltrate or whether proposed recovery, if any, of recharge water will actually pump groundwater.
- Please consider impacts of unintentional contaminant leaks such as PCBs (polychlorinated biphenyls) from new or upgraded sub-stations.
- Please consider interbasin flow. If a connection is found or assumed, please consider changes to interbasin flow.
- Please consider proposed and alternative pumping rates for individual wells or well fields.
- Please consider site-specific precipitation measurement modifications.
- Please consider the "plumbing" of Tri-State's proposed power plants, including well field locations, surface water POD's, location of spreading basins/injection wells, pipeline routing, etc.
- Please consider the amount and characteristics of any wastewater discharged from plant operation processes and during project construction. Please consider proposed and alternate discharge locations, e.g., evaporation pond, local creek, etc.
- Please consider the frequency, extent, and duration of flooding that occurs as a result of surface runoff and determine how that affects the estimated discharge from the groundwater.
- Please consider the impacts of changing the period of use of the water rights that may decrease or eliminate the natural recovery period.
- Please consider the seasonal water demand of the project.
- Please consider the total water consumption for all units of the project including a break down of consumption by all individual uses including, but not limited to, cooling towers, blowdown water, and coal dust pile.
- Please consider water consumption by individual source, e.g., evaporation at cooling tower, scrubber, makeup to boilers, dust control, sanitary uses, and all others not listed here.
- Please consider water demand as both annual average and peak day.
- Please consider whether the combined use of surface and groundwater rights counts water twice. For example, groundwater rights are limited by the perennial yield but the perennial yield depends on recharge from stream flow that may not occur because of surface flow diversions.
- Please consider whether the project is dependent upon acquisition of all existing water rights in the basin, and, if not, what percentage Tri-State will need to acquire.
- Please determine the amount of drawdown that will occur and determine whether the decreased capillary flow and exfiltration will cause more particulate air pollution from winds blowing across the land.
- Please ensure the groundwater model developed for the basin adequately models the various fluxes such as spring flow and total ET loss. Please include at least two years of detailed study data.
- Please impose the transient simulations of the project on the seasonal changes in the basin. Please consider seasonal water demand and recharge and seasonal head levels in boundaries. Because of the magnitude of this project and because drought will maximize the impacts, please consider multi-year dry periods in the modeling.
- Please include simulated water level draw-down contour maps for the basin at time steps of 6 months and years 1, 2, 5, 10, 15, 20, project life in the EIS analysis. Please also include water level contour maps for these time steps and direction of ground water flow. Please make these maps public as they become available.
- Please make public the water Tri-State claims to hold under option for the proposed project, including the name of the current water user, the current water rights amounts, type of use, and place of use as they become available.
- Please model evapotranspiration ("ET") for both the steady state and developed conditions. It is not necessary for the water table to drop a certain level for effects to occur. The impacts occur even if just the gradient of the water table changes.

Water Resources

- Please model the actual points of recharge. Please evenly spread recharge across the basin or distribute according to the elevation zones from the Maxey-Eakin ("M-E") method. The ME method does not consider the hydraulic conductivity of the lithology in each of the zones. Additionally, most recharge occurs at canyon mouths due to runoff and recharge into alluvial fans. Because the effects of this project will be concentrated, please consider localized effects.
- Please obtain all Clean Water Act discharge or fill permits and make public the nature of the discharge and/or fill and all permit applications as they become available.
- Please perform a detailed water right abstract of the basin to identify the existing and supplemental nature of surface, groundwater, and spring water rights.
- Please provide a detailed map showing all points of study including, but not limited to, test holes, production wells, monitor wells/piezometers, ET measurement sites, stream/spring flow measurement locations, weather measurements, geophysical measurement locations, etc. as they become available.
- Please reassess recharge accounting for losses to interbasin flow and evaporation from the riparian areas of some of the tributaries.
- Please simulate groundwater flow from plateau of the west with general head boundaries and examine the fluxes against reality. Please consider flux to the basin fill aquifer both temporally and spatially.
- The EIS should evaluate effects of any proposed road improvements, new road construction, and general ROW construction and operation activities on the area. The evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. Dust particulates from construction, and ongoing operations on roadways are important concerns. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Please include detailed specific plans for addressing dust control for the project. Items in the plan should include, though not necessarily limited to, dust suppression methods, inspection schedules, and documentation and accountability processes. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. Consideration should be given to asphalt or concrete roadways instead of dirt or gravel roads.
- The EIS should evaluate storm water management. To protect water quality from storm water runoff, including contaminated runoff from construction, operation, and maintenance activities, specific practices should be implemented. These practices include the following: Preserve existing vegetation during clearing and grading; Divert upland runoff around exposed soils; Use sediment barriers to trap soil in runoff where sheet flows occur; Protect slopes and channels from gullying; Install sediment traps and settling basins to reduce the velocity of channeled runoff; Store chemicals for project activities in covered containers in a specific location; Identify areas and procedures for fueling, and provide a protected vehicle washout; Preserve vegetation near all waterways; Ensure materials and education for cleaning up spills and leaks; and, Inspect the effectiveness of best management practices.
- The EIS should show the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, large organic material supplies (woody debris), stream bank vegetation, and riparian habitats. The analysis should disclose whether projects could cause any reductions in habitat capability or impair designated uses. Other information relevant to the analysis, such as aquatic species habitat and the condition and productivity of that habitat, should also be included. Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation. Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts. Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.
- The EIS will need to analyze potential impacts to surface water, groundwater, and other existing and potential drinking water sources, including specifically any function and water quality impacts to aquifers. The analysis should also include water quality, quantity, and any adverse change to current water quality of the any rivers, streams and their tributaries. BMPs and mitigation measures should be used to protect these resources. EPA suggests ensuring that plans for any activities with the potential to impact any potential drinking water sources should be coordinated with the states and be evaluated for compatibility with the State's Source water Protection plans.

Water Resources

- The EPA recommends the EIS include an accurate description of surface and ground water resources, as both are essential to understanding the potential effects of any project. The EIS should clearly describe water bodies within the analysis area which may be impacted by project activities. Identifying affected watersheds on maps of the various alternatives helps convey their relationship with project activities. The EIS should summarize the available data and the condition (reliability, gaps in data, etc.) of that information.
- The transmission line already in place near County Road C is the better choice as it only crosses Adobe Creek. A line near County Road J would have to cross two branches of Adobe Creek plus Mustang Creek, Sand Arroyo Creek, and John Creek which all run into adobe creek.
- There are too many creeks to be crossed if a new transmission line from Lamar to Boone is placed near County Road J in Kiowa County.
- Therefore the States water would be put to more beneficial use benefiting farmers, and the country would have one more renewable home grown energy source.
- We encourage Western to require delineation and marking of perennial seeps and springs and wetlands on maps and on the ground before activity development so industry employees will be able to avoid them. We recommend establishment of wetland and riparian habitat buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. We recommend a 100-foot buffer of native vegetation be provided around each mitigation site to help enhance wildlife habitat and protect the site from sediment buildup that could result from land use practices immediately outside the buffer area. If stream bank disturbances result, then we suggest stabilizing stream banks using soil bioengineering techniques.
- what problems may be caused to the water table if the tower supports go through it. Also the ground water in my area is very shallow. Will you be putting in the towers deep enough to effect my well water due to punching holes thru the water table.

Weeds

- Absolute desire that if the transmission line must be near or on our property that it be placed adjacent to existing public roads. Not along field lines as these change periodically as crops and fallow ground vary to control weeds and erosion
- Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. ROW development activities, such as electric transmission and pipeline corridors, can cause such disturbances.
- Another question was weed control near the towers; will that be taken care of by Western/Tri-State or himself? I said probably him. He feels this will be a compensable cost to him.
- Habitat for noxious weeds
- I1 noxious weeds a big problem
- Please consider revegetation, dust control, and weed infestation of stripped agricultural lands due to decreased water availability and air emissions impacts.
- Studies show that new roads and pipeline/utility ROWs can become a pathway for the spread of invasive plants; therefore, we suggest that the vegetation management plan address control of such plant intrusions. As this project follows many existing ROWs, the current trend for weed infestations in the affected project area should be evaluated for mitigation effectiveness and improvements if warranted. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. There are a number of prevention measures available such as reseeding disturbed areas as soon as possible and cleaning equipment and tires prior to transportation to an un-infested area. Should an infestation occur or already be present, EPA supports integrated weed management (e.g. effective mix of cultural, education and prevention, biological, mechanical, chemical management, etc.). However, we encourage prioritization of management techniques that focus on non-chemical treatments first, with reliance on herbicides being the last resort. We recommend implementing yearly review and planning activity requirements for the above concerns, including evaluation of effectiveness to date.

Weeds

- The area under and around these towers grow weeds and become a harbor for grasshoppers and insects.
- The effects of the Eastern Plains project activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the EIS. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth jeopardizing reclamation efforts or post-project land use; any adverse impacts to Federal/State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or Wetlands and Riparian Zones. Important wildlife issues include: compliance with Federal or State game and fish wildlife management objectives; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, BLM sensitive wildlife or fish species, or other State-listed species. Potential impacts to the above that may occur in the project area should be identified and discussed.
- We also note that hay can be a source of noxious weed seed. Hay/straw is used as mulch to slow erosion and encourage seed germination, and used to feed horses in hunting and recreation camps, and as wildlife feed during harsh winters. Cattle that are released on grazing allotments or horses used on public lands can transport undigested weed seed and spread it in their manure. Western should consider requiring use of certified weed free hay in mitigation.
- Weeds hard to control under lattice structures-Noxious weeds are a big problem- joint grass

Wildlife

- Proposed mitigation that will be taken to minimize or eliminate adverse impacts should be presented. EPA recommends close, and early, coordination with the U.S. Fish and Wildlife Service on these and all other wildlife-related issues. Concerning the Greater Sage-grouse, please detail the project's adherence to BLM's "National Sage-Grouse Habitat Conservation Strategy" - November 2004, and the States' own criteria. As a minimum, the mitigation plans detailed in the EIS should be in compliance with those requirements. Generally, to effectively lessen impact to some wildlife, it may be necessary to provide additional "buffer zones" around the specific critical areas. For example, a recent study done at University of Wyoming indicates decline in breeding males at leks located within approximately 3 miles of drilling rigs in the Pinedale Anticline and Jonah natural gas fields in western Wyoming. Please provide additional information on where and how much buffer zone will be provided, as applicable. The EIS evaluations should include the above issues, among other area specific concerns, and detail mitigation steps that will be taken to minimize or eliminate adverse impacts. There may also be concerns related to the loss of upland resources associated with pipeline and associated facilities construction. An inventory of any high quality or locally and regionally rare habitats or plant communities, such as remnant prairie, should be included in the documentation. This would also include forested or treed areas. A description and the aerial extent of each site should be presented in the inventory. These resources should be avoided, if possible. If they can not be reasonably avoided then mitigation for their loss should be identified. We recommend replacement trees be planted to offset any unavoidable tree loss. We generally recommend that native saplings be used, if practicable, at a minimum ration of 1:1. In general, replacement trees should be planted close to where the loss occurred. However, mitigation might also include assisting county, state, or federal agencies with any ongoing or planned forest or tree reclamation projects in the watersheds affected. We recommend that the proponents commit to voluntary tree mitigation, if applicable, in the EIS and provide, as detailed as possible, a conceptual mitigation plan that compensates for any unavoidable tree loss. Equipment and materials should not be placed or stored in any environmentally sensitive areas. Where possible, excavation should be done from non-sensitive areas. Site preparation and construction activities should be timed to avoid disturbing plants and animals during crucial seasons in their life cycle. The specific BMPs that will be utilized for the Eastern Plains project should be identified in the EIS.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider impacts to existing wells, springs, wetlands, wildlife, etc., including a detailed mitigation plan that includes avoidance as a mitigation strategy. Please make that information public as it becomes available.

Wildlife

- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider measures for protecting water at the source for use by wildlife.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please consider proposed and alternate plans to prevent interference with wildlife migration routes.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop measures to prevent bird collisions with transmission lines.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please develop precautionary measures to keep birds safe from the evaporation pond(s) and all other facilities.
- Accordingly, we request that the EIS consider each of the following reasonable alternatives and appropriate mitigation measures and, for each of the options, please assess direct, indirect, and cumulative impacts. Appropriate Mitigation Measures That Tri-State Has Failed to Include in its Proposal for a New, Conventional Coal-Powered Generating Stations in Kansas and Colorado. Please include measures to keep wildlife away from waste ponds, disposal sites, other relevant plant operation facilities, and throughout all project construction activities.
- affects [sic] on wildlife?
- Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. ROW development activities, such as electric transmission and pipeline corridors, can cause such disturbances.
- Any effort to avoid large contiguous tracts of native grassland will successfully mitigate any major concerns with this species and other grassland obligate avian species.
- EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include, but are not limited to, impacts to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics. Road, transmission line, buried cable, and other facility construction, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.
- EPA recommends that the EIS address specific requirements to: Maintain physical integrity of aquatic ecosystems; Assure an amount and distribution of woody debris sufficient to sustain physical and biological complexity; Assure adequate summer and winter thermal regulation; Assure appropriate amounts and distributions of source habitats for riparian- or wetland-dependent species; Restore or maintain water quality and hydrologic processes; and, Restore or maintain naturally functioning riparian vegetation communities.
- flyways

Wildlife

- For increased deposition of various pollutants, please assess the amount, in tons-per-year or pounds-per-year, by which each option would directly or indirectly increase the deposition – on (1) the soils, waters, and vegetation, (2) each Class I area in the Western half of the United States, (3) each highly agricultural region in the Western half of the United States, and (4) the habitats of threatened or endangered species – of each chemical, including but not limited to mercury and dioxin, known to harm soil, vegetation, or animals. G-11 line goes through property that has horned lizards
- Have documentation and modeling been produced and submitted by Tri-State on how many millions of gallons of water per day that additional pulverized coal-produced electricity will use? Have drought and global warming projections been factored re water use? What is the source of the water? What populations, wildlife, and water resources will be affected?
- Impact of towers & powerlines on birds
- In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern that will be impacted by the project. At this time, for the Eastern Plains project, it appears that cumulative impacts analyses should be undertaken for the following resources: surface waters (quality, quantity and aquatic habitat), wetlands, wildlife habitat, and farmland. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area. Examining activity trends in other areas with similar uses and contributory metrics can be useful in this analysis.
- In eastern Arapahoe County there are major flyways
- Placement of these facilities and roads will also need to avoid ephemeral wetlands known as playa lakes which are important stopover points for migrating waterfowl and shorebirds. These concerns will need to be addressed as the project progresses and routes are selected and may warrant an Action Permit from this department in the future.
- Please consider impacts to human health, wildlife, and domestic animals caused by electromagnetic forces created by the proposed transmission lines.
- Please consider the metal uptake by plants from emissions from the plant, specifically B, F, As, and Se. Please consider the translocation to mammals.
- Please perform a human health and ecological risk assessment to evaluate the impacts of the project on residents and wildlife including diesel exhaust from trucks, trains, and on-
- site mobile equipment and all criteria pollutants.
- The area under and around these towers grow weeds and become a harbor for grasshoppers and insects.
- The effects of the Eastern Plains project activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the EIS. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth jeopardizing reclamation efforts or post-project land use; any adverse impacts to Federal/State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or Wetlands and Riparian Zones. Important wildlife issues include: compliance with Federal or State game and fish wildlife management objectives; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, BLM sensitive wildlife or fish species, or other State-listed species. Potential impacts to the above that may occur in the project area should be identified and discussed.

Wildlife

- The proposed Eastern Plains project traverses a variety of human environments, including but not limited to, low population rural farming communities to more populated communities. The EIS should identify and address the social and economic impacts this project may have on these different communities. This would include, but is not limited to, identifying the number of outside workers that would be brought in to construct the project and duration of proposed construction activities through the various communities. The EIS should also consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, increased road traffic with associated dust and hazardous materials spill potential, and easier human access to wildlife habitat (with associated increased disturbances and ROWS). Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. While assessing the reasonably foreseeable development that may follow this project can be difficult without having specific plans or requests for additional activities in the area, it is reasonable to address what additional activities could look like based on similar ongoing projects in Colorado, Kansas and other states.
- We encourage Western to require delineation and marking of perennial seeps and springs and wetlands on maps and on the ground before activity development so industry employees will be able to avoid them. We recommend establishment of wetland and riparian habitat buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. We recommend a 100-foot buffer of native vegetation be provided around each mitigation site to help enhance wildlife habitat and protect the site from sediment buildup that could result from land use practices immediately outside the buffer area. If stream bank disturbances result, then we suggest stabilizing stream banks using soil bioengineering techniques.
- We have Dove, Quall [quail], Deer, Antelope, and the sometimes lost Elk out here, but when you guys bring your trucks and equipment out here, they will leave and the hunting ground for hunters gets farther away
- wildlife
- Wildlife habitat and management are also very important to us and our land
- Wildlife habitat disturbance
- wildlife management
- will the transmission line effect wildlife or livestock living and grazing near it
- Within the past year, Wheatland Electric has approached our department in regards to the possibility of cooperative efforts in restoring a large portion of irrigated cropland south of the Holcomb plant back to sandsage prairie. This area, if restored, will increase viable habitat for the Lesser Prairie Chicken and other grassland obligate species. We are not supportive of routes B1 and B2 because of the location of this future restoration effort.
- You'll chase the wildlife away