Eastern Plains Transmission Project, Colorado and Kansas

Environmental Impact Statement Scoping Summary Report (DOE/EIS-0390)

January 2007

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LIST OF ACRONYMS

AQRV	air quality-related values
ARM	Adaptive Resource Management
BACT	Best Available Control Technology
BLM	Bureau of Land Management
CCS	carbon dioxide capture and storage
DEIS	Draft Environmental Impact Statement
DOE	Department of Energy
EIS	Environmental Impact Statement
EMF	Electric and magnetic fields
EPTP	Eastern Plains Transmission Project
ESA	Endangered Species Act
GPS	global positioning system
HAPs	hazardous air pollutant
IGCC	integrated gasification combined cycle
KDWP	Kansas Department of Wildlife and Parks
kV	kilovolt
MACT	Maximum Available Control Technology
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NPS	National Parks Service
PA	Programmatic Agreement
POD	point of delivery
PSAs	public service announcements
PSD	Prevention of Significant Deterioration
PV	photovoltaic
ROWs	Rights-of-way
RDP	Resource Development Plan
THPO	Tribal Historic Preservation Office
Tri-State	Tri-State Generation and Transmission Association, Inc.
SHPO	State Historic Preservation Office
Western	Western Area Power Administration

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1.0 Introduction

Western Area Power Administration (Western) will prepare an Environmental Impact Statement (EIS) for the Eastern Plains Transmission Project (EPTP). Western is a power marketing administration of the Department of Energy (DOE). The EIS will be prepared in accordance with the National Environmental Policy Act (NEPA) and DOE Implementing Procedures (10 CFR 1021). The EIS will address the environmental effects associated with siting, constructing, operating, and maintaining the transmission lines and associated facilities. Western is the lead Federal agency for the NEPA process. Cooperating agencies include the Jicarilla Apache Tribe, National Park Service, and U.S. Army Corps of Engineers.

Western is proposing to participate with Tri-State Generation and Transmission Association, Inc. (Tri-State) in this project. The EPTP is a part of Tri-State's Resource Development Plan (RDP). There are two other components of the RDP in which Western in not proposing to participate: coal-fired generation located near Holcomb, Kansas, and a potential generation resource located in southeastern Colorado. Potential cumulative effects associated with the generation components of the RDP, as well as other past, present, and reasonably foreseeable future actions will be discussed in the EIS.

This report describes the scoping and other public involvement conducted as part of the NEPA process and EIS preparation for Western's proposed participation in the EPTP.

1.1 Description of the Proposed Project

The EPTP would consist of approximately 1,000 miles of new transmission lines, new or expanded substation facilities, and associated communication facilities in eastern Colorado and western Kansas. The EPTP analysis area covers part or all of 17 counties in eastern Colorado and 10 counties in western Kansas: Adams, Arapahoe, Bent, Cheyenne, Crowley, Elbert, El Paso, Kiowa, Kit Carson, Lincoln, Morgan, Otero, Pueblo, Prowers, Washington, Weld, and Yuma counties in Colorado; and Finney, Greeley, Hamilton, Kearny, Logan, Scott, Sherman, Thomas, Wallace, and Wichita counties in Kansas.

The EPTP would consist of 15 new high-voltage transmission lines connecting to eight existing and four new substations in eastern Colorado and western Kansas. Table 1.1-1 lists the individual project segments and their lengths. Figure 1.1-1 shows the extent of the EPTP as it was shown to the public at the scoping meetings. Eight of the transmission lines (771 miles) would be 500-kilovolt (kV) lines. The 500-kV structures would be steel lattice. Two of the transmission lines (155 miles) would be 345-kV. The 345-kV structures would be steel lattice. Five of the transmission lines (133 miles) would be 230-kV. The 230-kV structures would be wood or steel H-frames. Steel single-pole construction may be considered in congested areas for any of the transmission lines.

Table 1.1-1 EPTP Transmission Line Segments

Transmission Line Segment	Approximate Length (miles)
500-kV Rolling Hills Substation[1] to Energy Center[1]	87
500-kV Rolling Hills Substation[1] to Burlington Substation[2]	163
500-kV Energy Center[1] to Burlington Substation[2]	85
230-kV Energy Center[1] to Lamar Substation[2] (two single-circuit lines in separate right-of-ways, with a 3-mile separation goal)	37
500-kV Energy Center[1] to Boone Substation[2]	115
500-kV Energy Center[1] to Big Sandy Substation[2]	116
500-kV Burlington Substation[2] to Big Sandy Substation[2]	79
230-kV Burlington Substation[2] to Wray Substation[2]	60
500-kV Boone Substation[2] to Midway Substation[2]	38
500-kV Midway Substation[2] to Big Sandy Substation[2]	88
345-kV Big Sandy Substation[2] to Beaver Creek Substation[2]	72
345-kV Big Sandy Substation[2] to Green Valley Substation[2]	83
230-kV Green Valley Substation[2] to Beaver Creek-Erie Tap[1]	10
230-kV Big Sandy Substation[2] to 125-mile Substation[1]	26
Approximate Total Miles	1,059

[1] New substation, [2] Existing substation

The EPTP includes construction of four new substations and the expansion of eight existing substations. New substations would be constructed at Rolling Hills (near Holcomb, Kansas); Energy Center (east of Lamar, Colorado); 125-mile (north of Simla, Colorado); and north of the existing Green Valley Substation along the existing Beaver Creek-Erie transmission line. Existing substations that would be expanded include Burlington (near Burlington, Colorado); Lamar (near Lamar, Colorado); Boone (near Boone, Colorado); Big Sandy (near Limon, Colorado); Wray (near Wray, Colorado); Midway (near Fountain, Colorado); Beaver Creek (near Brush, Colorado); and Green Valley (northeast of Denver, Colorado). The communication system for each of the transmission line segments would consist of a fiber optic cable integrated with one of the two static ground wires placed at the top of the structures. Regeneration sites are typically located every 50 miles along fiber optic lines to refresh degraded signals. Regeneration sites are located where electrical power from a distribution system and existing access are available and typically cover less than 1 acre.

Figure 1.1-1 Preliminary Alternative Corridors

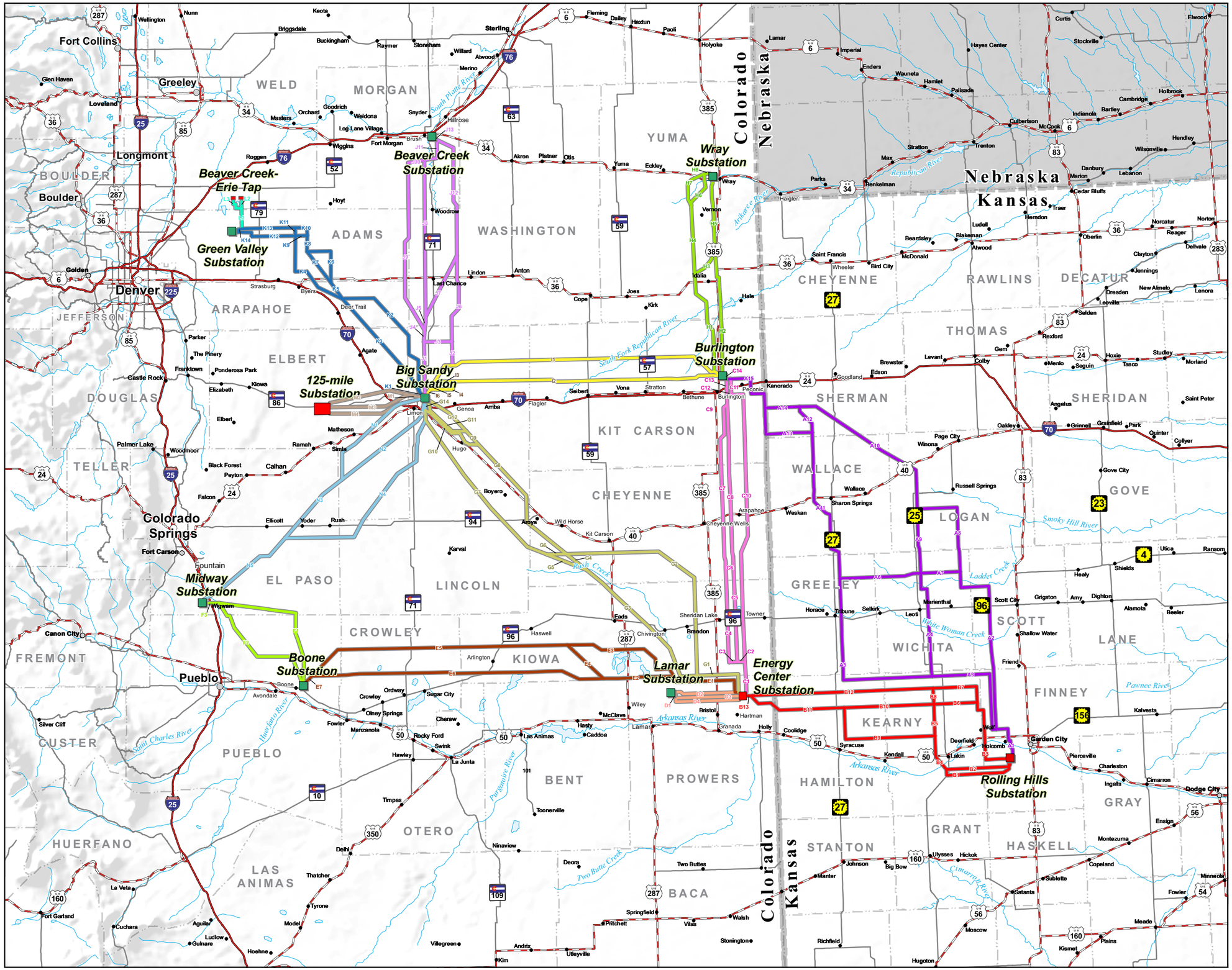

Figure 1.1-1

Preliminary Aternative Corridors

Legend

Substations

- Existing Substation
- Proposed Substation Siting Area

Preliminary Alternative Segments

- Big Sandy to Beaver Creek
- Big Sandy to Green Valley
- Big Sandy to 125-mile
- Boone to Midway
- Burlington to Big Sandy
- Burlington to Wray
- Energy Center to Big Sandy
- Energy Center to Boone
- Energy Center to Burlington
- Energy Center to Lamar
- Midway to Big Sandy
- Rolling Hills to Burlington
- Rolling Hills to Energy Center
- Green Valley - Beaver Creek-Erie Tap

Source Data:
ESRI (Cities and Shaded Relief), BTS (Highways), National Atlas (States, Counties, Water Features)

1:750,000 When printed at 22 x 34 Inches

0 4.5 9 18 27 36 Miles

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Eastern Plains Transmission Project

TRI-STATE Generation and Transmission Association, Inc.

Western Area Power Administration

The EIS will discuss alternatives such as system alternatives, the no action alternative (no Federal action), and the no project alternative. Tri-State's Board of Directors approved a RDP, which includes generation in Kansas and Colorado (together these projects are referred to as "Tri-State's generation projects") and construction of a transmission system to deliver the generation to customers. Western is not a participant in and does not have control over Tri-State's generation projects. Cumulative effects are defined in 40 CFR § 1508.7 as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless what agency (Federal or non-Federal) or person undertakes such other actions." Therefore, the EIS will evaluate the cumulative effects of Tri-State's generation projects as well as other past, present, and reasonably foreseeable future projects. For example, the EIS will discuss the cumulative effects of other coal-based generation, wind generation, transportation, agriculture, and other activities in the cumulative effects analysis area for which necessary information is available.

1.2 Scoping

After the lead Federal agency publishes a Notice of Intent (NOI) to prepare an EIS in the *Federal Register*, project scoping is one of the first activities to determine the content of the EIS. NEPA defines the process of scoping as "an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action" (40 CFR 1501.7). The lead agency is responsible for the following actions as a part of the scoping process:

- Invite the participation of affected Federal, state, and local agencies, any affected Indian tribe, the proponent of the action, and other interested persons (including those who might not be in accord with the action on environmental grounds), unless there is a limited exception under Sec. 1507.3(c). An agency may give notice in accordance with Sec. 1506.6.
- Determine the scope (Sec. 1508.25) and the significant issues to be analyzed in depth in the EIS.
- Identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3), narrowing the discussion of these issues in the statement to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere.
- Allocate assignments for preparation of the EIS among the lead and cooperating agencies, with the lead agency retaining responsibility for the statement.
- Indicate any public environmental assessments and other EISs which are being or will be prepared that are related to but are not part of the scope of the impact statement under consideration.

- Identify other environmental review and consultation requirements so the lead and cooperating agencies may prepare other required analyses and studies concurrently with, and integrated with, the environmental impact statement as provided in Sec. 1502.25.
- Indicate the relationship between the timing of the preparation of environmental analyses and the agency's tentative planning and decision making schedule.

1.3 Purpose of This Report

This scoping summary report:

- Describes coordination with Federal, state, and local agencies; Native American tribes; other interested parties; and the public on the scope of actions, alternatives and effects that will be studied in the EIS.
- Provides information about the public scoping meetings including participation statistics.
- Lists all comments provided by all commenters, consolidated by topic into groups of comments.
- Summarizes the comments received to help define the scope of the EIS.

1.4 Information Analyzed for This Report

Information analyzed for this scoping report was developed in the following ways:

- Comments submitted orally or in writing at public open houses held at 10 locations in eastern Colorado and western Kansas during August and September 2006
- Meetings or correspondence with Federal, state and local agencies; Native American tribes; and others
- Comments mailed to Western, left on the EPTP hotline, or submitted electronically on the project website during the scoping period that ended on September 30, 2006
- Comments postmarked after September 30, 2006, and before December 31, 2006, have been incorporated into this report
- Comments postmarked after December 31, 2006 will be incorporated into a second summary report to be prepared after the February 2007 public meetings and the close of the additional opportunity to provide comment on March 9, 2007.

Subsequent sections of this report provide additional detail on the types of input received from participants.

2.0 Scoping Process

This section describes the scoping process for the EPTP that began with the publication of the NOI in the *Federal Register* on August 2, 2006, and ended on September 30, 2006 at the end of the scoping comment period. Western will use the information received to help identify potential environmental issues, action alternatives, and mitigation measures associated with the project. Western will also use the results of the scoping process to focus and clarify the issues to be addressed in the EIS.

Scoping activities included publication of an NOI; identification of stakeholders; notification of stakeholders about the project, scoping meetings, and correspondence to potentially affected Federal, state and local agencies and Tribes. Each of these activities is described in more detail below.

2.1 Pre-Scoping Activities

Before the formal scoping period began, Western and Tri-State participated in several pre-scoping meetings that were designed to brief local governments and other stakeholders. Table 2.1-1 lists the dates, locations, times, and approximate attendance at these meetings.

Table 2.1-1 Pre-Scoping Meetings

Date	Location	Time	Approximate Attendance
March 28, 2006	Lamar, Colorado, Best Western Cow Palace	9:00 AM	32
April 20, 2006	Garden City, Kansas, Garden City Community College	11:30 AM	250
June 26, 2006	Burlington, Colorado, VFW	2:00 PM	10
June 26, 2006	Wray, Colorado, Community Building	10:00 AM	12
July 13, 2006	Limon, Colorado, Limon Community Center	10:00 AM	25
July 13, 2006	Fort Morgan, Colorado, Country Steak-Out restaurant	4:00 PM	15
July 25, 2006	Sharon Springs, Kansas, Wallace County Senior Center	9:00 AM	16
July 25, 2006	Leoti, Kansas, Business Care Center	1:30 PM	9
July 25, 2006	Lakin, Kansas, Veterans Memorial Building	5:00 PM	12

Tri-State sent invitations to the pre-scoping meetings to member cooperatives and local economic development groups. The Limon pre-scoping meeting was advertised in the local newspaper. Materials distributed at the pre-scoping meetings included the first *Powering the West* newsletter (Appendix A). Western used information gathered at the pre-scoping meetings to identify issues of concern and stakeholders who may be interested in the project.

2.2 Identification of Stakeholders

The stakeholder list identifies interested individuals, non-government organizations, interest groups and agencies that will be notified of scoping. Western compiled the list of stakeholders from mailing lists generated during pre-scoping public involvement efforts by Western and Tri-State, and contacts with agencies and Tribes. This list facilitated information sharing, public education, and identification of key milestones for announcements, such as public meetings and comment or review deadlines. Stakeholders include:

- Interested individuals and businesses
- Potentially affected landowners
- Congressional representatives
- Native American tribal governments
- Federal, state, county, and local agencies and elected and appointed representatives
- Cooperating agencies to the EIS
- Special interest groups
- News media

Appendix B contains a list of stakeholders. As new stakeholders are identified throughout the project, the list will continue to be revised.

2.3 Notification of Stakeholders

Western prepared a NOI for the EPTP, which was published in the Federal Register on August 2, 2006, marking the beginning of the scoping period. The NOI invited public participation in the EIS scoping process and solicited public comments on the scope and content of the EIS. A copy of the NOI is included in Appendix A.

Western issued a press release on August 4, 2006, providing general notice and a description of the project as well as requesting public comment. This press release listed the times, dates, and locations of the scoping meetings. A copy of the press release is included in Appendix A.

A newsletter with information about the project, including times, dates, and locations of the scoping meetings, was mailed to the list of stakeholders on August 9, 2006. Property owners of record (using County Assessor records) within 1.5 miles of the reference centerline in the preliminary alternative corridors received newsletters with information about the project and the scoping meetings. Western used a series of three mailings based on the location and dates of the scoping meetings to notify landowners. The first mailing (on August 9, 2006) included landowners near Brush, Wray, Limon, and Aurora, Colorado. The second mailing (on August 15, 2006) included landowners near Fountain and Pueblo, Colorado. The third mailing (on August 22, 2006), targeted landowners near Burlington and Lamar, Colorado, and Sharon Springs and Lakin, Kansas. The mailings included information on NEPA, the EIS

process, a preliminary list of issues that would be addressed in the EIS, a schedule for the process, general information about Western and Tri-State, a request for public comment, ways to submit comments, and Western's contact information. Western mailed approximately 5,000 newsletters to landowners and other stakeholders. A copy of the newsletter is included in Appendix A.

Western published advertisements in the August and September 2006 editions of the *Colorado Country Life* magazine. The advertisements contained the times, dates, and locations of the scoping meetings, along with project details and contact information. *Colorado Country Life* has a distribution of approximately 175,000 that includes all members of electric cooperatives in Colorado. A copy of the advertisement is included in Appendix A.

Notices that included the times, dates, and locations of the scoping meetings and contact information were included in the August utility bills of Tri-State's cooperative members in the EPTP analysis area. Western sent approximately 80,000 notices to members of YW Electric, KC Electric, Morgan County Electric, Southeast Colorado Power Association, Mountain View Electric, Pioneer Electric and Wheatland Electric. A copy of the notice is included in Appendix A.

The summer 2006 edition of *Powering the West* newsletter, which is distributed to all of Tri-State's cooperative members and about 300 other stakeholders, featured an article on the EPTP, including the times, dates, and locations of the scoping meetings and contact information. A copy of the summer 2006 *Powering the West* newsletter is included in Appendix A.

Western maintains a web site for the EPTP (http://www.wapa.gov/transmission/eptp.htm), which provides notice of the scoping meetings; background documentation on the project such as the NOI, project description, and maps; and an online comment form. Tri-State also maintains a web site for the project (http://www.tristategt.org/RDP/EPTP/overview.cfm), which provides information on the scoping meetings, opportunities to comment, and contact information.

Western published advertisements in 10 local newspapers in the weeks before the scoping meetings. The advertisements in each newspaper were published approximately 2 weeks before the corresponding scoping meeting in the community the newspaper serves. A list of the specific dates and newspapers that published the advertisements are listed in Table 2.3-1. A copy of the standard newspaper advertisement is included in Appendix A.

Table 2.3-1 Newspaper Publications

Newspaper	Publication Frequency	Publication Date
Lamar Daily News	Daily	September 3, 6, and 10, 2006
Limon Leader	Weekly (Wednesday)	August 23, 2006
Fountain Valley News	Weekly (Wednesday)	August 23 and 30, 2006
Fort Morgan Times	Daily	August 21 and 23, 2006
Wray Gazette	Weekly	August 23, 2006
Burlington Record	Weekly	August 24, 31, and September 7, 2006
Garden City Telegram	Daily	September 6, 10, and 13, 2006
Brush News Tribune	Weekly (Wednesday)	August 23, 2006
Pueblo Chieftain	Daily	August 30 and September 6, 2006
Goodland Star News	Twice weekly (Tuesday and Friday)	September 5, 8, and 12, 2006

Western prepared a flyer for distribution to Tri-State's member cooperatives in the analysis area on August 11, 2006. The member cooperatives posted the flyer in locations where the public would see them, such as the cooperative offices, U.S. Post Offices, and other prominent locations. A copy of the flyer is included in Appendix A.

Western prepared and distributed radio public service announcements (PSAs) for broadcast beginning August 21, 2006. The PSAs advertised the public meetings in various locations. A list of the radio stations that broadcast the PSAs and their locations is included in Table 2.3-2.

Table 2.3-2 Radio Stations

Radio Station	Format	Audience Served
KCFR	National Public Radio	Denver, Colorado
K214CO (KANZ)	National Public Radio	Lamar, Colorado
K210CC (KRCC)	National Public Radio	Limon, Colorado
KSYY	Spanish	Limon/Fort Morgan/Wray, Colorado
KRCC	National Public Radio	Fountain, Colorado
KGDQ	Spanish	Fountain, Colorado
KSIR	Farm	Fort Morgan/Brush, Colorado
K228 DL (KUNC)	National Public Radio	Wray, Colorado
KLOE	News/Talk	Burlington, Colorado
KANZ	National Public Radio	Holcomb, Kansas
KSSA	Spanish	Holcomb, Kansas

2.4 Agency and Government Communications

Western contacted over 20 Native American tribes and appropriate Federal, state, and local agencies before and during the scoping process. Western sent letters to Federal, state, and local agencies requesting their involvement as cooperating agencies for the EPTP. The NOI also requested that interested Federal, state, county, and tribal governments request cooperating agency status, if they desired. Western initiated government-to-government consultation with the Native American tribes and provided a draft Programmatic Agreement (PA) for Section 106 compliance to the Advisory Council on Historic Preservation, State Historic Preservation Officers (SHPOs), and Tribal Historic Preservation Officers (THPOs). Tribal contacts who requested to remain on the mailing list are included in the stakeholder list in Appendix B. Agencies contacted included:

- City and town officials in the analysis area
- Colorado Dept. of Transportation
- Colorado Division of Wildlife
- Colorado Historical Society
- Colorado Natural Heritage Program
- Colorado Public Utilities Commission
- Colorado State Land Board
- Colorado State Parks
- County Commissioners, planning departments, and other county agencies
- Governors of Colorado and Kansas
- Kansas Corporation Commission
- Kansas Dept. of Health and Environment
- Kansas Dept. of Transportation
- Kansas Dept. of Wildlife and Parks
- Kansas Natural Heritage Inventory
- Kansas State Historical Society
- U.S. Advisory Council on Historic Preservation
- U.S. Army Corps of Engineers
- U.S. Army Installation Management Agency
- U.S. Bureau of Land Management
- U.S. Bureau of Reclamation
- U.S. Dept. of Housing and Urban Development
- U.S. Dept. of Veteran's Affairs
- U.S. Environmental Protection Agency
- U.S. Federal Highway Administration
- U.S. Federal Emergency Management Agency
- U.S. Fish and Wildlife Service
- U.S. National Park Service
- U.S.D.A. Farm Service Agency
- U.S.D.A Forest Service
- U.S.D.A. Natural Resources Conservation Service
- U.S.D.A. Rural Utilities Service

2.5 Scoping Meetings

Western conducted 10 public scoping meetings in August and September 2006. Table 2.5-1 lists the dates and locations for these meetings.

Scoping meetings ran from 3:00 pm to 8:00 pm to allow the public flexibility to attend at their convenience. Western selected an open house format for the meetings. Large-format informational displays and take-home fact sheets provided information about the project. Sheet maps based on aerial photography and parcel boundaries illustrated the reference

centerlines and corridors. The sheet maps facilitated work with landowners and interested individuals to identify property, issues, and concerns within specific preliminary alternative corridors. Sign-in sheets provided additional stakeholder contact information to add to the mailing list.

Western staffed the scoping meetings with several people who could respond to public comments and questions, including the project manager, the EIS manager, two realty specialists, an electrical engineer, and a public information specialist. EDAW, the firm contracted with Western to assist with the EIS, staffed the meetings with their project manager, assistant project manager, electrical characteristics expert, and a project assistant to aid with meeting logistics and recording of public comments. Tri-State staffed the meetings with their transmission project manager, public information specialist; and project environmental manager to answer questions of a technical nature about the project.

Table 2.5-1 Scoping Meetings

Date of Meeting	Facility	Location
August 28th, 2006	The Carroll Building	Brush, Colorado
August 29th, 2006	The Community Room at City Hall	Wray, Colorado
August 30th, 2006	Limon Community Building	Limon, Colorado
August 31st, 2006	Holiday Inn – Denver International Airport	Aurora, Colorado
September 5th, 2006	Lorraine High School/Community Center	Fountain, Colorado
September 6th, 2006	Pueblo Convention Center	Pueblo, Colorado
September 11th, 2006	Burlington Museum	Burlington, Colorado
September 12th, 2006	Community Activity Building (CAB)	Sharon Springs, Kansas
September 13th, 2006	Lamar Community Building	Lamar, Colorado
September 14th, 2006	Veteran's Memorial Building	Lakin, Kansas

2.6 Scoping Meeting Attendance Summary

Three hundred and fifty-seven individuals signed in at the scoping meetings. Landowners with agricultural or residential land were the primary attendees. Additional attendees included representatives from the National Park Service (NPS), the Bureau of Land Management (BLM), the Kansas Department of Wildlife and Parks (KDWP), local government officials, local electrical utility representatives, the media, environmental groups, local financial institutions, local business owners, wind energy advocates, and other interested parties. Approximately half of the commenters who used the pre-printed comment forms identified themselves as involved in grazing, farming, residential, and mineral interests.

3.0 Scoping Comments Summary

Western identified potential issues to be considered in the EIS through internal and interagency discussions during proposal development. The following list of potential environmental issues was identified in the NOI. This list was designed to help the public frame its comments on the scope of the EIS:

- Effects on protected, threatened, endangered, or sensitive species of animals or plants; or their critical habitats
- Effects on other biological resources
- Effects on land use, recreation, and transportation
- Effects on floodplains and wetlands
- Effects on cultural or historic resources and Tribal values
- Effects on human health and safety (including military, civilian, and agricultural aviation safety)
- Effects on air, soil, and water resources
- Effects on agricultural operations
- Effects on visual resources
- Effects on socioeconomic resources and disproportionately high and adverse impacts on minority and low-income groups

This list was not intended to be all inclusive or to imply predetermination of effects. Western invited interested parties to suggest specific issues within these general categories or other issues not included above for consideration in the EIS.

Individuals, organizations, and agencies who provided comments during the scoping process identified additional issues. The substantive comments received during the scoping process are the basis of the issues described in the following sections of this report. Not all comments relate to the scope of the EIS. For example, comments expressing general support for, or opposition to, the proposed project or requests to remain informed of project progress are not included.

3.1 Comments Received

Western received comments by many different means during the scoping period. Commenters provided comments in forms, letters, email, fax, and phone correspondence through the pubic scoping period that ended on September 30, 2006.. Western received comments at the public scoping meetings on comment forms and as written suggestions on sheet maps. The written comments on the sheet maps were primarily site-specific information or concerns regarding particular preliminary corridors. Representatives of Western and Tri-State engaged many stakeholders at the public scoping meetings and

recorded oral comments on comment sheets. Meeting staff recorded comments with the approval or on request from commenters. After the meetings, representatives responded to queries from commenters that were not answered at the meetings.

The comment form included a list of issues that could be checked off as being of interest or concern. Table 3.1-1 shows the number of times each of these topics was checked. The most frequently identified topics on the checklist were land use and residential, followed by health and safety, visual, physical issues, radio and television interference and noise, water resources, biological issues, historic or cultural resources, electrical characteristics, noxious weeds, and social and economic values.

Table 3.1-1 Checklist Comments

Issue	Number of Comments
Biological Issues	17
Health and Safety Concerns	37
Historic or Cultural Resources Protection	12
Land Use Impacts	36
Noise (from construction)	22
Physical Issues	28
Radio or Television Interference	26
Residential Property impacts	38
Visual Impacts	31
Water Resources impacts	19
Weeds (especially noxious weeds)	1
Total	**267**

Western examined the comments received during the scoping period and entered substantive comments into a database. In the database, each comment is associated with the commenter's name and contact information as well as a topic (for example, alternatives, water resources, or generation). Appendix C contains a listing of the substantive comments, organized by topic. Appendix C does not contain the name and contact information of each commenter. All of these comments were considered in development of the issues summary section of this scoping report.

Table 3.1-2 displays the number of specific comments received for each topic. These comments include all comments received in all formats from agencies, individuals, and organizations during the scoping period. The order of topics in Table 3.1-2 and Appendix C does not imply importance or level of interest on the part of Western, the public, organizations, or agencies.

Table 3.1-2 Substantive Comments

Topic	Number of Comments
Access and Transportation	25
Agriculture	54
Air Quality	56
Alternatives	215
Aquatic Species and Habitats	7
Climate	11
Cumulative Effects	64
Electrical Characteristics	28
Environmental Justice	17
Fiber-optic Cable	2
Floodplains and Wetlands	19
Generation	240
Geology	1
Hazardous Materials and Solid Waste	12
Health and Safety	44
Historic and Cultural Resources	12
Land Use	59
Mitigation	79
Noise	7
Process	61
Public Involvement	31
Radio or Television Interference	2
Recreation	7
Residential	32
Rights-of-Way Acquisition	7
Social and Economic Values	57
Soils	25
Special Status Species	14
Vegetation	21
Visual Resources	25
Water	68
Weeds	11
Wildlife, Wildlife Habitat, and Migratory Birds	35
Total	**1,348***

*The total number of substantive comments is less than the sum of the comments for individual topics because some comments addressed more than one topic.

3.2 Comment Categories

Once all scoping comments were compiled, entered into the database, and organized by topic, Western placed the comments into one of six categories base on how they will be addressed in the EIS. Within each category and topic, Western summarized the individual comments into a set of statements that will be used to define the scope of the discussion for each topic in the EIS. The categories include:

- **Comments on Topics to be Considered in the EIS.** Western will consider the direct, indirect, and cumulative effects of the project, including appropriate mitigation on each of these resource topics in EIS.
- **Comments to be Analyzed as Cumulative Effects.** Comments in this category will be used to develop the discussion of cumulative effects in the EIS. This section does not include comments on Tri-State's generation projects.
- **Comments on Tri-State's Generation.** Comments in this category will be used to develop a discussion of effects in the EIS that is specific to Tri-State's generation projects.
- **Comments on Energy Alternatives.** Western will use the comments in this category to develop the discussion of energy alternatives in the EIS.
- **Comments on Process and Public Involvement.** Comments in this category will be used in NEPA and public involvement activities to the extent that they are applicable to Western's NEPA process for this project.
- **Comment on Preliminary Alternative Corridors.** Comments in this category apply to specific alternatives and routing considerations. These comments will primarily be used to refine the alternative routes, leading up to the route alternatives that will be described in the EIS.

3.3 Comments on Topics to be Considered in the EIS

Western has organized the comments, which relate only to the direct, indirect, and cumulative effects of the EPTP, into resource topics as presented below. Western will address the comments under each resource topic in the EIS, Comments on the effects of other past, present, or reasonably foreseeable projects, including Tri-State's proposed generation, are addressed in subsequent sections of this report.

3.3.1 Access and Transportation

- Analyze direct, indirect, and cumulative effects on roadways and transportation during construction and operation, including sedimentation, airborne particulates, access, travel management, traffic congestion, and enforcement
- Discuss landing strip/airport conflicts
- Prevent access by public to rights-of-way (ROWs) on private lands

- Consider the number of vehicles and trips per day during construction and operation of the project
- Minimize traffic on private property
- Consider that access and transportation in some areas, especially south of I-70, can be difficult because of rough terrain, sandy soils, and erosion risk
- Evaluate proposed road improvements, new road construction, increased access, travel management, and enforcement. Consideration should be given to use of asphalt or concrete for new roadways instead of dirt or gravel

3.3.2 Agriculture

- Analyze the direct, indirect, and cumulative effects to agriculture including irrigation systems, farmland, prime irrigated farmland, livestock, crop production, crop loss, crop production centers, pastures, access to farmland, farm characteristics, farm values
- Discuss safety of livestock (cattle, sheep, and hogs)
- Effects caused by transmission lines crossing center pivot irrigation, electric fences, pastures, ponds, springs, watering systems, livestock ranges, grain bins, grain elevators, feedlots, homesteads, houses, corrals, feedlots, harvestores, grain bins, and farm headquarters
- Difficulty farming around transmission line poles (especially when several lines are adjacent) and inability to use crop dusting, leading to crop loss
- Economic viability and decreasing land value of farms and ranches
- Concern with revegetation, dust control, and weed infestation of stripped agricultural land
- Consider alternative routes for the transmission lines to eliminate interference with ranching operations

3.3.3 Air Quality

- Analyze direct, indirect, and cumulative effects to air quality
- Effects from construction and roadway use including fuel use, vehicle emissions, air toxics, hazardous air pollutants, visibility, and particulates
- Analysis of effects by airsheds rather than political boundaries
- Dust control measures

3.3.4 Aquatic Species and Habitats

- Analyze direct, indirect, and cumulative effects to aquatic wildlife and habitats.
- 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, and the overall physical integrity of aquatic ecosystems

3.3.5 Cultural and Historic Resources

- Analyze direct, indirect, and cumulative effects to tribal and cultural resources such as human remains, archeological items, significant historic properties, Native American Graves, cultural and historic sites
- Analyze potential effects on the Sand Creek Massacre Site
- Consult with Colorado and Kansas State Historical Preservation Officers and Tribal Nations, and in tribal databases

3.3.6 Electrical Characteristics and Radio and Television Interference

- Describe transmission line proximity to and effects on other electrical systems and utilities such as electric and regular fences, irrigation wells and pipes, grain elevators, two-way radios, GPS, farm equipment, railroad operations, residences, large metal farm structures, other transmission lines, and local distribution systems
- Consider health and safety concerns for humans, domestic animals, livestock, and wildlife from exposure to electric and magnetic fields (EMF)

3.3.7 Environmental Justice

- Analyze direct, indirect, and cumulative effects to rural, low-income communities, low population rural farming communities, housing, schools, and labor force
- Describe relative effects to rural and urban areas
- Discuss distribution of wealth and profit of the proposed project
- The proposed project excludes Baca County, Colorado, giving them no chance to improve the socioeconomics of their county, helping to create more low income households

3.3.8 Floodplains and Wetlands

- Analyze direct, indirect, and cumulative effects to floodplains and wetlands, including waters of the U.S., wetlands, farmed wetlands, prior converted wetlands, forested wetlands, fens, ephemeral wetlands, playa lakes, surface water, water quality and supply, aquatic and terrestrial habitat, channel and bank stability, flood storage, ground water recharge and discharge, sources of primary production, recreation, and aesthetics
- Consider protection of hydrologic processes, aquatic ecosystems, and functioning riparian areas
- The EIS should include a wetlands mitigation plan and should incorporate the 404 permitting process.

- Replacement/mitigation of affected and drained wetlands is requested, as well as details on mitigation banks, or other similar compensation programs
- Delineate and mark perennial seeps and springs and wetlands before development activities, and establish buffer zones to avoid adverse effects
- Wetland restoration is preferred to wetland creation and enhancement because it has a higher rate of success
- Consider wetlands and floodplains as designated critical habitats of the Kansas state threatened green toad (*Bufo debilis*)
- Adhere to Executive Order 1, 1990, "Protection of Wetlands" and the interim goal of "No Overall Net Loss of the Nation's Remaining Wetlands" by making a mitigation commitment to avoid disturbances if at all possible

3.3.9 Geology

- Analyze area geology, topography, soils, and stream stability in terms of erosion and mass failure potential to adequately portray the potential risk to resources from the implementation of specific alternatives

3.3.10 Hazardous Materials and Solid Waste

- Analyze the direct, indirect, and cumulative effects of unintentional contaminant leaks and exposure to hazardous materials
- Discuss the likelihood and frequency of hazardous material spills and response capabilities
- Identify all hazardous materials that will be used at project sites, the amount that is used and stored, and the mode of transport

3.3.11 Health and Safety

- Analyze direct, indirect, and cumulative effects to human health, public health, future public health, livestock, and domestic animals caused by air pollution, EMF, mass failure and erosion, static electricity, or stray current
- Consider safety of agricultural operations and other activities near and under transmission lines

3.3.12 Land Use

- Analyze direct, indirect, and cumulative effects and mitigation plans for land use including conflicts with Federal, state, public, and private land; recreation; conservation easements; current and future land use, including residential, commercial, and industrial; existing utility corridors; existing and proposed wind farms; agriculture and ranching; and transportation including airports, railroads, and highways

- Avoid conservation easements, including Blackwolf Creek, Colorado Peaks to Prairie, the Fountain Creek Crown Jewel Conservation Program, Quivira National Wildlife Refuge, and Cimarron National Grassland
- Consider traditional and historic land-use patterns
- Avoid areas with the potential for sustainable development in the future

3.3.13 Noise

- Analyze direct, indirect, and cumulative effects of noise from construction and operation of the project
- Discuss the potential for short and long-term noise pollution
- Provide details of mitigation measures that will be implemented to reduce effects from noise
- Conduct baseline noise monitoring
- Include electrical noise from the transmission lines and substations

3.3.14 Paleontology

- Western received no comments specifically related to paleontology during scoping.

3.3.15 Recreation

- Analyze direct, indirect, and cumulative effects on recreational activities and areas including hunting and fishing, visual character, scenic resources, aesthetics, and functional quality of recreational areas
- Provide details of mitigation measures to reduce intrusion into recreational areas

3.3.16 Social and Economic Values

- Analyze direct, indirect, and cumulative effects on social and economic values including property and land values, rural areas and communities, loss of crops, noxious weeds, difficulty of farming, cultivated fields, high value farm and agricultural land, local economic drivers, local housing, workforce, schools, and quality of life
- Discuss devaluation and loss of productive prime irrigated and dry land farmland and associated economic changes to communities
- Assess the general economics of the project including benefits, opportunity costs, cost effectiveness, and effects on workers, schools, and housing
- Analyze effects of eminent domain on economic viability of farms and ranches
- Baca County has been excluded from the project, causing the loss of potential benefits to the county from the project

3.3.17 Soils

- Analyze direct, indirect, and cumulative effects to soils, erosion, mass failure potential, exposed soils, sandy soils, and sandhills from construction, access roads, and wind
- Consider existing erosion of sandy soils caused by utility projects including transmission lines, water lines, and crude oil lines
- Discuss erosion hazard to water resources
- Assess difficulty of reclamation in sandy soils, especially with drought conditions

3.3.18 Special Status Species

- Analyze direct, indirect, and cumulative effects to Endangered Species Act (ESA) listed threatened, endangered, proposed, or candidate species; state-listed species; sensitive and other special status species; designated critical habitats; crucial wildlife habitats; and any other species in need of conservation
- Habitat loss and threat to the lesser prairie chicken, green toad, Topeka shiner, and greater sage grouse
- Provide “buffer zones” around specific critical areas
- Inventory any high quality or locally and regionally rare habitats or plant communities, such as remnant prairies
- Mitigation for loss of these resources should be identified
- Prefer not to cross major tracts of native grassland where lesser prairie chickens have been documented
- Avoid areas of proposed grassland restoration near Holcomb

3.3.19 Vegetation

- Analyze direct, indirect, and cumulative effects to vegetation, including habitat for terrestrial and aquatic life, sources of primary production, designated critical habitat, native grassland, crucial wildlife habitat, area ecology, Federal and state sensitive plants, invasive plants and weeds, stream bank vegetation, native prairie, wetland and riparian vegetation, high quality or locally and regionally rare plant communities, remnant prairie, forested or treed areas, ongoing or planned forest or tree reclamation areas, and all local crops and vegetation
- Inventory and mitigation for rare vegetation and habitats
- Analyze sources of noxious weeds, effects from and management of noxious weeds, compensation for noxious weed management by landowners
- Create mitigation plan that includes and considers reclamation activities, avoidance of large contiguous tracts of grassland and native prairie, create 100-foot buffers of native vegetation around project components, tree replacement, and time construction to avoid disturbing plants during crucial seasons in their life cycle

- Areas under the towers grow weeds and become a harbor for insect pests

3.3.20 Visual Resources

- Analyze direct, indirect, and cumulative effects to visual resources including viewsheds from major and scenic roadways, homes, farmsteads, pastures, wetland aesthetics, light pollution, effects out of character with the setting, and construction, operation and maintenance equipment and crews
- Include skyline visual effects
- Describe aesthetics of undisturbed topography and scenic residential views
- Discuss visibility effects and air quality effects from dust
- Assess potential for light pollution at substations
- Reduce visibility from the I-25 corridor

3.3.21 Water

- Analyze direct, indirect, and cumulative effects to water resources (groundwater, surface water, drinking water, municipal water sources, streams, rivers, tributaries, perennial seeps, and springs) including quality, quantity, drinking water sources, adjacent water basins, aquifers, culverts for water drainage, wells, hydrologic processes, contaminants in water, water demands, functioning riparian areas, water quality parameters (conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen)
- Reduction of non-point source pollution using best management practices
- Interaction of wells and irrigation with transmission line structures, including well maintenance
- Impaired designated uses and water quality standards
- Stormwater management including flooding and runoff
- Effects of transmission line foundations on groundwater, aquifers, water table
- Mitigate water crossings
- Adhere to Executive Order 1, 1990, “Protection of Wetlands”, and the Clean Water Act
- Create a mitigation plan that includes restoring and maintaining water quality and hydrological processes
- Provide accurate descriptions of surface and ground water resources and identify affected watersheds on maps before development activity
- Obtain and provide water rights to all water resources used in the project and make this information public
- Analyze affects by watershed instead of by political boundaries.

3.3.22 Wildlife

- Analyze direct, indirect, and cumulative effects to wildlife and habitats, physical and biological complexity, crucial wildlife habitat, breeding and nesting activities
- Displacement of wildlife and habitat fragmentation
- Effects of transmission lines and towers on birds (collision and electrocution)
- Flyways in eastern Arapahoe County
- Effects to specific species (dove, quail, deer, antelope, elk, and horned lizards)
- Maintain integrity of playa lakes as they are important stopover point for migrating water fowl
- Comply with Federal and state game and fish wildlife management objectives, and consider wildlife mortality
- Mitigate effects to wildlife and wildlife habitat

3.4 Comments to be Analyzed as Cumulative Effects

Comments in this category will be used to develop the discussion of cumulative effects in the EIS. This section does not include specific comments on resources or Tri-State's generation projects.

- Cumulative effects of existing and proposed transmission lines
- The Peak to Prairie Project and the Fountain Creek Crown Jewel Project in El Paso and Pueblo counties are two local projects to be considered
- In Sherman County, Kansas, parts of Highway 27 and the highway to the Greeley county line are proposed for relocation and widening
- Three miles south of Sharon Springs is a conglomeration of already existing transmission lines and underground public and private gas lines, city water lines, domestic water lines, and crude oil lines that prohibit the building of any permanent structure on the ROW.
- Avoid cumulative effects from cutting through farmland with numerous overhead utility lines including high-voltage power lines, cellular towers, and underground city and domestic water lines, irrigation pipelines and wells, pump stations, oil and gas lines, and public works projects like Superslab, highways, county roads, etc.
- Address future projects in the area and the effect the project may or may not have on those developments such as residential or commercial development and city expansion and the Southern Delivery Water Project (Colorado Springs Utilities/Bureau of Reclamation)
- Western's EIS must address cumulative effects of possible conflicts between the proposed action and the objectives of Federal, regional, state, and local land use plans, policies, and controls for the areas concerned

- Analyze cumulative effects of the ongoing drought of several years and the effects of construction of project

3.5 Comments on Tri-State's Generation

Comments in this category will be used to develop a discussion of effects in the EIS that is specific to Tri-State's generation projects. The comments related to Tri-State's generation projects have been summarized by topic because of the large number of comments that apply to specific resources or components of these projects.

3.5.1 Access and Transportation

- Effects on local traffic flow during construction and operation of generation facility
- Effects on railroad activity delivering coal to Holcomb and Garden City, Kansas generation facilities
- Proposed upgrades and maintenance to local infrastructure including roadways and railways.
- Alternative transportation routes for vehicles carrying hazardous materials
- Total and effects of daily train trips

3.5.2 Agriculture

- Effects to crops, farmland, and agriculture caused in any way by generation projects, including air emissions and changes in water use
- Assess effects to crops within 500 miles of power plants in terms of the aggregate of lost value-per-year and remediation cost-per-year
- Loss of productive agricultural land when water is sold from the land for use in coal-fired power plants
- Assess the amount in tons-per-year or pounds-per-year of increased deposition of various pollutants on each highly agricultural region in the United States

3.5.3 Air Quality

- Effects on air quality during the following phases: 1) construction, 2) start-up, 3) operation, and 4) shut-down
- Air quality assessments including Class I increment and Class II Prevention of Significant Deterioration (PSD)
- Potential effect 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, significant concentrations of hazardous air pollutants, and protection of public health

- Effects to human health, wildlife, and agriculture from air quality issues, including but not limited to mercury and dioxin toxicity in fish eaten by humans caused by increased emission from coal burning power plants
- The results of air quality modeling consistent with EPA and Kansas Department of Heath and Environment guidelines
- The amount, in tons-per-year or pounds-per-year, of specific emissions of carbon dioxide, methane, mercury, atmospheric sulfur dioxide, nitrogen oxides, sulfur trioxides, particulate matter/particulate matter 10 microns or less, sulfuric acid mist, fluorides, dust particulates, hazardous air pollutants (HAPs), and any potential air toxics
- Air pollution control measures and devices including coal washing, Best Available Control Technology (BACT) limits, Maximum Available Control Technology (MACT), sulfur dioxide scrubbers, mercury emissions controls, etc.
- Schematics of the air pollution control system including carbon and mercury capture, bypass of the pollution control system, and conditions under which bypass will occur, activated carbon injection, fabric filters with FGD control, circulating dry scrubbers, drift eliminators, coal washing, and circulating fluidized bed technology
- Dust control methods for storage piles, conveyors, crushers, pulverizers, and storage bins
- Mitigation of significant deterioration of air quality near the plant, such as emission offsets, coal washing, and Adaptive Resource Management

3.5.4 Alternatives to Supercritical Pulverized Coal-Fired Generation

- Alternatives to supercritical pulverized coal-fired generation, including studies on supply-side options such as integrated gasification combined cycle coal (IGCC) generation, natural gas, wind, solar, biomass, and demand-side options such as energy conservation
- The quantity of renewable energy to be developed by Tri-State for delivery on the EPTP including the megawatts, megawatt hours, and the types of renewables, construction dates, locations, and operations timelines
- Consider modeling on concentrating solar power, wind energy, biomass, and IGCC generation
- Consider and assess the energy resource alternatives to coal-burning power plants including conservation, renewable energy sources (solar, wind, biomass), and cleaner methods of fossil fuel generation
- Costs and socioeconomic benefits of wind energy, biomass, and gas-fired resources including pollution trade-offs
- Alternative locations for generation

- Consider peer-reviewed studies indicating that “as much as 98 percent of the capital stock of US 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.”
- The relative efficiencies of long-distance transmission of electricity versus local, decentralized electricity generation
- Financial analysis of project alternatives
- Energy requirements and conservations potential of various project alternatives
- Why was only one power source for project the basis for economical, reliable, diverse, and flexible power delivery system

3.5.5 Climate

- Include climate change considerations in the EIS
- Amounts of greenhouse gas emissions, such as methane, nitrous oxide, and carbon dioxide, and how they will affect global warming
- Effects of atmospheric sulfur dioxide producing sulfuric acid and formation of atmospheric fog/haze during time of winter air inversions in the regional valleys
- Consider and model drought and global warming projections in regards to water use
- Mitigation measures such as Carbon dioxide capture and storage (CCS) technology

3.5.6 Cultural and Historic Resources

- Consult with the State Historic Preservation Officer and any Indian Tribe regarding mitigation of effects to significant historic properties

3.5.7 Cumulative Effects

- Assess all cumulative effects related to Tri-States three new coal units and coal consumption and combustion

3.5.8 Environmental Justice

- Effects on minority and low income populations in all resource categories
- Jobs that could be created in rural areas through renewable energy generation and coal generation
- Where the electricity generated by these projects will be used
- Factual finding as to whether the following communities 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

3.5.9 Construction and Operation of Facilities

- Conduct and make a detailed report of environmental and cultural effects for all communities in the immediate vicinity of proposed coal power plants
- The effects to coal supplies and contracts and other fossil fuels resources to be used in Tri-State's generation
- Potential future costs of pulverized coal generation plants if a carbon tax is enacted.
- 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, the type of emission controls to be used at each unit, 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
- Projected average plant capacity factor for each project
- The location of storage piles and source of materials used in construction and operation of the coal fired power plant
- All mobile equipment that will be used on site and annual fuel use
- The line segment from Holcomb to Lamar would not be required if the power plant were not connected to the EPTP

3.5.10 Hazardous Materials and Solid Waste

- All hazardous materials that will be used, stored, or transported at all project sites
- The amount of waste (including, but not limited to ammonia, ash, scrubbers and hazardous waste), the disposal sites, and modes of transporting waste to disposal sites
- Alternative transportation routes and disposal sites for all hazardous materials and other waste to avoid populated areas
- MACT and BACT for hazardous wastes and emissions

3.5.11 Health and Safety

- Human health effects of these coal-fired power plants
- All epidemiological, clinical, and environmental health studies related to cumulative and synergistic exposure to hazardous and criteria pollutants emitted from the proposed coal plants
- Emergency management plan, maintenance schedule, and traffic control plan for the coal-fired power plants
- Explosion and fire hazard risks and mitigation for same, including monitoring equipment
- Consider the lack of sufficient local medical facilities to address health effects to workers and local residents

- The protection of public health
- Analyze and develop mitigation for the cancer and non-cancer health effects from emissions and discharge
- Analyze risk to human and ecological health from all criteria pollutants and exhaust from trucks, trains, and on site mobile equipment

3.5.12 Land Use

- Effects to lands caused by the proposed coal plants

3.5.13 Mitigation

- Analyze proposed use of Adaptive Resource Management (ARM)

3.5.14 Noise

- The potential effects of noise, including baseline noise monitoring
- The effects of noise levels of steam blows and proposed and alternative noise reduction control measures
- The projected peak and 1-hour average and maximum noise levels at the fence line of the coal plants in noise analyses

3.5.15 Process and Public Involvement

- Request for Western to reissue a NOI to include three new coal plants as part of the scope of this project
- Request that Tri-State swear under penalty of perjury that all information provided to the public as part of this process is complete and accurate
- The scoping meetings too narrowly defined what people could comment on and failed to identify the proposed new coal plants
- 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

3.5.16 Social and Economic Values

- Socio-economic effects for all communities in the immediate vicinity of proposed coal power plants
- Any proposals to mitigate effects to local infrastructure, including assistance to local agencies for infrastructure upgrades related to project construction and operations
- Effects on medical costs and productivity on members of all affected communities
- Financial effects of the proposed power plants on Tri-State's owners and the financial liability to each consumer

3.5.17 Special Status Species

- Effects to threatened and endangered species on and around the plant site and all related project components; for example, for increased deposition of various pollutants, assessments of the amount, in tons-per-year or pounds-per-year, by which each pollutant would directly or indirectly increase the deposition on the habitats of threatened and endangered species—of each chemical, including but not limited to, mercury and dioxin

3.5.18 Vegetation

- Consider the metal uptake by plants from emissions from the plant, specifically boron, fluorine, arsenic, and selenium.

3.5.19 Visual Resources

- Effects to visibility caused by emissions, and for decreased visibility in scenic areas, the hourly, daily, and annual assessments of visibility degradations caused by each project through performing visibility modeling for the maximum hourly average emissions and maximum 24 hour average emissions
- Effects of light pollution

3.5.20 Water

- Consider the total water consumption for all units of the project including a breakdown of individual uses including but not limited to cooling towers, blowdown water, scrubber, makeup to boilers, dust control, sanitary uses, and coal dust pile
- Consider effects to existing wells, springs, wetlands, include detailed mitigation plans
- For increased deposition of various pollutants, assess in tons-per-year or pounds-per-year each option would directly or indirectly increase the deposition on waters
- Consider the “plumbing” of Tri-State’s proposed power plants, including well field locations, surface water PODs, location of spreading basins, and injection wells
- Consider the amount and characteristics of any wastewater discharged from plant operation processes and during project constructions. Consider proposed and alternative discharge locations
- Provide detailed breakdown of acre-feet water demand for each coal plant including construction and operation
- Consider proposed and alternative water consumption rates and amounts to include an analysis of proposed and alternative recycling methods
- Require adjudication of all water rights before issuance of DEIS

3.5.21 Wildlife

- Describe wildlife populations that will be affected by water use of pulverized coal produced electricity

- Provide measures to keep wildlife away from waste ponds, disposal sites, other relevant plant operation facilities and throughout all project construction activities
- Develop mitigation strategies to avoid effects to wildlife, wildlife migration routes, and wildlife habitat
- Consider measures for protecting water at the source for use by wildlife

3.6 Comments on Energy Alternatives

Western will use the comments in this category to develop the discussion of energy alternatives in the EIS. Components of the energy alternatives topic include:

- Question whether wind power from private owners could be connected to EPTP
- Consider how the Montezuma Wind Farm can be integrated into the grid
- Consider the proposal to build the Grand Mesa Project on the western slope to provide additional storage on Surface Creek and generate an average of 52 million kilowatt-hours annually
- Even in dry years, hydroelectric power can peak generate at any appropriate time (peak dispatchable power)
- Consider incentives for home and business photovoltaic systems, benefits of alternative energy including dollar costs, health costs, environmental costs, and national security costs.

3.7 Comments on Process and Public Involvement

Comments in this category will not be addressed in the EIS, but will be used to help define future NEPA and public involvement activities to the extent that they are applicable to Western's NEPA process for this project.

- Conduct environmental, natural resource, and cultural resource investigations
- Make all mitigation plans public information
- 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 transcribed
- Present the environmental effects of the proposal and 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
- Western should conduct all public meetings in a question and answer format with a facilitator and have all questions, comments, and answers recorded or transcribed
- Provide for a staffed complaint hotline to address neighborhood problems such as noise, odor, dust, traffic, and vibration and a plan to resolve any identified problems

- Provide public training on the permitting and NEPA process to all communities designated as environmental justice communities
- Make independent experts available to the communities and other interested entities for review of permit applications, technical reports, and other project requirements and components

3.8 Comments on Preliminary Alternative Corridors

Comments in this category apply to specific alternatives and routing considerations. Western primarily used these comments to refine the alternative routes, leading up to the proposed and alternative routes that will be displayed at the next round of public meetings. In addition to the comments recorded here, many comments were drawn on the sheet maps at the scoping meetings. Some of the general comments listed below are summarized from notes drawn on the sheet maps. In addition, some of the route-specific comments were taken from the sheet maps, although most minor route changes drawn on the sheet maps have not been transcribed here.

3.8.1 General Comments

Several comments made general recommendations for selection of alternative routes for the EPTP. These recommendations include:

- Route transmission lines to avoid homes, gas wells, the Garden City Western Railway tracks, center pivot irrigation systems, grain elevators, areas with large populations, conservation easements, farms, hog farms, and prairies
- Use existing linear features such as utility rights-of-way, roads including the I-70 corridor, field lines, section lines, fence lines, and grass lines
- Site transmission lines near wind farms to reduce land use effects
- Avoid visual effects
- Avoid properties that already have transmission lines and other infrastructure projects
- Use low value land for the project
- Avoid spider-webbing out of substations
- All feasible alternatives should be given equal consideration and analysis
- Broadband internet should be developed over power lines
- Concern why Baca County is not included in the project
- Use existing corridors and ROWs including linear facilities, roads, county lines, railroads, pasture lines, section lines, and edges of fields
- Build project away from residential areas, farmsteads, and developed and populated areas

- Consider fiber optic cable as an alternative to power lines
- Consider the value paid for land and lost crops compared with decreased property value

3.8.2 Route-Specific Comments

Commenters made many location-specific comments on the preliminary alternative corridors. Western has organized these comments by transmission line. Personal preference is the basis of many of these comments and some clearly conflict with others. The analysis of the alternative transmission line routes to be carried into the EIS will include consideration of these comments as well as other opportunities and constraints as routes are refined. The comments include:

3.8.2.1 Rolling Hills to Energy Center

- Prefer B3, B7, and B12
- Avoid B1 and B2
- Prefer line stay west of Holcomb
- Avoid B7 (home would sit between two lines one mile apart)
- B7 and A3 possibly affecting eight quarter sections with three large lines in 3 mile area
- Move B4 to eastern border of section 30 (to avoid affecting scenic views)
- Prefers B9 to B5, B6, B7, and B8
- Avoid Little Lowe Rd.
- Avoid B13

3.8.2.2 Rolling Hills to Burlington

- Prefers A1, A3, A5, A11, A12, A14, and A15
- Avoid A11
- Prefer A5 and A11 (stay west of Leoti)
- Move A9 and A10 1.5 to 2 miles to the west (to avoid residences)

3.8.2.3 Energy Center to Burlington

- Avoid the Plainview School
- Avoid hog farms

3.8.2.4 Energy Center to Lamar

- Coordinate with irrigation district for canal crossings

3.8.2.5 Energy Center to Boone

- Avoid area south of US 287 (effects to sand hills include damage and erosion)

- Concerned about lines near reservoirs and wildlife areas affecting migratory birds, including threatened and endangered species

3.8.2.6 Energy Center to Big Sandy

- Avoid G7 (passes by homes and raises health concern)
- Prefer G8 and G9 (soil less sandy and more stable)
- Prefer lines routed as far SE as possible
- Avoid G7 north of Colorado Highway 94 (very sandy)
- Prefers to extend G8 and stay north of Wildhorse (harder soils) rather than use G4, G5, or G6

3.8.2.7 Burlington to Big Sandy

- Avoid I1 (snow loads, ice, and noxious weeds)
- Prefer I5
- Prefer I1 and I2
- Route line to the south of I-70 along existing line of H-frame structures on road 2W (much fewer homes)
- Avoid I5
- Move I1 to the south (follow existing line)
- Prefer routing along existing 230-kV line
- Route project to the south of I-70 to avoid residences, and gain less expensive and more accessible land, grassland, and less ice and snow

3.8.2.8 Burlington to Wray

- Avoid feedlots between H5 and US 385
- H2 less populated than H1

3.8.2.9 Boone to Midway

- Lines across BLM lands could affect ability to develop mineral resources and could affect other resources of concern
- Avoid areas of sandy soils
- Avoid or minimize new effects to state stewardship trust lands
- Consider an alternative that runs south and west of the Pueblo Chemical Depot, rather than east and north
- Avoid F1
- Follow Xcel's proposed Comanche to Midway Line at north end of F2

3.8.2.10 Midway to Big Sandy

- Prefers N4 or any route Northwest of N3 (minimize effects to property)
- Consider alternative route which runs east of I-70 in Arapahoe and Elbert counties
- Prefers N1 or N2
- Avoid N4 (line would cut through landowners property)
- Prefers N2 to N1
- Avoid N1
- Consolidate the new transmission line with existing Tri-State line
- Stay on south side of existing line on N5 through Frontier Sportsman Club, or create new alternative that follows south and east boundary of club, away from existing line

3.8.2.11 Big Sandy to Beaver Creek

- Avoid J8 (very sandy and sensitive grassland)
- J9 runs over rough terrain
- Prefer J12 and J6
- Prefer J8 to follow Colorado Highway 71
- Consider moving J3 one mile to the north or south (to avoid residences)
- Prefer J9
- Move J1 to west of section line (adds to existing lines on property)
- Avoid J9 (sandy soils)
- Avoid western route (effects to shallow sand aquifer that supplies drinking water to Brush)
- Avoid J1 and J12

3.8.2.12 Big Sandy to Green Valley

- Move K2 out of field and along highway
- Prefer K13 route to the north
- If K12 used, consider moving it south (between 112th Avenue and 104th Avenue to avoid residences)
- Prefers K2 to K3
- Avoid K2
- Prefers K3 to K2 (effects to farmland)
- Move K4 west to 144th Avenue (to avoid residences)

3.8.2.13 Green Valley to Beaver Creek-Erie Tap

- Lots of development in area
- Already affected by Xcel lines

3.8.2.14 Big Sandy to 125-mile

- M1, M2, M3,and M4 is grassland (request line stay 0.5 mile from homes along these routes)
- Avoid M3

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