

APPENDIX M RESPONSES TO COMMENTS

Table M-1. List of Comment Categories and Codes

Subject Category	Category Code	Topics Covered by Comments	Page Number
General	GEN-100	The proposed project and/or AECl, and not directly related to the Draft EIS.	M-12
	GEN-101	The length, difficulty in finding information, and/or complexity of the document.	M-36
	GEN-102	Document authorship.	M-40
	GEN-103	Compliance with NEPA	M-41
	GEN-104	Baseline studies.	M-42
	GEN-105	Externalized costs of energy	M-43
	GEN-106	Miscellaneous.	M-44
Purpose and Need	PUR-200	Anecdotal reports of increased need within AECl's service area.	M-57
	PUR-201	Questioning the need.	M-70
Alternatives	ALT-300	Alternatives, general.	M-77
	ALT-301	Renewable energy, general.	M-78
	ALT-302	Conservation and efficiency	M-80
	ALT-303	Solar and wind power	M-82
	ALT-304	Biomass, general	M-82
	ALT-305	Carbon capture and sequestration	M-83
	ALT-306	Carbon tax or cap and trade	M-86
	ALT-307	Fuel cells, ethanol, biodiesel	M-87
	ALT-308	Coal as an energy source; coal industry; coal-fired plants in general	M-97
	ALT-309	Nuclear power	M-99
	ALT-310	Siting	M-99
	ALT-311	Transmission and rail	M-100
	ALT-312	Big Lake Site	M-101
	ALT-313	No Action Alternative	M-102
	ALT-314	Details of the Proposed Action.	M-103
Air Quality	AIR-400	Air pollution controls, general	M-104
	AIR-401	Air monitoring	M-107
	AIR-402	Mercury, including controls and risk evaluation	M-109
	AIR-403	National Ambient Air Quality Standards (NAAQS) including permitting	M-121
	AIR-404	Greenhouse gas emissions and climate impacts	M-125
	AIR-405	Regional avoidance criteria, Class I areas, new source review, the Prevention of Significant Deterioration program and related requirements	M-126
	AIR-406	Hazardous air pollutants (HAPs)	M-129

Table M-1. List of Comment Categories and Codes

Subject Category	Category Code	Topics Covered by Comments	Page Number
	AIR-407	General air quality and air pollution issues	M-130
Groundwater	GRO-500	Groundwater resources impacts including the relationship between groundwater and surface water, floodplains, and wetlands; impacts to local water supply; dewatering activities; springs	M-132
Surface Water	SUR-600	Impacts to surface water	M-141
Floodplains	FLO-700	Floodplain and flooding impacts	M-143
Farmland	FAR-800	Affects on farmland and farmers	M-149
Land Use	LAN-900	General impacts on land use; planning and zoning issues	M-151
Recreation and Public Lands	REC-1000	Affects on outdoor recreation and public lands	M-152
Visual Resources	VIS-1100	Visual resources impacts	M-153
Biological Resources	BIO-1200	Biological resources impacts including flora and fauna; threatened and endangered species	M-154
Wetlands and Waters of the United States	WET-1300	Impacts to wetlands and Waters of the United States	M-156
Cultural Resources	CUL-1400	Cultural issues including findings of Phase I survey and Phase II testing	M-161
Socioeconomics	SOC-1500	Transportation impacts and issues	M-162
	SOC-1501	Socioeconomic issues including income, taxes, employment, financing, tourism, and quality of life	M-163
Noise	NOI-1600	Noise-related issues	M-175
Waste Management	WAS-1700	Handling and disposal of wastes such as solid and hazardous wastes generated by the project	M-176
Cumulative Impacts	CUM-1800	Cumulative impacts in all resource areas	M-178
Mitigation	MIT-1900	Mitigation measures	M-181
Other required considerations	OTH-2000	Consideration of irreversible and irretrievable commitment of resources; short-term uses versus long-term productivity	M-184
Consultation and Coordination	CON-2100	Public involvement, meetings, hearings and on-going dialogue; public access to information	M-186

Table M-2. Alphabetical List of Commenters and their Comments

Name	Type of Comments *	ID#	Comment Codes
Albrecht, Renate	O	C65	500-3, 2100-1
Bigler, Charles	O	C93	200-1
Boone County, Keith Schnarre	O	C67	100-1, 100-2, 200-2
Boone Electric Cooperative, Brent Voorheis	O	C62	100-4, 200-2
Boone Electric Cooperative, Jay Turner	O	C63	100-2
Boone Electric Cooperative, Joel Bullard	O	C61	100-1, 100-4
Boone Electric Cooperative, Roger Clark	O	C69	311-1
Calloway Electric Cooperative, Clint Smith	O	C40	100-1, 100-2, 100-4, 200-2, 1501-1, 1501-3
Calloway Electric Cooperative, Dennis Wease	O	C39	100-2, 303-1, 308-4
Calloway Electric Cooperative, Tom Howard	O	C70	200-2, 308-4
Carroll County Commission, Nelson Heil, Jim Stewart, David Martin	W,O	C3	100-1, 100-3, 1501-1, 1501-2, 1501-3, 1501-4
Castle, Edward	W	C4	100-4
Central Missouri Electric Cooperative, Francis Burks	W	C1	100-1, 100-2
Central Missouri Electric Cooperative, Ron Bledsoe	O	C42	106-6
City of Camdenton, Missouri, Steven Craig	O	C46	100-3, 200-1, 200-3
City of Carrollton, Missouri, Sharon Metz	W	C5	1501-1
Clark, O.B.	O	C80	200-2
Co-Mo Electric Cooperative and Burger's Smokehouse, Steven Burger	W,O	C2	100-4, 200-2, 1501-1
Co-Mo Electric Cooperative, Abe Rohrbach	O	C53	100-4, 200-3
Co-Mo Electric Cooperative, Ken Johnson	O	C81	100-2, 200-2
Co-Mo Electric Cooperative, Mike Kenagy	O	C52	100-3, 100-4, 200-2
Consolidated Electric Cooperative, Terry Blaue	O	C38	100-1, 100-3, 100-4, 200-2
Cowherd, Robert	O	C90	1501-5

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Name	Type of Comments *	ID#	Comment Codes
Cowsert, Diana	O	C77	100-5, 100-8, 106-4, 200-2, 308-4, 500-3, 1501-6
Cowsert, Rod	W	C78	100-6, 100-7, 101-1, 104-1, 105-1, 106-5, 403-1, 403-3, 406-1, 600-3, 700-5, 900-1, 1300-1, 1800-4, 2100-1, 2100-2, 2100-3, 2100-4, 2100-5
Department of the Interior (U.S.), Robert Stewart	W	C7	300-1, 312-1, 312-2, 500-1, 500-2, 1000-1, 1200-1, 1200-2, 1200-3, 1200-4
Eisler, George	O	C54	1501-6
Eisler, Melissa	O	C55	1501-6
Environmental Protection Agency (U.S.), U. Gale Hutton	W	C8	101-1, 401-1, 402-1, 402-2, 402-3, 402-4, 402-5, 402-6, 403-2, 500-3, 700-1, 700-2, 1300-1, 1300-2, 1300-3
Farmers Electric Cooperative, Ray Shields	O	C87	100-1, 106-7
Farmers Electric Cooperative, Steve Shoot	O	C89	100-1, 200-2
Federal Aviation Administration, Todd Madison	W	C9	100-5, 106-1
Gascosage Electric Cooperative, Carmen Hartwell	O	C47	100-1, 100-3, 200-2
Gascosage Electric Cooperative, Kimberly Doyle	O	C48	100-1, 100-4
Great Rivers Environmental Law Center, Henry Robertson	W	C10	102-1, 103-1, 302-1, 305-1, 311-1, 313-1, 400-1, 402-1, 404-1, 700-2, 1300-1, 1800-1, 1800-2, 1800-3, 2000-1, 2000-2
Gregory, Walter	O	C64	100-8
Hines, Peggy	W	C11	403-1
Houseworth, Jim	O	C92	100-1, 100-3, 106-6, 200-2, 1501-1
Howard Electric Cooperative, Dale Kirby	O	C31	100-2, 100-4
Howard Electric Cooperative, Randy Asbury	W,O	C12	100-1, 100-2, 100-4, 200-2, 308-1
Kern, Leroy	O	C85	100-1
Korff, Rob	O	C96	100-5, 100-8, 500-3

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Name	Type of Comments *	ID#	Comment Codes
Laclede Electric Cooperative, Carl Lowrance	O	C43	100-1, 100-4, 200-2, 200-3
Lewis County Rural Electric Cooperative, John Bloom	O	C41	100-4, 200-2, 303-1
Lindley, Henry and Joline	W	C99	1200-4, 1300-3
List, Gerhardt	W,O	C13	101-1, 102-1, 104-1, 106-2, 106-3, 201-1, 300-2, 301-1, 304-1, 307-1, 308-2, 309-1, 310-1, 311-1, 312-3, 400-1, 401-1, 402-6, 407-3, 500-3, 500-5, 700-3, 1000-1, 1501-4, 1700-1, 1700-3, 1800-4, 1900-2
Livingston County Electric, Jason Helton	O	C84	100-1, 100-2
Machado Jr., Manuel	W	C15	106-4, 201-1, 307-1, 700-5, 700-7, 900-1, 1501-1, 1501-2, 1501-4
Macon Electric Cooperative, Mary Liebhart	O	C34	100-1, 100-4, 100-8
Matthews, J.D.	W	C14	106-4, 303-1, 402-6, 403-1, 403-3, 500-3, 700-3, 800-1
Matthews, Noelle	W	C16	106-4, 106-7, 308-2, 308-3, 400-3, 403-3, 407-3, 500-3, 700-4, 700-5, 800-1, 1300-3, 1500-1, 1501-5, 1501-6
Missouri Department of Natural Resources, H. Floyd Gilzow	W	C17	106-3, 304-1, 314-1, 400-2, 400-3, 401-1, 402-1, 403-2, 403-3, 405-1, 406-1, 407-1, 407-2, 500-2, 600-3, 1300-1, 1700-2, 1800-1
Missouri Office of Administration, Sara VanderFeltz	W	C6	100-5
Missouri Renewable Fuels Association, John Eggleston	O	C33	100-3, 200-3
Missouri Rural Electric Cooperative, David Wright	O	C32	100-1, 100-3, 100-4, 200-2
Missouri Rural Electric Cooperative, Vic Cline	O	C35	100-1, 100-2, 200-3
Northeast Missouri Grain, LLC, Steve Burnett	W,O	C18	100-2, 200-3
Osage Valley Electric Cooperative, Frank Burton	O	C45	100-8, 200-2

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Name	Type of Comments*	ID#	Comment Codes
Osage Valley Electric Cooperative, P.D. Kircher	O	C44	100-1, 100-8
Owens, Martha	W	C19	900-2
Page, Dale	O	C72	100-1, 100-3
Platte Electric Cooperative, Brian Moorhead	O	C58	106-2
Platte Electric Cooperative, Cheryl Barnes	W,O	C20	100-1, 200-2, 2100-6
Platte Electric Cooperative, Dorothy Frock	O	C56	100-1, 100-3, 100-8
Platte Electric Cooperative, Jack Woods	O	C59	200-2, 308-1
Platte Electric Cooperative, Jim Eldridge	O	C60	100-3, 200-1
Platte Electric Cooperative, Judith White	O	C57	100-1, 200-2, 308-4
Ralls County Electric Cooperative, Lynn Hodges	O	C36	100-2, 100-4, 100-8, 200-2
Rapp, Paul	W	C22	200-3
Richards, W.D.	O	C79	106-5
Rollings, Beverly	O	C49	200-2, 402-1, 402-6
Rumery, Terry	O	C91	100-1, 1501-1, 1501-4
Saadeh, Karen	W	C23	100-1, 100-5, 101-1, 102-1, 104-1, 106-1, 201-1, 302-1, 313-1, 400-1, 402-2, 402-4, 402-6, 404-2, 407-3, 500-3, 500-4, 500-5, 500-6, 600-1, 600-2, 700-5, 700-6, 800-3, 1100-1, 1600-1, 1700-4, 1800-2, 1800-4, 1800-5, 2000-1, 2000-3, 2000-4, 2000-5, 2100-1
Sac Osage Electric Cooperative, Rick Bagby	O	C50	100-8
Scurlock, George	W,O	C24	100-1, 100-2
Thomas, Christal	O	C74	200-2
Thompson, Carl	O	C37	100-1, 100-3, 1501-1
Three Rivers Electric Cooperative, Chris Ryan	O	C66	100-2
Town & Country Service & Supply, Mary Lichte	W,O	C25	100-1, 100-3, 200-2, 1501-1, 1501-3, 1501-5
Trial, Mike	W,O	C26	305-1, 305-2, 404-2

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Name	Type of Comments*	ID#	Comment Codes
United Electric Cooperative, Brock Pfost	W,O	C21	100-1, 106-6
Unknown commenter 1	W	C30	106-7, 600-3, 700-5, 1700-1
Unknown commenter 2	O	C97	1200-5
Unknown commenter 3	O	C98	2100-1
Voss, Ralph	W,O	C27	100-2, 100-3, 100-4, 106-7, 200-3
West Central Electric Cooperative, Charles Teter	O	C75	200-1
West Central Electric Cooperative, Fred Wolff	O	C76	100-2, 100-4
West Central Electric Cooperative, Glenn Alsup	O	C82	100-1
West Central Electric Cooperative, Max Swisegood	W	C28	200-2
West Central Electric Cooperative, Ralph Dye	O	C73	100-8, 200-2
West Central Electric Cooperative, Ray Maring	O	C71	200-2
West Central Electric Cooperative, Steve Moore	O	C83	100-1, 200-2
West, Grace	W,O	C29	101-1, 106-3, 302-1, 306-1, 308-4, 313-2, 401-1, 402-1, 402-2, 402-6, 500-3, 600-1, 700-2, 700-5, 800-2, 1200-4, 1200-6, 1300-3, 1400-1, 1500-2, 1501-5, 1501-8, 1700-4, 1800-1, 2100-1
Westbrook, Rick	O	C51	100-2, 1501-1
White, Nathan	O	C68	106-4, 800-3
White, Thomas	O	C95	106-7, 500-5, 2100-1
Whiteside, Dale	O	C94	200-1, 200-2
Williams, Sherry	O	C86	100-3, 1501-3
Wood, Rex	O	C88	106-6

* W - Written comment (electronic mail (e-mail), e-mail with attached electronic file, hard copy, or comment form)

O – Oral testimony provided during public meetings held in Salisbury, Sedalia, or Carrollton, Missouri

Table M-3. List of Commenters and their Comments in Numerical Order

ID#	Name	Type of Comments *	Comment Codes
C1	Central Missouri Electric Cooperative, Francis Burks	W	100-1, 100-2
C2	Co-Mo Electric Cooperative and Burger's Smokehouse, Steven Burger	W,O	100-4, 200-2, 1501-1
C3	Carroll County Commission, Nelson Heil, Jim Stewart, David Martin	W,O	100-1, 100-3, 1501-1, 1501-2, 1501-3, 1501-4
C4	Castle, Edward	W	100-4
C5	City of Carrollton, Missouri, Sharon Metz	W	1501-1
C6	Missouri Office of Administration, Sara VanderFeltz	W	100-5
C7	Department of the Interior (U.S.), Robert Stewart	W	300-1, 312-1, 312-2, 500-1, 500-2, 1000-1, 1200-1, 1200-2, 1200-3, 1200-4
C8	Environmental Protection Agency (U.S.), U. Gale Hutton	W	101-1, 401-1, 402-1, 402-2, 402-3, 402-4, 402-5, 402-6, 403-2, 500-3, 700-1, 700-2, 1300-1, 1300-2, 1300-3
C9	Federal Aviation Administration, Todd Madison	W	100-5, 106-1
C10	Great Rivers Environmental Law Center, Henry Robertson	W	102-1, 103-1, 302-1, 305-1, 311-1, 313-1, 400-1, 402-1, 404-1, 700-2, 1300-1, 1800-1, 1800-2, 1800-3, 2000-1, 2000-2
C11	Hines, Peggy	W	403-1
C12	Howard Electric Cooperative, Randy Asbury	W,O	100-1, 100-2, 100-4, 200-2, 308-1
C13	List, Gerhardt	W,O	101-1, 102-1, 104-1, 106-2, 106-3, 201-1, 300-2, 301-1, 304-1, 307-1, 308-2, 309-1, 310-1, 311-1, 312-3, 400-1, 401-1, 402-6, 406-1, 407-3, 500-3, 500-5, 700-3, 1000-1, 1501-4, 1700-1, 1700-3, 1800-4, 1900-2
C14	Matthews, J.D.	W	106-4, 303-1, 402-6, 403-1, 403-3, 500-3, 700-3, 800-1
C15	Machado Jr., Manuel	W	106-4, 201-1, 307-1, 700-5, 700-7, 900-1, 1501-1, 1501-2, 1501-4

Table M-3. List of Commenters and their Comments in Numerical Order

ID#	Name	Type of Comments*	Comment Codes
C16	Matthews, Noelle	W	106-4, 106-7, 308-2, 308-3, 400-3, 403-3, 407-3, 500-3, 700-4, 700-5, 800-1, 1300-3, 1500-1, 1501-5, 1501-6
C17	Missouri Department of Natural Resources, H. Floyd Gilzow	W	106-3, 304-1, 314-1, 400-2, 400-3, 401-1, 402-1, 403-2, 403-3, 405-1, 406-1, 407-1, 407-2, 500-2, 600-3, 1300-1, 1700-2, 1800-1
C18	Northeast Missouri Grain, LLC, Steve Burnett	W,O	100-2, 200-3
C19	Owens, Martha	W	900-2
C20	Platte Electric Cooperative, Cheryl Barnes	W,O	100-1, 200-2, 2100-6
C21	United Electric Cooperative, Brock Pfof	W,O	100-1, 106-6
C22	Rapp, Paul	W	200-3
C23	Saadeh, Karen	W	100-1, 100-5, 101-1, 102-1, 104-1, 106-1, 201-1, 302-1, 313-1, 400-1, 402-2, 402-4, 402-6, 404-2, 407-3, 500-3, 500-4, 500-5, 500-6, 600-1, 600-2, 700-5, 700-6, 800-3, 1100-1, 1600-1, 1700-4, 1800-2, 1800-4, 1800-5, 2000-1, 2000-3, 2000-4, 2000-5, 2100-1
C24	Scurlock, George	W,O	100-1, 100-2
C25	Town & Country Service & Supply, Mary Lichte	W,O	100-1, 100-3, 200-2, 1501-1, 1501-3, 1501-5
C26	Trial, Mike	W,O	305-1, 305-2, 404-2
C27	Voss, Ralph	W,O	100-2, 100-3, 100-4, 106-7, 200-3
C28	West Central Electric Cooperative, Max Swisegood	W	200-2
C29	West, Grace	W,O	101-1, 106-3, 302-1, 306-1, 308-4, 313-2, 401-1, 402-1, 402-2, 402-6, 500-3, 600-1, 700-2, 700-5, 800-2, 1200-4, 1200-6, 1300-3, 1400-1, 1500-2, 1501-5, 1501-8, 1700-4, 1800-1, 2100-1
C30	Unknown commenter 1	W	106-7, 600-3, 700-5, 1700-1

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ID#	Name	Type of Comments*	Comment Codes
C31	Howard Electric Cooperative, Dale Kirby	O	100-2, 100-4
C32	Missouri Rural Electric Cooperative, David Wright	O	100-1, 100-3, 100-4, 200-2
C33	Missouri Renewable Fuels Association, John Eggleston	O	100-3, 200-3
C34	Macon Electric Cooperative, Mary Liebhart	O	100-1, 100-4, 100-8
C35	Missouri Rural Electric Cooperative, Vic Cline	O	100-1, 100-2, 200-3
C36	Ralls County Electric Cooperative, Lynn Hodges	O	100-2, 100-4, 100-8, 200-2
C37	Thompson, Carl	O	100-1, 100-3, 1501-1
C38	Consolidated Electric Cooperative, Terry Blaue	O	100-1, 100-3, 100-4, 200-2
C39	Calloway Electric Cooperative, Dennis Wease	O	100-2, 303-1, 308-4
C40	Calloway Electric Cooperative, Clint Smith	O	100-1, 100-2, 100-4, 200-2, 1501-1, 1501-3
C41	Lewis County Rural Electric Cooperative, John Bloom	O	100-4, 200-2, 303-1
C42	Central Missouri Electric Cooperative, Ron Bledsoe	O	106-6
C43	Laclede Electric Cooperative, Carl Lowrance	O	100-1, 100-4, 200-2, 200-3
C44	Osage Valley Electric Cooperative, P.D. Kircher	O	100-1, 100-8
C45	Osage Valley Electric Cooperative, Frank Burton	O	100-8, 200-2
C46	City of Camdenton, Missouri, Steven Craig	O	100-3, 200-1, 200-3
C47	Gascosage Electric Cooperative, Carmen Hartwell	O	100-1, 100-3, 200-2
C48	Gascosage Electric Cooperative, Kimberly Doyle	O	100-1, 100-4
C49	Rollings, Beverly	O	200-2, 402-1, 402-6
C50	Sac Osage Electric Cooperative, Rick Bagby	O	100-8
C51	Westbrook, Rick	O	100-2, 1501-1
C52	Co-Mo Electric Cooperative, Mike Kenagy	O	100-3, 100-4, 200-2
C53	Co-Mo Electric Cooperative, Abe Rohrbach	O	100-4, 200-3

Table M-3. List of Commenters and their Comments in Numerical Order

ID#	Name	Type of Comments*	Comment Codes
C54	Eisler, George	O	1501-6
C55	Eisler, Melissa	O	1501-6
C56	Platte Electric Cooperative, Dorothy Frock	O	100-1, 100-3, 100-8
C57	Platte Electric Cooperative, Judith White	O	100-1, 200-2, 308-4
C58	Platte Electric Cooperative, Brian Moorhead	O	106-2
C59	Platte Electric Cooperative, Jack Woods	O	200-2, 308-1
C60	Platte Electric Cooperative, Jim Eldridge	O	100-3, 200-1
C61	Boone Electric Cooperative, Joel Bullard	O	100-1, 100-4
C62	Boone Electric Cooperative, Brent Voorheis	O	100-4, 200-2
C63	Boone Electric Cooperative, Jay Turner	O	100-2
C64	Gregory, Walter	O	100-8
C65	Albrecht, Renate	O	500-3, 2100-1
C66	Three Rivers Electric Cooperative, Chris Ryan	O	100-2
C67	Boone County, Keith Schnarre	O	100-1, 100-2, 200-2
C68	White, Nathan	O	106-4, 800-3
C69	Boone Electric Cooperative, Roger Clark	O	311-1
C70	Calloway Electric Cooperative, Tom Howard	O	200-2, 308-4
C71	West Central Electric Cooperative, Ray Maring	O	200-2
C72	Page, Dale	O	100-1, 100-3
C73	West Central Electric Cooperative, Ralph Dye	O	100-8, 200-2
C74	Thomas, Christal	O	200-2
C75	West Central Electric Cooperative, Charles Teter	O	200-1
C76	West Central Electric Cooperative, Fred Wolff	O	100-2, 100-4
C77	Cowsert, Diana	O	100-5, 100-8, 106-4, 200-2, 308-4, 500-3, 1501-6

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ID#	Name	Type of Comments*	Comment Codes
C78	Cowse rt, Rod	W	100-6, 100-7, 101-1, 104-1, 105-1, 106-5, 403-1, 403-3, 406-1, 600-3, 700-5, 900-1, 1300-1, 1800-4, 2100-1, 2100-2, 2100-3, 2100-4, 2100-5
C79	Richards, W.D.	O	106-5
C80	Clark, O.B.	O	200-2
C81	Co-Mo Electric Cooperative, Ken Johnson	O	100-2, 200-2
C82	West Central Electric Cooperative, Glenn Alsup	O	100-1
C83	West Central Electric Cooperative, Steve Moore	O	100-1, 200-2
C84	Livingston County Electric, Jason Helton	O	100-1, 100-2
C85	Kern, Leroy	O	100-1
C86	Williams, Sherry	O	100-3, 1501-3
C87	Farmers Electric Cooperative, Ray Shields	O	100-1, 106-7
C88	Wood, Rex	O	106-6
C89	Farmers Electric Cooperative, Steve Shoot	O	100-1, 200-2
C90	Cowherd, Robert	O	1501-5
C91	Rumery, Terry	O	100-1, 1501-1, 1501-4
C92	Houseworth, Jim	O	100-1, 100-3, 106-6, 200-2, 1501-1
C93	Bigler, Charles	O	200-1
C94	Whiteside, Dale	O	200-1, 200-2
C95	White, Thomas	O	106-7, 500-5, 2100-1
C96	Korff, Rob	O	100-5, 100-8, 500-3
C97	Unknown commenter 2	O	1200-5
C98	Unknown commenter 3	O	2100-1
C99	Lindley, Henry and Joline	W	1200-4, 1300-3

* W - Written comment (electronic mail (e-mail), e-mail with attached electronic file, hard copy, or comment form)

O – Oral testimony provided during public meetings held in Salisbury, Sedalia, or Carrollton, Missouri

GEN-100 Comments not Directly Related to the Draft EIS

1. I live in Saline County, R-2 Slater, Missouri. I am a co-op member of Central Missouri Electric located in Sedalia, Missouri. Associated has a

long, successful history of generating reliable and affordable wholesale power for electric co-ops. *C1*

Response: Thank you for your comment.

As elected representatives for Carroll County, we have studied Associated Electric's proposed power plant project and feel it would benefit Carroll County and its residents for several reasons of which we list a few here: AECI is a good, responsible corporate citizen - something we have concluded after the discussions we have held and the working relationship we have developed with them over a period of two years; We have verified this by attending AECI's annual meeting and observing how business is conducted with members of the cooperatives; We have reviewed the financial statement and history of AECI and found them to be financially solid; We have found that AECI has a bond rating that is among the very best in the country, proving their ability to meet their financial obligations. *C3*

Response: Thank you for your comment.

Associated Electric annually invests millions in environmental air emission controls. Over the past years, Associated has continually been on the cutting edge of environmental protection and, for that reason; tremendous improvements in air quality have taken place. Associated recognizes the importance of sound environmental practices and I am confident will consistently be among the national leaders in staying abreast of new emission technologies that will further enhance our environment for the future. Having also closely worked with the Missouri Department of Natural Resources (MDNR) over the years and having worked with water quality issues in private practice, I am convinced that Associated Electric will meet or exceed all protective regulations relating to our state's clean water standards plus build and maintain a strong working relationship with MDNR. *C12, C25*

Response: Thank you for your comment.

In addition to the superb manner in which Associated has supplied electricity to our three-tiered system, our generation and transmission cooperatives have built and maintained a reliable transmission system. Service reliability is something that consumers often take for granted. Yet, we can all flip any switch in our homes at any hour of the day or night and know with confidence that the response we desire is going to happen. This occurs because of the efforts put into planning transmission corridors to minute detail by individuals that are experts in their field. *C12*

Response: Thank you for your comment.

Missouri and this nation are fortunate to have Associated Electric leading the way in power production. Because they are, I am certain that my children will have access to business and personal opportunities made available by a plentiful power supply. Moreover, the power made available will be generated in a manner that provides for a clean and safe environment at the same time. *C12*

Response: Thank you for your comment.

I work for Platte Electric Co-op in Kearney. I want to speak to three things this evening. First, I want to commend Associated for buying all the power from three wind farms being built near St. Joe. It's a great way to introduce renewable energy to Missouri. It's also a great new business for those rural communities. Second, I want to thank Associated for planning ahead to provide Missouri with the electric power that rural families and rural businesses need. Third, Associated is a non-profit cooperative. As a consumer, I appreciate that they are responsible and responsive to their members. *C20*

Response: Thank you for your comment.

AECI wants people to believe that their lights will go out if this Proposed Action is not built and that there is no other alternative. *C23*

Response: Thank you for your comment.

My experience w/ AECI has been exemplary, both from a community and environmental perspective. Since every single Associated project has been carried out to the highest standards, I fully expect the same on this one. *C21*

Response: Thank you for your comment.

I'm an engineer and contractor from Maryville, Missouri and our family has been United Electric Cooperative members for 45, 50 years and we have been involved in design and construction of water and sewer and storm sewer systems around the state, including down here in Norborne and I'm here to speak on behalf of the project. I guess since my field is environmental work, I will stay with that subject and when they built the peaking plant up near Maryville, Associated was a fantastic corporate sponsor and a member of the community. They helped the water district

tremendously. They helped run a new water line down there and they were fantastic. *C21*

Response: Thank you for your comment.

Finally, you will find no better neighbor than Associated Electric. Just last week, as I sat in a Randolph County commission meeting, a statement was made about how easy it had been over the years to work with Associated on county matters relating to their Thomas Hill plant. In fact, Randolph County would welcome this plant to our county because we understand the degrees to which Associated Electric would go to be team player and good neighbor. *C12*

Response: Thank you for your comment.

And number two, I would trust Associated to be a good corporate sponsor and a good environmental steward and a good economic benefit to our country. *C21*

Response: Thank you for your comment.

As a homeowner in a small rural town, I feel we are lucky to have good neighbors serving our area with electricity. Both Grundy Electric and Associated Electric Cooperative are professionally managed businesses that care about the people they serve. As a team, Associated generates the electricity and Grundy distributes the electricity to our area. But both co-ops must work together in order to provide reliable electricity at a reasonable rate.

I sit on the City Council as well as the School Administrator and I'm here to support Grundy Electric and Associated Electric. They are a good service, a quality service. And I appreciate your service over 25 years and it's been good to get the dividends and be a member of this great co-op. Good service to us. *C24*

Response: Thank you for your comment.

And we, as member owners, are very proud of Associated Electric and their track record on reliability, as well as environmental benefits. *C32*

Response: Thank you for your comment.

The Associated and co-ops have been very concerned and have spent large amount of money to improve our electricity demand, our environment, and

quality of air. The Norborne plant will be using all the latest technology for this. *C34*

Response: Thank you for your comment.

It takes several years to build a power plant. So as a farmer and a member of an electric co-op, I am glad Associated Electric is looking ahead and planning to build a power plant so I don't have to worry where my power will be coming from. As they have done in the past, I'm sure they will do their best to satisfy the needs of the people in rural Missouri. *C35*

Response: Thank you for your comment.

Associated has proven to be a reliable supply, low-cost power supply for all the electric co-op members who actually own the co-op. They have been good neighbors in the things that they have done in the past. They look to find -- the wind farms that they're building, they are constantly looking for new sources of not only coal-powered generation, but any sort of renewable. They've even went to the extent of burning walnuts as a trial to see if that would work. *C37*

Response: Thank you for your comment.

So Associate needs to keep up the good work that they're doing. *C38*

Response: Thank you for your comment.

Always give Associated a chance to serve your community. To the community of Carrollton, don't let this opportunity slip away. The people of Callaway County sat in the same chairs you sit in tonight, wondering if this was the right thing to do. After being a landowner and a neighbor to the Callaway plant, we realize our lives would be much different today without this facility, and not for the better. Good luck with your decision and always remember the opportunities Associated would give this community. *C40*

Response: Thank you for your comment.

Associated Electric is environmentally friendly. *C43*

Response: Thank you for your comment.

They are just like I am, a stewardship of the ground; and Associated is environmental and clean air. They expect the best. And basically, they're not going to accept anything less. *C44*

Response: Thank you for your comment.

I have the highest level of trust in the cooperative model which Associated follows and that recommendations are made in the best interests of the members who are also the owners. More importantly, it should be understood that those members and owners are very likely family members, friends, and neighbors. *C47*

Response: Thank you for your comment.

And I feel sure that Associated will make the best decisions for our environment and for our community. *C48*

Response: Thank you for your comment.

I have had the opportunity to lobby in Jefferson City on many co-op issues. I found that Associated Electric from Springfield has a history of looking ahead to the future. *C56*

Response: Thank you for your comment.

I am also a member of Platte-Clay Electric. I've been a member for over 43 years. I'm also -- and I've been a Pathfinder for 20 years or better and through the Pathfinder association I have been able to tour several Associated plants and I have had nothing but positive experience with their operations. They are clean. They are very well kept. They seem to be very good stewards of our land and our environment. They spend millions of dollars to keep up with all the modern technology that keeps the emission controls on everything. They just work very well, I think, with the areas they're in. *C57*

Response: Thank you for your comment.

To the best of my knowledge, the research that I've done on the AECl, they have a tremendous track record for the environment. They just recently sold SO₂ credits that are issued by the federal government and to me that tells me that they have done an exemplary job in protecting our environment and being awarded those credits. I see no reason from this past history that they would not continue that same track record. The co-op is not building this plant. *C61*

Response: Thank you for your comment.

I feel that this is a member owned cooperative control and I feel Associated has done a tremendous job in meeting the needs of and being a good environmental citizen. *C67*

Response: Thank you for your comment.

I'm a former employee of West Central Electric. And in dealing with Associated over a period of time, about four years, I think that in the environmental department I think they will do their best in trying to work with you. *C72*

Response: Thank you for your comment.

I'm the general manager of COMO Electric, and I moved here about a year and two months ago to Missouri to take advantage of an opportunity to come to a state where you had a three-tier cooperative system. Associated Electric is known throughout the United States as one of the best run cooperatives in the United States, and that's largely due to the member owner memberships that we have. It's owned by the grassroots people who are consumers, and that makes this system much better than many of the other cooperative systems throughout the United States.

Associated has been very responsible in environmental expenses that they've made in the past few years. They spent millions of dollars on cleaning up existing plants. This new plant will be state of the art technology and I know as member owners they have great concern for the environment and they want to make sure that everything is done in a way that will meet all of the federal requirements and take care of the environment. They care about the people. They are the people that live here in the communities. *C81*

Response: Thank you for your comment.

I'm with West Central Cooperative. I have been for several years. I'm from a small town named Wellington, and I am the general manager of West Central. And in looking at this Environmental Impact Statement, one of the key focuses that I think our membership all over the state is bringing to us tonight is the need for this power plant. And that is part of the Environmental Impact study is to evaluate the need, and that seems to be where many of the co-op members are focusing tonight. And I think one reason you're seeing such a focus or emphasis for the need is because of

the competence we have developed in Associated's electric to be good stewards of the environment to handle those issues.

We don't feel like we need to stress that, but Associated has always been out in front in taking care of those issues. We also have a strong interest in the Department of Natural Resources protecting our water supply, our land, our rivers and waterways, the air quality, and so I think that's one reason we're seeing such a focus in the meeting because that need is so great. So, basically, we're a rural electric co-op.

Associated has always been there for us in trying to get out in front. We definitely need a new coal powered supply. We can use natural gas and charge our members a lot more money that we could if we used coal, but coal technology allows us to produce good clean electricity and environmentally sound methods. And I really appreciate the comments I'm hearing from everyone tonight and everyone's concerns and look forward to moving forward. C82

Response: Thank you for your comment.

I'm a member of West Central Electric Co-op in Knob Noster, Missouri. We've all heard a lot of things about the Environmental Impact Statement and how Associated has been an extremely good steward of the environment. They've been active in community affairs, social affairs. They do realize their responsibility and neighbors and they've been a good neighbor. Plants take a long time to design and build and get in operation. If they don't plan ahead, then we will have shortages. And my experience with Associated has been that they've either met or exceeded regulations in the past, and I think it will continue. There's not much question about the need for the plant, and I'm very comfortable with how Associated will take care of their neighbors in the Norborne area and across the state. C83

Response: Thank you for your comment.

I will state, though, the cooperative system is really based on member owners who employ and depend upon experts and professionals in the business operation of plants and engineering and scientific fields to make such decisions as the needs for the plant. Therefore, the decisions for the implementation of this plant directly impact the member owners of this cooperative system, at least financially.

I believe that AECl responds to the overall planning with a total cooperative energy portfolio, and has evaluated a number of options to meet the increasing needs of the future. AECl is a catalyst of the customer in order

to bring -- excuse me, in order to bring energy production to northern Missouri.

While some might say it's taken too long to incorporate renewable energy in the overall portfolio, the reality is a combination of the developers and cost effective technology is not coming together. It is also my understanding that AECl has recently joined a Chicago exchange, which demonstrates the awareness and commitment to costs reduction with respect to market based training system.

I feel that AECl showed a comprehensive concern to increased member's demand by (indiscernible), and that AECl's member owners are all conscious of having corporate alternative energy sources and emissions training and plan to meet those needs. *C84*

Response: Thank you for your comment.

I'm a member owner as many of you are in here. We are the old Associated. We are very conscious of how we want it to be and we want it to be environmentally friendly. If we look over the years as they have met or exceeded and been ahead of the curve. Millions and millions have been spent and just recently they have purchased all the power from the three generation plants that will be going in northwest Missouri. Their concern for the environment, I think, is beyond reproach. They're a good company. They'll be a good neighbor. *C85*

Response: Thank you for your comment.

And I know that Associated is a good operator, and that the best indicator of future performance is the past, and they don't have skeletons in their closet. *C87*

Response: Thank you for your comment.

I'm from northwest of Chillicothe, member owner of Farmers Electric Co-op. I'm going to go back a little bit about talk about the environment. I know the late 1970s when I first moved into this area I was taken to Thomas Hill Lake where the power plant is to go fishing. At that time you could see dark clouds of smoke, emissions from the smoke stacks, you kind of wondered what was going on and what was coming out of there. Last summer I went back over there again to fish again. All three units were running. All you could see is a little wisp of steam. I know Associated Electric has spent hundreds of millions of dollars not only at Thomas Hill and New Madrid. They announced in a rural Missouri magazine last year

that they're spending hundreds of millions of dollars again to improve the quality at those plants. I know that the new plant that they're proposing, that they have to follow specific guidelines involving air and water quality and they will have the proper equipment to do so. *C89*

Response: Thank you for your comment.

I can also tell you that Associated Electric does not have a problem with the environment part of the environment. They are a top-notch quality company. Period. They are recognized throughout the United States for that. *C91*

Response: Thank you for your comment.

I'm a business owner and land owner in Carroll County and Livingston County. I've lived here all my life. I've always been concerned about the environment. The Associated Electric folks have taken care of me numerous times over 40 some years, and they've done that in a very professional and caring manner. Associated Electric is a good company and we appreciate them. *C92*

Response: Thank you for your comment.

2. Building new generating coal-fired plants is the only way they continue to furnish affordable electricity for our rural areas. If they don't build new generating plants, they will need to buy on open market to meet our growing need at much higher prices. We need their help to keep our electricity at affordable prices in our rural areas. *C1*

Response: Thank you for your comment.

We are also pleased that our consumer members benefit from a three-tiered not-for-profit cooperative business model that offers them member ownership and governance and that combines power generation, transmission and distribution operations in a manner that provides for great economic efficiencies. These efficiencies will also apply to the proposed coal-fired plant in Norborne. Coal-fired plants are extremely efficient and economical generators of electricity. *C12, C31*

Response: Thank you for your comment.

I am the General Manager of Northeast Missouri Grain, LLC, near Macon, MO. NEMO Grain was the first ethanol plant built in Missouri, 7 years ago. We are on the Macon KEC system, and are their largest customer for

electric power. NEMO Grain is a corn-to-ethanol fuel refinery, which runs 24:7, year around. The plant has 12,000 connected horsepower, which would equate to the electric load of a city of about 4000 people. Consistent electric service, at a fair price, with room for growth, is of paramount importance to NEMO Grain. We have always gotten this from Macon REC, and appreciate the power generating and delivery system which they are a part of here in Missouri. Macon REC is very pro-economic growth, and has always been a great partner in our success. As we have grown, they have grown. *C18*

Response: Thank you for your comment.

As the Principal of Princeton High School, it is important in our budgeting of expenses that we continue to have reasonable electric rates. We are currently building a new high school, thus the need for additional energy will also be required. Associated is also planning for the future to construct the new coal plant at Norborne. This coal plant will affect more than just local area residents. It will allow our school and Co-op members in northwest Missouri to have access to quality power, knowing that the Cooperatives will be able to provide the additional energy we will need in the future. I think this Norborne coal plant will benefit and it will make things better in Northwest Missouri as far as service and rates. *C24*

Response: Thank you for your comment.

I support the power plant because I want there to be a reliable and affordable source of electricity for our rural areas. *C27*

Response: Thank you for your comment.

Rural Missouri must grow to survive. With a reliable supply of power and transmission lines to distribute this power we will continue to grow and raise our kids in rural Shelby County. *C35*

Response: Thank you for your comment.

As an infrastructure -- if we all intend to continue to promote rural development, this infrastructure is greatly needed; but it must be provided as a reliable system at an affordable cost. *C36*

Response: Thank you for your comment.

I'm a member of Callaway Electric. I've been a member for 17 years. Not only that, but when I was asked to do this, I got to thinking all of my family

is on co-op and most of my distant family. So what I'm going to talk about is pretty important to me, and that's affordable electric. I got on the Internet and did a little research, and according to the Department of Energy, our rates are 19 percent below the national average. And when I think about my parents or a lot of people like them that I know, they're on fixed incomes. And so I want to go further. Why is our rates so much cheaper? I got to studying. And 85 percent of electric generated in Missouri is done through co-op. C39

Response: Thank you for your comment.

Associated Electric is keeping our costs to a minimum. Missouri is the third lowest cooperative paying state in the United States, and we should be proud of that. There are factors contributing to the cause of these inexpensive, reliable rates. The use of coal to generate electricity and having the capacity to serve their members without purchasing electric themselves are two contributing factors. C40

Response: Thank you for your comment.

There's a substantial negative impact that can be seen here that was mentioned. Its about six years from now and the electric cooperatives are going to be running out of energy. They're going to be looking for alternative sources. Missouri currently, I think, ranks bottom from the 11th. In other words, that's good, they are the 11th lowest in their cost and that's largely due to coal fire plants within the state of Missouri and this is going to contribute to that savings. C51

Response: Thank you for your comment.

I'm from Columbia, Missouri, and I'm a member of Boone Electric. I farm and I'm here to speak in support of the project and I'm going to give you a very simple and basic reason for this. I can give you a history lesson about what we call Turner farms to be able to make a full circle. My father started in a bank, his first job in Columbia, as a bookkeeper. He, in 1929, he left the bank and started Turner Farms. My father just since passed away and recently I acquired a journal that he had from 1934, 35 and 36 and I find it very amusing to look at the journals and see the expenses and the checks he wrote and the deposits. While I was admiring his penmanship and his ability to write good, clear journals, I noticed something interesting and it was about a \$3.50 to \$4 a month electric bill to Boone Electric. It was consistent for those three years. Today, Turner Farms pays over \$500 a month for the electric bill. This tells you that I get more out of my \$500. It's far more important to me today that it was

seven years ago to my father. And that tells me that we need to keep up with the needs of our membership and if they hadn't done that seven years ago we wouldn't be where we are today and we have to look ahead and so that's my elementary basic reason for supporting the project. C63

Response: Thank you for your comment.

I am with Three River Cooperative out of Troy. And this may -- these nice people I can only comment on how this plant will effect Missouri cooperatives. The cooperatives pride themselves in providing the best possible electric service at the lowest possible cost to their members and without this and without this plant I don't see how they can continue to provide this type to it's members. C66

Response: Thank you for your comment.

I'm from Centralia, Missouri, and I farm. I want to talk about the governance, the co-op governance and which its member owned and member governed and non-profit. We are lucky here in the state of Missouri to have a three-tier system and we've got the local distribution system which bring electric to our doorstep with a transmission system they can put this to the distribution system and then we've Associated which produces our electric and making sure that we all have electricity at our door. C67

Response: Thank you for your comment.

I was paying about -- my electric bill I was concerned was going to get a lot more expensive. While inflation has affected everything else a lot, my electric bill is not much more than it was 28 years ago and that's attributed to good management of West Central and I just can't believe of any better source for more electricity than building a coal plant considering the world's situation. C76

Response: Thank you for your comment.

I'm a member of the cooperative system and specifically in Livingston County Electric. For the second time I certainly respected and appreciate the benefits this plant will bring and I would like to comment for the need for reliable and affordable electricity in our area. C84

Response: Thank you for your comment.

3. The Carroll County Commission does hereby go on record as being in support of the proposed AECl power plant near Norborne, Missouri in Carroll County. We furthermore have confidence in the environmental measures regulated by DNR and EPA that will be employed at the plant to protect the environment, and that all proper steps and procedures have been followed during permitting phase. We therefore sincerely request that this project proceed forward as planned. C3

Response: Thank you for your comment.

The only concern I have about the proposed power plant coming to Carroll County is, "What's taking so long to get started?" My husband and I have lived in Norborne for 27 years. We own and operate the grocery store and Town & Country Service & Supply in Norborne. We are here to offer our support for the coal fired power plant that AECl has proposed for Carroll County. C25

Response: Thank you for your comment.

I live in the city of Linn, Mo. I support the construction of the coal-based power plant which rural electric cooperatives from this state are proposing to build at Norborne, Mo. C27

Response: Thank you for your comment.

I live 75 miles northeast of here in a little town called Emden, Missouri. I'm a farmer and a member of Missouri Rural Electric, also a member of the first ethanol plant that Steve mentioned. I'm a member of the Missouri Cattleman's Association, as well as other associations. I am in favor of this proposed power plant. C32

Response: Thank you for your comment.

I appreciate this opportunity to come forth in support of the new proposed electrical generation power plant in Norborne. C33

Response: Thank you for your comment.

I support this Norborne project; I'm strongly in favor of this project. C37, C38, C46, C92

Response: Thank you for your comments.

I am a member of Gas-Osage Electric Cooperative in Dixon, Missouri; and I support the Norborne coal project. Discussion about this project began in 2003, and research and analysis over the last couple of years. I feel that this is the best choice for our power needs. *C47*

Response: Thank you for your comment.

Good job and I do support the program from quite a ways a way from where the plants going to be. *C52*

Response: Thank you for your comment.

As a Pathfinder I have toured the Thomas Hill and New Madrid power plants. As a farmer I support this power plant in Norborne as everyone needs electricity to survive. *C56*

Response: Thank you for your comment.

Platte County Electric Cooperative. We are home to Platte County Electric Cooperative's headquarters. Platte-Clay is Kearney's predominant supplier of electricity, serving virtually all of Kearney's new growth. I speak in support of Norborne -- the Norborne power plant proposal. Personally, it was exciting to read the news about this new power plant, proposed to be constructed in this area. The fact is that it is a clean, state of the art coal powered plant and knowing that the power generated from the plant will be used by it's membership. *C60*

Response: Thank you for your comment.

It's going to take time and it takes forever to get these things completed and I think if you wait, you know, if this is postponed then the cost is going to be twice what it will be at this time so I am for it and also for the impact of the environmental part for them to try to work with you. *C72*

Response: Thank you for your comment.

I'm the Economic Developer here in Carroll County. I have read the summary of the EIS and I don't have any specific concerns to address tonight. My concern is the study was conducted and this forum is being held and the concerns are being addressed in support also. *C86*

Response: Thank you for your comment.

4. I am here representing Burgers' Smokehouse. We are a cured and smoked meat processor that sells product nationwide through grocery, foodservice, and mail order. Our plant in rural California occupies approximately 300,000 square feet and employs over 300 people during the Christmas season. Most of our labor force comes from the small rural communities of California, Eldon, Versailles, Tipton, and Jamestown. We have a long and successful relationship with our rural co-op. Since the rural co-op began providing power in the late 1940's we have had amazingly reliable electrical service. Response times to the few power disruptions we have had are incredibly fast. We have never had to use auxiliary power generation or move product off site because of service failure. Our major accounts are requiring much more diligence when it comes to contingency planning. In response to our concerns Co-Mo is currently making provisions to feed us electricity from two directions. We have asked Co-Mo to take part in a thorough risk assessment of our power needs and help us address areas of vulnerability. It is clear to us from past and current performance that the co-op system of power generation and distribution is an effective and efficient way to power rural Missouri. I strongly encourage the decision makers to allow our co-op network the ability to play a major role in the generation and distribution of electrical energy in the years to come. C2

Response: Thank you for your comment.

In 30's I helped set hedge posts to hold lines, going across fields to avoid trees on the right away in Livingston County Missouri. In 35 I left for college and in 40 left the state. In 76 I returned to N. Carroll County and started a 100 acre tree farm, walnut and oak. I ask Farmers Elect in Chillicothe if when they replaced poles in the field if they would move the line to road now tree (indiscernible). They agreed. Several years later a representative appeared with new agreement. I signed. Several weeks later I found they had buried the line down the road past my trees. A great organization and I believe that still exists in their management. Best thing to happen to rural America after the whole war (indiscernible). My mother put away her sad iron (indiscernible). C4

Response: Thank you for your comment.

I am a consumer member and board member of Howard Electric Cooperative - an electric distribution cooperative in Fayette, Missouri that provides power to portions of Howard, Randolph, Chariton and Boone counties. I am also representing Randolph County as its Western District Commissioner. It is my pleasure this evening to offer comments regarding Associated Electric Cooperative's proposed power plant, transmission lines and rail corridor that will supply electricity to end-user s throughout

Missouri, Iowa and Oklahoma. As a board member for Howard Electric Cooperative, I understand the critical need to have a consistent and reliable power generation company providing the electricity we need to meet the power demands of our consumer members. We are fortunate that Associated Electric provides reliable power at an especially competitive price and in an environmentally sound manner. *C12, C31*

Response: Thank you for your comment.

I made the trip to Sedalia Wednesday and I am giving this written statement because I have a great deal of respect for Three Rivers Electric Cooperative, our local co-op headquartered here in Linn. From the board and general manager to the newest hire, Three Rivers people go out of their way to provide good service. Three Rivers has strong support in this community and throughout its extensive service area, and I want those who may read this statement to know that. Three Rivers, however, provides more than service. It's an organization with a long history of integrity. For most of the last 30 years I've owned bulls in partnership with a man who serves on the Three Rivers board. I do not know a more honest man than this gentleman, and I think he is representative of the kind of individual that serves on the board and the kind of person Three Rivers tries to hire. The current general manager and his two successors have served since 1966. I've gone to the same school as some of them. I've been involved with them in Lions Club work for decades and in numerous other activities as well. The two managers who served from 1966 to 2006 have continued to be active in the community. I wish we had more organizations like this in our community. *C27*

Response: Thank you for your comment.

I live close to Illinois and observe their problems with rates and regulations, as well as reliability; and we don't want to let our system go down hill and backwards to -- we want to keep being the leader. *C32*

Response: Thank you for your comment.

After experiencing the bitter weather the last several weeks and heating my home with an electric heat pump, I have come more to appreciate the reliable and affordable electric service we have and continue to build for our co-op's load growth now and in the future. *C34*

Response: Thank you for your comment.

I am a co-op member and am a user of our system. And I've really come to appreciate over the last 15 years the reliable service and affordable services the co-op has been providing to us. *C36*

Response: Thank you for your comment.

I'm from rural Missouri from Consolidated Electric; I'm a member there. I'm a farmer. We raise cattle and livestock and a grain farm also. From what I understand and believe, Associate is -- we're a co-op; we're owned by the members; it's owned by the members. They're very diligent in taking care of their own people. And by taking care of their own people, they're taking care of their rural community -- all the rural communities because we are all members. *C38*

Response: Thank you for your comment.

I'm from Callaway Electric. I'm 30 years old and I've lived on a farm outside of Fulton my whole life. I'm always amazed about how we receive electrical service at Callaway Electric. Starting as a lineman, I saw first-hand how important reliable electric service was to our members. From working a thunderstorm on our system, assisting with the aftermath from Hurricane Katrina, people rely on electricity. But the most reliable things come with a price tag. *C40*

Response: Thank you for your comment.

The second comment I'd like to make is the picture is often painted that electric companies are willing to sacrifice the environment to maximize profits. Rural Electric Cooperatives are all nonprofit; and therefore, don't share that motive with others. *C41*

Response: Thank you for your comment.

The U.S. spends millions of dollars to protect the environment. This plant will be built by a cooperative for our cooperative rural members. *C43*

Response: Thank you for your comment.

I live in Dixon, Missouri, which is in Pulaski County. I am also a member of Gas-Osage Electric Co-op -- a proud member because it is a co-op. And Associated is along with the three-tier system with the co-op family, which I have learned over the years means a lot to our community.

We really experienced that, of course, during the last ice storm. Most of our community was out for ten days-plus. And it was not only just our daily living that was interrupted, but we have a nursing home there that does not have a back-up generator. And when it came to the point that we knew that they were going to not have electric for a few days, that was quite heart-wrenching to know that there could be lives in danger. And it really brought home the fact that we knew just how important our electric needs were.

We're in a growing community. We're next to Ft. Leonard Wood, which is an Army place that continues to grow year after year. And we're proud that a co-op surrounds the Army base. And we've had some other experience with other utilities; and from what I see, the co-op is an advantage. It's because they are member-owned; every one of our families and our friends, they have to answer to us. And so it's good to know that we have a voice and a choice in the decisions we make. *C48*

Response: Thank you for your comment.

COMO electric member. I'm down at the Lake of the Ozarks, which is one of the fastest growing areas in Missouri. From 1990 to 2000, Camden County, which COMO served, grew at better than 30 percent in population. Morgan County which they served closer to that grew at 20 plus percent. Our projections now for 2000 to 2005, we're looking at maintaining a 15 percent growth rate at the west side of the Lake of the Ozarks that COMO serves. COMO has been a very great business partner for the Lake of the Ozarks. Recently in our ice storm that we had down there where many of the areas were without power, COMO maintained power. I don't know of a single outage in the COMO service area, so they're a reliable partner. We need to maintain that growth with safe, reliable electricity, not for residents but also the service and commercial businesses that are coming to support them. *C52*

Response: Thank you for your comment.

I am from down in California, Missouri. I have been a farmer and COMO Electric co-op member for 45 years. During these 45 years the time that I've worked with COMO a great deal and experienced their attitude on things and I can't imagine them being a part of anything that they didn't feel like was perfectly good for the community that they're in, the state, even the country. I have a lot of faith in them and I've gotten that faith by working with them for a long time. So they've done a wonderful job and I think this will help them do a good job in the future and that's my story. *C53*

Response: Thank you for your comment.

I'm a farmer and I live in Ashland, Missouri and I'm a member of Boone Electric Cooperative. And as a farmer, I think we take great pride in keeping the soil and air and water clean in our farm because it is the life's bread of our operation. The co-op system is a good system. It's owned by you and me, the users, and that's what makes it different and special. In my estimation, as we've heard from other people earlier talk about to build profits for some investor in New York or Boston or somewhere else. It's building this plant to serve the people in Missouri and northern Oklahoma. It's owned by the people that they serve and not by some shareholder in some other city. *C61*

Response: Thank you for your comment.

The other item I wish to address is the integrity of the electrical co-ops. The co-ops are owned by those they serve. We've heard that before. Not by some private corporation interested in making a profit at any or all costs. I know my co-op board members and trust them with my life. *C62*

Response: Thank you for your comment.

I'm from Warrensburg, Missouri. I am a member of West Central Electric Cooperative. 28 years ago we built a home out in the country. I tried to make it very super energy efficient, a ground source heat pump, pumping water from a well and pumping in a small lake. While there are those that might say that I'm tight, I'd like to think that I'm trying to be conservative with energy and so forth. And I believe that West Central Electric is conservative in their approach. *C76*

Response: Thank you for your comment.

5. The Missouri Federal Assistance Clearinghouse, in cooperation with state and local agencies interested or possibly affected, has completed the review on the above project application. None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review. A copy of this letter is to be attached to the application as evidence of compliance with the State Clearinghouse requirements. *C6*

Response: Thank you for your comment.

The Federal Aviation Administration (FAA) reviews other federal agency environmental from the perspective of the FAA's area of responsibility; that is, whether the proposal will have effects on aviation and other FAA responsibilities. We generally do not provide comments from an environmental standpoint. Therefore, we have reviewed the material furnished with the January 12, 2007, transmittal letter, concerning the proposed 660 MW Baseload Power Plant near Norborne, Missouri, and have no comments regarding environmental matters. C9

Response: Thank you for your comment.

Since many states on the 2 coasts have increased their air and water standards for new industry and power generation, making building there more expensive, states with looser environmental laws have seen an increase in proposed plants. C23

Response: Thank you for your comment.

I also believe it would be better for us to eat rather than have electricity, for us to have water, because if we can't eat and drink, we're dead. So if you all think that electricity is much better than eating and drinking, I'm sad for you. C77

Response: Thank you for your comment.

I just want to remind everybody tonight that it's not all rosy and not all popular. This will cost my family dearly. So I'm glad everybody here is benefited from their pocketbooks, but not everybody's in that same situation.

I've contacted DNR, my state rep, our senators. I've contacted a lot of people on this issue and we're not going to let it happen. We're going to argue this and everybody else shouldn't let it happen. We've been neighbors here all our lives. C96

Response: Thank you for your comment.

6. Please conduct an exhaustive analysis of AECl's environmental compliance history, including all parent and sister companies. C78

Response: The requested analysis is not part of the NEPA process and outside the scope of an EIS.

7. Please require the applicant to swear under penalty of perjury that all information provided to the public is true, complete and accurate. C78

Response: This is not part of the EIS process.

8. One of my main concerns with AECl is they have not been forthcoming with information on this plant to any of us and hiding information is not correct. If anyone in here thinks that they can just bulldoze any of us in the Norborne community or surrounding community, they're wrong. We have asked for Sunshine requests which in the past -- well, I believe it was today we received an email that was rejected. There will be lawsuits for it. C77

Response: Thank you for your comment.

I live near here and have property on both sides that AECl is proposing. I think there's a problem with as far as Tom has left off. I'm not a competent board member and knowledge here. Thank you for everyone who did here. I appreciate your concern. AECl -- they're sneaky, they've lied to us, they scare people, they're anything but roses. I don't disagree with Mr. Whiteside very often, but they are excited about this plant and I think Hillary Clinton as president. C96

Response: Thank you for your comment.

I am here to speak in favor of the construction of this facility, not just as a co-op member, but also as a small business operator. I run a small Internet service provider business in Ralls County, and I see a great demand for the services that we provide. C36

Response: Thank you for your comment.

I'm from Osage Valley, a member of Osage Valley in Southern Missouri, which is located in Bates County. But I live in Cass County, and that's near Kansas City. Yes, electric service is very important for economic development. But let me share with you the agriculture in my region. I own and operate a very large grain operation with high-tech irrigation. Now, as I go through this presentation -- I haven't got an hour to put you through that -- electricity is not all electricity. It's got to be very quality electricity.

For the last three years, I have invested over a half a million dollars in just upgrading high-tech irrigation. And I have one system there's only 16 of them in the world. So I'll bring you to where I'm at, is how important

electricity is. Now, that takes quality electricity. If we get it from Osage Valley and CAMO and Associated, a three-tier system, and that's -- we've got what not too many people in this country have; and I'll cover that just a little bit later.

Now, diesel motors and generators don't work very good. We've replaced all our diesel motors with electric motors. And that should be environmental friendly; it does clear the air up just a little bit. But we've got three- and four-generation farmers in our region. And on a drawing board of those -- of the large operators, which includes me, sure, is an elevator at the plant and a large feed lot. Now, that takes a lot of electricity, which is coal. We want the lowest possible reliable cost; that's what we want. And we have the confidence that Associated can deliver. Now, those other operators are member owners just like I am. And if they've figured this out, they've done their homework. They understand the three-tier system. They know, they have something to say about Associated's performance. *C44*

Response: Thank you for your comment.

I'm from Stockton, Missouri. Osage is my co-op. I want to tell you something that happened on our farm. We had a transformer that blew up, and we called them. And they were out in a matter of minutes. They were faster than our ambulance service. I mean, I have dealt with them -- I have dealt with another in Indiana where the same thing had happened; they showed up in two hours with a guy in a pick-up truck looking at it. They came out immediately, secured the area, cleaned up all the oil on the ground, soot, put it all in containers, sealed it up, and got rid of it. This was all done in a matter of an hour or two to get all this done. And if they're doing that for the environment right there, to me, they're not going to -- they're going to follow the exact same kind of attitude about it. So I think it's important to realize that took seriously -- they did take as a serious job of trying to clean it up. *C45*

Response: Thank you for your comment.

I'm from the Macon Electric Co-op. I live on a farm on our electric co-op service. Raising livestock makes me very dependent on my electric service, needing it at the pump house and keeping the water is always important. Without electricity, not even a diesel tractor for feeding would start in this cold weather. *C34*

Response: Thank you for your comment.

I'm a small business owner in Stockton, Missouri; Stoc-Osage Power. I am concerned about manufacturing in this country as a whole. I support this project. We need the energy; we need low-cost, reliable, electrical power. My plant uses a lot of electrical power. I'm one of the biggest customers for Stoc-Osage.

I want to comment on something that those of you that are old enough to remember 15 years ago. Ross Perot, when he was running for president, one of the things that he used to say was if we sign NAFTA, we're going to hear this big sucking sound; and that's manufacturing coming out of the United States into Mexico and Canada. Well, old Ross had the right idea. The only thing, he had the country wrong. Manufacturing is going to China in big, big numbers. And if we don't continue to keep the power reliable, affordable in this country -- when you walk into Wal-Mart, already it says, "Made in China," "Made in China." I worry about the future. I'm old enough that I'm not going to have to get a job in the fast-food industry, but I worry about where the jobs are going to come from in this country.

I'm a small business owner; I hire only eight people; but still, I make an impact. And there are tens of thousands of small businesses like mine in this country that are risk if we don't have enough power. That's all I have to say. C50

Response: Thank you for your comment.

My name is Dorothy Frock and I live between Kearney and Liberty, which is kind of close to the Liberty Hospital. We are a 42 year member of Platte Co-op in Kearney. I am also a Pathfinder for almost 40 years. This Pathfinder group of 50 women serves as a liaison to the Board of Directors. Whenever they need extra help we are called upon to help with annual meetings, open house, blood drives or focus groups. We own a 200 acre farm in Hale, Missouri, which is just north of here about 30 miles. We are serviced from Farmers' Co-op in Chillicothe.

No body likes change, including myself but change means progress. We must move forward to prepare for the rapid growth all of the co-ops are faced with. I strongly support the new power plant in Norborne. As a farmer, the electric service is very important to our farming operation. We had a cow/calf operation and sow operation. We must have the electric power to heat the water tanks and heat the lamps for the new born baby pigs. C56

Response: Thank you for your comment.

I'm a member of (indiscernible) Electric Cooperative. I live on a farm about 45 miles north of St. Charles County, which is one of the fastest growing areas in the state. I farm with my dad and three brothers on a grain and livestock farm. We also own and operate a fertilizer business, which is a reliable and portable source of electricity so I'm in support of this plant.

C64

Response: Thank you for your comment.

I live about two and a half miles from Higginsville, and I'm served by West Central Electric. I don't know how I'd run my farm without it. *C73*

Response: Thank you for your comment.

GEN-101 Document Length, Difficulty in Finding Information, Complexity

1. Document length - We recommend that the FEIS be more concise by moving some of the old site studies and technical discussions to an appendix. Section 1502.7 of the CEQ Regulations for Implementing NEPA states that the text of final environmental impact statements (e.g., paragraphs (d) through (g) of Sec. 1502.10) shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages. *C8*

CEQ guidance also states that the body of the EIS should be a succinct statement of all the information on environmental impacts and alternatives that the decision maker and the public need, in order to make the decision and to ascertain that every significant factor has been examined. *C8*

With a document of this length it is difficult to know where to begin. The Code of Federal Regulations states: "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." This document is anything but "brief," does not prove need, states conclusions without reasons or evidence, and generally says very little with lots of words. *C23*

It seems that AECI has taken advantage of Carroll County and the seeming lack of sophistication of the county commissioners, and has assumed if the document is long and cumbersome enough people won't read it. *C23*

When I began preparing my comments, I wanted to understand what an Environmental Impact Statement should include.. . so I searched for a definition. I found several definitions, but the one I thought the most

succinct was in a glossary on the Department of Energy's Website. It stated, and I quote:

"A report that documents the information required to evaluate the environmental impact of a project. It informs decision-makers and the public of the reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the environment."

Since we are dealing with the Rural Utilities Service I searched the applicable Federal Code of Regulations (Section 1794.61, in Chapter XVII of Title 7) stating:

an EIS shall be prepared in accordance with Section 1502 of Title 40

Title 40 expands on the definition of an EIS, stating

"It shall provide full and fair discussion of significant environmental impacts and shall inform decision-makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses." This is further set forth in Section 1502.2.

I believe the Environmental Impact Statement for Associated Electric Cooperative, Inc., does not meet these criteria. I question whether the procedure used for compilation of the Draft EIS was based upon the regulation or did the procedure come from an RUS Policy Manual? There is so much information that distracts and leads to a dead end in this EIS that it is all but impossible for the public to make reasonable and informed comments.

Back now to Sec. 1502.2 (a) of the regulations... we find:

"Environmental impact statements shall be analytic rather than encyclopedic."

The EIS includes extensive material about the hazardous air pollutant, mercury-its source, disbursement, transformation into methylmercury, and adverse health, and environmental effects. This all sounds like an excerpt from the Encyclopedia Britannica. (Actually it is from the EPA Website.)

Leaving mercury and moving on to another subject we find Sec. 1502.2 (c) states:

"Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations. Length should vary first with potential environmental problems and then with project size."

This draft EIS consists of 1308 pages! I don't think that can be considered concise by any stretch of the imagination. C29

I made every effort to read all these 1,308 pages in the few days we had and contrary to RUS's definition of an Environmental Impact Statement, I didn't find it clear and concise and to the point at all. I found discrepancies, omissions, and just a lot of confusion. A lot of subjects were scattered throughout the EIS and it was really rather hard to make any definite conclusions because it was just so -- the way it is put together so confusingly.

If the above referenced draft Environmental Impact Statement (Draft EIS) could be condensed into one word, that word would be "phony"! If I were to adequately comment on the entire document, doing so would require the same 1300+ pages. We expected more than what's already published on AECI's website, their self-promoting hardcopy publications, and statistics, non-site specific, obtained from general internet "surfing". C78

It is generally understood that an Environmental Impact Statement is required only if a proposed project is assumed to have an adverse impact on the environment. The purpose is to determine the extent of such adverse impact and the best mitigation to lessen these impacts.

As per 7CFR1794.25, an EIS, at the minimum, should accurately and correctly in simple and generally comprehended terms describe the impact of a proposed activity to the overall environment in which it is to be located. Such environment shall include physical, biological, chemical, sociological, psychological, and economical factors. This document under review did none of the above.

It should be self explanatory that in order to determine impact to anything, one must know two things; a) The nature of what is being impacted, and b) The nature of the activity doing the impacting. Neither of these two requirements are met in this Draft EIS. The purpose of the former two requirements should be equally obvious, a) To accurately assess environmental changes at any future time, and b) To correctly attribute such changes, if any, to the cause[s] responsible for them.

I further suggest now that *no further action shall be taken with regard to AECI* until these determinations, as well as scientifically sound baseline studies have been performed. Only then should a draft EIS be prepared and presented for review. Only then will we know exactly what Impact is significant, and can proceed in a transparent, orderly, and knowledgeable fashion, with truth, not AECI's ad agency, to assess mitigation. C13

Response: These comments either objected to the length of the document, or expressed frustration at the difficulty of finding items of interest, or both. (We assume that when a commenter complained that the document did not describe impacts, he or she had difficulty in finding a discussion of the impacts of interest.)

***Length.* For the Final EIS, some material taken from previous reports that are included in the appendixes has been further condensed to make the document more concise.¹**

***Difficulty of Finding Items of Interest.* Because of the complexities and the many issues that must be discussed in an EIS today, features are incorporated into the document to make it easier to review. The expectation is that most readers would want a general overview, then details on their particular area of interest. The Executive Summary is a concise summary of the alternative evaluated, the proposed project, and the impacts. After a review of the Executive Summary, the table of contents can be used to find specific topics of interest. Section 1 *Introduction* provides a reader's guide to the document and describes the purpose of and need for the project. Section 2 *Alternatives Including the Proposed Action* is the evaluation of alternatives and ends with a detailed description of the proposed project. Section 3 *Affected Environment and Environmental Consequences* begins with a discussion of the organization of the section. Each main subsection in Section 3 addresses a particular resource and is structured the**

¹ The noted page length in one of the comments (1308 pages) includes several appendixes that are previous documents and not part of the DEIS, but were included because they are referenced in the DEIS and are not easily available.

same way, beginning with a discussion of the affected environment and ending with a discussion of environmental consequences. In each environmental consequence section is a subsection titled *Identification of Issues*, which lists all issues identified during the public scoping process plus any other issues that USDA/RD merit consideration. For each resource, each of these issues is addressed in the corresponding *Impact Assessment* subsection.

An index is also provided (Section 10) and a glossary (Section 9). The appendixes are included only as reference material.

GEN-102 Document Authorship

1. The Draft EIS was prepared by AECl and its consultants. In Part 7, agency personnel are listed as reviewers but URS Corp., the consultant, provided all the contributors. The Executive Summary, p. 2, notes that the Draft EIS includes reports prepared by AECl itself, while reports from AECl's consultants are included as appendices. The result is predictable: the Draft EIS is biased toward the outcome desired by AECl, with far less attention being paid to alternatives. The EIS is supposed to be prepared by the lead agency or a contractor selected by it, not by the applicant, for the express purpose of avoiding a conflict of interest. 40 CFR § 1506.5(c). A conflict is apparent in this Draft EIS. C10

Sec. 1794.61 Environmental impact statement allows that, "*A third-party consultant selected by RUS and funded by the applicant (7 CFR part 1789) may prepare the EIS.*" It assumes that such an entity is an un-biased consultant, and not the applicant itself. This does not appear to be the case here. After review, this Draft is almost entirely composed by Associated Electric Cooperative, Inc. (AECl) itself. The specifics will become evident as we progress through it. C13

As for this document, I'll start my review following the same general outline, i.e., meandering, used by the consultant ... less the majority of needless "filler" donated by AECl that has absolutely no bearing on the impact area. C13

This Draft EIS really doesn't cover alternatives in depth and appears to primarily be written by AECl, putting forth their arguments for building the Proposed Action. As I understand the process, this document should be prepared by the lead agency or a contractor selected by it, not by the applicant. This appears to be a conflict of interest. C23

Response: The document was prepared by URS, under contract to USDA/RD, in accordance with USDA/RD and NEPA regulations. The Executive Summary indicates that information and analyses from AECI reports were incorporated into the Draft EIS. For example, all the details of AECI's proposed action originated with AECI and were incorporated into the Draft EIS. Examples of analyses from AECI reports that were incorporated into the draft are: the groundwater pumping tests, the assessment of cultural resources and the noise assessment. There are many other examples. When information from AECI or from past reports prepared by or for AECI is used in the EIS, it is referenced.

GEN-103 Compliance with NEPA

1. In many instances AECI attempts to excuse its non-compliance with NEPA with the assurance that it will abide by permitting and legal requirements: see Part 3.1.1.2.4, pp. 3-19-20 and Part 3.1.2.3, p. 3-42 for mercury; Part 3.5.2.4.1, p. 3-114, for floodplains; Part 3.7.2 for land use; Part 3.3.2.3, p. 3-77, for groundwater contamination; Alternatives Report, Part 6.5.5 and Part 2.4.6.6 for wastewater disposal; Alternatives Report, Part 6.5.4 for fuel and waste disposal; Part 2.4.8.3 for the landfill; and Part 3.1.2.4.1, p. 3-45 and Part 4.4.1 for criteria air pollutants. NEPA would be practically a nullity if the existence of regulations was sufficient ground to avoid making a statement of environmental impacts. *C10*

Response: NEPA is procedural and not substantive. It requires a full and open discussion of impacts. We can quantify or estimate some effects (e.g., farmland taken, groundwater withdrawn, noise, mercury emissions). For some effects (future groundwater impacts, for example), it is reasonable to assume that AECI will comply with laws and regulations. For those resources for which agencies tasked with environmental protection have established rules, compliance with those rules is presumed to be protective of the environment.

Note that NEPA compliance applies to federal agencies; it is USDA/RD, not the project proponent that must assure compliance with NEPA.

The DEIS does not weigh the need for action against the uncertainty created by incomplete or unavailable information as required by 40 CFR § 1502.22(b). *C10*

Response: 40 CFR § 1502.22 addresses “reasonably foreseeable significant adverse effects on the human environment” when “there is incomplete or unavailable information” to assess those impacts. In our opinion, there weren’t effects in this category.

GEN-104 Baseline Studies

1. There are no chemical baseline studies presented for existing flora, fauna, air, water, and soils. I even invited both Rural Utilities Services (RUS) and the consultant to use my property as a sampling station location in addition to sampling my pristine pond, constructed in 2000, and aquatic organisms. I didn't even receive the courtesy of a reply. Little did I realize until reviewing this DEIS that NO baseline studies were anticipated! Wonder why?² C13

AECI/URS has not done baseline air, water (surface or ground), and soil testing in the area. Without this baseline information, how will their activities be monitored? They will certainly claim in the future that their operation is not necessarily to blame for contaminant levels because it can't be proved the chemicals were not already there. USDA/RD must require extensive baseline testing to both confirm that the area is in attainment and to provide a way to measure how the plant has impacted the quality/quantity of our drinking water, soil, and air. C23

Please require that a complete scientific environmental baseline study be performed as part of the EIS, and prior to any further agreements with AECI. C78

Response: A number of baseline studies were done for this project and included in the Draft EIS. These included air (ozone, SO₂, PM₁₀, and meteorological data; see Draft EIS Section 3.1.1.3 *Existing Conditions – Meteorological Conditions*), groundwater and soils (Sections 3.2.1.2 *Existing Conditions*, 3.3.1.3 *Existing Conditions* and 3.3.2.3 *Impact Assessment Methods*), wetlands (Section 3.10.2.3 *Impact Assessment Methods*), historic and archaeological resources (Section 3.13.1.2.3 *Phase I Survey and Phase II Testing*) and noise (Section 3.16.1.2 *Existing Conditions*).

The issue of future environmental liability in the event AECI’s activities result in releases of hazardous materials to the environment is outside the scope of the NEPA process and the EIS document.

² Exhibit A: Email to URS Corporation cc: Stephanie Strength, RUS

GEN-105 Externalized Costs of Energy

1. Does the EPA/RUS have any comments on a study done by the European Union on the external costs of energy? See

<http://www.externe.info/expoltec.pdf>.

- According to the study, conventional coal burning power plants cost 9.9 to 17.85 US cents/kwh (kilowatt hour) for health and environmental destruction;
- Coal Carbon emissions without sequestration costs 3.2 to 3.9 US cents/kwh in health and environmental destruction;
- Gas CC 1.31 US cents/kwh;
- Photovoltaic 0.54 US cents/kwh;
- Wind offshore 0.16 US cents/kwh;
- Wind onshore 0.12 US cents/kwh;
- Hydro costs 0.066 US cents/kwh
- (Fuel cell energy costs were not considered.)
- (Nuclear energy costs were not considered.)

For example: 600 MW plant @ 80% capacity factor * 365 days/year * 24 hours/day = 4,204,800 MWh per year. New 600MW conventional coal plant would have hidden cost of .099 * 4,204,800 * 1000 kwh/MW = \$416 million 0.1785 * 4,204,800 * 1000 kwh/MW = \$750 million. IGCC 600MW: 0.039 * 4,204,800 * 1000 kwh/MW = \$164 million; 0.032 * 4,204,800 * 1000 kwh/MW = \$134.6 million. Comments by the EPA/RUS on these "externalized" costs would be appreciated. Such research should be objective from recognized experts in their fields; not AECI! C78

Response: The referenced report is a product of the ExterneE project, which was jointly launched in 1991 by the European Commission (the executive body of the European Union) and the U.S. Department of Energy (DOE) to evaluate "fuel cycle externalities." Research now is apparently done mostly by the European Commission.³ According to the project's website, "Fuel cycle externalities are the costs imposed on society and the environment that are not accounted for by the producers and consumers of energy, i.e. that are not included in the market price.

³The DOE's Energy Information Administration (EIA) issued a report in 1995 that was a case study of three states (California, Wisconsin, and Massachusetts) that incorporated externalized fuel costs into their planning process (EIA 1995). The report concluded that the "requirement to incorporate externalities in the resource planning process had negligible impacts on the planned resource mix of the utilities in each of the three States." However, that conclusion was partly based on the circumstances at the time: there was little need for new capacity and natural gas was the fuel of choice at the time.

They include damage to the natural and built environment, such as effects of air pollution on health, buildings, crops, forests and global warming; occupational disease and accidents; and reduced amenity from visual intrusion of plant or emissions of noise.”

ExternE’s approach is different from USEPA’s. USEPA set limits (National Ambient Air Quality Standards) to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. While USEPA’s approach requires judgment about acceptable levels, it does not involve nearly the judgment and subjectivism of the ExternE approach, which, for example, requires assigning monetary value to such things as visual intrusion or hypothetical extra years lived. Certain items that would at least be relevant in a U.S. analysis are also apparently not included. For example, the ExternE results suggest that hydroelectricity results in minimal damage to the natural and built environment; these results surely could not include the environmental and social damage of constructing a large hydroelectric impoundment. The report also does not address the very real health effects on low-income populations of higher-cost sources of electricity. The referenced report does point out the major disadvantage of coal—emissions—a topic discussed at length in the Draft EIS. Assessing the report conclusions and attempting to relate them to a project in the U.S. would require an in-depth evaluation of many variables, including the widely-varying emissions standards in the countries included in the report, the control technologies used, and the populations affected (for example, external costs would be much higher in a densely populated area), which is outside the scope of this Draft EIS.

GEN-106 Miscellaneous

We remind you that you will need to consider whether or not the project will require formal notice and review from an airspace standpoint. The requirements for this notice may be found in Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace. This regulation is contained under Subchapter E, Airspace of Title 14 of the Code of Federal Regulations. We would like to remind you that if any part of the project exceeds notification criteria under FAR Part 77, notice should be filed at least 30 days prior to the proposed construction date. Questions concerning this matter should be directed to Ms. Brenda Mumper at (816) 329-2524.

C9

Response: Thank you for your comment. This regulation is addressed in Appendix A, Relevant Federal and State Environmental Laws and Regulations. The contact and notification information from the comment has been added to the summary table.

I hope the United States Department of Agriculture will support the agricultural community it was set up to represent and aid, by not approving AECl's loan request. If the federal government funds these antiquated technologies, there will be fewer resources to invest in developing and implementing the new technologies which will be necessary to move our country forward in our quest to be energy independent, reduce Green House Gases, protect the health of our people, and be a world leader in responsible use of resources. C23

Response: Thank you for your comment.

1. I live in Platte City, just outside of Platte City and I work at the Harley Davidson Manufacturing Plant near KCI and I'm a member, I'll say, customer-owner of Platte-Clay Cooperative. Near Platte City we're seeing substantial growth south of the city. There are several subdivisions going in. Rainworth and Seven Bridges are a couple examples. At full build out they're expecting there to be 2,911 homes there. Platte-Clay is expecting in the next 10 years that 10,000 more homes will be built in that time and they're growing about 8 percent per year in electrical usage. Obviously, the need for electricity is great.

Along with these are supporting businesses to support these homes and businesses. I feel after looking at the Environmental Impact Study which if you don't have broadband, I suggest you read it instead of downloading it, you'll read it faster than you'll download it, but Associated's definitely done their homework in looking at all the possibilities and doing a process of elimination in every aspect of this project.

Now, being a physicist, I have an education in physics. Contrary to the former speaker, I'm a little more pro-nuclear. However, that technology is something that's going to become more prevalent in probably 15 or 20 years. Now, obviously, the time is not right for that type of technology right now. Again, looking at the Environmental Impact Study, Associated' definitely done their homework and I think this is obviously, or definitely the way to go, so I appreciate your viewpoint. C58

Response: Thank you for your comment.

Since "no action" is already stated as an alternative and/or mitigation process in the phony DEIS, simply opt for it. I am aware that AECI has considerable clout in high places, although the recent changes in government personnel, and overall environmental conscience by major industries outside the government, may give them cause to re-evaluate their omnipotence, as well as their position in tomorrow's utility marketplace. We have offered many times to sit down with their higher management to resolve many current issues; to no effect. Don't copy AECI's mistake and underestimate the influence of grass-roots movements on policy makers in Washington, as well as financial lenders. Time, environment, and concerned citizens (voters!) will dictate the future of coal power. Their future is very limited. I hope my comments may help in accomplishing both our goals.

Since there was limited time to more fully address the draft EIS by Feb. 8, and even less time to present them orally, (Just as well, as my voice wasn't up to the task.), enclosed please find my completed comments to be duly entered for the record. *C13*

Response: Thank you for your comment.

2. What also is evident is that data submitted by AECI to this EIS 'consultant' (URS) contrasts greatly from information AECI submitted to Missouri Department of Natural Resources (MODNR) for an air quality permit, and from what AECI submitted to Carroll County Planning & Zoning Commission to receive a zoning change. Quite obviously, AECI provides regulatory agencies with whatever information they want to see in order to win their approval, regardless of its veracity. *C13*

This is the time for the regulatory agencies to compare notes, and tell AECI to either follow the rules of the land, and quit wasting everyone else's time and money, or get out. *C13*

Response: Minor design revisions are continually made, resulting in the potential for inconsistencies when submittals are required at different times. Any substantive design changes that would affect the conclusions of the EIS would require a supplemental EIS. The information in the EIS is more recent than that submitted with the air permit application. MDNR, in their comments on the Draft EIS (comments and responses included in this comment response summary), pointed out differences from the air permit application. These changes will be addressed through the air permit application process, and do not affect the EIS. The only project change specific

to the County would be the PILOT agreement with Carroll County (see comment regarding PILOT agreement, below).

AECI's permit application states that the plant is scheduled to begin commercial operation no later than 2011. Table 1-1 shows that start up of the new plant is 2013. C17

Response: The date has been revised and the permit would include the revised dated (2013). The commercial operation date has been delayed in great part because AECI can't execute major construction contracts committing over 10% of the project costs until the Record of Decision is signed by USDA/RD. Since there is some uncertainty in that regard, the current schedule is that commercial operation will not begin before 2013.

A rather blatant error in this section is in Figure 3-49, as well as all other maps of the plant site in this DEIS. There is an area of approximately 5 acres in Section 17 that is not owned by AECI. It is owned by an individual. However, this area is shown as being owned by AECI. This is a gross oversight. C29

Response: In the Final EIS all the figures that have the plant boundary have been corrected to exclude this area.

3. I am very concerned about the environmental effects that AECI's proposed coal-fired power plant will have on the Norborne community and surrounding area during construction and after the power plant is complete and producing energy. I am also very concerned about the impact that the transmission and railroad corridors will have on agriculture practices and the flood levels in the immediate area. I feel these issues should be included in the final Environmental Impact Statement. C14

Response: Impacts on communities were addressed in the Draft EIS, see Section 3.14 *Socioeconomics and Environmental Justice*. The only issue raised during scoping regarding agricultural impacts of transmission lines on agricultural practices was in relation to center-pivot irrigation systems; this was discussed in the Draft EIS, Section 3.6.2.4 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*. The rail corridors and transmission lines will take some farmland; this is discussed in Section 3.6.2.3 *Impact Assessment Methods* and Section 3.6.2.4.1 *Impact Assessment*. Potential flood impacts caused by the railroads was not included in the Draft EIS but has been added to the Final EIS. See Final EIS Section 3.5.2.3.1 *Potential for Increased Flooding*.

AECI must be responsible for the air quality, water quantity and quality, and the disruption of farming practices and flooding risks that will be imposed on area residents during and after construction of this power plant! What will the final Environmental Impact Statement include so that we (all Carroll County residents and neighboring counties affected by transmission and railroad corridors) are protected from any disruption to our current lifestyles. Remember, we NEVER had the chance to vote on allowing AECI to build this power plant and we should NOT be expected to be distressed at the convenience of AECI. C14

Environmental factors including water quality and quantity, air quality, and noise and light pollution should be the highest priority of USDA in enforcing mitigation and controls to protect Carroll County residents and surrounding communities. C16

Response: The Draft EIS evaluated environmental impacts in the areas listed. Air quality was discussed in the Draft EIS Section 3.1 *Air Resources*; surface water quality, Section 3.4 *Surface Water*; groundwater quality and quantity, Section 3.3 *Groundwater*; farming, Section 3.6 *Farmland*; noise, Section 3.16 *Noise*; light pollution, Section 3.8 *Public Lands, Recreation and Visual Resources*; and flooding, Section 3.5 *Floodplains*. Additional discussion of flooding has been added to the final EIS (see final EIS Section 3.5.2.3.1 *Potential for Increased Flooding*). The NEPA process is intended to provide a full and open discussion of impacts and alternatives; it does not provide assurance of no impacts. Note that enforcement of most environmental regulations is the responsibility of the Missouri Department of Natural Resources. Applicable environmental laws, regulations, and permits are included in Appendix A.

My comments begin by stating: I am merely a citizen of the county where this proposed power-plant is being considered. I have neither scientific credentials nor expertise on the application of environmental controls or amelioration of the hazardous emissions (including greenhouse gases) which are inherent in the proposed project. I will leave those subjects to the appropriate professionals. However, I will take-up a few associated issues as presented in the Draft EIS from the standpoint of a novice. . . as the proposed project will have adverse impacts upon my health and life style. . . if. . . it is allowed to become a reality. Alternative processes will also be presented which would reconcile the two diverse enterprises (farming & electrical generation).C15

I must confess... I have yet to lay down sufficient roots to keep me in this area... so... if the AECI project is approved and comes to fruition, I can easily pack-up and move to another area in order to preserve my health... even if it means moving to another country. However, my greatest concerns are my children and grandchildren... who are deeply rooted in this community. In as much as my family is of greatest concern... I join this fight... and will fight tenaciously to preserve their overall health. C15

Response: Potential health effects from emissions were discussed in the Draft EIS Section 3.1.2.4.1 *Impact Assessment*. Other potential health and safety impacts, including from electrical and magnetic radiation were discussed in Section 3.15.2.4.1 *Impact Assessment*.

Considering all my comments, as presented herein and heretofore... I ask... again... why are we, the citizens of Carroll County, confronted with this proposal for a massive coal-fired, base-load, generation facility by AECI... a cooperative limited to providing electrical power to its members? Why has this area been selected to be the dumping grounds for environmental contamination? Have the residents (and this region) been categorized as expendable... in the best interests of a limited few? C15

Response: Thank you for your comment. The plant site is within AECI's service area.

I grew up in Norborne just a few miles north of where this power plant is going to be built. I'm a fifth generation farmer and I went to college and got a job with the co-op, so I know all about the co-op and how they're run.

About this power plant, what concerns me from what we see here today is something that will, not really affect you guys, because I'm afraid the effects of what will happen to this power plant, you will probably be gone and in the grave by the time we see all of these hazards pop up and when the landfill goes from 80 acres and they have to take your land, through eminent domain, to expand their landfill from 80, like they did in New Madrid, and expand it even larger.

I'm afraid, you know, it may not be such a good steward for this community. Why are the people here so mad and all the folks that live around it and near it are going to be affected. Why did they come out and seize the Craigs' land? Why did they scare people? Why are people afraid to file just because their motions are so wild and round up about this? This kind of portrays the happy picture of what they want everyone to look at.

The people of Carrollton and Carroll County and the adjoining communities, they see this as a dream and I see different problems that might come up. It's just that and I know I'm a young person and I'm pretty emotional about this. I'm kind of just concerned on AECI probably isn't doing the best they can to treat everyone fair in the community, letting them know what is going on and will they actually spend the extra cents since they're trying to save so much on your power to actually help the environment, help the community.

I'm glad I moved back to this town and you know, seems like this project can't be stopped and it probably won't, but it's a good thing we address these issues ahead of time and I hope they take -- RUS takes a good look at the young people who do want jobs and do want this done safely and just have a good look at this project. C68

Response: The facility would be constructed to allow for up to two more 660 MW net units. This is addressed in the cumulative impacts section of the Draft EIS (Section 4.4 *Cumulative Impacts and Mitigation by Resource*). In the Final EIS some additional language was added to this section, clarifying that if more units were added buffer property would be needed, and that there would be additional emissions and the need for another air permit. Also, while the Draft EIS states that the proposed landfill would have capacity only for the one unit and that there would be a need for additional capacity with additional units, the Final EIS makes it clear that creation of additional capacity would require acquisition of more land. See Final EIS Section 4.4 *Cumulative Impacts and Mitigation by Resource* for revised language.

I am writing to you concerning AECI's proposed 660 MW coal-fired power plant to be located in Carroll County, Missouri near Norborne. Although I currently live in Wyoming, this proposed plant is of great concern to me for many significant reasons. My grandparents (Henry and Joline Lindley) own 480 acres in Carroll County, which has always been considered "home" for our whole family throughout many years and generations. Portions of this 480 acre farm have been in the Lindley family for over 130 years. AECI representatives have contacted my grandparents on numerous occasions in the pursuit of this property, threatening that eminent domain could be used in order to obtain the farm. On a 160 acre parcel of these 480 acres that is of interest to AECI is the resting place of my mother, Diane Lindley Whitmer, who passed away in 1999. The very 160 acres where my mother's ashes were spread, is the portion of my grandparent's 480 acres that is of greatest interest to AECI. Preserving my mother's resting place is of utmost concern to me and my family, however, the proposal of this

power plant is an abomination to Carroll County, its residents and countless others involved. *C16*

Response: The Lindley property is not included within the facility boundary shown in the EIS, and is not included in AECl's plans for the facility.

There are many reasons why the construction and operation of this coal-fired electricity generating facility will cause many problems for present and future Carroll County residents, but also for residents in neighboring counties. Wildlife populations, habitat and overall environmental health of the plant site and surrounding area and the excavation areas from where the coal is mined will be affected immensely. *C16*

The coal mining industry has been long known to be environmentally detrimental to the immediate area of coal extraction sites. Wildlife habitat is too often destructed and no mitigation is enforced. As a resident of Wyoming I have witnessed first hand the struggle to find the balance for energy resource extraction and wildlife habitat preservation. Coal extraction leaves horrendous scars on the landscape and directly affects wildlife habitat and wildlife populations. *C16*

Response: Coal mining is a related activity that is addressed with its own impact analysis. AECl may obtain coal from any one of 14 Powder River Basin Coal Mines. The federal Bureau of Land Management (BLM) recently completed an EIS for mining coal from federal tracts adjacent to five of those mines. The impacts of the coal mining are detailed in the BLM EIS, available at <http://www.blm.gov/wy/st/en/info/NEPA/cfodocs/prbcoal-feis.html>.

I actually do live in Norborne near where this place is going to be built. I have a farm that has been in my family's heritage for over 150 years, which, if this plant would go in, transmission lines would go over, if it's not taken for railway or whatever. *C77*

Response: Thank you for your comment.

4. What is the real power output of the units? It has been described by AECl in different publications as 660 MW, 688 MW, and 735 MW. *C78*

Response: The electrical output to the grid is 660 MW. The size of the generator proposed to be installed is 688 MW. The difference between these two numbers is the electric energy that is required

to power the plant itself. This power is primarily related to the operation of the air pollution control equipment.

My comments are not going to be made as they were originally. I sympathize with the people sitting out here. I very well may be sitting with you in the same situation. I just want to tell you that I sympathize with you, because we have a farm my son and I bought and we have a cattle operation on it. The next two years I'm going to build two more 42-inch high pressure natural gas and another (indiscernible), and how do we know there'll be enough of this electricity from Chicago. I can't do both if it -- so we're all in this together, and I probably would be sitting with you except our property is not part of the proposed site. What is the answer? We all have to give and if it's not here it's going to be somewhere else. I'm telling you I don't think we can do anything about it. C79

Response: Thank you for your comment.

5. I am a member of the Central Missouri Electric Co-op, and I farm in northern Saline County. And I'm a farmer; I farm in the Missouri River bottoms there. And I'd like to testify that the Missouri Department of Natural Resources, known as DNR, have their regulations that protect Missouri's land and water. In 1993, we had what they call a 500-year flood. And after the flood, we had damage to our levees; and we had to ask the government for funding to replace the levees. And a lot of that came with rules and regulations of DNR. And as an example of how strict their regulations are, we had sand bags that we had -- leftover sandbags that we put on the levee prior to the flood; and DNR stepped in and told us that there was rules and regulations we had to follow with the sandbags. They would not let us throw the sandbags into the River. We couldn't just dump the sandbags on the land and destroy the bags. We had to remove the sandbags to a hazardous waste site. And that told me that they are very particular when it comes to contaminating or using hazardous material on any of Missouri's land and waters. And if they're that particular with the land and water, I have to feel they're that particular with the air of Missouri also. And DNR is very much involved in this project that Associated has before the public tonight. C42

Since I work with the environmental regulatory agency, DNR, and for all these people day to day, I trust the regulatory bodies to make sure that Associated does what it's supposed to do on an environmental basis. I would never say that the DNR doesn't do a good job of being a watch dog. C21

I've been a farmer for 35 years and my remarks will be a little bit more specific. I've had some experience with DNR over the last 10 years. First of all, it was a log jam in Locust Creek loading through DNR property. The second was with a waste manure spill in the neighborhood, and the third was with a levee through some wetlands and state agencies are made up of individuals. These people are professionals. They're good. They do their job. This manure spill, the DNR guy was there on a Wednesday, prior to Thanksgiving Day. He was there that night and all Thanksgiving Day making sure that tributary was all cleaned up. These people are serious, and they do a good job. So I think if you have any concerns about state agencies and their willingness to stick to the rules, that shouldn't be a concern. C88

When we've had a problem, DNR has come in and looked at it, spent whatever time necessary to make sure that it got cleaned up in a very professional and good way. C92

Response: Thank you for your comments

6. I remember what the environment was like as a boy growing up in Jefferson City in the late 40s and early 50s. We had just fought World War II. The Great Depression was in the very recent past. People had little money and as a result government had little money. In 1948 Harry Truman didn't campaign on providing clean water and air to America's cities, he promised a chicken in every pot. In 1946 or 1947 we moved in with my grandparents in a very old house on West Main St. just below the Capitol. If you walked out the front door of our house and turned left, in less than 50 feet you were on the grounds of the Missouri power plant, an ancient coal-fired facility that provided steam heat and DC—not AC—power to the Capitol. If you turned right and walked 100 yards, you would be at the Missouri Power and Light generating plant. There was one smokestack at the Capitol power plant. I believe there were three at MP&L.

In addition the Missouri Pacific Railroad was less than 100 yards away and in the late 40s most of the locomotives were the old steam engines with black smoke bellowing out their stacks. Making the smoke situation even worse was the fact that most of the homes and businesses in the area burned coal.

The amount of smoke, dust and soot that came from the power plants and steam engines and from people burning coal was a reality that most people today could not imagine. I haven't heard the term "soot" for years, but it was a piece of burned coal roughly the size of a large grain of sand. It would be so thick on our sidewalk you could slide on it like sand.

As bad as that was the people next door lived there much of their lives and were in their 80s when they passed away. My grandparents both lived into their 80s. A lady down the street who lived there her entire life was past 80 when she went into a nursing home. The only man I'm aware of who didn't reach 80 was a heavy smoker.

Fast-forward 60 years and look at the power plant at Chamois, Mo. The plant there burns coal and you literally cannot tell when the plant is generating electricity. Chamois is 20 miles from Linn and either my wife or I go through there at least once a week and you do not see or smell anything.

Our house there in Jeff City was one of four older homes and the sewer system which had been set up years earlier for those four homes consisted of a pipe that ran down to nearby Wear's Creek, where the raw sewage landed not in the water, but on the bank where it remained until a good rain caused the creek to rise.

The rest of the folks in Jeff were served by a system that was a little more subtle. This system collected all the sewage and ran it well out into the Missouri River before it got discharged into the river without treatment. At times the Missouri got so low it was almost possible to walk to Callaway County. Then those big pipes weren't so subtle.

A lady at Sedalia expressed concern that the proposed plant be operated in a manner that would ensure mercury did not get into the water. In no way am I suggesting we deal with mercury or any other pollutant in a cavalier fashion. But let me once again put today's pollution in perspective.

When I was growing up my dad fished with a hoop net in the Missouri River, which was just beyond the railroad tracks. I remember pulling up a net and it would be full of toilet paper, condoms and even fecal matter. Looking back I do not know what amazes me most, the fact that we ate the fish or that the fish didn't kill us.

Compare those fish to what fishermen can take out of the river today. For the past 10 years our former conservation agent here at Linn has been fishing for crappie in small creeks that empty into the Missouri.

In terms of protecting our environment we have made great strides. I have every confidence Missouri's rural electric cooperatives will operate this proposed power plant in an environmentally-friendly manner. C27

Response: Thank you for your comment.

I live on a farm north of Meadville and am a member of Farmers Electric Cooperative. As a kid once in a while, about once a year we went to Kansas City, came in from the north, I don't remember on what road, but I remember the stench in the air from the Blackwater processing plants. A friend of mine that lived in Kansas City said they dumped all the blood right into the river.

I went to MU, graduated, and got a degree in Civil Engineering with a minor in Environmental Sanitation. My first job was in Chicago, country kid who moved into a big town. And one road took me up over the southern edge of Lake Michigan up to Gary, Indiana, and I remember seeing plumes of every color smoke you can think of and cars two or three years old that the paint was rusted off the tops of them.

I'm concerned about the environment, but I also know the EPA and DNR do a tremendous job. We have cleaner air and water today than we did have when I got out of school for sure back in 1969. C87

Response: Thank you for your comment.

Now I want to talk about the integrity of AECI. A lot of people have talked about that tonight and really don't have any experience with any of it. They have not. Now, about a year and a half ago or so at a local school board I went, this is on the agenda at that time. We were advised to go to a meeting at the courthouse about tax entities. At that meeting, they were wanting to waive the property taxes and have a payment in lieu of taxes. All the citizens said it wasn't good enough. They figured that the County commission and AECI had set up was not enough, but the Commission and AECI went ahead and made an agreement and this agreement was three payments made to the County starting in 2006. This didn't happen. Did AECI do the honest thing? That last week in December we see an article in the paper this agreement has been cancelled. Can you believe that? \$500,000 to the county and the agreement is cancelled. And that's not honesty. I think you need to know about that. The county wished to receive \$500,000, and the last week of the month, the last week of December, it was cancelled. They paid nothing to the counties. And the next thing I want to do is a statement a man made here before is we all know that's not AECI's way in business. They have not been fair to people in this area. When they came in here and bought the land they didn't say – the original tract, they didn't say we're going to build a power plant, we're AECI. They hired a separate entity to come in and lie to the people and bought the land. C95

Why didn't AECl pay their PILOT payment in December 2006? C30

Response: The commenter is correct; AECl did not make a PILOT payment in December under its original agreement with the county. That original economic development agreement contemplated a transaction going forward with the needed legal opinions forthcoming.

However, due to a state litigation on another utility project with a similar economic development agreement, the viability of AECl's agreement with the county was put into question. Therefore the original agreement was put into abeyance pending the outcome of that litigation. The litigation was resolved favorably earlier this year, but due to the delay and the fact that project cost estimates had increased it was necessary to re-visit the economic development agreement with the county. AECl is currently in discussions with the county to amend and restate the agreement such that payments to the county would be increased due to increased construction costs. Under a revised agreement, grants would be on a sliding scale increasing if construction costs increase further, but with a floor at the previous levels.

It has been made clear by AECl officials that the electricity that will be produced at the Norborne plant will not be used in the area, but rather in parts of Oklahoma and elsewhere. It is extremely unfortunate that Carroll County residents are being distressed on many levels for energy that is not being consumed even in their home state. Is it too much to ask that local communities become more economically self sufficient? Why must my family and other local residents in Carroll County become subject to loss of water, decreased local air and water quality, transportation interference, loss of farmland (thus income), decreased recreation (hunting and fishing) opportunities and significant increase in light and noise pollution among countless other environmental and economical stresses? When will USDA step up and help protect the local agricultural economy of Carroll County instead of helping greedy power companies profit off of uneducated county officials? C16

There is an undying need for more political education and awareness regarding healthy, sustainable, low impact (environmentally friendly) forms of energy production for the sake of our nation's overall health right now and in the future. Power companies should be required to incorporate alternative energy methods at or near the site of any coal electricity

generating plants. In order for there to be more political awareness not only on a local scale but a national scale as well, Rural Development organizations including the U.S. Department of Agriculture need to enforce such behavior and require mitigation and healthier forms of electricity generation. *C16*

Responses: Thank you for your comment.

PUR-200 Anecdotal Reports of Increased Need within AECI' Service Area

1. I'm from Chillicothe, Missouri. I'm not a member of FEC. I've been fortunate enough to be around a group who are members of FEC and they hire quality people. They do their best work in communities and I realize it's a difficult thing to look at when someone's talking or land or building next to your land but the thing is we have to make responsible decisions to generate power to our communities or we can't grow. And if we choose not to grow it won't be in these communities, it will be somewhere else.

My son lives in San Diego, California and my daughter in Oklahoma, and what's happening to our towns is they're spread all over Missouri, and we can't keep our economy because we can't have our own power here. Now, I see in this proposal that we're building a plant right here in Missouri that will employ Missouri people that will give power to people here in Missouri to make decisions. I think it's a responsible thing to do.

Now, there's always impacts and we have to suffer impacts. But we also have to get things to grow or we won't be here and we can't keep our land and fight over local power. *C93*

Response: Thank you for your comment.

Lots has been said tonight and today about various issues, but I think it still needs to be said because the support is very important when it comes to meeting our needs, our electrical needs for these communities. I personally have been excited about this project since I first heard about it. I've always been a farmer. I did spend nine years in the state legislature, but I'm still a farmer and our major enterprise is raising hogs.

Now, back in 1939 when I was nine years old, electricity came to our farm, and I know it's almost certain the monthly bill was less than \$10. I don't know for sure what it is, but I know now we spend \$1,000 a month for electricity. We use a lot of electricity. We're primarily in the hog production business. What our needs are -- once a generation of electricity by water, once they surpassed all they could do there, the affordable

source of power, then we come to coal. That's why there are lots of coal power plants being built in our nation. *C94*

Response: Thank you for your comment.

I'm the Assistant State Administrator for the City of Camden. And I'm here to speak in favor of the proposed power plant. In my position with the city, I handle all of the economic growth and activities for Camden. I am responsible for developing and moving in programs that stimulate the Camden-area economy. Specifically, this means facilitating partnerships with businesses to build a stronger tax base with quality developments designed within the community, such as commercial developments to increase our sales tax base and attract community manufacturers that provide good wages for our residents.

In my efforts to attract potential prospects, there are a number of factors that are examined. However, this proposed plant will directly affect one of the most essential components of operating business, energy costs. Currently, Missouri has some of the lowest industrial and commercial electric rates in the country, which is an incentive to potential prospects looking to locate within the State. This power plant will provide a source of continuing affordable electricity. However, without this plant, the potential consequences will not only include the loss of this competitive advantage, but also the trickle-down effect that could lead to the migration of jobs and economic activity to other states.

It will directly impact the electric rates on commercial, industrial, and residential customers pay in my community. The advantages of constructing this plant are numerous, but the consequences of inaction are disastrous. This plant is desperately needed for the continuing growth, not only in the City of Camden, but for all communities that receive power from Associated Electric. *C46*

Response: Thank you for your comment.

Since the 2000 census, over 850 new homes have been constructed in Kearney. Plats have been approved for over 4500 residential housing units. Commercial growth has also been active in Kearney. An abundant economically priced electric energy source plays a critical part in Kearney's future. Platte-Clay Electric has provided key assistance to Kearney in its economic development efforts and construction of this plant benefits the interests of our city. *C60*

Response: Thank you for your comment.

I live in Warrensburg, Missouri, and I am a member of the West Central Electric. I grew up in northeast Missouri, and my dad's farm is under water at this time with the Thomas Hill reservoir. That is a great recreation area there that they have created. I enjoy going back and fishing over the place that we farmed, and we had a lot of farm neighbors with that. But that's beside the point of why I'm here. I am a member of the Warrensburg Industrial Corporation. We build buildings for industrial customers and this is one of the main things that we look at that there is a supply of electricity for these industrial companies in the area. If the electricity supply isn't there, the manufacturers aren't interested in bringing their plant or their people to this community. Thank you very much and that's all I have to say. C75

Response: Thank you for your comment.

2. Over the past 8 years the company revenue has grown by 40%. We currently use 1 1,000,000 Kwh annually, which is a 47% increase over the last 8 years. Until the recent price change the cost per Kwh had not changed for 14 years. The company is currently implementing a marketing plan that will fuel consistent revenue growth for the foreseeable future. With revenue growth comes capital expansion and with capital expansion comes the need for additional power. C2

Response: Thank you for your comment.

The need for new sources of electricity continues to grow. Demand for electricity increases annually as today's home and business technology requires more and more usage. That is evident in my home. As my family of six becomes more dependent on the technology of our age, we also become more dependent on the electricity needed for that technology to function. Our electric meter runs day and night as we use electricity for computers, cell phone chargers, landline phones, appliances, entertainment, hair dryers, hair straighteners, hair curlers and a multitude of digital equipment. I cannot imagine what life would be like in our home without electricity. C12

Response: Thank you for your comment.

At Howard Electric, our consumer electricity usage has increased by 104% over the past twenty years. This level of increase is not uncommon among rural electric cooperatives. Moreover, it is anticipated there will be a 67% increase in kilowatt hour usage over the next eight years and an increase in demand of 54% for that same period. Now is the time to move this project

forward to meet that ever-increasing power demand in a timely manner.
C12

Response: Thank you for your comment.

If our county and Norborne is to grow and prosper we need new industry. This project will provide needed rural electricity to support that industry. Even in our area we are seeing growth from people and businesses moving to rural areas. In the future we will need a plant such as the one AECI is proposing to meet the growing electrical demands of an expanding rural area. *C25*

Response: Thank you for your comment.

As member of West Central Electric Cooper, I feel that the way new houses are built in the county, if the power supply continues we will run short of power soon. Associated Electric as done a good job of supplying power at cheep rates. They continue to build new power plants to supply the need of the county. *C28*

Response: Thank you for your comment.

Not only do we need to look to the future of this new power plant, but we need to build and keep our transmission lines up in good shape as well. Rural Electric Co-op of Missouri needs to stay in the lead. This power plant being proposed is being built by co-op Associated Electric for its cooperative members. This proposed plant of Associated will help meet the growing demand we are seeing in our own system as well as the future load growth to help rural Missouri to continue to prosper. We need to look at the future needs of rural Missouri. Our little co-op, Missouri Rural Electric, has experienced growth of around 4 percent annually. *C32*

Response: Thank you for your comment.

And at least in my opinion, without construction of these type of base-load facilities, we'll not be able to meet that demand. *C36*

Response: Thank you for your comment.

And I am seeing a movement from the cities of people coming out and moving out to the rural areas. And we are supplying them with adequate supply of electricity. And with this growth coming out from the cities, we need this extra build-up of electricity from this new plant that they're proposing. And I think this new plant would be very beneficial to us all, not

just the rural people, because the urban areas are coming to us. They are relying on us and looking at us and comparing us to our other people that are supplying electricity to them; and we're getting a thumb's up. C38

Response: Thank you for your comment.

The load of our system is growing daily; and without the support and capabilities of Associated, our necessity for inexpensive reliable electrical service will no longer exist. Our consumers on our system relying on Callaway Electric to provide reliable service to them; and I believe we've done just that, but not by ourselves. Without Associated's efforts this would have never been accomplished. C40

Response: Thank you for your comment.

I'm a member of Lewis County Rural Electric Co-op. I'm speaking and have a couple of issues in support of the power plant. As Nancy commented earlier, our demand is growing in the cooperative by 100 megawatts a year. This plant will generate and the output on it is 660 megawatts. As I view that, we're looking at a new power plant every six or seven years. As we are right now with the growth and timeline and permitting, Rural Electric Cooperative is walking a tightrope to meet the future needs of our members; and it's important that we move forward with this plan. C41

Response: Thank you for your comment.

I live at Laclede, Missouri, five miles west of Lebanon on Highway 64, down toward the beautiful Bennett Springs Park. I'm a member of Laclede Electric, my parents were, and either I was a member or they was all of my life. I'm here to talk to you about a 660 megawatt plant and why I believe that we need it. My comments are going to be very brief, and what I'm going to say to you is I'm going to say God gave us the brains, so let's use it this moment. I want to say these things to you. You and I both know down deep in our heart that we need more electricity, because we know what electricity has done for this country. C43

Response: Thank you for your comment.

Our facility that I'm on, we -- I'm a pastor of a church. Also we have a boarding school for troubled boys. Our electricity that we used the last ten years, we have increased by over 100 times in the last ten years. And we still build. Our buildings will just have nowhere to go. And I'm not sure where we're going to stop, but we need more electricity. We can't -- we can't change our lives; we can't stop that because we can't have electricity.

Let me say this, I think it's important that we have this plant. Here's why I say, that if we don't get busy and get our need done before our growth happens, then we won't be able to meet adequately what we need to have down the road. Case in point, California. They have black-outs. They have all kinds of problems and what because they did not work on planning ahead of time to get everything done and taken care of. And they did all kinds of -- they have all kinds of problems. We need this plant so we can have electricity for the future. *C45*

Response: Thank you for your comment.

It's my understanding that Associated says that they will not have the capacity to meet the needs of its members by the year 2013. With this coal-powered plant, Associated will be able to meet those needs with cost effectiveness that will allow me and my fellow-members to enjoy some of the lowest rates in the nation. *C47*

Response: Thank you for your comment.

I am from here in Sedalia. I grew up in Macon, Missouri. And I'm looking around this room. Any one of you could be my relatives. I've grown up in families and families and generations and generations of farming; and I grew up within 15 miles of the AECl plant in Thomas Hill. And I am standing here and understanding that we need an expansion of electricity. Obviously, our population is growing. *C49*

Response: Thank you for your comment.

I'm just worried there's not enough megawatts to meet our needs now. *C20*

Response: Thank you for your comment.

As we see our baby boomers coming to the Lake and we're seeing numerous of them, becoming second homeowners a population and the strain on the electric services is going to be higher and higher and I applaud Associated and COMO and all the other co-ops. I'm looking forward in making great steps in alleviating our problem we're going to see in 2011 and 13. As we see our growth down there at the Lake we need the power. We need to help turn the lights on and keep the economic engine of our area in the state going and we have a year round population of 80,000 around the Lake.

It has been estimated that during the summer time and during season we'll have four and a half -- three and a half to four million visitors to the Lake of the Ozarks. Many of those are staying in second homes and depending on electricity and so forth and COMO services that area and we want to have them be able to turn on their lights when they come in and have a good time. C52

Response: Thank you for your comment.

And, I'll tell you the truth, I'm in a older home at the edge of West Ray County and that area has just snowballed in growth and over the 43 years I've been in my home, my home was outdated when I moved into it. I had what they called the Green Acres home. Remember the TV show, Green Acres, where you couldn't plug everything in at the same time? I couldn't run electric dryer and a microwave. My home was built with 30 amps of power and we had to upgrade to at least 100 amps to just accommodate our home and that's not without in the farming area so I know what it's like to be without power and our new homes they require lots of power. C57

Response: Thank you for your comment.

I live in Smithville. I am a member of the Platte-Clay Electric Cooperative and my family and myself have been associated with cooperatives for over 50 years so I have a certain level of comfort in anything that a cooperative education proposes. My particular area we're rapidly moving from an agricultural diversion to an urban atmosphere and that kind of explosive growth calls for all kinds of increased services, especially because we're still rural enough to need it, especially electric energy. We see in this plant that's proposed a step certainly in the right direction. We need this plant. We need it as quickly as we can bring it on because the longer we delay, the more critical the need will be. We need this plant. C59

Response: Thank you for your comment.

I live on a family farm just south of Harrisburg, Missouri in Boone County. I like many people wear many hats. I'm a husband, father, auctioneer, farmer, a Boone Electric Co-op member and several others, but the one I want to talk about tonight is the one of 21 years school member and school board president. In a rural school district electricity is very important. We had a couple moving to the country from Columbia, building their dream homes and raising their families. Increased enrollment required us to look into a building program. This growth requires additional electricity at all levels. We need to be assured that our future electrical needs can be met. C62

Response: Thank you for your comment.

I am also the past presiding commissioner for Boone County in which we have worked very cooperatively with the local co-op not only with our citizens but with the growth rate they're having down there, the need for electric and construction of lines. C67

Response: Thank you for your comment.

I am a member of the Callaway Electric Cooperative located in Fulton, Missouri. I speak to you tonight also as an employee of Callaway Electric Cooperative of over 20 years, the former 10 years as a general manager. In my 20 years I have seen my employees, but not (indiscernible) our membership. I've seen our electric load and demand more than double. The new plant is going to affect the entire Midwest and state of Missouri and that the need for new electric generation is real. I think it's my suggestion, it's cost efficient and an environmentally friendly way to provide new electric needs is through central state electric plants, such as the Norborne plant. C70

Response: Thank you for your comment.

I'm from Warrensburg, Missouri. I live ten miles north of Warrensburg and a member of West Central Electric Co-op and in my neighborhood there's a lot of new construction. In the last four years there's been three farms sold and split up and there's 30 new homes out there and it takes a lot of electricity. I was talking to another fellow last week and he had bought another 20 and is going to put 60 homes on it and that's taking place all over Johnson County and people in the know says that the 2010 census in Johnson County will probably be 50,000 people and we'll be having a need for it. C71

Response: Thank you for your comment.

As a hobby I belong to Mason Shriners. I have an airplane, and I haul those children to the various hospitals. Galveston, Texas, Cincinnati, Ohio, Chicago, St. Louis. In flying, you look down on territory and we very seldom ever fly over 18,000 feet and you can see a whole lot what's going on. Now, I guarantee (indiscernible). What I really can't figure out is how the electric companies are holding up now. How they're supplying enough. I don't think anybody that's building those buildings without figuring on holding up electricity. The only way I know of is maybe stopping the population. Anybody want to volunteer? The other solution might be to go

home and unhook your electricity and I don't know maybe someone would volunteer that. I think the electric companies are already doing about all they can do and they're doing a darn good job. We really appreciate that.
C73

Response: Thank you for your comment.

I live in Centerview, Missouri. I've been a member of a co-op for about ten years. I'm the mother of two young children and where we live we have so much growth going on that when my kids get into high school and get into college then is there's still going to be enough electricity, and will we have the means to be able to afford it when we get older. *C74*

Response: Thank you for your comment.

I do realize that we do need some electricity, but I don't believe it's needed around here. I don't believe it's been proven that it's needed around here.
C77

Response: Thank you for your comment.

I live 80 miles in the southern part of Morgan County. I am an electric cooperative member. I was going to speak about as I attend meetings with the distribution cooperatives of the 100s of millions of dollars that Associated has already spent to clean the air, take care of the water, but I've changed my direction. One thing we all have in common, we have a need, a need for electricity. In this state there are now -- just now there will be 3 industrial utilities. There is one cooperative generator. There are several municipal systems and we lean on each other. Associated has a combination of interchanges and interconnections over 100 different points where we can help our investor owned utilities, our cities. We are integrated in this project or any other project that some utility might need to build and is not allowed to do it, then the whole state, the whole Midwest suffers. And I assume regardless of where it's located there will be those that challenge the Environmental Impact Statement, and I understand their reason why, but we need this project. *C80*

Response: Thank you for your comment.

COMO has grown four to five percent every year for the last 30 years. We set an all-time peak January 31, last week. We use more electricity than we've ever used before, and we see this continuing throughout the next 30 years. We serve a high-low growth area around the Lake of the Ozarks. We connected more than 800 new homes last year for new service and we

see no end to this. We definitely need to have a new coal fire base load power plant for Missourians. C87

Response: Thank you for your comment.

It's obvious the need for the increased generation. C83

Response: Thank you for your comment.

One thing I'm very concerned about is that we end up like the state of California. Several years ago they didn't just have brownouts out there, they had complete black outs, because it's a scenario in which power plants weren't allowed to be built out there. It went from not out in my backyard to not on planet earth. I wouldn't want us to be in that situation.

I want it to be built properly with the proper equipment, which I really believe Associated is going to do. But we need the power plant, and we need to do that not just from an economic development standpoint, but we need to have the power and the studies show we need to have the power to do the key jobs in the state. C89

Response: Thank you for your comment.

We're going to have power shortages. C92

Response: Thank you for your comment.

With 30 seconds to go I'll summarize. We need a new power plant for the greater good of rural Missouri. We not only -- we need not only more power but we need affordable power. The key word is affordable. Be grateful to Associated Electric and our local co-op for their continued good service and in the future. What better place is there to build a new power plan than Carroll County? I sure don't want to wake up or lie awake at night worrying about if I'll have power in the morning or power five years from now. C94

3. Our plant has tripled its electric load over the years, and is now in the process of doubling its substation capacity due to further growth. The presence of adequate power capacity is of utmost importance for the growth of the renewable fuels industry in Missouri. NEMO Grain is only 1 of 4 operating ethanol plants in the state. Several other ethanol and soy diesel plants are either under construction or being planned in Missouri. Sufficient power is required to already be available in an area, before the site will be chosen for a plant. If it is not, the developers will move on to

another location, possibly in another state. Competition for these plants is keen. C18

These ethanol plants have huge economic impacts within an area and for the entire state. Almost all renewable fuel plants are built in rural communities, and these communities benefit greatly during the construction phase, and continually thereafter, once operations are begun. Although NEMO Grain employs only 43 people, the total economic impact of the plant approaches the equivalent of 2000 permanent full-time jobs across Missouri. C18

Adequate electric power, outstanding service, room for growth, and fair pricing are of utmost importance to the future of our industry in Missouri. Industrial growth, good jobs, and the growth and vitality of our rural and state economies depend directly on electric power being available. We strongly support the proposed Norborne project . C18

Response: Thank you for your comment.

But tonight I'd like to speak to you as president of the Missouri Renewable Fuel Association. Missouri Renewable Fuel Association represents all four of the now-producing ethanol plants in Missouri and the other two that are in the construction phase. This growing industry comprises the investment of many, many producers all across the state. Growing interests in ethanol and soy diesel is being seen across the state and this country. The benefits of these plants being located in rural Missouri brings economic benefits beyond belief. The cry all across this country as of right now is for energy independence, which is imperative for this country's energy security. As this renewable fuel industry grows, the demand for electrical then also grows. Adequate electrical power supplies at reasonable rates must be present to keep this industry growing and expanding. This state and this country must have the adequate electrical resources available to further expand this renewable fuels industry. C33

Response: Thank you for your comment.

We own a business. We use more elect every year. We work on new houses in the Rual area which is growing fast. We must have new power plants to keep up with the growth or we will run out of elect for our needs. C22

Response: Thank you for your comment.

I'd like to comment on this power plant will help rural development in our area. I am a member of Missouri Rural Electric Co-op in Palmyra. I manage Boars, Inc., which is a business which sends out 5,000 doses of swine semen per week to pork producers in Missouri, Kansas, Iowa, and Illinois. This 5,000 doses per week results in 260,000 doses per year. Both of those produce 1.3 million pigs or about 130 million dollars worth of pork. We have nine employees, some full-time and some part-time, plus eight drivers to deliver this semen. So we impact the economy in Shelby County and the surrounding area. Everything we do needs a good, affordable, reliable supply of electricity. The boars that we house are kept in 60 to 75 degrees whether the outside temperature is -1 degree like this week or 105 degrees as can get in the summer. The semen is maintained at 64 degrees, so you can see we rely on electricity. C35

Response: Thank you for your comment.

So having said that, let me explain this to you just a little bit. Over my life time, I have observed, as you have -- think about it -- as you have, how the farmers have appreciated the properties, they have improved their lives, they're improved their families' lives, they've improved their children's lives. You know that the farmers are the good stewards of this land that we live on. You have seen, in your lifetime, how the adequate supply of electricity has caused individuals to better themselves and also businesses.

Now, also, if you've been paying attention to the life that we live, that we have to have an adequate power supply for economic development in order to continue to go forward in this country and not backwards. So I say to you that, as a member of the Laclede Electric Cooperative, our cooperative is growing at about 20 percent per year for the last several years; and we have 35,000-plus meters. C43

Response: Thank you for your comment.

I live in town and have Ameren service there and, including a family business, spend many times as much with Ameren as with Three Rivers. But the Three Rivers service is very valuable to our cattle operation, which we operate on a farm six miles east of Linn. Federal, state and local agencies promote something called intensive grazing of livestock. This involves keeping livestock—in our case cattle—in a relatively small area called a paddock. Our cattle are not free to roam the entire farm, as was the case prior to 1999. The cattle are given enough grass in a paddock to get them through a designated period of time. I move our cattle daily. The grass is fresher. The manure and urine stays in the fields, rather than

get deposited in the woods and waterways. The cattle do not trample the roots of trees, thereby avoiding damage to the trees. The cattle do not have access to creeks, springs or the Gasconade River, and this reduces water pollution. To control the cattle we use electric fences—miles and miles of fence. Since the cattle do not have access to creeks, springs or the river, we have to provide them with water. This we do with a watering system that involved putting in 20,000 feet of water line and some 40 hydrants. Electricity had never been a problem with our grazing practices until last month's severe ice storm, which left us and many other people without power for up to a week. Without electricity, we had no energized fences and no water. Our only solution was to move our cattle to an area where they had access to flowing water. In one day a herd of 140 cows and their calves can cause a huge amount of damage to a spring branch. Fortunately we did not have turn in on the Gasconade River. That would have been even worse. This is why we need reliable electricity. C27

Response: Thank you for your comment.

The City of Camdenton is located within the Lake of the Ozarks region, which is one of the fastest growing areas in the State. For example, from 1990 to 2000, Camden County, which is where Camdenton is located in, was the third-fastest growing county in Missouri. The City of Camdenton is experiencing strong growth that is only going to continue for many years to come.

For example, the city is currently working with a developer on a \$133 million retail project that will construct approximately 760,000 square feet of space when all the spaces are completed. And we will have substantial growth as far as our residential housing in the next ten years. We have at least 600 new homes just within the City of Camdenton. Those projects need the power that this power plant is going to provide. C46

Response: Thank you for your comment.

In the 1980s my farm used about 1,000 kilowatts a per month. Last July which was one of the -- one our higher months probably, we used 16,000 kilowatts. A lot of this increase is in our turkey operation. If we would lose electricity on a 100 degree heat day, lose our fan, our foggers and our water, we'd have a terrible mess. In the 20 years that we have been -- had turkey farms on COMO we have never lost power long enough to even give us a scare. C53

Response: Thank you for your comment.

PUR-201 Questioning the Need

The next several paragraphs are comments provided from Commenter C13.

1. Quite frankly, and I'm sure you will check it out; AECI **IS** grossly exaggerating the (consumer) need for increased generation. C13

AECI has failed to meet the criteria that there is a need for more electrical generation in the immediate impact area, and their G&T distributors outside the impact area. In fact, RUS was informed of their creative math following the scoping meeting held in Norborne 2005.^{4,5} This information was obtained by simple arithmetic addition of data presented by AECI themselves. Since, and in addition to that data, a non-biased SERC prediction for this area is that the current total generation connected to the SERC systems exceeds projections for SERC regional load in the year 2015 by over 27,000 MW. Essentially, if AECI were to become non-existent immediately, it would have no effect in existing or projected energy needs. Neither this community, nor any other area needs AECI. This is a competitive market ... they need us! Thus, AECI's 688 MW plant's generation is ALL surplus, which will be sold on the open market. This is legally questionable as AECI is a "non-profit" member only provider, and allowed to sell a restricted amount of excess electricity (10%). A slick stunt if one can pull it off! Why? It's simple ... Greed! This whole project and AECI's behavior to date is better described in the Wikipedia internet encyclopedia as follows:

A confidence trick, confidence game, also known as a con, scam, grift or flim flam, is an attempt to intentionally mislead a person or persons (known as the "mark") usually with the goal of financial or other gain. Perhaps the promised PILOT money, \$500,000/yr that never arrived? No taxes *and* no payments in lieu of taxes? As stated above, a slick trick!

Very recently, Feb.8, 2007, at a public hearing concerning this same DEIS, both RUS and the public had a telling opportunity to witness AECI's tactics. Again we refer to Wikipedia and find:

A shill is an associate of a person selling goods or services who pretends no association to the seller and assumes the air of an enthusiastic customer. The intention of the shill is, using crowd psychology, to encourage other

⁴ 1.1 Current Generation Capabilities

⁵ Exhibit B: Bulk Power Systems Reliability Report – prepared by the North American Electric Reliability Council, 2006

potential customers unaware of the set-up to purchase said goods or services. Shills are often employed by confidence artists.

There were more than 50 of these "associates" used by AECl that evening.
C13

BACK TO BASICS...THERE IS NO CURRENT OR PROJECTED NEED BY AECl's MEMBER CO-OPS for additional generation!! C13

If there comes a time we actually do need additional electricity, there are many more capable, plus ethical companies that deserve the rewards of honesty. Enough is enough! C13

Rather than turning this area of fertile land into a future superfund site for ABSOLUTELY NO NEED because of politics, bureaucracy, avarice, lies, and ignorance, (any redundancy is incidental), let's work together, aboveboard, to meet whatever our future needs actually may be, safely. C13

End of comments for this topic provided by Commenter C13.

The next several paragraphs are comments provided from Commenter C15.⁶

AECl has represented they are seeking financing and approval of this proposed project "to construct electric -generating facilities to meet its members' growing needs." (Cover Sheet - Abstract); and further represented the projected future need is based upon a study performed in 2004, projecting- a 3.2% per year growth in energy sales through 2025 (Pg. ES-2). C15

This was the primary information utilized to move this project through the Carroll County Commission, which now brings us to this point in the process. However, certain information has come to the attention of the local citizens with respect to AECl's projections... namely a **2006** Bulk Power Systems Reliability Report - prepared by the North American Electric Reliability Council.

Review of the aforementioned report punctures AECl's over inflated balloon...regarding the projected future electric supply needs for its members. The proposed project is to be located in the SERC region of the country which is comprised of fifteen (15) states, including portions of Iowa, Oklahoma, Illinois, Tennessee, Arkansas, Louisiana, Texas, Florida and the entire state of Missouri.

⁶ Two sets of very similar comments were submitted by Commenter C15; they are combined here.

The North American Electric Reliability Council has determined, in conjunction with its members (Regional Self Assessments) the following for SERC:

The 2006 summer total internal demand forecast is 188,763 MW and the forecast for 2015 is 226,921 MW. The average annual growth rate over the next ten years is 2.1 percent. This is the same as last year's forecast growth rate. The historical growth rate over the last five years averaged 1.9 percent. (Pg 90)

The SERC region has significant demand response programs. These programs allow demand to be reduced or curtailed when needed to maintain reliability. The amount of interruptible demand and load management is expected to decline slightly over the forecast period from 4,980 MW in 2006 to 4,838 MW in 2015. These amounts are comparable to last year's [2005] projections. In addition to the reported interruptible demand and load management, other significant demand-side management programs are also available to maintain reliability in the region. (Pg 90)

The actual annual electric energy usage in the SERC region during 2005 was 962,054 GWh. The forecast annual electric energy usage in the SERC region during 2006 is 973,215 GWh. This is an increase of **1.2** percent. The forecast annual growth rate in energy usage for the region over the next ten years is 1.7 percent, which is the same as last year's forecast growth rate. The historical SERC growth rate for the last ten years has been 2.1 percent. (Pg 91) (Emphases Added)

SERC believes that capacity resources will be sufficient to provide adequate and reliable service for forecast demands throughout the long-term assessment period. The 2006 forecast for capacity margins show that the margin is projected to remain at or above 14 percent throughout the ten-year period. Collectively, SERC members are projected to be net sellers of firm power across regional boundaries throughout the ten-year period. (Pg 91) (Emphases Added)

Effective January 1, 2006, SERC membership expanded to include several members in the central part of the country, resulting in the creation of a fifth SERC subregion (Gateway subregion). The Gateway subregion is comprised of the following SERC members: Ameren, City of Columbia, Missouri, Electric Energy, Inc., Illinois Municipal Electric Agency, and Southern Illinois Power Cooperative. All but Electric Energy, Inc. are also members of the Midwest ISO. (Pg 90) (Emphases Added)

Note that AECl is not included in this subregion. This will become significant in the information presented below and will support my conclusions at the end of this section.

Gateway

Demand - The 2006 summer net internal demand forecast for the Gateway subregion was 17,611 MW and the forecast for 2015 is 19,606 MW. The average annual growth rate over the next ten years is 1.2 percent. The historical growth rate has averaged 1.3 percent. (Emphases Added)

Energy - The 2006 annual electric energy usage forecast for the Gateway subregion was 80,220 GWh and the forecast for 2015 is 88,818 GWh. The forecast growth rate in energy usage is 1.1 percent. Energy consumption for 2006 was forecast to be 1.5 percent more than the 2005 actual consumption of 79,028.

Resources - Projected capacity margin was 31.3 percent for the 2006 summer, and remains above 31 percent over the remainder of the planning period. (Emphases Added)

Transmission - Planned transmission additions include 111 miles of 345-kV lines. Planned reinforcements in the Jefferson City, Missouri, area are scheduled for completion in 2008 which would increase transfer capability from SERC (Gateway) to SPP [subregion].

Capacity resources in SERC are expected to be adequate to reliably supply the forecast firm peak demand and energy requirements throughout the long-term assessment period. Significant generation development has occurred in the SERC region during the past few years, resulting in thousands of MW of uncommitted generating capacity. Some of this generation can be made available as short-term nonfirm or potential future resources to SERC members and others. (Pg 18)

The survey indicates that an additional 1,617 MW of generation plant capacity is expected in the SERC region for the 2006 summer, the vast majority of which have signed or filed interconnection agreements by the time of the survey. In the near-term planning horizon, significant speculation exists about the amount of generation that will be added (approximately 6,000 MW for 2008 and 2009 , but the amount to actually be constructed will likely change before the next annual survey. The reported generation development decreases sharply beyond 2010 as plans for the longer term have not been finalized. The majority of generation development was reported for the first six years and totals

24,100 MW. This compares favorably to the 21,000 MW reported to be operable in the first six years of last year's survey.

During the public meeting an AECl Representative (See transcript for name/position) confirmed AECl would require an additional 84 to 256 megawatts of base-load power through 2011 (not quite sure of the numbers, but they were stated to range from no less than 80 nor more than 300 megawatts). Turning to the SERC's report we find the following: (Pg 93)

As of December 31, 2005, SERC's generation development survey indicated that the total generation connected to the transmission systems in SERC was 248,390 MW. An additional 1,617 MW of generation was planned to be connected to the transmission systems by July 1, 2006, bringing the total to just over 250,000 MW. These values differ slightly from the EIA-411 data due to inoperable capacity and mothballed units. The current total generation connected to the SERC systems exceeds projections for SERC regional load in the year 2015 by over 27,000 MW. If all of the proposed capacity is built, installed generation could exceed forecast peak demand by more than 63,000 MW in 2015. This is significantly more than the generation capability needed for reliability/adequacy in the region. (Pg 93) (Emphases Added)

Conclusions (1)

Two issues come to mind regarding the above referenced information. First ... with respect to the North American Electric Reliability Council's report, AECl may have misrepresented the need for additional base load electrical generation. Second. . .it may be logically deduced from the foregoing information that AECl's true intent would be. . . to garner additional income (quasi-profits or income over expense) from the sale of excess electrical power generated by the proposed plant. With current total generation (speaking of 2006) exceeding projections for 2015, AECl's proposed project is not otherwise necessary to meet the demands of its members (those listed in their project proposal). Entering such a market appears contrary to AECl's statutorily mandated nonprofit purpose i.e. providing electrical power to its members! I find no statutory authorization for AECl to become a *net seller of firm power*... that power generated in excess of member requirements. . . or to build a base load plant essentially earmarked for that purpose⁷.

⁷ Note that the AECl purchased power analysis specifically excludes transmission costs as a factor in base load calculations (2004 dollars (verses 2011 dollars - projected in-service date); it also lacks specifics as to what the calculations are based upon. I suggest. . . this omitted cost and

Where I come from (not being a native Missourian) such aforementioned actions, along with the continual use of disingenuous visual representations of a proposed project, would be considered a "bait and switch (if an existing object) or "blue sky", being the lesser of other related terms, (suggesting or implying above and beyond that which will truly be provided - if a proposed plan). In both instances such actions would be considered unlawful. Yet ..., I suppose that if one were well heeled in terms of funds, property and political prowess.. . even the judicial powers would redefine the law for a given purpose??? Such was recently exemplified in a Missouri Supreme Court decision (*redefining the term "commercial" (found within in a list of other terms unrelated to electrical generation) to include the term "utility". Such a decision having been rendered, would be and is contrary to the overall intent of a limiting provision of the Missouri Constitution.*) I cannot fathom how a court of law would deem it had the authority, or the jurisdiction, to alter (in a manner of speaking - amend) a constitutional provision in order to preserve corporate profits.. . and doing so at the expense of the peoples mandated right to vote on such amendments??? Guess an old adage readily applies in Missouri for the expedience of corporations.. . Money Talks!!!

There exists, at this point in time, sufficient reliable power in the grid to more than offset AECI requirements through 2015. Allowing ample leeway for AECI's purported growth rate beyond 2011, we apply: 400 MW requirement v. 27000 MW excess grid availability, as of July 2006. (The report also provides: for the period ending in 2015 excess reliable power availability in the grid should be as much as 63,000 MW).

Accordingly, with respect to the information provided herein and heretofore, the EIS assumptions that establishing a base-load generation plant is more cost effective than buying from the grid... is without merit and unsupportable. C15

Conclusions (2)

There exists, at this point in time, sufficient reliable power in the grid to more than offset AECI requirements through 2015. Allowing ample leeway for AECI's purported growth rate beyond 2011, we apply: 400 MW requirement v. 27000 MW excess grid availability, as of July 2006. (The

information may indicate purchased power as the reasonable alternative! The calculations appear skewed to the desired result! (Pg. 2-6,2-7) The true premise considered was not cost of base-load over transmission... but retained income and tax benefit between the two scenarios.

report also provides: for the period ending in 2015 excess reliable power availability in the grid should be as much as 63,000 MW). C15

Accordingly, with respect to the information provided herein and heretofore, the EIS assumptions that establishing a base-load generation plant is more cost effective than buying from the grid... is without merit and unsupportable. C15

The relative cost of transmission interconnections (building, operating, maintaining and purchasing power), even with stretching ones imagination, would not approach the costs of a base-load generation facility, with its supporting transmission infrastructure! With more than sufficient power available in the grid to meet the AECl needs for their projected period, approval of this proposed generation plant belies logic and prudence... from the ratepayer's standpoint... at the low end of the spectrum. Yet, there would be logic in such approval... if premised upon an overall monetary gain for AECl... but of course... this is not the foundation upon which an RUS approval is based... or is it? This reminds me of a cartoon (a little king on his balcony... looking down upon his subjects... shouting): "The Golden Rule... them who have the gold... makes the rule!" C15

I state again, AECl entering into a net sellers market appears contrary to their statutorily mandated nonprofit purpose i.e. providing electrical power to its members! I find no statutory authorization for AECl to become a net seller of firm power... to untold buyers of firm power outside of its membership... or to build a base load plant essentially earmarked for that purpose (See RSMo Section 394.080.1(4)⁸). C15.

End of comments for this topic provided by Commenter C15

The draft EIS assumes the need for additional electric generation. Other comments have addressed this area in depth, I believe. From what I have read, there is no need for additional generation in this area, which leads me to believe that the real reason the plant is being built is to have excess power to sell on the nationwide grid. C23

Response: The proposed project need is based on the projected capacity and demand within AECl's system (Section 1.4 Purpose

⁸ Except as provided in section 386.800, RSMo, to generate, manufacture, purchase, acquire, accumulate and transmit electric energy, and to distribute, sell, supply, and dispose of electric energy in rural areas to its members, to governmental agencies and political subdivisions, and to other persons not in excess of ten percent of the number of its members[.] ([RSMo] 386.800. 1. No municipally owned electric utility may provide electric energy at retail to any structure located outside the municipality's corporate boundaries after July 11, 1991[.]) (Emphases Added)

and Need), without reference to capacity or demand outside AECl's system. AECl is required to provide these projections as part of their loan application.

Power is available from others through direct purchase or participation in another company's project, and AECl was required to evaluate those alternatives through solicitation of proposals. Those alternatives and the reasons for eliminating them from detailed study were described in the Draft EIS Sections 2.2.1 *Power Purchase Agreements* and 2.2.2 *Participation in Another Company's Project*.

The report referenced by two commenters, *2006 Long Term Reliability Assessment*, is a report of the North American Electric Reliability Council⁹ (NERC) (October 2006). According to the report, some regions of the US will have surplus power and some will not; but nationwide a deficit is projected by 2015. Information from the report is summarized below.

There are eight regional reliability councils in the U.S. The Southeast Reliability Council (SERC) includes parts of Missouri and several other states in the southeast part of the U.S. Figure 37 of the referenced report does show that 2006 capacity in SERC exceeds projected 2015 demand by 27,900 MW (and that, with projected capacity additions, 2015 capacity will exceed 2015 demand by 63,066 MW). However, SERC is unusual among the reliability councils. The same report states that nationwide "Electric utilities forecast demand to increase over the next ten years by 19 percent (141,000 MW)...but project committed resources to increase by only 6 percent (57,000 MW)." The report identifies the following action item: "Electric utilities need to commit to add sufficient supply-side or demand-side resources, either through markets, bi-lateral contracts, or self supply, to meet minimum regional target levels."

ALT-300 Alternatives, general

1. Section 2.2 (pages 2-6 to 2-1 87), Alternatives Considered But Eliminated From Detailed Consideration: The title of this section and that of the section that follows (Section 2.3, Alternatives Assessed in Detail) leads the reader to believe that Section 2.2 provides information only for the alternatives

⁹ NERC's stated mission is to improve the reliability and adequacy of the bulk power system in North America.

that were not carried forward for detailed analysis. In fact, the section provides moderately detailed evaluation of all of the alternatives that were investigated to meet the purpose and need of the project, including power from outside sources, self-build alternatives, technology alternatives, and siting alternatives. It provides sufficient information on each alternative to allow the reader to understand why the alternative was, or was not, carried forward for detailed evaluation of the potential environmental consequences of the alternative. Accordingly, we suggest that the title of the section be changed to more accurately describe the information that is actually provided. The revised title might read as follows: "Evaluation of All Alternatives to Determine Which Alternatives Are Retained for Detailed Consideration." C7

Response: The title has been changed. A short title is included, and the first paragraph has been revised to explain what is included.

2. AECI states, "For coal deliveries from the BNSF line to the north, the western option and sub-options, which generally follow the West Fork of the Wakenda Creek, had the least favorable score and were eliminated from further consideration. " Again, the reasoning defies logic and is not the truth. This *is exactly* the route AECI plans to use. Why disrupt the existing environment, especially creek drainage basins, by construction of more rail spurs, when upgrading existing facilities would allow them to continue using the same rail system. Given the fact that Wyoming is hard pressed to handle additional coal transport anyway, why add to the expense? This certainly does not make coal an economical solution for future energy needs. C13

Response: The quoted text is correct as stated. The West Fork was eliminated and the eastern option, along Wakenda Creek, is part of the Proposed Action. Existing rail systems will be used; however, a rail connector from the existing systems to the plant is required. Upgrading an existing facility, as the commenter suggests, was addressed in the Draft EIS in Section 2.2.10 *Consideration of Adding Capacity at Thomas Hill*. While using existing rail connectors was an advantage of that alternative, other disadvantages outweighed the advantages. Additional coal transport would be needed in either case.

ALT-301 Renewable Energy, general

1. Secondly, there are already a number of industries manufacturing and marketing *ethanol* and/or *biodiesel fuel cell* technology specifically to

produce electricity. In fact, our own U.S. Rep Ike Skelton, D-Mo., the new chairman of the House Armed Services Committee, is interested in the technology for possible use by the military.¹⁰ Here we arrive at an interesting issue. This DEIS has spent hundreds of pages, most unsubstantiated by any research or testing, explaining why all the listed alternative renewable energy choices were rejected, and I might add, completely overlooking extant and viable systems. Could it be that RUS only guarantees financing for oil, gas, and coal electrical production? Has RUS ever promoted a renewable fuel alternative? This question might be more suitably addressed by the General Services Administration. Hopefully, it will be answered before the next phase. C13

Response: The part of this comment related to ethanol and/or biodiesel fuel cell technology is discussed under ALT-304.

The Draft EIS discussion of renewable energy sources begins on page 2-9 and ends on page 2-34 (26 pages, not “hundreds”). Information (with all sources included) on cost, resource availability, feasibility, and impacts was used to evaluate renewable energy alternatives, as detailed in that section. In no case was independent testing needed to evaluate an alternative.

RUS does not guarantee financing for only certain alternatives, and, yes, RUS does promote renewable energy. Section 9006 of the 2002 Farm Bill mandates that the Secretary of Agriculture create a program to make loans, loan guarantees, and grants to “a farmer, rancher, or rural small business” to purchase renewable energy systems and make energy efficiency improvements.¹¹ RUS implements this program.¹² Section 9006 was funded at \$23 million in the FY07 Continuing Resolution, and is funded at approximately \$35 million in the FY08 budget request and, in fact, also has support from the President's 2007 Farm Bill proposal, which calls for a funding increase to \$71 million annually beginning in 2008. The program already is a strong success, having leveraged nearly one billion dollars in investments in its first four years. Section 9006 has invested \$87 million in grants and \$34 million in loan guarantees for over 800 renewable energy and energy efficiency projects in 42 states. When completed, these projects will yield 330+ megawatts of wind power, 170 million gallons

¹⁰ Exhibit D:

¹¹ The Farm Security and Rural Investment Act of 2002 (Pub. L. 107-171) (2002 Act) established the Renewable Energy Systems and Energy Efficiency Improvements Program under Title IX, Section 9006 (7 U.S.C. 8106).

¹² 7 CFR Part 4280. Federal Register, Vol. 70, No. 136, July 18, 2005.

annually in biofuels production, millions of dollars in annual energy savings, and over 1 million tons of annual CO2 reductions. This national program improves the country's energy security, environmental quality and economy.¹³ Renewable fuels are discussed in detail in Section 2.2.3 *Renewable Non-Combustible Energy Sources* and Section 2.2.4 *Renewable Combustible Energy Sources: Biomass*.

ALT-302 Conservation and Efficiency

1. In its Alternatives Report, Parts 4.3.3 and 5.1, AECI takes the position that it is largely powerless to pursue the most important alternatives to new generating capacity: energy conservation and efficiency programs (also known as Demand Side Management (DSM) and load management). The DEIS fails to provide a rigorous exploration and evaluation or a reasonable basis for rejecting such programs as an alternative to be discussed in detail, as required by 40 CFR 1502.14(a). *C10*

AECI says it is contractually obligated to provide energy to its customers and that only the distribution co-ops can do DSM Alternatives Report, part 4.3.3). At the same time, they admit they can and do send "appropriate price signals" to their members, which is a large part of how DSM works — by offering incentives to reduce energy use. AECI does not explain why, if it can contract with its customers to provide electricity, it cannot also contract to provide other energy services. Co-ops have broad powers under Missouri law over the delivery of energy services. §§ 394.080.1 and 394.310, RSMo. *C10*

AECI is a member of the National Rural Electric Cooperatives Association, whose members offer DSM programs; see <http://www.nreca.org/Documents/PressRoom/nationalplanforincreasedenergyefficiency.pdf>

It is also a member of Touchstone Energy Co-ops, which also touts its members' efficiency programs; <https://touchstoneenergy.cooperative.com/public/programs/EnergyEfficiency.htm>. *C10*

Conservation and efficiency are now highly developed methods for significantly displacing demand for new generation, meeting demand in alternative ways and with cost savings. See, e.g., http://www.ornl.gov/info/ornlreview/rev28_2/text/uti.htm; <http://www.aceee.org/press/u071pr.htm>. The surge in DSM activity is

¹³ From USDA/RD 04-11-07.

largely related to the imperative to avoid dangerous climate change, to be discussed further below. Reducing demand is an indispensable alternative to be considered against building a coal-fired power plant. C10

In the Alternatives section AECI/URS does not address energy conservation. I live in Austin, Texas, a city which has had aggressive conservation measures in place for 25 years. In that time, with a ballooning population, the city has saved enough energy to keep from having to build another power plant. Conservation is certainly better for the environment and better for individuals and businesses (lower electric bills, less pollution), but does not necessarily lead to profits for AECI, which is, I'm sure, why they did not address this alternative. Although they are a "cooperative" they seem to have a firmly entrenched profit motive. C23

Another alternative that was not addressed at all is energy efficiency and conservation. Think what could be accomplished if instead of building this power plant, the money would be used for an energy efficiency program. And think of the amount of carbon reduction that could occur, and the money that would save AECI in future carbon taxes and regulation.

From the standpoint of true economics it seems to me that Associated used at least even a part of the \$1.3 billion dollars that they need to build this plant for energy efficiency and conservation. Educate the public on how to stop wasting electricity. There are many things that can be done to stop wasting electricity and perhaps even enough to prevent this plant from having to be built. C29

There is no need for the facility if current generation figures are reviewed from a less biased perspective, transmission improvements are made, and aggressive conservation measures are put in place. They could provide power at even less cost by supporting conservation measures at all levels. As a customer of a distribution cooperative, which buys power from AECI, we have been notified of a 10% rate increase with possibly more to come to pay for building more generation facilities. I would much rather my added fees went toward energy efficiency education and support. The fact that there would be slightly higher costs to locate somewhere else also does not make the Proposed Action the "only practicable alternative." C23

Response: A detailed discussion of energy efficiency and conservation as an alternative has been added to the Final EIS as Section 2.2.13 *Energy Conservation and Efficiency*. Note that the topic of ACEEE press release referenced in the ACEEE website site is reduction in peak demand, which is not relevant to the baseload needs of this project. (The subject ACEEE document is titled

Examining the Peak Demand Impacts of Energy Efficiency: A Review of Program Experience and Industry Practices.)

Note that the “only practicable alternative” (referenced by commenter C23) refers specifically to construction in a floodplain (see Section 3.5.1.2 *Executive Order on Floodplains*). Section 3.5.2.3.2 discusses the practicability of an upland site compared with the proposed Norborne Site, and compliance with Executive Order 11988.

ALT-303 Solar and Wind Power

1. Why aren't we using alternative energy production methods such as solar and wind power? C14

You know, I like the idea about the wind farms; I think it's pretty neat. But them wind farms were 20 percent below national average. That technology may come later. C39

And Associated and their efforts have been very strong and made investments in wind generation and is open in exploring other alternatives to renewable resources. C41

Response: Wind and solar, and the reasons for their elimination, are discussed in the Draft EIS Sections 2.2.3.3 *Wind* and 2.2.3.4 *Solar*. AECI's service area has limited wind resources, as discussed in Section 2.2.3.3.3 *Available Wind Energy in AECI's Service Area*. AECI's investments in wind projects are discussed in Section 2.2.3.3.4 *Wind Energy Projects in Missouri*.

ALT-304 Biomass, general

1. AECI goes on to state, 2.2.4.3 Alcohol Fuels, "*Biomass alcohol fuel, or ethanol, is derived almost exclusively from corn. Its principal use is as an oxygenate in gasoline (EIA, 2005b). It is not used to produce electricity.*" Firstly, ethanol can be, and is, derived from many other plants than corn. A great deal of agricultural science has been tried and is successfully being used to produce ethanol, e.g., sugar beets, sugar cane, sorghums, etc. More research is continuously being conducted at major universities world wide...all of whom would have, and will be happy to share their knowledge to anyone interested...the key word here is "interested". C13

Secondly, there are already a number of industries manufacturing and marketing *ethanol* and/or *biodiesel fuel cell* technology specifically to

produce electricity. In fact, our own U.S. Rep Ike Skelton, D-Mo., the new chairman of the House Armed Services Committee, is interested in the technology for possible use by the military.¹⁴ C13

Response: The commenter is correct in that ethanol can be derived from plants other than corn. Some, such as sugar cane, which is extensively used as a fuel in Brazil, are much more efficient than corn. In the Final EIS, Section 2.2.4.3 *Alcohol and Biodiesel Fuels* has been revised to clarify that in the U.S., corn is the principle source of ethanol.

The department supports consideration of generation from biomass as a measure to mitigate the adverse environmental impact of CO₂ emissions. Section 2.2.4.2 discusses possible projects to generate electricity from waste biomass. The EIS discusses several possible technologies and waste streams such as biomass co-firing and generation from landfill gas (LFG). C17

The DEIS cites several considerations that may eliminate generation from waste biomass as an alternative to meeting full baseload requirements. These technologies may still serve as viable measures to mitigate the proposed Norborne plant's GHG impact. Biomass co-firing could occur elsewhere and would not necessarily have to be implemented at the Norborne site to mitigate the impact of Norborne's GHG emissions. In addition to generating from a renewable source, landfill gas projects prevent emissions of methane, a highly potent GHG. C17

Response: Thank you for your comment. The Draft EIS addresses biomass co-firing, wind generation, and other technologies that AECI uses or is currently developing, that result in reduced or no GHG emissions.

ALT-305 Carbon Capture and Sequestration (Storage)

1. AECI's primary justification for pulverized coal is its cost-effectiveness relative to other options. (DEIS Part 2.2.7 (Jan. 2007); Alternatives Report Part 5.9.) The DEIS briefly notes the prospect of Congressional action on global warming, which would likely result in a cap-and-trade pollution credit system or a straight tax on carbon dioxide emissions (Part 2.2.5.3.1); and the expense and unproven nature of carbon sequestration, also known as carbon capture and storage (CCS), the technique for piping carbon dioxide to a place where it can be safely held underground. (Parts 2.2.5.3.2, pp. 2-

¹⁴ Exhibit D:

54 and 2-61-2; Alternatives Report 5.4.4.2, p. 5-16; ES 8-9.) Bills in Congress rely heavily on CCS to mitigate emissions from power generation, and Sens. Bingaman and Boxer have warned utilities that if their new coal plants are not equipped for CCS they should not count on their being grandfathered in under legislation; see Dallas Morning News, http://www.dallasnews.com/sharedcontent/dws/dn/opinion/viewpoints/stories/DN-bingaman_19edi.ART.State.Edition1.290de70.html. C10

These are mitigation measures which need to be taken into account under 40 CFR 1502.16(e, f and h) and 1505.2(c), despite their uncertainty; and their costs and uncertainties need to be evaluated as part of the “cost-benefit” analysis under NEPA § 102(2)(B). Ignoring likely future environmental costs could prove to be false economy. Maybe pulverized coal isn’t so cost-effective after all. C10

What legislation would you require to modify the proposed design or the operating plant to reduce carbon release at a later date? C26

I would -- even though IGCC was not the preferred alternative selected, I would ask that AECl and your design contractor try to assure that the pulverized coal combustion technology that you did use is somehow flexible enough so that in the future, if we need to capture combustion carbon, we can do it cost-effectively. C26

You rejected Integrated Gasification Combined Cycle (IGCC) technology (section 2.2.5.3.2) based on higher cost and lower availability than Pulverized Coal (PC). What legislation would you have required to select IGCC in place of PC (i.e. tax credits to offset higher risk and first cost, grants to offset cost of redundant equipment to boost availability, etc.). What legislation would you require to modify the proposed design or the operating plant to reduce carbon release at a later date? C26

If you are required to reduce carbon released to the atmosphere from coal combustion during the proposed plant's operating lifetime, how will you accomplish it? C26

Is your proposed design flexible enough to cost-effectively allow for changes during the plant's construction or operation to reduce carbon released to the atmosphere? C26

Response: In response to these comments, substantial additional information and assessment has been added to Section 2.2.5.3.1 *Coal—Greenhouse Gases (GHGs)* in the Final EIS, as summarized here:

Potential Regulation of CO₂. This unnumbered subsection (titled ***Potential Regulation of CO₂ and Other GHGs*** in the Draft EIS) has been further subdivided: The first subheading in this subsection is titled ***Current governmental programs and proposals*** and includes information from the Draft EIS plus new information that became available after the Draft EIS was issued. Following that, a new subheading titled ***Business and organization attitudes*** has been added, with information from very recent documents issued by the U.S. Climate Action Partnership (USCAP) and the National Commission on Energy Policy (NCEP) (both issued since the draft was released). A short subsection titled ***Public attitudes about global warming*** was also added to the Final EIS.

Cost of Regulation of CO₂. This new subsection has been added following ***Potential Regulation of CO₂.*** The discussion addresses only CO₂, the major GHG relevant to electric power generation.

CO₂ Capture and Storage (CCS). For both supercritical pulverized coal (SCPC) and IGCC technologies, in the Final EIS the discussions of capture and storage (also called sequestration) have been expanded to include more information about the current state of the technologies and estimated cost ranges (including both existing and new facilities). These discussions are in Section 2.2.5.3.2 ***Coal—Energy Generation Options.***

Other items in the comments:

Carbon Mitigation and Future Environmental Costs. Both AECI and RUS are aware of Senators Bingaman and Boxer's statements referenced by one of the commenters. Both the USCAP and the NCEP documents discussed in the Final EIS Section 2.2.5.3.1 ***Coal—Greenhouse Gases (GHGs)*** urge Congress to pass carbon-controlling legislation as soon as possible. The NCEP document explicitly requests Congress and the President to "Ensure that new coal plants built without CCS are not "grandfathered" (i.e., awarded free allowances) in any future regulatory program to limit greenhouse gas emissions." The Massachusetts Institute of Technology (MIT, 2007) document also referenced in the updated EIS sections makes a similar recommendation.

A commenter notes that "bills in Congress rely heavily on CCS to mitigate emissions from power generation."

While there may be heavy reliance on CCS, the capture and storage technologies are not currently available for anyone planning a power plant. The MIT study (*The Future of Coal*, 2007) and the latest study by the Intergovernmental Panel on Climate Change (IPCC, *Carbon Dioxide Capture and Storage*, 2005) both acknowledge this. Capture has not been demonstrated at the scale necessary for a major power plant. For carbon sequestration, even a demonstration project, which would need to precede full-scale implementation, “is an enormous and complex task and it is not helpful to assume that it can be done on a fixed schedule, if for no other reason than the need for required regulatory, financing, and siting actions” (MIT, 2007). The MIT report recommends that the U.S. undertake three to five large-scale sequestration demonstration projects “in order to answer the outstanding technical questions concerning CO₂ sequestration.”

The recognition that CCS is far from the implementation stage, and that non-fossil fuel options to meet electricity demand are limited, is implicit in the bills in Congress and almost all other proposals, which favor a gradual increase in carbon penalties over a period of years. The underlying assumption of this approach is that the gradually increasing penalties will be incentive for development of CCS technologies, which currently do not exist at the scale to implement on a major utility power plant.

A reliance on CCS in bills and proposals is also recognition of the very high likelihood that coal will be a fuel source for a very long time to come.

Modifications that May Be Made to the Plant Design. The possibility of incorporating design features to facilitate future addition of CCS, or to make the facility “capture-ready” is addressed in the added language in Section 2.2.5.3.2 *Coal—Energy Generation Options*. The MIT 2007 report concludes that the concept of a “capture ready” IGCC or pulverized coal plant “is as yet unproven and unlikely to be fruitful.” The report recommends that “new coal combustion units should be built with the highest thermal efficiency that is economically justifiable,” since this will reduce the net effect of a carbon charge (for pulverized coal, that’s SCPC) (MIT, 2007).

ALT-306 Carbon Tax or Cap and Trade

Closure Due to Lack of Financial or Political Feasibility: This plant could become financially unfeasible if carbon regulation imposes fees for CO₂

emitted or if the cost and/or transportation of coal become prohibitively expensive. Other factors could cause the plant to be only partially constructed, then closed. An analysis of the socio-economic and environmental impacts that would occur should AECI pass carbon taxes on to the consumer or if the plant faced closure should be performed, including what will happen to the land used and how it will be restored. C29

Response: A discussion of the potential for carbon costs has been added to the Final EIS Section 2.2.5.3.1 *Coal—Greenhouse Gases (GHGs)*. As discussed in that section, coal is likely to remain an important fuel source for the U.S. and most of the world, under any reasonable scenario of carbon pricing. If some form of carbon charge is legislated, that added cost, along with all costs to produce electricity, would be reflected in the consumer price of electricity. This would be true not only for AECI, but for all the utilities who supply the 53 percent of electricity that comes from coal in the U.S. The impact would be that most, if not all, Americans would be paying more for electricity than they would without a carbon charge.

Since the U.S. has a very large supply of coal relative to other fossil fuels, the cost of coal or coal transportation becoming prohibitively expensive relative to other fuel sources appears very unlikely, based on available information; that issue is not addressed in the EIS. Plant closure also appears to be an unlikely scenario and is not evaluated.

ALT-307 Fuel Cells, Ethanol, Biodiesel

The next several paragraphs are comments provided from Commenter C13.

1. As you might have noticed at the Feb. 8 DEIS hearing, my comments re "con-artists" was not far off the mark. I doubt anyone observing AECI's tactics that evening was not aware of their objective, or would debate their motive...limit any real comments on the draft EIS. This site may help explain how they were able to muster their troops so readily. http://www.aeci.org/Resources/Documents/AECIPNJanO72MB_000.pdf An ethical and transparent business would have no need for such tactics. C13

As I noted, this was the first "open" public meeting since your scoping hearing, and as AECI was in no position to defy RUS, they used the "shills" you observed. Normally, their meetings are held w no public notice, bulletin board notice only, at 9 am, and earlier, and the details labeled privileged. Minutes, if any, are not released until weeks after our attorney submits a

Sunshine request; and scant at that. (There is ongoing and future litigation on this subject, which hopefully will make ANY involvement by RUS a moot issue.) Unfortunately, 50+ so-called DEIS comments from people brought in by AECl who have never even glanced at the EIS, put a cloud on this well intentioned process. By rights, such comments should not have been allowed and ought to be expunged from the record. (Including the same type of behavior at the other DEIS comment hearings.) C13

This being said for the record, I truly AM interested in RUS's policy re alternative electrical generation. One of the speakers DID make an interesting point. ..it's all about the grid. Perhaps that IS a problem resulting from a tiered grid system? The advantages of fuel cell technology are that they are basically "plug and play". Yes, they may be connected to existing transmission systems, but don't need to be. In fact, they were the main "band-aid" used in the past when the grid failed! In addition, it seems almost serendipity to use this type of electrical generation in an agro-community that already has the renewable fuel and grows the fuel sources. And, as it will not involve union membership, employment estimates will be genuine! (The Malta Bend plant and the two Carroll County plants also offer on-the-job training for new employees.) C13

Quite frankly, and I'm sure you will check it out; AECl IS grossly exaggerating the (consumer) need for increased generation. You may have read the editorial in the New York Times, Feb. 25, "Truth about Coal". Senators Boxer and Bingaman are seriously "gunning" for coal plants, and appear to have a lot of support on the hill. Carbon caps and/or tax, cost of transportation, (Wyoming has absolutely no more rail space even if they gave coal away), and superior generation methods will not make coal a viable fuel in the near future. In addition, you may want to look at a newer technology that surpasses current pollutant control devices at <http://www.wowenergies.com/>. These types of systems may allow existing coal and oil plants to upgrade with a net decrease in emissions, less hazardous wastes, and probably much cheaper than new construction of 200 year old technology. (Many by-products can be extracted and sold; especially the uranium!) Cost effective and more efficient up-grading would also save them the expense of new transmission and rail corridors, not to mention negotiating new transportation contracts, litigation, and mitigation costs. If they move fast enough, it might even save them from being shut down completely.

The above technology would also be useful in removing the ketones, aldehydes, and much of the CO₂ from ethanol plants. The second costliest unit, after energy to distill, in an ethanol production plant is the molecular sieves needed to make it anhydrous for internal combustion fuel, which, in

turn, adds more greenhouse gases to the environment. Fuel cell electricity, quite the contrary, performs better with 5-10% water! In a normal reflux type still, this is the normal distillate percentage. C13

Secondly, they did not even consider fuel cell electrical production, which is the cleanest technology extant. Again, AECl's lack of awareness of current technology is a pathetic reason to dismiss the alternative. It would seem that the most logical method in an agricultural community would be to use agricultural fuels, both produced and renewable in that same area, for electrical production. If there were feasibility issues with this alternative, they should have been listed and discussed. Instead, it was completely absent. C13

End of comments for this topic provided by Commenter C13.

The next several paragraphs are comments provided from Commenter C15.

AECl represents they have considered alternatives to the proposed project. However, in reviewing the chart on Pg. ES 3 I find no in-depth consideration of Fuel Cell Technology (although mentioned within a discussion of distributed energy¹⁵ Pg. ES 2-5). C15

Normally when the subject of fuel cells come up... a question arises... how can fuel cell technology benefit our needs? I will start with the following ... which was copied from the Website of FuelCell Energy... it provides:

FuelCell Energy, Inc. develops and markets ultra-clean fuel cell power plants that generate electricity with higher efficiency than other distributed generation plants of similar size and with virtually no air pollution. [essentially, nothing more than CO₂ and water] Direct FuelCell® (DFC®) power plants combine increased efficiency and reliability [providing] greater control over [] energy costs.

¹⁵ This DEIS Heading discusses applications of all such technologies (reciprocating engines, microturbines, fuel cells, photovoltaic, run-of-the-river, hydroelectric, and windmills). The statement(s) following thereafter exclude a specific discussion with respect to fuel cells. The limitations imposed concerning generation capacity (5 to 5,000 kW) are not appropriate nor are they fully applicable to fuel cells. Fuel Cells are currently available in the mega watt range. Related discussions on distributed generation, advanced later in the DEIS, indicate a relative impasse where redundant permitting and costs of individual units would not be financially prudent. However, review of applicable regulations would indicate that fuel cell technology is treated with certain exemptions to the process ... that point being moot in this instance. (for an alternate process, See: Reconcilable Electrical Energy Production in Farming Communities, below)

FuelCell Energy services over 50 power plant sites around the globe that have generated more than 140 million kilowatt hours, and conducts research & development on next-generation fuel cell technologies to meet the world's ever-increasing demand for ultra-clean distributed energy. C15

The original comments indicate CO₂ emissions from fuel cell technology thusly:

FuelCell Energy, Inc. develops and markets ultra-clean fuel cell power plants that generate electricity with higher efficiency than other distributed generation plants of similar size and with virtually no air pollution. [*essentially, nothing more than CO₂ and water*] Direct FuelCell® (DFC®) power plants combine increased efficiency and reliability [providing] greater control over [] energy costs.

The emissions indicated are based upon the use of fossil fuels for operations. I have no reliable information regarding emissions based upon ethanol or bio-diesel as the operational fuels. I would assume the lack of, or reduced, carbon in the fuel source would eliminate, or significantly reduce, CO₂ in the emissions stream... leaving essentially water and oxygen (referring to ethanol). There may be other emission concerns with these fuels (VOCs?), but the information is not readily accessible for this presentation. C15

The fuel cell alternative demonstrates significant reductions of environmental impacts from AECI's proposed project... a significant reduction on inappropriate use of important (flood plain) farmland... and a compatible resource for expanding local agribusiness... it's time to visit the economic impact this alternative technology will bring to the immediate area... verses that purported by AECI. C15

From a strategic standpoint the alternative plan presented bestows significant grid security. Have we not learned the lesson of massive grid interconnections where a mishap or mechanical failure would render complete disruption?. . . such as the blackouts of the entire northeastern portion of the country? Are we not aware of PlugPower, Inc.'s successful testing of fuel cells, which were installed on individual homes to provide electric, heat and air conditioning service? Do we recall this test was at the behest of a major southern utility in an effort to eliminate electrical transmission costs in rural areas? Looking back further in history ... do we not recall the first electrical generation demonstrated by Thomas Edison... the limited generation he

suggested of direct current by small strategically placed units? Do we recall his reasoning (reduced transmission losses, with greater grid security)... and the inherent longevity of light bulbs and motors run on direct current? C15

As provided in my Original Comments, this section includes: "from a strategic standpoint the alternative plan presented bestows significant grid security." Grid security, at this point in history, must also consider terrorist threats. In this light, it has been proposed at the federal level, that much smaller generation facilities... dispersed in various areas throughout the land... be not only considered... but planned and initiated. Why provide a target for radicals? C15

AECI, and that expressed within the DEIS, presume distributive generation is not cost effective and disruptive to the vitality of a utility. However, as presented here ... an electrical generation project in cooperation with alternative energy production (ethanol & bio-diesel), the farming community and a utility, will reduce AECI's fuel and operating costs to... (respectively) nonexistence and minimal (in comparison to the coal-fired proposal)... will not be located in a flood zone... will diminish environmental impacts for electrical generation to virtually none... will greatly expand the area's educational diversity, agribusiness, commercial and retail development, increase employment diversity, with related long term growth of the local tax base (not based upon a single project where property taxes have been significantly reduced and deferred), thereby transforming AECI into a proactive environmental, educational and economic benefactor ... a "Truly Good Neighbor". This should be the goals of EPA, RUS, AECI, Carroll County, and the Towns of Norborne and Carrollton. C15

FuelCell Energy has been brought to your attention for two specific reasons.

First... a personal meeting was had with FuelCell Energy early in 2006, requesting information concerning the probability of ethanol as a source of fuel for the technology. Information was provided that ethanol was the first fuel utilized during the development of this technology. In addition, the ethanol need not reach the state of compete distillation.. . there is a requirement for a specific water content.

Second... the AECl project is based in a farming community¹⁶, and its presence (as proposed) would significantly disrupt farming operations, as well as pollute the region (air, land & water¹⁷) ... notwithstanding existing assurances of emission control capabilities. Further, AECl has stressed numerous times it would work with the farmers..., yet has failed to consider any means of reconciling the impacts this project would subject on the farming community. A number of offers were made by a group of farmers and concerned citizens to sit with AECl's Board of Directors to resolve the impasse between the two diverse enterprises..., but such a meeting failed to materialize. Such failure goes a long way toward demonstrating that this organization will not be a good neighbor... as it has suggested it will!!! C15

So I ask... why are we, the citizens of Carroll County, confronted with this proposal for a massive coal-fired, base-load, generation facility by AECl... a cooperative limited to providing electrical power to its members in rural America? Would it not be a logical and prudent step, under the current circumstances and level of fuel cell technology, to entertain the alternative plan presented... for all of the reasons stated heretofore? C15

Currently, in the immediate area, an ethanol plant is in full operation and under expansion, with another ethanol plant currently under construction and a soybean (biodiesel) plant to commence construction within a few short months. Now you might ask... what would these projects have to do

¹⁶ Note that the project is proposed to be built in a flood plain. Man has not yet devised any means of protecting this proposed project or surrounding area from the devastation of a flood; levee and berm notwithstanding. Further, Carroll County's Planning & Zoning Ordinance specifies the best use for floodplains is agriculture (supported by FEMA). We have already seen how vulnerable levee systems are to the ravages of storms and floods ... it has been well covered by the media. So I ask... what long term assurances or guarantees will AECl, Carroll County, RUS and EPA provide the citizens and farmers ...that in the event of flooding (like that in 1993 or worse) the area surrounding the project will not be utterly devastated by contamination when floodwaters recede? And who will pay the clean-up costs if contamination occurs?

¹⁷ The DEIS, and apparently the entire process, lacks a discussion on deferred medical costs relating to the allowable emissions from the AECl project (to be located in an attainment area). Related health effects, supported by sound epidemiological studies, will appear within the aged and younger populations, with the disabled population conveniently omitted (preponderance of population in project area is elderly (disabled comprise 20% of population, yet excludes elderly in calculation)). Why would any government entity consider allowing the cost of such related effects to become a burden on local, state and federal budgets, not to exclude the lowest on the rung... the individual? Is it not the province of the government to protect the public's health and welfare? So... why is it that such cost shifting is not considered in the decision-making process? Shifting the results of allowable environmental impacts (which would assuredly translate into medical costs) upon the shoulders of individuals and governments is a shortsighted application of EPA regulations.

with the subject at hand? There are certain terms necessary, in this instance, to achieve reconciliation for these two diverse enterprises... and the terms we are looking are... fuel cell & co-generation.

The suggested process will be explained in rudimentary terms and concepts. I realize that certain technicalities will arise, yet such technicalities would not adversely impact the proposed alternative for reconciliation of the diverse enterprises.

By coupling fuel cells with an ethanol plant... a portion of the fuel produced will be utilized for fuel cell operations... the heat generated by the fuel cells will be utilized (in-part) for distilling the ethanol - heating & cooling of the plant... with the remaining heat redirected for electrical co-generation.

As for the soybean (bio-diesel) plant... the heat for co-generation may not be necessary to that process, thereby increasing the electrical co-generation. FuelCell Energy has already tested the feasibility of diesel as a source of fuel cell operations on behalf of the U.S. Navy. Therefore, the utilization of bio-diesel for this operating source should not present a significant problem.

By applying the aforementioned alternative we gain electrical power for the grid and a compatible (or reconciled) means of producing the electrical power within a farming community. In addition, the footprint of this type operation would be less than 1/100th of that required for AECl's proposed project. As a further enhancement ..., fuel cell systems require little in the way of site preparation, thereby significantly reducing the need to disturb the land for construction; and, the majority of hosts plants are located next to rail corridors, where high voltage lines are prevalent. C15

Applying my past experience with development of agricultural greenhouse operations, I speak to this issue of CO₂ reduction... as it relates to the alternative fuel cell cogeneration operations proposed here.

Nature has devised a means of balancing carbon dioxide in the atmosphere and readily accomplished with the earth's abundant vegetation. This natural action may be incorporated into the alternative co-generation process with the inclusion of agricultural greenhouses. In a rudimentary explanation... the CO₂ from the combined plant (fuel cell & ethanol/bio-diesel) is transferred into the greenhouse and taken up by the plants, converting it to oxygen. Of course not all of the CO₂ will be handled in this manner..., but the CO₂ exhausted from fuel cells have been proven to be of higher grade than that currently used in the soft drink industry. Therefore, it can also be bottled and sold to that market, further reducing atmospheric release. C15

And... least we forget... fuel cells produce water... which may be utilized in the ethanol distillation process or in combination with the attendant greenhouses; here is yet another form of reducing the human impact on the environment.. . reducing available water resource impacts. C15

As previously stated... the selected area for the AECI proposed project is agriculturally based... you might say... agriculture engrained through history! It is true this area could do with some economic growth... but requires sustained growth which is reconcilable or compatible with its engrained history... not disruption of the historic ambiance. The AECI coal-fired electrical generation facility is completely out of sync...irreconcilable and incompatible with area historical traditions. Accordingly ... , an alternative method must be considered, a form of compromise, addressing the needs (AECI purported needs) of both entities. Therefore the proposal of an alternate plan... a truly collaborative effort... with AECI, Ethanol/ Bio-Diesel Production Facilities and the Farming Community... to be accomplished by utilizing the leading edge of current technology to meet the needs of all concerned... fuel cell technology! Just imagine... for a moment... the reduced operational costs and environmental savings associated with such a collaborative effort! Can you visualize it?

Related Manufacturing: such an alternative collaboration will induce light industrial manufacturing, relating to the fuel cell membrane and some (if not all) of the integral parts which make up the system. Such action would also attract greenhouse agribusiness, to include structure and supporting systems. Upon this disclosure a specific question arises.. . why would this alternative plan attract manufacturing where the AECI proposed project would not? The answer is plain ... see the following paragraph.

Related Education: Collaboration of fuel cell technology, bio-fuel technologies and greenhouse design and operational technology, with alternative generation of electrical energy will attract collegian and vocational interests. Since the collaborative technologies are hot-beds of multifaceted research and experimentation, they become the catalyst for scholastic and scientific expertise, continued experimentation and technological development. As a result, certain research/development grant funding and hands-on educational opportunities⁶ become available for the local and area populations. Educational/ research/ development enhancements, such as those expressed here, will certainly attract other interests... see the following paragraph.

Commercial/Retail development: once this alternative is accepted and becomes public knowledge, the draw of the potential commercial dollar will

ensue. Great strides will be made to secure properties (mostly leases, but some purchases) in order to establish consulting and other service enterprises in this area. Dovetailed with commercial expansion will be retail outlets looking to capture the new market. The area will find retailers, such as WalMart, Home Depot, Loews, J.C. Penney, Sears, (including major grocery chains) seeking a foothold. People... this translates into an expanded job market, a draw of surrounding populations to shop in this area and other expansions of the market... see the following paragraph.

Housing: in order to meet the need of incoming populations to work in this area... the housing market will have to expand. This will entail renovations to existing stock, with expansion of single family and apartment developments. Since the locals are satisfied with the rural settings in this area... such growth would have to be controlled in order to maintain the rural character. Such control would most likely entail expansion into unincorporated areas around the Towns of Carrollton and Norborne.

Tax Base Growth: As demonstrated, above, the alternative collaborative plan will produce a Monetarist economy (acceleration (turnover) of moneys in the economy)... not the Keynesian (supply-side/trickle down) economy currently experienced. With this acceleration come increased sales taxes (which are enhanced further by the area becoming a draw for area-wide shoppers), with commercial/retail/manufacturing growth the town/county tax base increases, and with expansion of the housing market (including the relative increase in values) the area governments will no longer be strapped for revenues. It is apparent the alternate collaborative plan will greatly enhance this region as ... it demonstrates positive impacts over a wide range of the economy. C15

End of comments for this topic provided by Commenter C15.

Response:

Fuel Cells. Fuel cells have application for distributed power generation, as discussed in Draft EIS Section 2.1.2.2.2 *Siting Alternatives*. For the reasons discussed in that section, the category of distributed power generation was eliminated as an alternative.

Emissions from Fuel Cells. Fuel cells operated with fossil fuels would have the same emission issues as large plants operated with fossil fuels; regulatory oversight would be complicated by the large number of units. Ethanol, like other carbon-based fuels, produces

carbon dioxide when burned. (The major difference is that it releases recently-fixed carbon rather than fossil carbon).

WowEnergies. According to the referenced website, this company uses a technology similar to the second cycle of a combined-cycle gas plant to capture heat energy that otherwise would go to waste, at facilities such as refineries. The technology does not appear to be applicable to this project. The company also offers emission control equipment, as the commenter notes. AECl is required to use the best available control technology (BACT) for their emissions control (Section 3.1.1.2.1 *Federal and State Laws and Regulations*).

Ethanol/biodiesel. While the future may see ethanol plants selling power to the grid as the commenters envision, in the present, production of ethanol and biodiesel in AECl's service area represents an increase in demand for electric power; it is more cost-effective to use power off the grid to operate these plants than it is to operate them with on-site units powered by fuel produced at the site. Ethanol, a biomass fuel, was discussed in the Draft EIS Section 2.2.4.3 *Alcohol Fuels*. Biomass fuel was eliminated as a technology alternative in Section 2.2.4.5 *Summary of Reasons for Elimination of Biomass as the Energy Source for this Project*. The discussion specifically includes ethanol, but not biodiesel, which has been added in the Final EIS in Section 2.2.4.3, now titled *Alcohol and Biodiesel Fuels*.

For a project the size of the ethanol plant, now under construction in Carrollton, Missouri... a greenhouse (of the gutter-connected type) covering from three (3) to (5) acres would be preferred. It is also recommended that vegetables and some fruits be produced, which (in this application) should be produced year-round. A significant amount of the CO₂ produced by the alternative process could be handled in this manner... thereby ameliorating adverse impacts on global warming... without reliance on sequestering.

This proposed handling of carbon dioxide is not new or unique. The process, described here, in its rudimentary form, is common place in Europe. It appears the United States is straggling far behind in its application. Here may be the means of catching-up! C15

That which has been presented here, as a farming-utility cooperative source of electrical generation, is not Einsteinian physics... (the contemplation of gravitational influences... on space and time)... , but akin to the readily understandable and reality based theory of the Newtonian apple. (See the apple falling?) C15

Response: This comment appears to be relevant to the ethanol plant under construction in Carrollton, but not to the Draft EIS.

ALT-308 Coal

1. Not only that, it is projected that our nation's coal reserves are capable of supplying fossil resources for power production for an estimated 250 additional years. It is only prudent that coal would be used at this plant to produce affordable power in an environmentally sound manner given the successful environmental record of accomplishment Associated Electric has set at two previous locations. *C12*

It's the right kind of a plant. I, like many of the others, have done research in the various methods of generating electric power. The coal plant makes sense. Number one, the technology is there. The engineering expertise is there. Certainly the need is there and I would remind you of one additional fact. Coal is a domestically produced fuel. It would not become subject, nor is it now subject to international pressures brought about by political or economic sanctions that may take place around the world. I feel much more comfortable with a coal fired plant than some. *C59*

Response: The long-term US coal reserves are identified as one of the advantages of coal (Draft EIS Section 2.2.5.3).

Coal is not a sustainable energy resource for our future generations even when the latest and greatest technology and controls are used. Other forms of energy including solar, wind, and even fuel cells need to be incorporated in energy production in an effort to become less reliant as a nation on coal-produced energy. The consumption of coal provides low-cost energy, but simultaneously provides an atmosphere with increased levels of toxic pollutants in the immediate emission area as well as on a global scale. *C16*

Response: Thank you for your comments. Coal is likely to be an important energy source in the U.S. for a long time. See revised discussions in Section 2.2.5.3.1 *Coal*. The alternative forms of energy noted are all discussed in the Draft EIS Section 2 *Alternatives Considered but Eliminated from Detailed Consideration*, along with the reasons for their elimination.

2. I realize that coal's given a bad name when it comes to environment. I don't really understand it. I'm old enough -- we were talking a while ago, back in the '60s and '70s, I can remember when the air was really dirty. I

can remember when in the Great Lakes fish were dying. That's not the case today. In fact, according to the EPA, in the last 35 years, the total emissions had dropped by 54 percent. And today we're burning 200 percent more coal in Missouri to generate electric than we were 35 years ago. To me that's amazing, so this is awfully important to me. C39

Response: Reductions in emissions since the enactment of the Clean Air Act (and amendments) is discussed in Section 2.2.5.3 Coal (Draft and Final EIS).

Coal does not burn cleanly. There is no such thing as a clean coal-fired power plant. C29

Response: Emissions from coal burning are discussed in Section 3.1 Air Resources.

The coal plants probably are the cleanest form of energy that can be given to us today. I personally would much rather have a coal plant near me than a nuclear power plant any day. They work really hard to have the best coal brought in that's low sulfur emission and I think they are a good operation to have if we have to have one. C57

Response: Thank you for your comment.

A couple of speakers ago talked about the Callaway Nuclear Plant. It's AmerenUE's. It's in my backyard and I see it everyday. Twenty-five years ago in 1973 my community was having these meetings. I look out the other window in the other direction from my backyard and I see a base load coal plant, and (indiscernible) because it's clean. These plants have done wonderful things to our community and to our school system, most importantly to the economic health and the well-being and opportunity of our citizens. In the next generations, a few years down the road when this is in place, if it's in place and a more important question, what happens to each of you and your kids if that opportunity is not sought? C70

Response: Thank you for your comment.

I also have an uncle who worked for Kansas City Power and Light and he actually bought coal, and to your all's amazement, he is definitely against this coal fired power plant. C77

Response: Thank you for your comment.

ALT-309 Nuclear Power

1. AECI simply, and with no explanation to support their claims, lists and dismisses some alternatives they considered. Firstly, the excuse given in ES-1 for some of the alternatives, such as nuclear, is that AECI has no expertise. So what! This is immaterial. AECI's lack of expertise is their own problem, and this lack of experience in a field common to utilities around the world should not become a problem to the environment. Lack of expertise is not a valid excuse for rejecting any alternative. C13

Response: Executive Summary Table ES-1, *Technology Alternatives Eliminated from Detailed Consideration*, is a very brief summary listing. The commenter is referred to Section 2.2 (titled *Alternatives Evaluation* in the Final EIS) for a detailed assessment of alternatives considered. Section 2.2.6 *Nuclear Power* provides a full discussion of the nuclear alternative, including the challenges of developing new nuclear plants. USDA/RD believes the current discussion adequately supports AECI's decision not to pursue the nuclear alternative at this time.

ALT-310 Siting

1. Page ES-4 states that Norborne was chosen because it is an attainment area. Where is the data to back up this statement? More outdated internet sources? This is supposed to be an EIS, where such information must be included. There were no baseline studies performed to substantiate this claim. AECI's excuse that such a study would be costly is insufficient reason to omit it. The truth is that Norborne was chosen because the Carroll County government invited them to this area, and for no other reason. Again, as an EIS, this document should inform the readers that by choosing an attainment area, if true, this type of activity will degrade the environment to a non-attainment area by its existence. Actually, RUS should have informed the general public that an EIS is only required if an adverse impact from a project is assumed. C13

Response: The referenced discussion, from the Executive Summary, describes the siting process, where certain areas were eliminated from consideration for different reasons. Note that for ease of reading the Executive Summary does not include references; these are included in the discussions in the main body of the document. Non-attainment areas are those that do not meet National Ambient Air Quality Standards for one or more pollutants for which there are standards. Non-attainment areas are

designated by the U.S. EPA, based on Clean Air Act criteria and air monitoring. Only a few areas of the state were eliminated based on non-attainment.

ALT-311 Transmission and Rail

1. I'm a member of Boone Electric Cooperative, which is Boone County, City of Ashland, just south of Columbia. And I speak this evening in support of this project in part because of what the transmission component means. There's been a lot of comments about reliability. And I think everyone in this room would acknowledge that electricity has long surpassed a luxury, it's a necessity of life today. Too often when we think about reliability tend to look at the lines that are in front of our house and the lines in front of our business or our farms. Reliability starts with a good transmission system. Over the past number of years there have been five documented significant blackouts in this country. Probably the most well-known in the northeast and in everyone of those cases the culprit was traced back to a lack of transmission. This country has done a poor job of building a transmission grid to support it's load.

Now, I support the plant for what it brings in the capacity that it's needed, but the transmission lines that are built in conjunction to this are very responsible. I have reviewed the EIS and I am convinced that Associated has looked at a number of options. They've done everything they can to address the impact of that transmission line. And while there is an impact to that the impact I see is building a transmission area that's going to keep Missouri and the central United States from being susceptible to the blackouts that we read about in the paper. That's a situation I don't want to be a part of. I think the transmission system is a significant part of this entire project and one of the many reasons why I support Associated. C69

Response: Thank you for your comment.

Page ES-5, "Consideration of Adding Capacity at Existing AECl Facility". AECl states, "The addition of a unit at Thomas Hill would result in a high percent of base load capacity at one location, stressing transmission system reliability. " This is utter nonsense as AECl intends to connect new transmission lines from the Norborne unit to the existing old lines from Thomas Hill, adding the same or more burden as an additional unit at Thomas Hill, to the alleged overload on their transmission grid. And, according to the SERC Report, see Exhibit 8-Transmission, more than adequate transmission lines are already being made available, and will be in place before AECl's proposed project.

"Planned transmission additions include 111 miles of 345-kV lines. Planned reinforcements in the Jefferson City, Missouri, area are scheduled for completion in 2008 which would increase transfer capability from SERC (Gateway) to SPP [subregion]." C13

Response: AECI does plan to connect new lines from the proposed Norborne facility to an existing substation at Thomas Hill. AECI also plans to construct new lines from the proposed facility to three substations south of the proposed plant (See Section 2.4.11 *Transmission Lines* and Figures 2-83 and 2-84). These new transmission facilities would greatly enhance transmission system reliability.

Tantalizingly, the Alternatives Report, Part 5.8, mentions new transmission technologies that can avert the need for new capacity. It refers back to Part 5.7 concerning an RFP to supply AECI's capacity and energy needs. AECI says the responses to the RFP were not cost-competitive. This is a conclusion, not an explanation. It does not say that new transmission technologies were actually part of the RFP, nor explain why, as seems highly unlikely, transmission improvements would cost more than a \$1 billion coal plant. Reasons, not conclusions, are required before eliminating an alternative from detailed study. 40 CFR § 1502.14(a). C10

Response: There was a typographical error in the Alternatives Report, Section 5.8, that this comment is based on. The report states "There are now new transmission capacity additions that in and of themselves would provide the needed power and energy." (The word "now" was intended to be "no".)

ALT-312 Big Lake Site

1. Table 2-24, Groundwater (pane 2- 192) and Wetlands (page 2- 197): Big Lake Alternative - Effects from groundwater withdrawals would likely be greater at this site because of the connectivity between the river, the alluvial aquifer, and many of the floodplain wetlands that are in close proximity to the site and Big Lake State Park. C7

Response: The referenced text has been edited to note that effects may be greater for these reasons.

2. Table 2-24 (page 2-1 97 & 198). Fisheries and Wildlife: Given the proximity to wetlands, bird concentration areas, and a National Wildlife Refuge, a facility at the Big Lake Site would have potentially significant effects to fish and wildlife from mercury deposition. The DEIS addresses mercury only in

terms of fish consumption and human health (page 3-5 1). If this site is pursued, we recommend that a thorough evaluation of potential effects to fish and wildlife resources be provided. C7

Response: If the Big Lake Site is pursued, effects to the wildlife and natural resources listed would be addressed in detail.

3. This myth needs to be dispelled at once. There was *never* any intention to use Holt County as an alternative site. An alternative site is a requirement for any EIS, and RUS requires that an alternative site be listed in their loan application. Both AECI and RUS were aware of this. Carroll County Commissioners were not, and AECI let them believe that there was the possibility of losing the plant to Holt County, unless Carroll County lowered the price and added more incentives. This technique resulted in a virtual giveaway to AECI! Bait and Switch techniques. C13

Response: The commenter's assertion about alternative sites, upon which his/her conclusions appear to be based, is incorrect. While NEPA requires assessment of alternatives to the proposed action, there is no requirement to identify a specific alternate site (such as the Big Lake Site in Holt County). RUS' requirements for loan applications (7 CFR 1710) also do not require identification of a specific alternate site.

ALT-313 No Action Alternative

AECI says that if Norborne isn't built its customers' electricity needs will need to be supplied somehow (Part 2.3.2). It is not inappropriate to note that even the no-action alternative will have environmental effects. However, AECI assumes that "no action" means building another Norborne somewhere else. It says, for example, that if the plant isn't built there will still be acid rain pollution from other power generation (Part 3.1.2.4.1, p. 3-50). But that is true only if the alternative is another pulverized coal plant. This reasoning immediately disqualifies the no-action alternative, which is not why NEPA requires that it be included. The law does not demand a useless exercise; the no-action alternative has a purpose which is nullified if it is the equivalent of 2 of the other 3 alternatives (building Norborne or building the same plant elsewhere). C10

The no-action void could also be filled by, as discussed earlier, meeting customers' energy needs with conservation and efficiency. That would give the alternative real meaning. AECI is in violation of NEPA and 40 CFR 1514(d) by treating the no-action alternative as the equivalent of the proposed plan. C10

AECI/URS's analysis of the No Action Alternative assumes that even if the Proposed Action were not built, another coal-burning power plant would be built somewhere. This is faulty logic and relies on AECI's elimination of other alternatives for their own reasons. It is incomplete logic because they did not consider conservation as a viable alternative, when it is the best alternative. The cleanest and cheapest Kilowatt of energy is the KW never produced. C23

Response: The No Action Alternative would not stop demand for electricity. What the Draft EIS text actually says is "Therefore, it is likely that the no action alternative will result in similar air quality impacts that would affect a different geographical area."

In the Final EIS the text has been edited to indicate that the No Action Alternative *may* result in similar air quality impacts, depending on technology: Other potential resources for meeting the electrical demand that would not result in similar air quality impacts have been added.

1. Looking further to the regulations we find Sec. 1502.2 (d) state:

"Environmental impact statements shall state how alternatives considered in it and decisions based on it will or will not achieve the requirement of sections 101 and 102(1) of the Act and other environmental laws and policies. Under Sections 101 and 102, the Federal Government is tasked with the responsible stewardship of the environment, to take into account the environment impact of a proposed project, and to take into account alternatives."

One alternative that seems to not have been seriously considered is "no action." Just...don't...build...this...plant. Protect our environment! Preserve and protect the farmland! C29

Response: Thank you for your comment.

ALT-314 Details of the Proposed Action

1. **2.4.3 Fuel Supply and 2.4.9.1 Gaseous Emissions.** AECI has added a fire water booster pump to the combustion equipment proposed for the plant. At this time, no information has been received on the size of the unit. C17

2.4.7 Coal Handling System and Coal Piles. The DEIS states that the crusher house would be enclosed and would include two 600 tph crushers. AECI has submitted emission calculations in which each crusher is rated at 1,200 tph. *C17*

Response: This is correct. A fire water booster pump has been added to the design and there will be two 1200 tph crushers. This is an air permitting issue that AECI will address through its air permit application.

AIR-400 Air Pollution Controls

1. In many instances AECI has deferred gathering information that is necessary to assess the environmental consequences of the Norborne plant. Pollution controls for particulate matter (PM₁₀) haven't been selected (Alternatives Report, pp. 6-81-2, Part 6.5.2; Part 2.4.9.2). *C10*

Response: The Alternatives Report predates the Draft EIS by three years and does not include the most recent information. Draft EIS Section 2.4.9.2 *Particulate Matter (PM)* discusses the proposed particulate controls. Main boiler emissions will be controlled by a pulse jet fabric filter baghouse.

Secondly, AECI again shows their ignorance of recent technology. There are well documented systems that dramatically reduce emissions while also reducing the need of additional control measures and cooling water. A typical example of one such system is:

The PATENTED™ power generation systems naturally reduce flue gas temperatures to near ambient as nearly all the thermal energy (heat) is extracted from a flue gas. At these reduced temperatures, pollutants that exist in a vaporized state, such as oxides of Nitrogen, Sulfur, Mercury, Vanadium, Lead, Cadmium, and Volatile Organic Compounds (VOCs) will automatically condense out for handling and safe disposal. The Greenhouse Gases (GHG) by producing power without consuming fuel. When the PATENTED™ heat recovery power plant is used in conjunction with the PATENTED™ system described below, nearly all the pollutants from a flue gas are removed without using multiple pollution reduction systems such as a Flue Gas Desulphurization (FGD) unit, Selective Catalytic Reduction (SCR) system or Thermal Oxidizers (TO).

The PATENTED™ is a standalone multi-pollutant removal system developed for installation on coal-fired power plants, boilers, furnaces, incinerators, gasifiers, gas turbines, reciprocating engines and other flue gas waste heat sources. The PATENTED™ system removes nearly all the pollutants from a flue gas without using multiple pollution reduction systems such as a Flue Gas Desulphurization (FGD) unit, Selective Catalytic Reduction (SCR) system; ammonia or urea injection, Thermal Oxidizers (TO) or particulate filtration systems. In addition to removal of SO_x, NO_x and particulates, the PATENTED™ system has demonstrated the capability of removing heavy metals emissions including Mercury and reducing CO₂ greenhouse gases by 25% or more depending on chemical additive type and quantity.

Final Flue Gas: The resulting flue gas is nearly free of heavy metal oxides, SO_x, NO_x, PM2.5, PM10 and acid mists. Depending on the initial pressure of the flue gas and pressure drop in the reactor sections, an exhaust fan may be required. The final flue gas, free of contaminants, can be naturally dispersed and diffused into the environment since its molecular weight is now equivalent to the surrounding air.

Test Site – Boralex 40 MW Wood Waste Power Plant
POLLUTANT INLET EXHAUST (7)

SO ₂	< 20 ppm	~ 0 ppm
NO (1)	130 ppm	~ 0 ppm
NO _x (2)	80 ppm	~ 0 ppm
Total NO _x (3)	130 ppm	~ 0 ppm
Vaporized Metals (4)	-	~ 0 ppm
Mercury µg/DSCM (5)	2.18	0.37 (83% reduction)
CO ₂ - % (6)	11.6	7.25 (38% reduction)

- 1) 50 ppm eliminated. Remainder converted to water soluble NO_x
- 2) Water soluble NO_x (NO₂, NO₃, N₂O₅)
- 3) Client required 35 ppm with average approximately 7 ppm
- 4) Verified via effluent assaying
- 5) Hg precipitated out in the wastewater effluent.
- 6) Reduced by as much as 80% during CO₂ reduction trials
- 7) Verified by third party testing per EPA test procedures

Test Site - AES 150 MW Petcoke Fired Power Plant

POLLUTANT INLET EXHAUST (2)

SO ₂	2200 to 2500 ppm	~ 0 ppm
NO (1)	350 to 450 ppm	~ 0 ppm
CO ₂ - %	13.9	11.3 (19% reduction)
Particulates/SFC -		~ 0 (1.0 x E-7)
Vaporized Metals (3)	-	~ 0

- 1) Converted to water soluble NO₂
- 2) Verified by third party testing per EPA/TCEQ test procedures
- 3) Vanadium/Copper/Zinc/Cadmium/Aluminum & others precipitated out in wastewater effluent (there was no Mercury in the flue gas)

AECI could easily and economically increase capacity of existing plants with less emissions and little additional workforce (perhaps less). These systems may be either leased or purchased. C13

In section 3.1.2.4, Actions Incorporated into the Proposed Action to Reduce or Prevent Impacts, AECI/URS once again is very general and evasive in describing "a number of elements ...that would reduce or prevent air quality impacts." No where do they claim to implement the most advanced and effective measures to reduce pollutants. C23

Response: AECI is required, in its air permit application for the plant, to use the pollution control technology that the Missouri Department of Natural Resources (MDNR) designates as the best available control technology (BACT). The first commenter (C13) could consider contacting the MDNR Air Pollution Control Program with his/her suggestions. Regarding the "number of elements" referenced in the second comment (C23), they are enumerated in the Draft EIS in a bulleted list following the quoted text. For more detail on the proposed emissions control system, see the Draft EIS Section 2.4.9 *Emissions Control Systems*. Projected emissions are listed in Table 3-8.

2. 2.4.9.1 Gaseous Emissions, 2.4.9.2 Particulate Matter (PM), and Table 3-41 Summary of Impacts from Proposed Action, p. 3-217. AECI is undergoing PSD review for PM, NO_x, SO₂, CO, VOC and sulfuric acid mist. A BACT analysis is required for each unit or source emitting any of these pollutants. AECI has submitted BACT analyses for each of the above pollutants. Those analyses include control methods proposed by AECI for consideration as BACT. The final permit determination will include designation of what is the most appropriate control device, control requirement, and/or emission rate limits for each of the units that is subject to BACT. C17

Response: This information is included in the Draft EIS in Section 3.1.

3. **2.2.5.3.2 Coal – Energy Generation Options.** AECI has revised its proposed NO_x emission limitation from that found in the initial Prevention of Significant Deterioration permit application. Although the initial number was higher, the current Best Available Control Technology (BACT) limit proposed for review, 0.07 lb/mmBtu on a 30-day rolling average is similar to limits attainable with a CFB unit. River Hill Power Facility, Robinson Power's Beach Hollow Project, Spurlock Generating Station Unit 3 and Estill County Energy Producers are some of the CFB units permitted at the same level. C17

Response: This is an air permit issue that AECI will address through the air permit application process.

AECI has distributed various reading materials to Carroll County residents to ensure how *environmentally safe and economically wonderful* this power plant will be when it is completed. One publication states that AECI utilizes technology that will reduce nitrogen oxide emissions by more than 80 percent during the summer months. However, during a later meeting with AECI officials that I attended, Carroll County residents were informed that this power plant will be operational primarily during the winter months. Who will be responsible for making sure that AECI will use these controls year-around, regardless of when the plant is operational? Will USDA require in the final EIS that AECI uses stringent controls on emissions and particulate matter at all times, and not just certain times of the year? Who is working to protect the respiratory health of current and future Carroll County residents, as well as the overall atmospheric health of our entire planet one coal-fired power plant at a time? C16

Response: NAAQS are set to define air pollutant levels necessary to protect health. The USEPA and the MDNR are charged with ensuring that NAAQS are met.

AIR-401 Air Monitoring

1. Why weren't meteorological data from the impact zone determined and used? Carroll County differs considerably from KC1 conditions. Other air quality data cited came off the internet and is neither site specific nor current. There were no validity audits performed. Another example of no actual studies performed in Carroll County by the consultants! C13

There have been no baseline studies of the ambient air in the vicinity of the proposed site, especially downwind near schools, for PM 2.5, PM10, ozone, carbon dioxide, lead, sulfur dioxide and nitrous oxides. Results of air monitoring at locations 30 to 60 miles from the site do not represent air quality at the site. C29

Response: AECI monitoring site locations for ozone, PM₁₀ and sulfur dioxide are shown in the Draft EIS Figures 3-14 and 3-15 and are summarized in Table 3-5. Appendix C contains summary tables showing ambient air quality measured pollutant levels.

p. 3-36 Existing Major Air Emission Sources. AECI cites in Table 3-7 and in Figure 3-16 major sources of CO, VOC, NO_x, SO₂, PM₁₀ and PM_{2.5} in the Kansas City metropolitan area. This information was taken from a database maintained by the EPA and is for the calendar year 1999. National Emissions Inventory data for 2002 has been available on the EPA website since March of 2006. The department recommends updating this information. C17

Response: The Final EIS (Table 3-7 and Figure 3-16) has been updated with the latest information.

Given the existing ozone data recorded from the pre-construction monitoring, we also recommend that ozone monitoring be continued throughout the ozone seasons prior to and after construction of the facility. This monitoring data can be used as a baseline to document the existing condition and assist in further assessing the impact of the facility's emissions on ozone formation. C8

Response: Since ozone is formed through chemical conversions that occur over time, it is not likely that the proposed project would have any significant affect on ozone levels in the vicinity of the proposed plant. This is an air permit issue.

Existing Conditions-Meteorological Conditions. 40 CFR Part 58 Appendix D defines the ozone season for the State of Missouri as April 1st through October 31st. C17

Response: This has been corrected in the Final EIS Section 3.1.1.3 Existing Conditions – Meteorological Conditions.

AECI has completed their monitoring study for ozone. They collected data from April 1 through October 31, 2006. The data indicated that elevated 8-hour ozone concentrations could occur under certain meteorological

conditions. Compliance could not be determined from data collected during the 2006 ozone season alone. The department may require additional data collection at the existing ozone site upon permit issuance. C17

Response: This is an air permit issue.

AIR-402 Mercury

1. Air Pollution Controls for, Mercury - The Final Environmental Impact Statement needs to clarify if activated carbon will be used as a control measure to reduce mercury emissions from the plant. Page 1-1 Appendix D states, "AECI will inject activated carbon into the air stream before the particulate control system." Thus, the mercury impact assessment includes a 90% control of projected mercury emissions. However page 2-219 of the DEIS, states that an activated carbon injection system for mercury control would be an "option". If activated carbon injection is not used, mercury impacts will increase. Modeled impacts of mercury deposition without the use of carbon injection should also be provided to clearly identify the potential impacts from the facility for public review. C8

AECI's apparently thorough treatment of mercury pollution, assuming the use of activated carbon injection as a control (Appen. D, Part 1), is undermined by the admission that this has not been decided on as the control technology (Part 3.2.1.4.2, Part 2.4.9.3). C10

Hazardous Air Pollutants: Mercury is well known to cause various neurological conditions, especially in newborn. The DEIS states that an activated carbon injection system for mercury control would be an option. There is no corroborative data in AECI's Air Quality DNR permits for their New Madrid and Thomas Hill plants to indicate they have, or will, actually will employ this "option". C29

I understand that about 25 percent of mercury emissions go into the local area and then about another 75 percent into the global cycle. So I ask that you also look into the overall impact of coal burning. And it certainly may be the best option for what we need to do to generate more electricity. I ask, please, that you look very closely at also the other side and make sure we are minimizing, if not down to a zero point, the mercury emissions that go into the environment. C49

2.4.9.3 Hazardous Air Pollutants (HAPs) and 3.1.2.4.2 Mitigation and Residual Impacts. AECI states that the hazardous air pollutant (HAP) of greatest concern is mercury and indicates that an activated carbon injection system for mercury control would be an option. This option involves the

injection of powdered activated carbon before the dry FGD system. The activated carbon fixes the mercury to its surface and is then removed from the exhaust gas in the main boiler's baghouse.

AECI has not included the use of an activated carbon injection system in its New Source Review permit application. The PSD permit application indicates that mercury can be removed through the currently proposed SCR, FGD and baghouse control systems to a level adequate to meet New Source Prevention Standards limits. The department encourages AECI to implement the best available control technology. *C17*

Response: Mercury emission limits are set by the Missouri Department of Natural Resources through the air permitting process. As reflected in their permit application and noted in MDNR's (C17) comment, AECI believes that they can achieve the New Source Prevention Standards limits through the currently proposed SCR, FGD and baghouse control systems. However, as several commenters noted, the mercury risk evaluation included in the Draft EIS assumed that activated carbon would also be used. In the final EIS, the mercury risk evaluation has been revised to reflect the maximum allowable mercury emissions based on New Source Performance Standards.

2. Mercury Risk Evaluation - The Mercury Risk Evaluation Appendix D should evaluate impacts on water bodies in the project area. A number of conservative calculations are utilized prior to the bioaccumulation calculation in order to consider maximum potential impact on Wakenda and Moss Creek watersheds. Page 5-4 states "no ponds or lakes large enough to support large, sustainable harvest of fish are present in either watershed". Based on initial review of National Hydrography Dataset it appears that several ponds large enough to support populations of harvestable largemouth bass exist within the Wakenda watershed. A more detailed analysis of potential impacts on these water bodies should be done. *C8*

Response: Local ponds that would have the highest deposition rate also have small localized drainage areas and are within the Wakenda Creek watershed. Because of the conservative assumptions dealing with run-off calculations, mercury content in the run-off and fish uptake of the mercury, the model would predict that fish in the local ponds would have orders of magnitude smaller amounts of mercury available compared to the same fish in Wakenda Creek. This has been clarified in the Appendix D document in the Final EIS.

There is no indication that any baseline studies of open water (rivers, lakes, ponds) in the area have been done to determine the current level of mercury contamination. This should be done to determine if mercury emissions need stricter control to prevent a cumulative toxic level of mercury. AECl must comply with Missouri mercury rules, notwithstanding the probability of federal exemption. The EPA allows states to set greater restriction; therefore, RUS must require such state compliance be included in its EIS, and specifically address the local impact, mitigation and support such findings with appropriate baseline studies. C29

Response: Existing mercury data was used; no baseline studies were done. USDA/RD believes the mercury risk evaluation presented in this document is adequate for the purposes of a Draft EIS. Other items in the comment are addressed in the EIS Section 3.1 Air Resources. The Draft EIS acknowledges that an air permit from the State of Missouri is required. The State of Missouri will determine requirements for an air permit.

Continuing in section 3.1.2.4.1, Mercury Emissions, the DEIS repeatedly refers to fish from sources within 50 miles of the Proposed Action, but does not talk at all about fish sources in the county and down wind of the plant. They also assume people eat fish from multiple sources, but this is not necessarily true if you have farm ponds or if all your ponds are in the vicinity of the Proposed Action. C23

Response: The mercury risk evaluation estimates incremental increases in mercury concentrations in fish tissue for Wakenda Creek and Moss Creek, which are within the county. Based upon the modeled deposition rates, the Wakenda Creek watershed is downwind of the proposed facility. While there are no existing fish tissue data for these creeks, if existing mercury fish concentrations are similar to those in fish from nearby water bodies, the incremental increase in mercury concentrations from the proposed plant emissions would not affect the current Missouri Department of Health and Senior Services fish advisory. While most people do eat fish from multiple sources, the fish advisory would be applicable also to someone eating fish from a single source.

3. Mercury Risk Evaluation - We recommend reviewing the fish tissue database information included in Appendix B, of the Mercury Risk Evaluation. MDNR Mercury in Fish Database provides the available fish tissue data in the state. The observations in the "Weight" column are clearly out of range for typical sample weights taken in the field. A limited

number of the field data sheets that were used to generate these data in the report were pulled for comparison. Although the methyl mercury concentrations were accurate, none of the field weights were found to match the data provided in Appendix 3. We recommend that this data be validated. C8

Response: This has been corrected.

4. Mercury Risk Evaluation - We recommend that the risk assessment provide more detail regarding the fish ingestion rate including the number of meals per week. The risk assessment should also state that the ingestion rates are median values for a fisher and child fisher. Additionally, the risk assessment should evaluate the potential for subsistence fishing populations. C8

They assume in their risk projections that adults eat 5.4 fish meals per week and children only 0.8. I don't know many families who fix different meals for their children. If the adults are eating 5.4 fish meals per week, then the children probably are too, and this would definitely change the outcome of the analysis. C23

Response: The reference to "fish meals" is a typographical error and should have read "fish portions". The text has been corrected in the Final EIS to: "...an adult eats an average of 5.4 fish portions (4 oz) per week, ... a very young child eats, aged 0-6, eats an average of 0.8 fish portions (4 oz) per week"

These ingestion rates are the default fish ingestion assumptions used by USEPA (2005) in their combustion risk assessment guidance. These values were derived from data presented in USEPA's Exposure Factors Handbook Volume II (EFH; USEPA, 1997), are based on extensive fish consumption surveys, and are considered representative ingestion rates for their respective age groups for the general population.

It is possible that a subsistence angler population could be present along the Missouri River, and this population would eat more fish than the general population. However, it is important to note that subsistence anglers are more likely to target large trophic level 2 and 3 fish that can be readily caught in nets or with set lines, such as drum and catfish, than trophic level 4 fish, such as bass, which are more readily caught by rod-and-reel (although they would undoubtedly keep bass, if caught). Given that the methylmercury BAFs for trophic level 2 and 3 fish are substantially lower than for

trophic level 4 fish, this means that a subsistence angler could eat substantially more fish than a member of the general population who eats only bass (as was conservatively assumed in this risk assessment), and still have a lower total mercury uptake.

For example, the bioaccumulation factor (BAF) for a trophic level 2 fish (117,000) is only 4 percent of the BAF for a trophic level 4 fish (2,670,000), and that for a trophic level 3 fish (680,000) is only 25 percent of the trophic level 4 fish. This means an angler can safely eat 4X as much trophic level 3 fish, or 25X as much trophic level 2 fish. As a point of comparison, the USEPA-recommended fish ingestion rate for adult subsistence angler populations (EFH; Section 10.10.4; USEPA, 1997) is 170 grams/day, which is only ~ 2X the ingestion rate of 87 grams that was evaluated in this risk assessment. As such, we believe the current evaluation is also protective for a typical subsistence angler.

5. Mercury Risk Evaluation - The Mercury Risk Evaluation Appendix D should clearly identify that potential methyl mercury impacts on fish tissue from the project will be additive to the existing high values already identified in Missouri. On page 5-7 it states, "calculated fish tissue methyl mercury concentrations for Trophic Level 4 fish (i.e., the worst-case example) are: Wakenda Creek =3.9 ug/kg and Moss Creek =6.2 ug/kg. As a point of comparison, these fish tissue concentrations are considerably below the EPA Water Quality Fish Tissue Criterion comparison fish tissue value of 300 ug/kg". We question whether this comparison is meaningful because these results fail to make clear that the projected impacts are in addition to existing baseline methyl mercury concentrations in Level 4 fish. Although no fish tissue samples have been obtained in either of the two watersheds, existing fish tissue data provided by EPA, Missouri Department of Natural Resources (MDNR), and Missouri Department of Conservation (MDC) for watersheds throughout the state characterize elevated levels of methylmercury for largemouth bass. Based on these data, the maximum impact of 6.2 ug/kg would be additive to the existing baseline fish tissue concentrations that are likely to be in excess of 300 ug/kg. Therefore, this section should be revised accordingly. *C8*

Response: Appendix D and the discussion of the risk evaluation in the EIS has been revised to clarify that the calculated levels are in addition to the existing levels.

6. Mercury Risk Evaluation - Methylmercury bioaccumulation is generally viewed as a site specific process given that the Trophic Level 4 Bioaccumulation Factor (BAF) can vary greatly across ecosystems, (USEPA,

2006). Therefore, there is considerable uncertainty regarding the use of the draft national BAF. Use of the national BAF could significantly underpredict or overpredict the site-specific BAF. For the purposes of the risk evaluation, we recommend that the risk assessment provide a distribution of risk estimates using the range of the Trophic Level 4 BAFs provided in USEPA's *Draft Guidance for Implementing the January 2001 Methylmercury Water Quality Criterion*. Furthermore the risk assessment should provide a brief discussion on the uncertainties with using default rather than site-specific BAFs. C8

Response: We agree that mercury bioaccumulation rates can vary considerably from site to site, and can be either higher or lower than the USEPA (2006) default bioaccumulation factor (BAF) values that were used in this risk evaluation. However, given that site-specific values are not available, the USEPA-recommended default values, which are geometric mean values, were used rather than extreme high-end and low-end values. As noted in USEPA (2006):

EPA believes the geometric mean BAFs are the best available central tendency estimates of the magnitude of BAFs nationally, understanding that the environmental and biological conditions of the waters of the United States are highly variable. EPA generally does not recommend basing an AWQC on BAF values near the extremes of the distribution (e.g., 10th or 90th percentile) because such values might introduce an unacceptable level of uncertainty into the calculation of a water column-based AWQC.

Given that the geometric mean BAFs used in this risk evaluation are the USEPA-recommended values for establishing AWQC values, we felt that, in the absence of site-specific values, they were the most appropriate values to use in this evaluation. Also, given that USEPA (2006) recommends against basing BAFs on extremes of the distribution, we do not think it appropriate to present fish ingestion risk numbers that are based the extreme high-end and low-end BAFs.

Returning to the regulations, in Sec. 1502.2 (b) we find:

"Impacts shall be discussed in proportion to their significance. There shall be only brief discussion of other than significant issues. As in a finding of no significant impact there should be only enough discussion to show why more study is not warranted."

It appears from the extent of discussion that mercury emissions create a significant impact, yet we find the EIS lacks the "full and fair discussion of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." (40 CFR Sec. 1502.1 paraphrased). C29

Response: The actual text of 40 CFR 1502.1 states that the EIS "shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." The EIS provides a full and fair discussion of mercury impacts, which were determined not to be significant.

Is this report stating this mercury will remain disbursed in the air ... and therefore shall not have an adverse health impact? I would like to know what happens when this hazardous material blankets the land? It must reach the ground at some point! Where is this discussed ... how will it be mitigated from the land ... will it wind up in our water supply?

Nowhere is there any analysis of the cumulative exposure from power plants upwind or the health impacts on people downwind-near Thomas Hill, for instance. C29

Another thing was just the mercury emissions. That was just sort of blown off, oh, well there isn't going to be any impact, it's just negligible and insignificant, but there was no consideration of what the cumulative effect of all the mercury from, for instance, Hawthorne and the plant Sibley and other industries upwind from us, and there's no consideration of what the effect of mercury emissions would have on people downwind from this power plant.

What's this going to do for the people of Thomas Hill, for instance? C29

Response: The questions about mercury fate and health effects (from the proposed Norborne facility) are addressed in the mercury risk evaluation done for this project. The results are summarized in Section 3.1.2.4.1 *Impact Assessment*. The risk evaluation itself is included as Appendix D.

In section 3.1.1.2.4, Hazardous Air Pollutants, there is extensive discussion of mercury – sources, uses, emissions and depositions, and health and ecological effects. They have the audacity to refer to a "study in Texas

which related a positive correlation between environmentally released mercury pollution and rates of special education and autism at the county level (Palmer 35 al., 2005),” and then say since they didn’t look specifically at mercury released from power plants it is not significant. Mercury is mercury no matter the source. Our children deserve better than this. The community has many ponds which people – children and adults - fish and consume the fish from. Adding a neighborhood mercury source is unacceptable. Air-borne mercury is heavy and will fall. This is indicative of an extremely cavalier attitude toward the earth and its inhabitants, and particularly children of the community! C23

Response: The actual text from the Draft EIS is as follows:

Links between mercury exposure and autism have been suggested, but these possible links remain speculative rather than definitive. For example, a recent study in Texas reported a positive correlation between environmentally released mercury pollution and rates of special education and autism at the county level (Palmer et al., 2005). However, this study did not look specifically at mercury released from power plants and it is unclear what significance power plant emissions played in their reported association.

This section has been revised in the Final EIS to provide more information about a possible link between autism and mercury.

Please comment on the following study, Environmental Mercury Release, Special Education Rates, And Autism Disorder: An Ecological Study Of Texas, by Raymond F. Palmera, Steven Blanchardb, Zachary Steina, David Mandellc, Claudia Millera, November 2004, University of Texas Health Science Center. His paper finds a 43% increase in special education and a 61% increase in autism for every 1000 pound of mercury emissions. The study can be found at:

http://www.awm.delaware.gov/NR/rdonlyres/3B571C5A-080A-43D7-A3F2-032AE9748BD7/780/palmer_et_al.pdf.

Response: The referenced report was mentioned in the Draft EIS Section 3.1.1.2.4 *Hazardous Air Pollutants (HAPs)*, under the subheading of mercury and autism. In the final EIS additional information has been added to this discussion to address this comment.

Mercury is a major pollutant resulting from coal-fired electricity generation and it is very harmful to the environment and the humans living within a dose proximity to the source (the EPA states that up to 15% of the Mercury emissions from a coal-fired power plant falls within a 30 mile radius of the source!!). C14

Response: Please refer to the mercury risk evaluation included as an appendix in the draft and final EIS. The results of the risk evaluation are summarized in Section 3.1.2.4.1 *Impact Assessment*.

Adding insult to injury, the effects of this hazardous air pollutant are all waved away with these statements:

"While mercury contamination is widespread, indeed global, the incidents to date have tended to involve specific point source discharges to water rather than dispersed emissions to air." And, ". . .mercury emissions from the proposed power plant should not pose any health threat to the surrounding community." C29

But I also want to consider the flip side. It's very important to me that we experience and are assured of corporate responsibility. I don't know if you're familiar with the health effects of mercury exposure. But they cause -- the mercury exposure causes neurological and immune damage in both children and adults. I was diagnosed with multiple sclerosis two years ago. And the people in my community have also experienced it at a rate about ten times the national average. So knowing that the AECI plant did have scrubbers and the appropriate controls -- and I don't want to blame AECI, because they were compliant with the laws required at the time; and so I don't want to say they were doing something they knew was harming the environment. But I do want to learn more and be assured that this new supercritical technology is actually something that is going to keep mercury out of our environment because it is making our fish danger to consume, and it's a very critical supply for us. C49

Response: The mercury risk evaluation (Appendix D; summarized in Section 3.1.2.4.1 *Impact Assessment*) addresses potential impacts. While there is a widespread presence of mercury in fish, for example, that *may* cause health effects, the documented cases of health impacts have been from point sources.

In fact, in their air permit application to MO Department of Natural Resources (MODNR), relating to mercury, they blatantly state, "...However, on March 15, 2005, EPA revised and reversed its December 2000 finding, and concluded that it was not appropriate or necessary to regulate coal and oil fired EGUs, (Electrical Generating Utilities) under section 11 2(c) of the act and reversed its December 2000 finding. Coal-fired EGUs were effectively removed as a source category."¹⁸ In other words, there will be no mercury controls! In this same application AECI admits the yearly emission of mercury will be 1,171 pounds. (We find this figure to be amazing! Especially in light of the analytical techniques described next!)

In addition to this admission, AECI also presented MODNR with some very questionable coal sample analytical data. Laboratory proximate analyses indicate the coal to contain about 30% moisture, yet the report does not indicate whether or not the subsequent parameters were reported on the "dry" basis ... the normal system of reporting. And since AECI won't gain any BTUs from burning water, this is possibly a laboratory typo. On the other hand, it sure makes the coal appear 300/0 cleaner than it actually is. My experience in these methods of reporting means "typo", if caught, and "deliberate", if not. Of much greater concern are the metal analyses. These analyses appear to have been performed on the ash portion of the sample including mercury. This is very alarming since the ashing procedure is carried out at 600 °C and elemental mercury's boiling point is 357 °C! All the mercury, but residues of its salts was volatilized BEFORE the analysis. More flim flam from our good corporate neighbors?

Thus, the 1,171 pounds/year figure above represents only an unknown fraction of the actual amount of mercury emissions.

The current reports from DNR list the following emissions from AECI coal plants: *

New Madrid:	HAP - 113 tons/year
	Total - 45,036 tons/year
Thomas Hill:	HAP - 117
	Total - 35,382 tons/year

* AECI Facilities Emissions Report. DNR Date received: 03/30/2005.

Why was none of this information included in the DEIS?? Why must we duplicate these environmental disasters when there is already more than

¹⁸ Exhibit C: Regulatory Review-Mercury by AECI

ample electrical generation and state of the art renewable and control technology that will NOT create these emissions? Such technology was not even mentioned by AECI to their EIS consultants, whose business is to keep abreast with developing and existing improvements in the field of energy generation! Why? Because AECI, not URS, drafted this report.

Given RUS's experience with multitudes of such documents, I am both surprised and shocked that they don't recognize the effrontery AECI has displayed here, much less the insult to the scientific community, the intelligence of laymen, and RUS themselves by calling this an EIS! It is hoped that this attempt to by-pass accepted regulatory environmental policy is recognized for what it is and, place AECI on par with all other applicants, by rejecting this DEIS, and refusing any financial assistance.

I would *again* suggest that instead of participating in this "con-game", why not simply contract an *unbiased laboratory* to sample, analyze, and correctly report coal data from the Wyoming mines; emissions from AECI's Thomas Hill "Poster Plant", [during normal operation!]; solid landfill waste, including flyash, from the same facility; and their wastewater effluent point source[s]? Surely, there are laboratories that AECI can't bribe? (Accepted and mandated laboratory quality control procedures, (method identification, precision, and accuracy), and analytical records are required for just this purpose.) This rational was suggested in my comments to RUS in 2005, but not heeded. I further suggest now that *no further action shall be taken with regard to AECI* until these determinations, as well as scientifically sound baseline studies have been performed. Only then should a Draft EIS be prepared and presented for review. Only then will we know exactly what Impact is significant, and can proceed in a transparent, orderly, and knowledgeable fashion, with truth, not AECI's ad agency, to assess mitigation. This is the time for the regulatory agencies to compare notes, and tell AECI to either follow the rules of the land, and quit wasting everyone else's time and money, or get out. (I have purposely only attached the bare minimum of supporting documents to this critique. I trust the consultants are capable of reading the entire applications from their cooperating agencies for themselves. After all, AECI wrote them as well as this DEIS! It seems only fair that URS, who receive financial remuneration, wade through the same garbage I did gratis.)

If there comes a time we actually do need additional electricity, there are many more capable, plus ethical companies that deserve the rewards of honesty. Enough is enough!

Rather than turning this area of fertile land into a future superfund site for ABSOLUTELY NO NEED because of politics, bureaucracy, avarice, lies, and

ignorance, (any redundancy is incidental), let's work together, aboveboard, to meet whatever our future needs actually may be, safely.

Response: The referenced laboratory data was provided by the coal mines for AECl's use in plant design. This laboratory data is unrelated to the stack testing procedure that would be used to measure actual emissions from the plant for monitoring compliance.

From this point throughout the remainder of the DEIS, the "shell and pea tricks" are used by AECl with increasing frequency. For the most part I'll do my best to avoid their game, and stick to the issues. It is also a good time to reiterate what we, C4 Association, have been saying since this project commenced. All chemical pollutants, whether they're called "criteria" or "hazardous", benign or toxic can only exist, like all matter, as gas, liquid, or solid ... usually as percentages of all three states. (With the exception of thermal and radioactive emissions, which is *also* a problem in this instance!) The objective of environmental engineering is to convert any of the three to the easiest state to remove with the least impact. There is no magic trick to just make it non-existent! Again, why must we take *any* risk for an unnecessary utility to enrich itself? Since there is no need for electrical generation in this area, there is certainly NO NEED for this project and its associated pollution!! The proper mitigation is *no action*. C13

The consultants go into great volumes of verbiage dealing with the description of various pollutants and the danger and toxicity of mercury and its normally occurring oxidation states. Most of this was the same information obtained from the internet that we, C4 Association, had previously presented to our County Commissioners. Their vacuous stares at us, and immediate "round filing" of it, was a fair indication that they comprehended little, and cared less.

AECl states and graphically illustrates, "U.S. anthropogenic [Of or relating to the study of the origins and development of human beings] mercury emissions are estimated to account for roughly three percent of the global total, and emissions from the U.S. power sector are estimated to account for about one percent of total global emissions." (UNEP, 2002) (Refer to Figure 3-5).

This AECl pie chart is GLOBAL! Using the same data, power plants contribute to 33.3% of US mercury emissions!

The study reported in The New England Journal of Medicine (a reputable news source I think you will agree) involved more than 65,000 women ages 50 to 79.. These women did not have cardiovascular disease at the time the study commenced. They were followed for 9 years and the results of the study were correlated with outdoor air pollution levels near their homes. It was found that the risk of developing heart disease was much greater where there were higher pollution levels and that the risk rose with increases in the fine particulate matter levels. I am attaching a copy of the study as reported in The New England Journal of Medicine. I am also enclosing a synopsis of this article that appeared in Journal Watch. C11

There have been multiple other articles published regarding the deleterious health effects of air pollution, particularly of fine particles of 2.5 microns or less. The Missouri Department of Natural Resources section on National Ambient Air Quality Standards also indicates that inhalation of particulates increases chronic and acute respiratory illnesses. Given the health risks, as well as environmental risks, of burning coal to produce energy, it seems reckless to build any more coal-fired power plants, near Norborne or anywhere else. C11

First, it is clear that this power plant will emit harmful particulate matter into the atmosphere and then into our local water supply. C14

Response: Regarding air pollutants, the standard used to evaluate significance is compliance with regulatory air quality standards. This is addressed through an air permit with the Missouri Department of Natural Resources (MDNR). AECI has applied for an air permit, and will need to demonstrate to MDNR that the air pollution equipment they are proposing is the best available control technology and that they will meet the emissions requirements.

Does the EPA/RUS have any studies on Impacts to human health, increased asthma, neurological and heart disease, etc.? C78

Response: The health effects of particulate matter and other criteria pollutants are discussed in Section 3.1.1.2.2 *Criteria Air Pollutants*.

2. Air Quality (ozone) - As requested in our letter dated October 26, 2005, we continue to recommend that the potential ozone impacts from the facility be fully assessed through modeling. The ambient air ozone values measured during pre-construction monitoring, page 3-35, verify that ozone values above the National Ambient Air Quality Standard (NAAQS), are present in the project area prior to construction of the facility. This project

will result in an increase of emissions of ozone precursors and may potentially contribute to a violation of the ozone NAAQS. C8

Response: AECI will address this through their air permit application. Also note that compliance with the ozone NAAQS is calculated as the three year average of the annual 4th highest eight hour ozone level. Using the method of determining compliance with the eight hour ozone standard that is specified in federal regulations, the eight hour ozone NAAQS has not been exceeded at the AECI operated site.

AECI has indicated that the operations at the proposed facility will not contribute to elevated ozone concentrations within the Kansas City region. Ozone formation is a photochemical process that is difficult to replicate without extensive resources and modeling databases, and, as such, the assertion that AECI will not contribute to elevated concentrations can not be confirmed. C17

Response: The Draft EIS, on page 3-30 states:

The windrose shown in Figure 3-12 shows that the predominant wind directions during the ozone season are from the south, the south-southeast, and the south-southwest. This demonstrates that the proposed project, located to the northeast of Kansas City would not be expected to be a contributor to elevated O₃ levels in Kansas City.

It is possible that the emissions from the proposed project, during the small percentage of time that they could be transported from the area of the proposed project to the Kansas City area, could result in an increase in ozone levels.

As AECI's emission estimates indicate that the proposed operations would result in volatile organic compound (VOC) emissions greater than 100 tons per year, preconstruction monitoring for ozone is required. C17

Response: Table 3-5 *Monitoring Data – Vicinity of the Proposed Project* summarizes the preconstruction ozone monitoring data collected by AECI.

Since ozone is difficult to evaluate through the use of air quality models, EPA has established siting criteria based upon the movement of air masses within a region rather than relying on expensive photochemical analyses.

For point source emissions, the time it takes for ozone to form is dependent upon several meteorological parameters such as wind speed, temperature, cloud cover, etc. Under low wind speed conditions, the maximum ozone concentration should occur within three to four hours downwind of the source. As such, sites within a 15- to 20-mile radius of the facility are often chosen with emphasis placed upon locations downwind of the prevailing wind direction. Emphasis is not placed on urban areas when determining network design. C17

Response: This is addressed in the air permit application. Siting of ozone monitors in the Kansas City area was done by the MDNR. Siting of the ozone monitor in the vicinity of the proposed project was done at the direction of the MDNR.

3. **Page ES-9 Impact Analysis, Table 2-24 and 3.1.2.3 Impact Assessment Methods.** AECI must demonstrate that the impact from the proposed facility will be below the levels specified in 10 CSR 10-6.060(11)(D) Table 4 prior to concluding that there will be no significant impact from the operations at the proposed facility. The department is currently reviewing AECI's permit application. AECI will need to submit a complete air quality analysis that demonstrates compliance with the National Ambient Air Quality Standards, the increment standards or the Risk Assessment Levels. In addition, AECI will need to submit an evaluation of the impact from Hazardous Air Pollutants and visibility impairment for review. The department can determine compliance with all applicable standards and any potential adverse impacts once an analysis is completed. C17

Response: USDA/RD agrees. The Draft EIS impact analysis is based upon compliance with the permit and other regulatory requirements.

The cost for SO₂ health costs alone are \$7000/ton. What would be the estimated costs for AECI's plant? What mitigation will AECI assume for these effects? C78

Response: Through the National Ambient Air Quality Standards (NAAQS) USEPA sets limits for emissions, including SO₂, to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Through the air quality permit and by means of air pollution control equipment as described in the Draft EIS, the plant will meet the NAAQS. There are therefore no mitigation plans for SO₂.

Other pollutants that this power plant will produce include sulfur dioxide and nitrogen oxides. AECI stated in a report that they have reduced nitrogen oxides by more than 80 percent during the summer months when nitrogen oxides contribute to smog formation. In a later public meeting with AECI officials, it was stated that this plant will be used primarily during the winter months. Who will act as the "watch dog that will require AECI to use these controls year around, and not just during the summer months when the plant is dormant?! C14, C16

Response: This will be a baseload plant that will be operated year round. The same controls will be used year round.

AIR-404 Greenhouse Gas Emissions and Climate Impacts

1. Looming over every decision to build a coal-fired plant are the consensus that climate change is real and dangerous and the growing certainty that there will soon be government regulation of greenhouse gas (GHG) emissions, especially of carbon dioxide, probably in the form of either a cap-and-trade pollution credits regime or an out-and-out tax on carbon emissions. There are bills in Congress calling for reductions in GHG emissions of as much as 80% below 1990 levels by 2050.

To put it into perspective, the Energy Information Administration of the Department of Energy says that electric power generation accounts for 40% of US energy-related CO₂ emissions, while coal emissions increased 28% between 1990–2005. Since the U.S. accounts for 25% of all GHG emissions, American power plants are responsible for 10% of global GHG emissions. With well over 100 new coal plants in the construction or planning phase here and hundreds more in the rest of the world, each new increment counts.

An EIS must consider the environmental impacts and unavoidable adverse effects of a proposed action. 42 U.S.C. § 4332(2)(C)(i-ii). AECI evades this responsibility by setting the completely unrealistic significance criterion of 1% of total U.S. CO₂ emissions (DEIS Part 3.1.2.3, p. 3-43). No facility in the world could come close to that level, yet every sizeable coal-fired electric plant is a significant source. AECI has defined the problem in a way that dismisses it from consideration. C10

Response: The referenced discussion in Section 3.1.2.3 *Impact Assessment Methods* has been revised in the Final EIS.

2. (Section 3.1.1.2.5, P 3-27). The information in this paragraph is based on the Intergovernmental Panel on Climate Change (IPCC)'s Third Assessment

(2001). The department suggests that the DEIS be updated to incorporate information from the IPCC's recently released report, Climate Change 2007: The Physical Science Basis, Summary for Policymakers. A copy of this report is available at http://media.washingtonpost.com/wpsrv/nation/documents/climate_report_020207.pdf C17

In regard to Global Climate Change, once again AECI/URS wrote a lengthy history of Green House Gases (GHG), points out the general consensus that human activity (fossil fuel burning in particular) is increasing the GHG emissions, and then drops the subject by saying "What is not entirely clear is the relative role of natural temperature cycles and CO2 emissions increases." In light of current general agreement in the scientific community that GHG produce by human activity are absolutely contributing generating power plant, and subsidize it with tax-payer money. In addition, the current regulatory/political direction seems to be moving toward reducing emissions and increasing the cost of those emissions through purchased credits and/or taxes, which could make this plant prohibitively expensive to operate in the future. C23

Response: In the Final EIS Section 3.1.1.2.5 *Global Climate Change* has been updated with the 2007 information. Final EIS Section 2.2.5.3.1 *Coal – Greenhouse Gases (GHGs)* has information about the potential cost impacts of carbon charges.

Does AECI plan to join the Environment Protection Agency's 'Climate Leader' program? C26

Response: The Climate Leader Program is a voluntary program with individual emission reduction goals set by each participant. AECI has chosen instead to join the Chicago Climate Exchange (CCX) which maintains a functioning greenhouse trading market both domestically and in Europe. There are binding requirements for CCX members with commitments to reduce emissions by 6% by 2010. Associated believes that future greenhouse gas restriction programs will be market based and that the CCX is the best place to participate in the early stages as these programs are developed.

AIR-405 Regional Avoidance Criteria, Class I Areas, New Source Review, and the Prevention of Significant Deterioration Program

1. **Page 2-88 Regional Avoidance Criteria**. Section 165 of the Clean Air Act outlines the roles and responsibilities of the Federal Land Manger (FLM)

within the framework of the Prevention of Significant Deterioration program. The FLM is responsible for air resource management within the boundaries of Federal lands that Congress has assigned national/regional value due to natural, scenic, recreational, and/or historic worth. Within each Class I area, AECl is responsible for demonstrating compliance with the Class I increments as noted above. In addition, AECl must demonstrate that the proposed emissions will not cause an adverse impact on any air quality related values, such as visibility, that have been defined for each Class I area. *C17*

Air quality models for assessing pollutant impacts were limited in the 1980s and could only accept a small number of sources, source types, and receptors. This restricted their ability to evaluate the impact of large sources located more than 100 kilometers from a Class I area.

The adoption of long-range transport models, such as CALPUFF, has provided a tool for assessing pollutant impacts from large sources at distances up to 300-kilometers. The use of this robust modeling system does require additional information, such as terrain heights, time variant meteorological conditions, etc. not previously required. However, the results now achievable provide a more accurate picture of plume trajectories and pollutant impacts. *C17*

The avoidance criteria displayed in Figure 2-34 do not reflect the requirements contained within the Clean Air Act, the Federal Land Managers' Air Quality Related Values Work Group (FLAG) document or the New Source Review Workshop Manual. Proposed guidance from the FLAG outlines an annual emissions/distance (Q/D) screening criteria to determine if visibility and deposition analyses will be required for sources who propose to locate more than 50-kilometers from a Class I area. *C17*

The New Source Review Workshop Manual provides guidance that "If a proposed source or major modification may affect a Class I area, the Federal PSD regulations require the reviewing authority to provide a written notification of any such proposed source to the FLM (and the DOI and USDA officials delegated permit review responsibility)." EPA interprets the term "may affect" to include major sources proposing to locate within 100 kilometers (km) of a Class I area or even at a distance greater than 100 km if it is of such size that the reviewing agency or FLM is concerned about potential emission impacts on the Class I area. The reviewing agency can then require the applicant to perform an analysis of the source's potential emissions impacts on the Class I area. This is because certain meteorological conditions, or the quantity or type of air emissions from

large sources locating further than 100 km, may cause adverse impacts on a Class I area. C17

Region of Influence Page 3-6. The department can not confirm the results contained within Table 3-2 until AECI completes and submits the ambient air quality impact analysis for review and approval. C17

Typically, EPA requires an analysis of impacts on Class I areas within 100 km (about 62 miles) of a major new source of air pollution. However, if a major source proposing to locate at a distance greater than 100 km is of such size that USDA or the FLM is concerned about potential emission impacts on the Class I area, the AECI can be required to complete an analysis of the potential impacts on the Class I area. Adverse impacts could potentially occur due to certain meteorological conditions, or the quantity or type of air emissions from such large sources. Long-range transport models, such as CALPUFF, provide the means to evaluate the impact of large sources at distances up to 300-kilometers. C17

The criteria contained in Section 3.1.1.1 do not reflect the requirements contained within the Clean Air Act, the Federal Land Managers' Air Quality Related Values Work Group (FLAG) document or the New Source Review Workshop Manual. Proposed guidance from the FLAG document outlines an annual emissions/distance (Q/D) screening criteria to determine if visibility and deposition analyses will be required for sources proposing to locate more than 50-kilometers from a Class I area. C17

Response: Figure 2-34 is a representation of what AECI used in their siting studies in the 1980s. The text describes the siting work in 1980s. The Draft EIS on page 3-46 shows the potential visibility impact of the proposed project. The AECI analysis that produced these results was based on guidance provided by MDNR.

3.1.2.4.1 Impact Assessment. Under the Prevention of Significant Deterioration program, a full impact analysis is required for each pollutant from the proposed source that has a significant impact as defined in 10 CSR 6.020 (2)(S)(10). A full impact analysis must consider emissions from the proposed source, existing sources, and any growth that may occur as a result of the proposed activity. The impacts outlined in Table 3-9 reflects the impact from the proposed source and does not consider impacts from interactive sources within the region. Since the evaluation does not consider the impact from interactive sources, AECI can not state that compliance with all applicable standards has been established until the full analysis is completed and approved by the department. C17

Response: These items are addressed in the air permit application.

3.1.2.4.1 Impact Assessment: Ambient Air Quality Standards. The projected potential emissions associated with the plant (including cooling tower emissions) are shown in Table 3-8. These values are an initial estimate of potential to emit and have been revised as the PSD review process has progressed. Current potential emissions estimates for the majority of pollutants are within 10 percent of the values presented in Table 3.1.2.4.1. Mercury and NO_x potential estimates are between 10 to 15 percent lower than the quantities listed in the table. Potential emissions calculations are based on the boiler operating 8,760 hours per year. The auxiliary boiler will operate for no more than 2,190 hours per year, while the other ancillary equipment will be limited to no more than 500 hours of operation. C17

Response: In the Final EIS, this table has been revised with updated information.

AIR-406 Hazardous Air Pollutants (HAPs)

1. There is little discussion of the other toxic by-products AECI will be introducing to the impact zone; Most importantly, lead, arsenic, and radioactive elements, specifically uranium and thorium! *"For the year 1982, assuming coal contains uranium and thorium concentrations of 1.3 ppm and 3.2 ppm, respectively, each typical plant released 5.2 tons of uranium (containing 74 pounds of uranium-235) and 12.8 tons of thorium that year. Total U.S. releases in 1982 (from 154 typical plants) amounted to 801 tons of uranium (containing 1,371 pounds of uranium-235) and 1971 tons of thorium."* Since coal hasn't changed its characteristics in 25 years, and since AECI certainly has no intention of admitting to any hazardous emissions, much less installing effective controls, we can depend on similar emissions if this proposed plant is operated. This information has been presented to both AECI and RUS on other occasions over the last 2 years. Rather than the problem being studied, debated, or checked, it has simply been ignored. We don't believe this "Ostrich Syndrome" being displayed by regulatory agencies, utilities, or their consultants are in the best interests of the citizens of this county or the world! C13

Please comment on the following study published by Oak Ridge National Laboratories, Coal Combustion: Nuclear Resource or Danger, by Alex Gabbard. His report states average coal contains 1.3 ppm Uranium, and 3.2 ppm Thorium. This study may be viewed at:

<http://www.ornl.gov/info/ornlreview/rev26-34/text/colmain.html>. C78

Response: In February of 1998, the USEPA provided the United States Congress with a report on the public health impacts of emissions of air toxics from utilities that burn fossil fuel. Pollutants that were considered in that report included 67 air toxics, including arsenic, nickel, chromium, radionuclides, and mercury. "The report indicates that, although uncertainties in the analysis exist, on balance, mercury from coal-fired utilities is the hazardous air pollutant of greatest potential public health concern."¹⁹ The report also found that "... three other air toxics for which there are some potential concerns and uncertainties that may need further study: dioxins, arsenic, and nickel."¹⁰ As a result of the findings from this report, USEPA has adopted a Hazardous Air Pollutant emission standard and a New Source Performance Standard for mercury. It is for this reason that the Draft EIS included results of a health risk study related to mercury emissions.

3.1.2.3 Impact Assessment Methods. AECI's evaluation of the impact from Hazardous Air Pollutants has not yet been submitted for formal review. As such, the department can not confirm compliance with all applicable standards or state that an adverse impact will not occur.

In addition, AECI will need to submit an evaluation of the impact from Hazardous Air Pollutants and visibility impairment for review. The department can determine compliance with all applicable standards and any potential adverse impacts once an analysis is completed. C17

Response: This is addressed in the air permit.

AIR-407 General Air Quality and Air Pollution Issues

1. **General Air Pollution Issues.** The Missouri Open Burning restrictions prohibit burning of Solid Wastes generated from the project. For example, cardboard, pallets, fence posts, and demolition waste from farm structures demolished may not be burned. This waste must be taken to a permitted landfill or transfer station for disposal. C17

Brush can be burned as long as it is outside city limits and greater than 200 yards from the nearest structure. C17

Response: The Draft EIS states "Other waste generated during construction and operation, except any regulated hazardous waste

¹⁹ Fact Sheet, Utility Air Toxics Report to Congress, United States Environmental Protection Agency, February 24, 1998. <http://www.epa.gov/ttn/atw/combust/utiltox/utoxpg.html>

that may be generated, would be picked up by a licensed waste hauler and taken to a permitted sanitary landfill." A reference to the open burning regulations has been added to Appendix A, Relevant Federal and State Environmental Laws and Regulations.

2. Any structures being demolished must be inspected for asbestos prior to demolition. If asbestos is found, it will probably need to be removed by a Missouri-registered asbestos abatement contractor. All demolition projects must send notification to the department along with a copy of the inspection report 10 working days before demolition begins. This must be done even if no asbestos was found in the structure. *C17*

Response: Reference to Missouri asbestos requirements has been added to Appendix A, Relevant Federal and State Environmental Laws and Regulations.

Other concerns that need to be addressed also include the air quality not only on a local scale, but also a global scale - coal is not the answer for providing electricity for future generations! *C16*

Response: Air quality issues addressed on a global scale in the Draft EIS include mercury and greenhouse gases.

Has AECl even suggested shouldering the medical costs of the elderly, people afflicted with COPD [chronic obstructive pulmonary disease], pregnancy difficulties, autistic children, etc.? I submit that avoidance of responsibility for any future pollution related health problems explains why no chemical baseline studies were performed for this EIS. Is "eat less fish" their idea of mitigation for mercury contamination? They seem to take the position that, since everyone else is already adding to the environmental loading, why can't they? Isn't it high time that major polluters started taking responsibility for the health damage they cause? We can certainly live better without their dirty electricity, than not live at all! There was no health cost increase included in the socioeconomic portion of this EIS. Don't the consultants even check medical journals? *C13*

Response:

Miscellaneous Health Issues. The primary cause of COPD is cigarette smoking. Air pollution can also be a contributor, but the proposed project would not cause exceedances of EPA's National Ambient Air Quality Standards, which are set to protect public health, including that of sensitive populations. Regarding a possible link between mercury emissions and autism, see added

discussion in the Final EIS, Section 3.1.1.2.4 *Hazardous Air Pollutants (HAPs)*.

Fish Consumption. The Missouri Department of Natural Resources has issued a state-wide fish consumption advisory for a segment of the population because of the current mercury concentration in these fish. As stated in the Draft EIS, Section 3.1.2.4.1 *Impact Assessment*, based on the mercury evaluation done for the EIS, “there would be no change in limits on recommended fish consumption due to the incremental increase in mercury in the fish” from emissions from the Proposed Action. .

Under section 3.1.2.4.1, on page 3-46, in AECI/URS’s comments on soils and vegetation they refer to an evaluation using an air quality model. They did not take any samples of existing soil, specify what the model is, whose model it is, or indicate the reasons it should be considered a valid model. Yet, because “the analysis showed that emissions of SO₂ and NO_x related to the Proposed Action would be highly unlikely (emphasis added) to caused adverse effects” (based on AECI’s own unbiased report in 2006!!!), they concluded “the Proposed Action would not have significant adverse effects on soils and vegetation.” Talk about printing what you want to be true and saying it is so because it is in print! C23

Response: The model used was a USEPA approved air quality model. The proposed plant must show through the air permitting process that not only will it not cause or significantly contribute to violations of the primary (health related) air quality standards, but also, it must make the same showing for secondary (public welfare related, including protection against visibility impairment, damage to animals, crops, vegetation, and buildings.) air quality standards.

GRO-500 Groundwater Resource Impacts

1. Groundwater/Surface Water Interaction: The water in the Missouri River and the groundwater in the alluvium are linked hydrologically and for some purposes should be considered as one unit. The Final EIS should address the interaction between groundwater and surface waters. Two statements in the DEIS hint at this relation. The first, on page 3-70, last paragraph, is the statement that fluctuating levels of the river affect groundwater levels. The second is the comparison of the amount of water needed for power plant operations to river discharge under low-flow conditions, concluding that water withdrawn for operations is less than 1/10 of one percent of flow. Yet a discussion of the interaction between groundwater in the alluvium and surface water is not provided. The reader is likely to be

further confused because in other places in the DEIS, statements imply that groundwater and surface water are isolated from each other. For example, page 3-97 (second paragraph) describes that pumping of groundwater from the collector wells located on the river banks will have effects "...in the aquifer beneath the river, not in the river water itself." Page 3-98 (first bullet) states even more explicitly that the two are separate: "use of groundwater at the Missouri River would prevent impacts from surface water withdrawals." C7

Pumping of the groundwater will, in turn, induce river water to be drawn through the sediments to the pumps. It is recommended that the authors contact Brian Kelly, a hydrologist with the U.S. Geological Survey's Missouri Water Science Center in Lee's Summit, to obtain information about his research on groundwater / surface water interaction between the Missouri River and its alluvium. He can be contacted at (816) 554-2414 or at bkelly@usgs.gov. C7

Response: We have contacted Brian Kelly, who has reviewed the applicable parts of the Draft EIS and has provided specific comments for clarification that have been incorporated into the EIS. Changes were made in the Final EIS to Section 3.3.2.3 *Impact Assessment Methods* (changed to clarify that the larger impacts on groundwater levels are from longer term fluctuations such as those that occur seasonally or with river management flow releases) and to Section 3.4.2.3.2 *Operation Discharges* (changed to indicate that the effect of pumping on Missouri River water levels would not be measurable).

Page 3-81. Groundwater withdrawal, and Page 3-97, Hydrologic effects on streams and other water bodies: While river levels fluctuate greatly and have a strong influence over floodplain wetlands, continued water withdrawals for such uses as irrigation, power generation, and ethanol processing could adversely affect area wetlands through their cumulative effects, particularly during drought. If the Big Lake Site is pursued, the potential effects to wetlands should receive a thorough evaluation using river discharge and stage information from Rulo, Nebraska. C7

Response: If the Big Lake Site is pursued, these items will be evaluated.

2. Section 3.3.2.3 Impact Assessment Methods, Page 3-72, second paragraph, second sentence: The assumption that river levels at the project site will vary similarly with changes in flow as do the river levels at the Waverly gage may not be valid. The stage-discharge relation is a function of (among

other things) channel geometry (Rantz and others, 1982) at a particular location and will vary from place to place. Site specific hydrologic and cross-sectional data would be needed to verify this assumption.

REFERENCE: Rantz, S.E., and others, 1982, Measurement and Computation of Streamflow, U.S. Geological Survey Water Supply Paper 2175; available on the internet at: <http://pubs.usgs.gov/wsp/wsp2175/>. C7

Response: While not precisely reflecting the conditions at the site, on the scale required for this analysis, the data from the nearest station was adequate.

There are two groundwater quantity issues associated with this proposed power plant. The long-term water supply for the power plant. AECI proposes to use groundwater extracted from the Missouri River alluvial aquifer through two horizontal collector wells constructed adjacent to the Missouri River in the southwest corner of the Carroll County. The horizontal collector wells will produce water through several horizontal well screens that are extruded mostly beneath the bed of the Missouri River, and drain into a central, large-diameter caisson. Because most of the intake radials are beneath the river, a large percentage of the water they produce is induced infiltration from the river, with a minor part of the water being produced from the alluvial aquifer. Although the amount of groundwater that will produced seems large, as much as 7,400 gallons per minute, much of this will be replaced directly by river infiltration, and compared to the flow of the Missouri River this quantity of water is very minor. The Missouri River alluvium is a prolific aquifer. The aquifer, which underlies the Missouri River floodplain, is relatively wide in Carroll County. The high transmissivity of the alluvial aquifer, coupled with the ease of recharge from precipitation and from the river during high river stage, allow large quantities of groundwater to be produced with minimal drawdown effects. The magnitude of the off-site drawdown caused by the collector wells will likely be much less than the normal water-level fluctuations experienced by the aquifer during a normal year. There is no reason to believe that use of water from the alluvial aquifer will adversely impact wells drilled into bedrock or glacial drift aquifers north of the river valley. The department has already made arrangements with AECI to obtain permanent use of a water well near the collector wells so that groundwater levels can be continuously monitored and the data made available to the public real-time. C17

A second groundwater quantity issue involves dewatering during construction of a rotary rail car unloading facility. Because of the depth of structure, the water table will be temporarily lowered in the vicinity of the excavation during construction. Groundwater dewatering in conjunction

with construction excavation is a common and necessary practice. The impacts to groundwater levels are temporary. Water levels reduced during dewatering will recover quickly after construction ends and the dewatering wells are stopped. Groundwater modeling by Burns and McDonnell show that several nearby wells may be temporarily affected while the unloading facility is being constructed, but that the effects of drawdown can be minimized through injection wells and other techniques. Shallow sand point wells that extend only a few feet below the normal water table elevation are the most likely type of private water supply well to experience difficulties if groundwater levels decline appreciably. There are several dewatering and injection options under consideration by AECI that can exacerbate the short-term water-supply problems that may be experienced by a few nearby residents during construction. In addition, there are alternative water supplies including a rural water supply district that can be used to ensure continued water supply to impacted residents. *C17*

Response: Thank you for your comment. That information provided in the comment that is not already in the Draft EIS has been added to the Final EIS (Section 3.3.2.4.1 *Impact Assessment*).

3. As stated in our October 26, 2005, letter, we recommend that the Final EIS disclose the source of drinking water for the plant. If the well field proposed for operation is also used for potable drinking water, the facility may be classified as a public water system and subject to regulation by the state of Missouri. *C8*

Response: AECI would purchase potable water from one of the local water supply districts or municipal systems. The Final EIS has been edited to reflect this (Section 2.4.4 *Water Supply*).

Second, the water quantity will be directly affected during the dewatering stage of the construction phase of the project as stated by AECI. After the plant is complete and operating, the water quality of the area will be subject to pollutants expelled from the power plant. Several property owners have received letters from AECI stating their water supply will be limited for up to six months during the construction phase of the plant. Where will these local residents get their water on a daily basis? Rural water is currently not available to them and if it were, it would still cost them a tremendous amount of money to receive water! Who will compensate these residents for six months without water?! Who is to ensure that after this six month period the water will be clean and in the same condition as before the construction started? AECI must be held accountable for any distress imposed on area residents! *C14*

Response: See Section 3.3.2.4 Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts for a discussion of the actions incorporated into the proposed action to prevent groundwater contamination.

The water quantity in the immediate area will be affected during the dewatering stage as AECI has stated, as well as decreased water quality in the future caused by particulate matter and mercury, sulfur dioxide and nitrogen oxide emissions. C16

Even after the dewatering stage of construction phase when my grandparent's wells and wetlands dry up, there is the concern regarding the water quality of the immediate area of the power plant after it becomes operational. Coal-fired power plants are the world's leading producer of mercury emissions. Particulate matter, both microscopic and visible matter such as fly ash, will readily pollute local water bodies and seep into ground water supplies, thus effecting well water quality of local residents. Residents using well water often have minimal or no protection, via filters and purification technologies, against environmental pollutants. Will AECI be required to provide residents whose wells are negatively impacted with Rural Water Services available within the county? C16

As a "good corporate neighbor" what is the plan should their ~8,000 gal/min water use deplete the water supply to the town of Norborne, neighboring wells, and irrigation systems? Denying the possibility is not a mitigation plan! What US Geological Survey (USGS), Corps of Engineers (COE), Department of Natural Resources (DNR), and/or other reliable aquifer map for this area was used to substantiate and define the aquifer disposition, i.e., boundaries, retention rate, and volume/capacity? Such documentation is most critical to this EIS! C13

Will the so-called dewatering wells actually be removed after the 80 feet excavation is completed? Or, does AECI anticipate using them as a surreptitious method of obtaining sufficient water? It is quite obvious that a series of "dewatering" wells closely resemble the design of the "combined well" system located adjacent to the Missouri River, their alleged only water source. Again, the consultants printed only what AECI gave them. C13

As for the combined well system mentioned above, AECI performed a well publicized feasibility study in 2006. Where is the Army Corps of Engineers, (The stated cooperating agency.), permit for this activity? The normal procedure for such disruption to the Missouri River Drainage Basin is to obtain such required permits before, not after, the fact. We see no

evidence that any permit applications were ever submitted or received!
C13

In early January, my grandparents received a letter from AECI stating that during construction their water supply will be limited for up to 6 months.
C16

AECI/URS discusses the construction phase de-watering awfully non-chalantly. I did not receive a letter stating that my well may be affected, but it is less than 2 miles away in the bottom land. If my well goes dry will they compensate me? Provide water? *C23*

When AECI is drawing 7400 GPM during a drought, how can our water supply not be affected? I know they say it is coming from the Missouri River alluvial fields, but our wells are also connected to those same fields. Insufficient water will kill a community. Farmers in the area have noticed water level changes when neighbors installed irrigation systems which use much less water than what is being talked about here. *C23*

Another seeming lack of thorough consideration of possible impact relates to the "dewatering" procedure. There was some discussion of the effect on nearby wells; however, there was no mention of the effect this would have on crops should this dewatering occur during growing season. This should have been addressed. I also question why the response to this issue would be shifting the responsibility for mitigation of this impact to the contractor. How does this address the issue? And how can the public reasonably respond to shifting responsibility as a form of mitigation? *C29*

So my husband and I have a farm which is about half a mile west of the proposed power plant and I think it is very interesting that anybody can say that this has nothing -- no impact on ground water or agriculture, because two months ago, eight residents that lived about half a mile surroundings of this land got a letter and AECI told them that unfortunately during construction, the wells would be affected, which means they are going to run us out of water. And it's probably going to be only six months, but everybody knows that when a well has been dry for six months chances are that it will never run again. So how on earth are we supposed to run a cattle operation? How are we supposed to run a farming operation? How are we supposed to live without water? Water is life. So they might as well run us out of there because we cannot go on living there without water. And, that is what I would call significant impact. *C65*

I'm very concerned about the water and how this dewatering is going to take place. I'm afraid that the town of Norborne is going to -- not be available to have water for all of their residents. C77

And about the watering project. I believe I heard about that project to receive a letter about that, January 4, I believe, it's about how surrounding the excavation site and the wells (indiscernible) up to 2.4 gallons a minute out on the ground and let it go to my draining system for up to six months. Then they're going to steal our water from underneath and then flood us out on top. C96

One of the things that I was a little upset about and maybe someone else will address this. There's a procedure called the watering which will take place during the construction, and about nine or so of us who live near the site will have our water supply impacted. And we had expected that there might be something in the EIS to explain exactly what this procedure is and just how it would be mitigated, and all I found was that that would be the contractor's decision. And I thought that was really not addressed very well. C29

Response:

Water Well Impacts. The Proposed Action's major potential concern (addressed in the EIS) with water wells is related to long-term groundwater withdrawals associated with the supply wells for the proposed project and short-term drawdown associated with dewatering during construction. The hydrogeologic investigation for the supply wells indicated that adverse impacts to nearby users from groundwater withdrawal for the supply wells are highly unlikely. This detailed investigation was conducted by a qualified third party and the results were reviewed by URS groundwater specialists. The full report is included as Appendix E to the EIS and the results are summarized in the EIS in Section 3.3.2.3 *Impact Assessment Methods*. As discussed in Section 3.3.2.4.1 *Impact Assessment*, some wells may be affected for a few months during construction dewatering. Should adverse impacts to wells result from either the water supply well or from construction dewatering, AECI will mitigate the impacts as described in the EIS (Section 3.3.2.4.2 *Mitigation and Residual Impacts*). AECI's obligations under Missouri law are discussed in Section 3.3.2.1 *Identification of Issues*.

Potential contamination of groundwater as a result of spills during construction or operation, or from the landfill is also addressed in

the EIS (Section 3.3.21. *Identification of Issues*, Section 3.3.2.3 *Impact Assessment Methods*, Section 3.3.2.4 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*, and Section 3.3.2.4.1 *Impact Assessment*).

Air emissions from the proposed plant would not be expected to impact groundwater. In this area, groundwater contamination from agricultural fertilizer (nitrates) and pesticides, or from septic tanks (three of MDNR's top 10 priority groundwater pollution sources) would be a greater concern than possible impacts from the proposed project.

Agency Aquifer Maps. The listed agencies have available general information for this area. The site-specific soil, geology and groundwater data collected for this project are far more detailed than information available from agencies.

Possible use of dewatering wells for water supply. The dewatering system for the proposed excavation would be temporary, and has not yet been designed; however, it is unlikely to resemble the very large wells with lateral arms that will be installed for water supply. The purpose of the dewatering wells would not be to remove large quantities of water, but to temporarily lower the water table. The design criteria and resulting design would be very different.

Permit for Hydrogeologic Investigation. A permit from the Corps of Engineers for the hydrogeologic investigation for the well field was not required. A Section 10 permit for the production well will be required, as noted in the EIS (Section 1.3.2 *Federal Cooperating Agency--U.S. Army Corps of Engineers*).

4. In discussing ground water they indicated there aren't year round springs in the area. This is definitely not true. We rely on a spring to water cattle. It runs year round, just under 2 miles down the road, out of the same hill the landfill will be in. C23

Response: This information has been added to the Final EIS (Section 3.2.1.2.1 *Regional Setting*).

5. In section 3.3.2.1 under Potential Contamination of Groundwater the DEIS states: "Because of the higher potential for landfills to result in groundwater contamination, long-term monitoring is required by state regulations." What kind of monitoring will be done? Who will do it? Will monitoring be done with the focus being on prevention of contamination, or

catching them after the damage is done? Who will clean up the water? How will we live and farm if our water is unusable? If contamination occurs after AECl quits operating this plant, who will be held responsible? Will the county be faced with clean-up costs they cannot afford? It is interesting that in public meetings AECl representatives have said our water is safe, the landfill won't leak, or we'll all be dead before it leaks (now THAT is comforting!). As it turns out, they were only placating people they thought they could hood-wink. C23

The first thing I want to talk about is -- I'll talk about the environmental issues. Who here wants a toxic landfill in their backyard? That's what we're going to get. Who here would like to have their drinking water under a toxic landfill? With a wad of cash for this toxic landfill, not (indiscernible) wells are (indiscernible). Sure, I'm sure they can engineer it so there might not be a problem, but what if there is a problem? When you talk about your drinking water there's zero room for an error and they have not addressed that. On the air with the landfill I read some problems about oh that's a long way from it. The topography of the land is the same. It dumps right into the river bottom on a hill. I wanted to build a structure there so I got NRCS to stake out a pond. They came out and said we will not build you a little pond because the soil here is not where it will hold water. It's sand, and I mean, everybody who lives in the area knows that that hill is sand. It will not hold water. It's a poor place for a landfill. They have said, they implied it, but, you know, what if there is water? Toxic waste will get in our land water. C95

Mitigation details should flooding and/or leaks occur were also **absent**. C13

Response: These items are addressed in detail in the Rules of the MDNR, Division 80, Solid Waste Management, Chapter 11, Utility Waste Landfill, available on the internet, or by contacting MDNR. Because of the volume, applicable regulations are not included in the EIS, but are referenced. These requirements will be incorporated into the landfill permit. MDNR has requirements for the permeability of the landfill liner, which will be part of the landfill permit. If the local clay does not meet the requirement, suitable clay would need to be brought from off-site. A synthetic liner is also required, in combination with the clay liner. (Section 2.4.8.3 *Utility Waste Landfill*). MDNR also requires monitoring of the groundwater adjacent to the landfill so that if the landfill did leak it would be detected and corrective action could be taken before any off-site impact would occur. The groundwater threat represented by this landfill, with its strict construction and long-term monitoring requirements, is small compared with

groundwater threats from far less controlled sources such as agricultural fertilizer and pesticides and from septic tanks.

6. In section 3.3.2.4.2, Mitigation and Residual Impacts under Environmental Consequences, AECI/URS states: "No mitigation measures have been identified because impacts are not anticipated. However, AECI is committed to mitigate any serious adverse impact if it occurs." Who defines "serious" and "adverse?" And who decides what mitigation is acceptable? C23

Response: From Section 3.3.2.1 *Identification of Issues*: "Missouri is a riparian water law state, which means that all landowners touching or lying above water sources have a right to a reasonable use of those water resources. Recent case law has established the reasonable use criteria that the State Supreme Court has been following. Reasonable use requires that other users and landowners not be overly adversely impacted." If parties cannot agree on "overly adversely impacted" it would be decided by a court.

SUR-600 Impacts to Surface Water

1. Booker Slough is not referred to in section 3.4.1.3.2, discussing waterways in the Norborne area. This waterway is on maps, and runs through the proposed plant site. It is an important drainage route for all the farms in the area and flows into Wakenda Creek a few miles NE of the site. C23

There is no discussion of preserving the Booker Slough to prevent flooding upstream or of managing water flow into Booker Slough so that downstream farms/homes are not impacted. How will Booker Slough be protected? How will its function be protected? Where will their runoff water go? They say they will treat it, but can it possibly be as clean as it started? C23

And then there's Booker Slough. According to maps in the DEIS, the plant itself, as well as the rail loop, will be in Booker Slough, yet I see no mention of how this will impact the local environment, i.e., drainage. It's my understanding that the area encompassing the plant site and rail loop will be filled so that it is above the 100 year flood level. These things will most assuredly affect the farm ground Booker Slough drains. And while Booker Slough may have been dry when the site surveyor visited, rest assured, it is not after a good rain. C29

Response: A discussion of Booker Slough has been added to Section 3.4.1.3.2 *Norborne Area* in the Final EIS. See Section 3.4.2 *Environmental Consequences* for a discussion of surface water impacts and measures incorporated into the proposed action to reduce or prevent impacts. Language has been added to Section 3.5.2.3.1 *Potential for Increased Flooding* and Section 3.5.2.4 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts* to indicate that all work that will affect existing drainage systems will be designed to ensure that the existing drainage is not restricted.

2. In section 3.4.2.3.2, Operation Discharges, AECI/URS says they build external ditches, designed to handle a 50 year rain, around the active landfill cells. Once the cell is closed will the ditches remain to protect the surrounding area against an overrun of the cell? Why only a 50 year rain? It is not uncommon to have 100 year rains. In fact there is a 1% chance of a 100 year rain every year, and as people in the area can testify, they do occur. C23

Response: Only open cells require protection. Once the cell is completed and covered there is no need to keep surface water from it. MDNR determines appropriate design periods for various elements of a solid waste disposal facility, based on relative risk.

3. Concerns where water will go when they pump land for construction. C30

Response: Language has been added to Section 3.3.2.4.1 *Impact Assessment* indicating that water from dewatering would be directed to drainage ditches and would be managed so as not to cause downstream flooding and/or erosion.

If more than one acre of land is cleared on contiguous lands, AECI will need a land disturbance permit from the department. C17

Response: This requirement is addressed in Section 3.4.2.3.1 *Storm Water Runoff During Construction*.

All point source wastewater discharges need a construction permit and must then obtain an operating permit and adhere to the discharge limitations. C17

Response: This has been clarified in the 10 CSR 20 reference in *Relevant Federal and State Environmental Laws and Regulations, Appendix A*.

The department advises AECI to give careful consideration of the discharge of any process wastewater that has elevated temperatures. Any such discharges should be carefully evaluated to ensure that all appropriate water quality criteria of the Missouri River would be protected. C17

Response: The specifications developed for the project require that the water at the point of discharge be less than 90 degrees F, the maximum allowed outside the mixing zone. AECI recognizes the need to also prevent an increase greater than five degrees outside the mixing zone, particularly during the winter when flow and water temperatures are low.

Does the EPA/RUS have any studies on Thermal discharge impact on Missouri River at boundaries of the mixing zone? Have the above mixing zones and effluents diffusers design been established? If so, they were not included in this draft EIS. If not, why? Such information is required for an EIS. Or, does AECI assume receiving waters are not part of the environment? None of this information was accurately included in this DEIS. It appears that no actual studies were done by the EIS consultants. C78

Response: Site-specific studies on thermal discharge were not conducted for this study. MDNR has established criteria for the Missouri River for protection of aquatic life, and AECI is required to adhere to those standards (accomplished through design of the treatment and discharge system), and to demonstrate compliance by monitoring (Section 3.4.2.3.2 *Operation Discharges*).

FLO-700 Floodplain and Flooding Impacts

1. The final EIS should document the source of fill material to raise the approximately 120 acres of area above the 100 year floodplain. C8

In addition, the document should also evaluate the potential environmental and human health impacts at the borrow site including quarry operations and transport of the fill material. C8

Response: Fill material would be obtained from the landfill excavation, and some may also be obtained from cuts for the rail connector. This has been added to Section 3.5.2.4.1 *Impact Assessment* in the Final EIS. These activities will be part of the construction for the plant that is already included in the EIS impacts assessment.

2. We also recommend that the Final EIS include a discussion regarding the new proposed elevation of the facility to three feet above the 100-year floodplain, the flooding risk reduction associated with this new elevation, and any special considerations to protect the plant from scour and surrounding flooding during high storm events. C8

Response: A discussion of the new proposed elevation of the facility is included in Section 3.5.2.4.1 *Impact Assessment*. Based on FEMA FIRM maps, the new elevation is also above the 500-year flood elevation. Since the site is at the edge of the floodplain, where floodwater is stored but not conveyed, scour from Missouri River floods would not be an issue. Ditches will be designed with scour protection from local storm events, if needed.

Floodplain Impact Assessment - Section 3.5.2.4.1 discusses impacts on flood surface elevations as a result of raising an area of the floodplain. It states, "a very simplistic analysis was done to determine the magnitude of the displaced flood water". EPA recommends the use of a two dimensional analytical model to precisely determine elevation rise, and to also better determine floodplain impacts that may be realized from the project's floodplain footprint. Construction within the floodplain has the potential to increase flood water surface elevation, increase stormwater runoff, and alter the pattern of erosion and accretion in the floodplain. Even slight increases in flood water elevation may have adverse impacts on neighboring communities, and increased velocities within the floodplain may cause scour at important hard points, such as existing levees. C8 This project is sited within the Missouri River floodplains. The Flood Insurance Rate Maps used to assess flood impact are over 20 years old and outdated. They pre-date the 1993 flood. The "simplistic analysis" that was done to assess the magnitude of the displaced floodwater was just that—simplistic. The DEIS offered no historical support for its findings. Without having viewed firsthand the many floods in this area over the past 60 years it is impossible to comprehend how they impact this floodplain, as well as the Wakenda Creek floodplain. C29

Response: The "simplistic analysis" was not intended to replace the study required by FEMA prior to construction. The text has been revised to emphasize this (Section 3.5.2.4.1 *Impact Assessment*). A study is required only because the floodway (part of the river needed for conveyance of water) has not been defined. At the location of the plant, several miles from the river and at the edge of the floodplain, the floodplain functions as a storage area during flooding. The simplistic analysis was just a rough

calculation of the storage volume that would be displaced, to put that volume in the context of the overall floodplain. The study required by FEMA, and which must be done before a construction permit is issued, needs to demonstrate that “cumulative effect of the proposed development, when combined with all other existing and anticipated development, would not increase the water surface elevation of the base flood more than one foot at any point within the community.” As noted in the Draft EIS, the work would be done in cooperation with the USACE and would use recalculated USACE flood frequency values as appropriate.

In many instances AECI has deferred gathering information that is necessary to assess the environmental consequences of the Norborne plant. Floodplain analysis will admittedly need to be done. (ES 11; Alternatives Report, Part 6.3.2.5, Part 2.4, Table 2-24, p. 3-114.). C10

Response: Given the location of the site at the edge of the floodplain, several miles from the river and three feet above 100-year flood elevations, it is USDA/RD’s opinion that floodplain consequences have been assessed as appropriate for a Draft EIS.

Furthermore, this proposed project is inconsistent with the Guide Plan for Land Use and Future Development and specifically with Article XVII Flood Overlay District. C29

Response: Since the Guide Plan is Carroll County’s, and Carroll County is responsible for floodplain ordinances, we assume the County will address any floodplain issues in the floodplain permit they would issue to AECI.

3. This proposed site lies in a flood plain. How does AECI propose to mitigate their treatment plants and coal piles being under water? AECI’s numerous public statements that the plant would be above the 500 year flood plan are conspicuously absent from this document. A strange omission, if an independent consultant actually studied this subject. In addition to numerous public oral presentations and written press releases, AECI’s sworn testimony at a Planning & Zoning hearing of Jan. 10, 2006 was:

Presently the site is at approximate
7 grade 688 feet main sea level. The 100 year flood
8 elevation is 687.1. Meaning that it's about a foot from
9 existing site to hundred year flood elevation. We, to get
10 it out of the hundred year flood elevation, we would have
11 to raise the site less than one foot. For most of the

12 components of the site, we anticipate we will be raising
13 the site three to five feet, and this will raise the site
14 out of the hundred year flood elevation, and out of the
15 500 year flood elevation. C13

(Please don't "kill the messenger" here. I neither made nor comprehend some of the above statements. I just copied from the official transcript.)

Does AECl plan to mitigate the spread of pollutants to neighboring lands by financing flood related pollution cleanup? Strangely enough, this 500 yr flood plan omission occurs conveniently in the same time frame that AECl informed neighbors, via certified letter, that dewatering activities for an 80 feet deep permanent excavation may affect their well water levels. How does AECl rationalize raising the site out of the 500 year flood plan with an 80 feet excavation? C13

What are AECl's plans for the existing drainage system, Booker Slough, which runs through their property? Why is this very significant flood remediation system not mentioned in this EIS? – More evidence that URS never visited the proposed site, and only used AECl's crude "web-surfing" as their literature survey, (A required portion of a proper EIS.) C13

Response: The quoted testimony is consistent with what is included in the Draft EIS, Section 3.5.2.4.1 Impact Assessment. The deep excavation is temporary, during construction. In response to a previous comment, a discussion of Booker Slough has been added to Section 3.4.1.3.2 Norborne Area in the Final EIS.

Railroad corridors must be built above the existing flood plain. By doing this, flood waters will be diverted to unnatural locations and in turn causing problems for local residents that have had minimal flooding in the past. The exact location of the proposed power plant site has experienced extreme flooding including flash flooding within the past 10 years. What will AECl do to ensure the safety of the residents whose homes will be more at risk during these floods? Who will make sure AECl is held responsible for putting area residents at risks due to the construction of this power plant?! C14

It has been suggested (and presented) to a number of people in Norborne (including a reputable law firm) that in light of the AECl project's local impacts, the residents consider a means of protecting the Missouri River Floodplain. I believe this would be a prudent move on the part of area residents to safeguard their environment. C15

Would it not be a logical and prudent step, under the current circumstances, to forego building such a monstrosity in the Missouri River Floodplain, with all of its related adverse impacts upon our environment, health and economics? By approval of such a project... are we not starting the clock... and letting it tick relentlessly towards the inevitable disaster of irreparable contamination... due to flood?! C15

4. Additional railroad corridors will be needed to provide this power plant with coal transported from Wyoming and other areas. The transporting of huge amounts of coal over hundreds, even thousands of miles, puts a strain on the transportation of other goods and services. Not only does the hauling of coal over thousands of miles on a daily basis cause disruption in the flow of other goods and services, it is also inefficient as transportation costs increase at an alarming rate. Additional railroad corridors that will be needed in the area will also affect surface water flow during times of flood, which the plant site is prone to during seasonal flash floods and other natural disasters as experienced in years as recent as 1993, 1995 and 1998. C16
5. When flood waters are diverted to unnatural locations, will AECI be held responsible for residents whose homes may be flooded that were not susceptible to flooding prior to the construction of additional railroad corridors? What measures will USDA take in the final EIS to report any new flooding concerns in the area as the result of the construction of this power plant and rail corridors? C16

The southern rail spur, if not elevated, will act like a dam, increasing flooding. C23

Since AECI is planning to build both the Proposed Action and the rail lines in 100 year flood plains, where will the water which would have filled these fields go? It will flood fields and possibly homes which would otherwise not have flooded. C23

URS, or a disinterested 3rd party, should be required to conduct flood level studies, and present the data to the public and all regulatory agencies, prior to receiving any approvals or permits. It should not be something they do later, maybe. C23

How will railroad track crossing Wakenda Creek affect flooding of the creek? C30

Wetlands concerns: This area has had extensive flooding in the past. How do the MO EPA, Region 7 (EPA) and Rural Utilities Services (RUS) intend to address this? C78

A further consideration of the fill needed to surpass the 100 year flood level and the rail line to the south railroad track is how that could affect water levels in the flood plain if there is a flood. The Town of Norborne had water lapping at the edge of town in 1993. How much impact will these changes in the terrain have in the event of another such flood? I did not see this addressed. C29

The DEIS states, "The Norborne Plant site would require fill to raise it above the 100-year flood elevation. Current elevations at the proposed plant site are between 685 and 689 feet, compared to the 100-year flood elevation of 687.1 feet and a 500-year of 689.5 feet. Fill would be added to bring the grade elevation of the power block buildings, the outlying buildings, the access road, rails, and coal pile to three feet above the 100-year flood level (AECI, 2005f)." The elevation of the proposed rail spur from the south will constitute an obstruction. These things are dismissed as not being significant in the event of a flood. They WILL be significant. Each major flood has reached a higher level than previous ones. In 1993 the water poured over the railroad tracks south of the plant site. Once the flood crest was passed, water in most areas began to go down. However, on the north side of the railroad tracks, the water could not get away because of the railroad, and it took weeks for it to drain out under the railroad trestle. How does the power plant propose to deal with that type of impact? C29

Response: The Final EIS (Sections 3.5.2.3.1 *Potential for Increased Flooding* and 3.5.2.4 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*) has been revised to state that roadway and railroad culverts and bridges will be designed, and modifications to drainage that will occur as a result of raising the level of the plant site will be designed to ensure the existing drainage is not restricted. See Section 3.5.2.4.1 *Impact Assessment* for a discussion of impacts and Section 3.5.1.1.3 *Floodplain Ordinance Requirements* for a description of the studies that are required before a construction permit can be issued. The following language has been added to Section 3.5.2.4.1 *Impact Assessment*: "AECI commits to hold a community meeting to review the results of floodplain hydraulic study if there is a local desire to do so and the regulatory authorities participate."

It appears that 44CFR60.3 bars the construction of the Proposed Action. C23

Response: It is USDA/RD's opinion that the project complies with 44 CFR 60.3 (Flood plain management criteria for flood-prone areas.)

It does not appear that Executive Order 11988 would apply, as there are alternatives to siting the facility in the flood plain. C23

Response: See Section 3.5.2.3.2 *Compliance with Executive Order 11988* for a discussion.

6. In regards to 3.5.2.3.3, Effects on Potential Restoration Plans, it seems that having a power plant in the middle of or next to the Wakenda Bottoms Conservation Area would be detrimental from both an environmental and aesthetic point of view. C23

Response: Section 3.5.2.3.3 *Effects on Potential Restoration Plans* discusses potential impacts to the Wakenda Bottoms Conservation Area Opportunity.

7. Carroll County, in waiving agriculture as the highest and best use of the floodplain, by allowing "industrial development" under the AECI project, has opened the door to further industrial development within this floodplain. (See history of the AECI New Madrid Facility (Win-Win – An Informal History of AECI – Published by AECI)) Allowing industrial or commercial development in a floodplain is far from prudent and should be prevented... at whatever cost! C15

Response: As discussed in the referenced document, the circumstances of the New Madrid facility were entirely different. The plant was essentially built for a specific industrial purpose. AECI's Thomas Hill plant would be a much more relevant comparison.

FAR-800 Affects on Farmland and Farmers

1. My final concern regarding the proposed power plant is the surface area that will be taken by transmission and railroad corridors. Miles and miles of additional transmission lines will take up superb agricultural lands and will hinder normal farming practices not only in Carroll County, but in several surrounding counties as well. These transmission lines will disrupt parcels resulting in fragmented and uneven crop distribution which could very possibly result in lower crop yields, and lower income for the local farmers

(not including the farmers whose property has already been taken by AECI). C14

Land use patterns will be disrupted by miles and miles of transmission corridors and rail lines after construction completion, causing local farmers decreased crop yields, thus less income from the well established agricultural economy sustained in this area. C16

During and after complete construction, many landowners will be negatively impacted by increased transmission and railroad corridors. Increased transmission lines will hinder current farming practices not only in Carroll County, but also in neighboring counties in which these transmission lines will be located. Row crop parcels will be fragmented, resulting in less efficient use of farmland. Less efficient land use will also result in loss of income for local farmers. This economic loss should be of great concern to the USDA of all organizations! Who is being favored here, the power companies or the well being of local farmers? What measures will be taken to require AECI to use existing transmission lines? Will the final EIS offer protection against loss of productive farmland to transmission corridors? C16

Response: As discussed in Section 3.6 *Farmland*, the transmission lines will require minimal farmland (only at the locations of supports and the few substations), and will have little impact on farming operations. Farmland impact assessment is coordinated through the USDA Natural Resource Conservation Service using the Farmland Conversion Impact Rating Form (Appendix F).

2. There are discrepancies in information entered on Form AD-1006 Farmland Conversion Impact Rating as compared to a statement in the DEIS that says approximately 1200 acres of farmland would be taken out of production (3.6.2.4.1). This would affect the result in Part V, Relative Value of Farmland to be Converted, by about 22%. C29

Response: The estimated amount of converted farmland acreage as shown on the Farmland Conversion Impact Rating forms for the proposed site at Norborne and for the proposed transmission and railroad lines is 1,166.2 acres (Appendix F of the Draft EIS):

Form AD-1006 - Proposed plant at Norborne	= 955 acres
Form NRCS-CPA-106 - Proposed railroad line south of plant	= 25 acres
Form NRCS-CPA-106 - Proposed railroad line north of plant	= 95 acres
Form NRCS-CPA-106 - Proposed transmission line to Thomas Hill	= 18 acres
Form NRCS-CPA-106 - Proposed transmission line to Mt. Hulda	= 33.2 acres

Combined Estimated Total:

= 1,166.2 acres

The 1,200 acres shown in Section 3.6.2.4.1 *Impact Assessment of the Draft EIS* results from rounding to the nearest 100 acres.

There is also some question as to the accuracy of points assigned in Part VI (#7). C29

Response: The assigned of points was checked and appears to be correct.

3. The Midwest, and this part of Missouri in particular, is the breadbasket of our country. Putting a coal-burning power plant in the middle of this prime agricultural land is a little like putting a toilet on the dining room table. It just isn't healthy. C23

Response: Thank you for your comment.

I'm just concerned of what I will see when I'm your age and what my kids will see when they're your age and we've built this large tombstone out in the middle of our good, prime farm land. C68

Response: Thank you for your comment.

LAN-900 General Impacts on Land Use

1. The suggested means of protection is "annexation" of the floodplain by the Town of Norborne; including that area currently approved for development (From: Mo - D west to the county border and from Mo - DD north to CR 300). In this manner, and in accordance with Missouri Statutes, the residents will see a shifting to preservation... at the expense of development (ostensibly placing AECl in a position like that of the local residents at this time... utter hopelessness). With the shoe placed firmly upon the other foot... AECl will be precluded from building its proposed plant, the Economic Development Agreement will become void and the County's Zoning Ordinances would no longer be applicable (See RSMo Section 394.080.1(4)²⁰). C15

²⁰ [in pertinent part] where a cooperative has been transmitting, distributing, selling, supplying or disposing of electric energy in a rural area which, by reason of increase in its population, its inclusion in a city, town or village, or by reason of any other circumstance ceases to be a rural area, such cooperative shall have the power to continue to transmit, distribute, sell, supply or dispose of electric energy therein until such time as the municipality, or the holder of a franchise to furnish electric energy in such municipality, may purchase the physical property of such cooperative located within the boundaries of the municipality, pursuant to law, or until such

The result of such a maneuver would be the foreclosure of industrial development on the floodplains, and preservation of those lands for their highest and best use... agriculture. Currently... this suggestion is under advisement, but I suspect some form of action will be forthcoming (at the earliest) by late spring or (no later than) early fall, in order to place the matter on the November ballot. C15

In light of the current actions of the powers that be (in turning a deaf ear to the concerns of the people and their expounded firsthand knowledge of the local environment), the suggested efforts to "annex" the impact area is not only prudent..., but has become a necessary action towards the long term preservation of the area's overall health. C15

Response: Thank you for your comment.

Why was the zoning of AECl's property changed from agriculture to industrial? This is not required for utilities. C78

Response: This appears to be a question for Carroll County.

2. My brother and I are concerned with the exact placement of the transmission towers in the corridor on our property in the tower Road area near Highway 52 east of Cole Camp, Mo. It is CRP land, and perhaps other areas would be better placement. C19

Response: The exact location of the transmission line has not yet been determined. If the CRP land has been restored to high quality woodland or wooded wetland and the line could be moved within the corridor to avoid that location, that would probably be done. If the CRP land is not in that category, the line probably would not be moved. For example, if the CRP land is grassland or shrubs, the impacts would be very small and would not warrant moving the line.

REC-1000 Affects on Outdoor Recreation and Public Lands

1. Page 3-130, Section 3.8.1.2.1, Recreation and Public Lands, Big Lake Site:
The description of recreational and public lands provided in this section of

time as the municipality may grant a franchise in the manner provided by law to a privately owned public utility to distribute electric power within the municipality and such privately owned public utility shall purchase the physical property of such cooperative located within the boundaries of the municipality. (Emphases Added)

the DEIS fails to note the presence of the Rush Bottom Bend Feature of the U.S. Army Corps of Engineers Missouri River Fish and Wildlife Mitigation Project, which is located along the east bank of the Missouri River starting approximately 1 mile north of the proposed Big Lake site and extending another 2 1/4 miles north along the river's east bank (river miles 502 to 499.5). The site is comprised of 811 acres owned by the Corps and is also referred to as the Rush Bottom Bend Conservation Area by the Missouri Department of Conservation. Information concerning the site should be included in the Final EIS in this section, as well as in other appropriate sections, and the site should be depicted on Figure 3-45. C7

Response: This has been added to the Final EIS as suggested (Section 3.8.1.2.1 *Recreation and Public Lands* and Figure 3-45).

VIS-1100 Visual Resources Impacts

1. In section 3.8.2.3, Impact Assessment Methods, AECI/URS totally brushes off concerns about light pollution, stating there aren't many houses near by. Several houses (including ours) and the town of Norborne will be directly affected by the visual impact and light of the Proposed Action. C23

Response: The EIS acknowledges the impact (Section 3.8.2.3 *Impact Assessment Methods*): "The visual impact of the plant would be greatest for those few residences within a mile or two of the plant. For them, the plant would be a visual intrusion into the rural landscape, both during the day and at night when it is lit."

I don't think they actually looked for information on the health effects of light pollution. In 5 minutes or less I found the following, with references to studies and research articles: geocities.com, darksky.org, medicalnewstoday.com, and starrynightlights.com. All refer to studies finding increased risk of certain cancers, psychological problems, and other health issues related to low melatonin production brought on by night time exposure to light. C23

Response: The Draft EIS acknowledges that studies have been done on the effects of using lights at night (Section 3.8.2.3 *Impact Assessment Methods*): "Studies on health effects of light generally focus on the effects of using lighting to continue daytime indoor activities. The effects of light from a power plant would be small by comparison."

AECI/URS does not indicate that any precautions will be taken to keep light in the facility. C23

Response: Thank you for your comment.

It is possible to adequately light the work areas and not direct light upward and outward. They must be required to protect the community and night skies from light pollution, by keeping their lighting to an absolute minimum and shielding and directing it so as to keep it in the facility. C23

Response: Lighting will be provided as needed for plant operation and safety.

BIO-1200 Impacts to Biological Resources

1. The document adequately describes federally listed species that may occur in the project area. The commitment of the project sponsor to limit tree clearing to the winter months is a positive measure that will avoid adverse impacts to the Indiana bat, the bald eagle, and migratory birds. Based on the most recent Indiana bat records, the time frame for tree clearing should be modified slightly: clearing should be conducted only between November 1 and March 1. C7

Response: This has been changed as noted in the Final EIS (Section 3.12.2.3 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*).

2. In addition, bald eagles have become increasing common along many streams in Missouri. Therefore, we recommend that surveys of the project area be conducted early in the nesting season to ensure construction will not remove or disturb a new nest or nesting pair of eagles. If a nest is found, the project sponsor should contact the Fish and Wildlife Service's Missouri Ecological Services Office (573-234-2132) for further consultation. If the project sponsors choose to reconsider the preferred location of the proposed plant and pursue the Big Lake Site, further consultation with the Service would be required to address potential impacts to the bald eagle. C7

Response: Although the bald eagle may be delisted before this work is done, this information has been added to the Final EIS (Section 3.12.2.3 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*), since the bald eagle would still be protected under the Bald Eagle Protection Act.

3. Although the DEIS notes that Mead's milkweed may occur in the project area, there is no evaluation on the potential impacts. We recommend that

the proposed transmission line alternatives be evaluated for suitable habitat for Mead's milkweed to determine if surveys are needed. If there is no suitable habitat, that information should be used in the federal action agency's determination of effect on the species. C7

Response: This information has been added to the Final EIS (Section 3.12.2.3 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*).

4. Based on the information in the DEIS, it does not appear that project construction will affect the eastern massasauga rattlesnake or running buffalo clover. C7

Response: This information has been added to the Final EIS (Section 3.12.2.3 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*).

We demand that AECI take full responsibility in the wildlife and habitat preservation of this beautiful county, especially during the dewatering and construction phase of this proposed power plant. C99

Response: Thank you for your comment.

There were discrepancies in some information which, while in themselves perhaps are not significant, indicate lack of thorough study of the local environment. Section 4.3.2 regarding the northeast railway route states in part in reference to Wakenda Creek, "Because of the intermittent flow, intermittent streams typically do not usually support aquatic communities; therefore, no impacts to aquatic communities are anticipated." I have in my possession a report from the Missouri Department of Conservation of a sample performed on July 7, 2005, that shows a total of 513 fish comprising 13 species in a 246 meter reach of Wakenda Creek. This was during a time when there was no flow in the creek, just as there was no flow at the time of the site visit on August 2, 2006, by the site surveyor. The MDC report also states, "All of these fish species are characteristic of streams in your part of the state." These streams DO support aquatic communities, which surely could have been easily ascertained if anyone had made the effort. C29

Response: The quote was taken from a report prepared by AECI and included in Appendix H of the EIS. USDA/RD does not support this conclusion, and this language is not reflected in the Draft EIS. MDNR considers Wakenda Creek as supporting aquatic life, and this is reflected in the Draft EIS (Section 3.11.1.2 *Existing Conditions*).

5. In the draft EIS, they discovered a rattle snake and it was identified and I just know that they caught it and then they put it back so it doesn't go around my property. C97

Response: Thank you for your comment.

6. Impact to Vegetation: The DEIS states impacts to any high quality native plant communities are the major issue. The types of impacts are not described. If there are adverse impacts to native vegetation, wouldn't these apply to row crops as well? Impacts to corn and soybeans grown in proximity to the power plant were not addressed. What about area vegetable gardens and fruit trees? Area crops are not "native plant communities." It appears this DEIS is using legal phrasing to usurp a specific duty necessitating review of direct impacts to the immediate area. C29

Response: Agriculture is addressed in Section 3.6 *Farmland*. Aside from plants grown for agriculture, an EIS considers impacts to native plant communities such as forests and prairies.

WET-1300 Impacts to Wetlands and Waters of the United States

1. The proposed project will impact several wetlands as well as Booker Slough within the proposed facility boundary. As indicated in Section 3.10.2.4.2, AECI would need to apply for a Department of the Army (Corps) permit in accordance with Section 404 of the Clean Water Act (CWA) (33 USC 1344) prior to a final determination of the preferred alternative. In light of the 404(b)(1) Guidelines, dredge and fill activities in Waters of the U.S. are to be evaluated through a sequencing process asking; 1) can adverse impacts to the aquatic ecosystem be avoided through the selection of a least environmentally damaging practicable alternative; 2) can any unavoidable impacts be minimized through appropriate and practicable measures; and; 3) can any unavoidable adverse impacts, which remain after minimizing measures have been taken, be compensated through appropriate and applicable measures? Therefore, impacts to Waters of the U.S. must be incorporated into an alternatives analysis. It is not clear within Section 3.10 that alternatives were assessed through a sequencing process. C8

Response: In the Final EIS a discussion of the Section 404 sequencing process has been added to the introductory part of Section 3.10 *Wetlands, Riparian Areas, and Waters of the United States*. In that discussion, references were added to the relevant parts of Section 2.2 *Alternatives Evaluation*, which summarizes the

multiple impacts, including wetlands, that were assessed through the screening and site evaluation process.

In many instances AECl has deferred gathering information that is necessary to assess the environmental consequences of the Norborne plant. Wetlands analysis has not been done, (Alternatives Report, Part 6.3.2.2, p. 6-41, Part 6.3.2.5.4, p. 6-64). C10

Response: Refer to Draft EIS Section 3.10 *Wetlands, Riparian Areas, and Waters of the United States* and Appendix G (*Report of Wetlands Delineation*).

The department advises AECl that if any type of stream or wetland is impacted by construction, the project may require a Federal 404 Permit and a State 401 Certification. Any questions concerning the 404 Permit should be directed to the Army Corps of Engineers at (309) 794-4200. Should the Army Corps of Engineers decide that a 404 Permit is required, AECl will also need a 401 Certification from the department. C17

Response: This information is included in the Draft EIS (Section 3.10 *Wetlands* and Appendix A *Relevant Federal and State Environmental Laws and Regulations*.)

Wetlands concerns: In addition to the physical destruction of acres of wetlands around the plant, we believe there will be massive destruction of wetlands and drainage basins functions and values that need to be addressed. C78

Response: Please refer to Section 3.10 *Wetlands, Riparian Areas, and Waters of the United States* for a detailed discussion of wetlands impacts.

Wetlands concerns: Please ensure that all materials submitted are fully considered and responded to, and that all other agencies and jurisdictions that are affected are consulted before a decision is made. This should include the Carroll County "Guide Plan For Land Use & Future Development"—dated March of 1992, and adjoining counties. (Ray and Lafayette). C78

Response: Thank you for your comment. We address relevant items in the referenced land use plan as appropriate.

2. The 404(b)(I) Guidelines, Part 230.10, Restrictions on Discharge, state that PO discharge shall be permitted if there is a practicable alternative which

would have less impact on the aquatic ecosystem, as long as the alternative does not have other significant adverse environmental consequences. Practicable alternatives include those that, (1) do not involve a placement of dredged or fill material into Waters of the U.S., or (2) involve placement of material at other locations into Waters of the U.S. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology and logistics, in keeping with the overall project purpose. An alternative cannot be considered impractical or unavailable due to an increase in cost or the applicant's unwillingness to pursue an alternative. Additionally, the 404(b)(1) Guidelines, Part 230.10, Restrictions on Discharge, state that where the activity associated with a discharge which is proposed for a special aquatic site does not require access or proximity to, or siting within the special aquatic site in question to fulfill its basic purpose, practicable alternatives that do not involve special aquatic sites are presumed to be available, unless clearly demonstrated otherwise. *C8*

Response: Language from the guidelines has been added to the document.

3. Section 3.10.2.3 states that "wetlands within rail corridors that have not been delineated would be delineated when the final alignment is selected". Similarly, it is stated that for the transmission route "[wetland] delineations would be done as needed when the final alignment is selected". These statements indicate that the impacts to Waters of the U.S. may not be determined prior to selecting a final alignment and would thereby eliminate the sequencing process as outlined under the 404(b)(1) Guidelines. Impacts to Waters of the U.S. should be incorporated into the analysis of practicable alternatives. Mitigation plans cannot be proposed without first demonstrating that there are no practicable alternatives to avoid or minimize impacts. *C8*

The potential loss of wooded wetlands needs to be addressed in the FEIS. Section 3.10 indicates that most impacts to wetlands could be avoided except for those areas with wooded wetlands. The EPA has identified forested wetlands as a priority habitat type in Missouri. Most of the forested wetlands within the project boundaries are located along streams. The alternatives for railroad corridors each contain forested wetlands with 1) alternative one containing forested wetlands adjacent to the western proposed facility boundary near the intersections of County Road 503, County Road 603, and State Highway DD 2) alternative two containing numerous forested wetlands along West Fork Wakenda Creek and Wakenda Creek and 3) alternative three containing numerous forested wetlands along Booker Slough and West Fork Wakenda Creek. The concentration of

the forested wetlands along streams should facilitate placing the railroad corridor outside of these priority wetlands. It is particularly important that the riparian and wetland corridors of West Fork Wakenda Creek and Wakenda Creek are preserved as these watersheds have been identified as an aquatic conservation focus area by the EPA. The West Fork Wakenda Creek watershed has also been identified as an aquatic conservation opportunity area by the Missouri Department of Conservation. C8

Response: A discussion of potential impacts to wooded wetlands has been added to the Final EIS, along with an estimate of impacts, based on NWI maps (Section 3.10.2.3 *Impact Assessment Methods*). The estimated impacts are based on preliminary alignments shown in Appendix N *Estimated NWI Wetland Impacts for Rail and Transmission Routes*, which has been added to the Final EIS.

Is it known that on the same 160 acre parcel in which my mother's ashes are spread, that AECl desires so badly, there is a 33 acre Federal Wetlands Reserve? These wetlands are only a few feet from the plant site itself. How will the water be affected in this wetlands reserve? What is AECl doing to preserve the current condition of this "EPA-protected" area? It is apparent that the enforcement of the Protection of Wetlands Executive Order is a moot issue. What good are these "protection documents" if they are not enforced? Why hasn't USDA documented this wetlands reserve or even required that AECl must have a mitigation area? Are you aware that there are two other Federal Wetlands Reserves within one mile of the proposed plant site? Why hasn't there been an inventory of the local wildlife populations on these sites? Will this be done prior to the completion of the final Environmental Impact Statement? When will USDA answer these questions and require AECl to be an environmentally friendly neighbor? AECl must be required to produce mitigation areas on all existing owned property in Carroll County prior to the release of the final EIS and not use means of acquiring additional property for these mitigation, or wildlife buffer, areas. C16, C29

Are you aware that two other property owners within one mile of the current proposed plant site have registered Federal wetlands on their property as well? C99

We have been contacted on many occasions by AECl regarding the sale of our property, however our property is not for sale! AECl representatives have informed us several times that eminent domain may be used against our property because it is desired for the proposed plant. These desired 160

acres of ours contains 33 acres of registered Federal wetlands, situated only tens of feet from the proposed plant site.

This property containing the 33 acres of wetlands is prime natural habitat for many native species of plants and animals. The dewatering phase, construction phase and the plant itself, producing significant air and noise pollution, will cause much destruction to the present pristine condition of the immediate area. C99

On the 33 acres of wetlands and our surrounding property is the home of many species of wildlife. Year-round flora and fauna include turkey, quail, pheasants, otters, bobcats, American bull frogs, white tailed deer, coyotes, snapping turtles and red-eared sliders, and nests of Canadian geese, wood ducks and mallards, wild blue flag iris, and sunflower varieties among countless other species that have not yet been inventoried by an environmental group to this day. Seasonal migration routes allow Bald Eagles, flocks of snow geese, bitterns, king fishers and several herons to call this a temporary home each year. Why hasn't there been a complete inventory of the plants and animals that claim this area as their home? Why hasn't AECI shown any mitigation plans if this habitat is disrupted, or more probable, destroyed? C99

AECI MUST be required to mitigate a reasonable portion of purchased property into wetlands or other natural wildlife habitat. There also needs to be a complete inventory of all plants and animals that inhabit this area, especially in our 33 acres of Federal wetlands.

In early January, we received a letter from AECI stating that our water supply will be limited for up to 6 months during the construction/ dewatering phase of the proposed power plant, If our wells dry up for 6 months, what will happen to the wetlands (not to mention our water supply at our home!) that is directly north only a few feet from the plant site? C99

In addition, although one wildlife reserve 5 miles NE of the proposed plant is mentioned by name, Schifferdecker Wildlife, the other, abutting the projected hazardous waste landfill, Lindley Reserve, is not. Again, no chemistry baseline data was presented for either site. C13

Response: Schifferdecker Memorial Conservation Area is discussed in Section 3.8.1.2.1 *Recreation and Public Lands*. As noted in that discussion, it is the closest public land to the proposed Norborne plant site. We understand that the Lindley property to the north of the proposed plant site includes land that is enrolled in the U.S. Department of Agriculture's Wetland Reserve Program. This

program provides an opportunity for landowners to receive financial incentives to enhance wetlands on their property in exchange for retiring marginal land from agriculture. The land may be protected by conservation easements (either permanent or 30-year), but the land remains in private ownership. The program has no water quality or other chemistry requirements. This land would not be directly impacted by the proposed project. No indirect impacts (visual, noise, air emissions, for example) from the project would be expected to affect the functions and values of any wetlands on the Lindley property, or wetlands any other property outside the facility boundary. In USDA/RD's judgment, an appropriate assessment of impacts could be made without chemistry baseline data for the Schifferdecker Memorial Conservation Area or for the wetlands on the Lindley property, and therefore none was collected.

Note also that the project does not include a hazardous waste landfill.

Where is this wetlands protection that is to be provided by the Environmental Protection Agency in the Protection of Wetlands Executive Order No. 11990 (which has been attached for your records)? Why does this draft EIS not show any mitigation plans? C99

Response: Please refer to EIS Section 3.10 *Wetlands, Riparian Areas, and Waters of the United States* for a detailed discussion of wetland impacts, Executive Order No. 11990, and potential mitigation.

CUL-1400 Cultural Issues

1. Phase I Survey and Phase II Testing: Phase I survey included pedestrian coverage of existing farmsteads by qualified personnel. The type of survey was not described. C29

Response: See (Draft or Final) EIS Section 3.13.1.2.3 *Phase I Survey and Phase II Testing* for a summary description and Appendix I *Phases I and II Cultural Resources Survey* for more detail.

One area labeled Farmstead 4 is not a farmstead. It originally (early to mid 1960's) contained a building that housed some type of secret government facility. C29

Response: Thank you for your comment. This would not affect the results of the cultural resources survey.

A sixth farmstead was also evaluated, but this evaluation was not described either. Since this is private property, it would be interesting to know what kind of evaluation was performed and how this evaluation was done. C29

Response: See *Addendum to Cultural Resources Investigations (last four pages of Appendix I Phases I and II Cultural Resources Survey)* for a discussion of a sixth farmstead.

SOC-1500 Transportation Impacts and Issues

1. Area residents who travel to Kansas City on a daily basis for employment will have more difficulty traveling during the construction phase of the plant. C16

Economically, the proposed power plant will not benefit the Norborne community or Carroll County in general. In fact, it may be suggested that Carroll County's western neighbor Ray County will benefit more from the construction and operation of this power plant. When studying daily transportation patterns in the Norborne area, many residents travel to Richmond (located in Ray County) for various services. Many Carroll County residents also travel to the greater metropolitan statistical area of Kansas City, Missouri, also located to the west of Carroll County. During the construction phase of this power plant, normal traffic flow into Ray County and beyond from Carroll County will be strained due to road closures and heavy machinery traffic traveling to and from the plant site for the entire duration of the construction phase. C16

Response: Traffic and transportation impacts are discussed in Section 3.15.2.4.1 *Impact Assessment*.

2. At what point are infrastructure issues addressed? While road conditions may not be considered environment in the strictest sense, it is to those of us who live in the area and use those roads. Also what efforts will be made to ensure that our environment is safe from other human actions or misconduct? C29

Response: Roadway impacts are discussed in Section 3.15.2.4.1 *Impact Assessment*.

SOC-1501 Socioeconomic Issues

1. As lifelong residents of central Missouri, it is our desire to remain an active participant in the rural economy. In order for that to happen we need adequate infrastructure. Small communities everywhere are talking about economic development in order to survive. We must address the key infrastructure needs of our rural communities, such as roads, fresh water, wastewater removal, and energy needs. I encourage the decision makers to work through the short term challenges that can exist with a project of this magnitude and focus on the long term social and economic benefits that will result from strong rural communities. Let sound science and economics dictate our path to energy sufficiency. C2

It is the opinion of the Carroll County Commission that this project will benefit our County by bringing in a responsible corporate citizen, additional revenue for schools and good paying jobs for our residents. C3

I am in full support of AECl and know the economic benefit to our county and the surrounding area. As Mayor of Carrollton, I want the best for our people and want to see growth and a bright future for our children. We are committed to see all opportunities welcomed and explored. We see "AECl" as a wonderful opportunity for this area. C5

The construction of a coal fired power plant will have a huge economic impact on the City of Norborne and Carroll County. The influx of construction workers and employees of AECl will benefit the businesses in the area. The construction workers will need housing, food, and other services that existing and possibly new businesses can provide. C25

Response: Thank you for your comment.

The Draft EIS lacks an informative and accurate discussion on the economic impact to the local farming community, providing only limited reference to housing construction, additions to the population and project related jobs. I suggest this is nothing more than standard industry propaganda. From the information presented in the EIS it appears no actual review of current local conditions were undertaken, with respect to availability of a trained work force, existing commercial and retail commerce, availability of an accredited hospital and entertainment. C15

Response: Impacts on the farming community are discussed in Section 3.6.2 Environmental Consequences. Section 3.14 Socioeconomics and Environmental Justice has site-specific socio-economic information for the Norborne site.

Suggested Growth of Economy and Employment within Impact Area: During public comments... it was suggested by those from outside the impact area²¹... the proposed project would greatly enhance economic growth (historically) and provide significant job opportunities (139 positions) in the immediate vicinity. (See Original Comments). Economic Growth: it was suggested... the availability of a reliable source of electrical power would enhance manufacturing growth potentials (See discussion on electrical supply... below); there is no argument with this premise. However, the comments regarding the impact area's growth is entirely another subject. We heard from cooperative members/employees/officers, experiencing significant growth in their area of the state, that the AECI project was necessary in order to support their growth. We heard from developers/accountants/members from areas, such as, Richmond and Chillicothe, Missouri (30 miles (respectively - west and north) of the impact area) that the AECI project will greatly enhance their economic growth, and essential to that end. I applaud the growth of these outside areas and the expectant growth of towns such as Richmond, Chillicothe and Marshall, which is based upon the AECI project, but the premise of the meeting was the Draft EIS, and the premise of the Draft EIS was the environmental impact to the immediate area of the project! So why was RUS allowing comments for unrelated impacts? (See Transcript). C15

Response: Thank you for your comment.

The reality, with respect to commercial, retail and entertainment, is a significant lack of diversity and availability (essentially providing farm related needs)... this requires the local population to travel up to 30 miles in order to secure the majority of their commercial and retail needs (other than farm related basics) or entertainment (other than local bars and one bowling alley)...; and for some products and services of a higher or specialized nature, this travel would increase to 50 plus miles. A similar scenario is applicable to hospital care, where the local hospital (Carrollton) appears to have lost its accreditation, which necessitates sending their patients to Kansas City... for even minor injuries or other required medical interventions. C15

Response: Thank you for your comment.

²¹ A significant number of attendees from surrounding areas were present to support the AECI project (See attached AECI publication requesting attendance). Their attendance significantly reduced the time allowed for comment on the EIS by residents of the impact area... causing some residents to leave the meeting... their being frustrated with unrelated comments being allowed to continue. (See transcript)

Electrical Supply for Carrollton and Norborne: It is presumed, by the majority of people in this area, that with the existence of this power-plant an additional source of electrical power will be created and accessible. This is true... but only true for those seeking this electrical power... that just happen to be located in far flung areas outside the project's impact zone. My statement is supported by the fact that, currently, Norborne is supplied with electrical service from Aquila, Inc. (also serving a good portion of the surrounding unincorporated area); and Carrollton... provides its own electrical service (the municipal and surrounding unincorporated areas being supported and served by KCPL). Accordingly, AECI generation will be of no consequence in the prospective area of economic growth. If this power is not available for project growth in the neighboring towns, where would this expectation appear... in the unincorporated area... around the proposed project site where the zoning is now "industrial"? C15

Response: Thank you for your comment.

The economic impacts that electricity brings to rural America, I don't think we can multiply the numbers of dollars that it's worth to our communities. Without electricity, our kids will all be gone in the future. And I strongly support this. C37

Response: Thank you for your comment.

Our farm is located four miles from the power plant in Callaway County. The positives the plant has brought to our community are endless. From job opportunities to economic development, the power plant is the most important facility in our community; the positives this plan has brought to our community is endless. The schools, businesses, and surrounding towns all have prospered from this facility. C40

Response: Thank you for your comment.

I live in Richmond, Missouri. I also have a farm that's located four miles north and slightly just to the west of the location. In fact, it sits on the Burlington Northern Railroad just about half mile west of where the proposed hook up site is. I'm a CPA that serves a lot of business throughout Platte, Clay, Ray and Carroll counties and I am very interested in this project because I believe it's going to have a substantial economic impact. It's going to have a substantial economic impact on the Norborne School District. I think that will be very beneficial. C51

Response: Thank you for your comment.

Most people don't realize that something like this is only assessed only during the construction period for the benefit of the local school, but that assessment, and I've worked with school districts that have tremendously benefited from that. After that time, it's going to be a state assessed utility which then get spread among all the school districts. But also after that three or four year construction project, the economic impact that the community is going to see from 139 jobs and a payroll that, I think, is projected around \$10 million will be substantial. C51

Response: Thank you for your comment.

Another thing that I'm involved in is economic development throughout the area that I serve. I get involved with a lot of entities doing projections on production costs and so forth and utilities are huge when you're looking at bringing new businesses in, that's a huge, huge issue. C51

Response: Thank you for your comment.

Bottom line, I think this is going to be a positive economic impact for the Missouri River basin, not just northern but all the way up and down the river basin and I'm for the project. C51

Response: Thank you for your comment.

But the only thing I want to say real quick, and I'm sorry they left, I saw them leave a while, there was one couple back there that had a brand new baby, a precious young baby. And if they know what this meeting is really about, it's about those kids because those kids are the ones we need to stay here to help continue to continue to build this community up. If we don't do that, I can tell you this. What happens in other communities? They go down in population. Your taxes go up, your services go down, and that's what it amounts to. This is a total economic package for you and it is phenomenal. This is like a brand new Boeing plant. C91

Response: Thank you for your comment.

If you read the newspapers or listen to the consultants that have come to our community, and they do on a regular basis every time we start talking to a business about coming here those people start talking to us about what kind of electric service we have and whether we can take care of and work can be located. And unfortunately, some of us have to have a plant in our backyards, and we're all concerned about that. Those of us who have land and watch the pipelines that come across the land and what they do. We're all concerned about the impact of that. And it would be much

better in my opinion to have it in our backyard and have our people in this community benefit from the plant by jobs and taxes and services than it would be to have the plant in Illinois or southern Missouri and have to listen to those people talk us out of doing it. C92

Response: Thank you for your comment.

2. As elected representatives for Carroll County, we have studied Associated Electric's proposed power plant project and feel it would benefit Carroll County and its residents for several reasons of which we list a few here: As part of a Chapter 100 agreement, the affected taxing entities will receive over \$15.6 Million, with most of that money going to the local school. This is money that is not being received now; In its present state, the land for the proposed plant now generates \$8,935.00 in property taxes. In twenty years at that rate, it would amount to \$178,700; In contrast, the county will receive over \$15.6 million over a twenty-year period, and the plant would be taxable after the twenty-year period; This \$15.6 Million is 87 TIMES THE AMOUNT THE LAND WOULD GENERATE IN ITS PRESENT STATE IN TWENTY YEARS. C3

Response: Thank you for your comment.

Another adverse impact upon the expected housing expansion, including commercial and retail development, will materialize by virtue of the property tax giveaway under the Economic Development Agreement, by and between Carroll County and AECl. The contract allows payments-in-lieu-of-taxes at a rate that provides for certain specific services with nothing remaining for the general revenues account. The contract also calls for the abatement of all taxes, excluding the payments specified, for the period of financing (currently 24 years). Therefore, no new taxes for infrastructure which are necessary for expected growth. I seriously doubt the legality of tax giveaway or complete abatement (less... payments-in-lieu-of-taxes) as terms of a contract. C15

Response: Thank you for your comment.

Tax Base Growth (EIS Socioeconomics): As stated heretofore and contrary to the public comments provided in this matter (February 8, 2007 (See Meeting Transcript)): the Economic Development Agreement (EDA), by and between Carroll County and AECl stipulates payments-in-lieu-of-taxes... said payments limited to certain specific services... with nothing remaining for the general revenues account or the remainder of the County's taxing authorities. The EDA also dictates abatement of all property taxes throughout the period of financing (currently 24 years under the

EDA). Therefore, no new taxes for infrastructure will be available for Carroll County. This is a highly dubious method of tax forgiveness... research supporting this assumption provides:

Serious doubt arises concerning the legality of the tax relief or complete abatement of property taxes authorized under the terms of the EDA. The Missouri Constitution and existing state statutes disallow such unmitigated irresponsibility (See Missouri Constitution, Article X Sections 2, 3, 4(a); See, also RSMo Sections 137.010, 137.015, 137.016.1(3), 137.035, (See, also Iron County v. State Tax Commission (Mo.), 437 S. W. 2d 665 (1968))).

The EDA exemption, or relief from property taxes, is premised upon AECl transferring ownership of the project's property to Carroll County and leasing it back for operations. However, the Iron County case prohibits property tax exemption or relief on AECl's leasehold interests under the terms of the EDA. Currently, not only will the County lose significant tax revenues (necessary to economic stability and development), but the process relied upon for such abatement or relief is unlawful... as cited above. In as much as the EDA... the foundational premise for this project... is unlawful by virtue of its content... the entire process to this point in time... is invalid and void! C15

Response: Thank you for your comment.

All this in turn will generate more sales and property tax for Carroll County and the City of Norborne. C25

Response: Thank you for your comment.

3. As elected representatives for Carroll County, we have studied Associated Electric's proposed power plant project and feel it would benefit Carroll County and its residents for several reasons of which we list a few here: We have visited their facilities and have seen first hand their operations in other communities as well as speaking to other people in those communities who have agreed that AECl is a responsible business and one that has been a real benefit to their communities; These other communities have attested to AECl's quality operations and good business profile and that they are one of the best employers in the communities where they operate. C3

Response: Thank you for your comment.

We have already seen that AECl will be a good addition to our community. The employees have become involved in local fund raising activities by donating their time, talents, and funds. They are working hard to include local businesses in the construction of the new plant. In fact, meetings sponsored by AECl have already been held which included business men and women of our community. In addition, future meetings are planned to ensure the community is ready to participate in the building of the project. C25

Response: Thank you for your comment.

Knowing the people at AECl and the stability in their business, one could only hope for a chance for this company to enter their community. To the community of Carroll County, don't let this opportunity slip away. Being a landowner in the neighborhood to the plant in Callaway, our lives would be much different today and not for the better. C40

Response: Thank you for your comment.

I have had the opportunity to visit Thomas Hill in Randolph County and the headquarters in Springfield of Associated and the thing that impressed me is this is an employer that has a remarkable record of longevity with their employees which is a result, I think, of job satisfaction. Their payroll, their benefits and the opportunity for career advancement is exactly what the developer in the communities in Missouri strives to attract. C86

Response: Thank you for your comment.

4. As elected representatives for Carroll County, we have studied Associated Electric' s proposed power plant project and feel it would benefit Carroll County and its residents for several reasons of which we list a few here: AECl is proposing to bring approximately 139 full-time jobs to Carroll County that will pay an average of \$59,000 dollars for a total annual payroll of \$8.2 million plus benefits; We have determined that we have well educated county residents who would have an excellent chance of being hired at the plant. Most employees at AECl's existing plants come from the county where the plant is located, with the remainder coming from surrounding counties; These are desirable jobs, as was recently evidenced by AECl receiving over 2,500 applicants for only four entry level jobs at one of their local power plants in 2005. C3

Response: Thank you for your comment.

This leads us to a number of additional questions and discrepancies in AECI's "audience specific" handling of information.

Another myth that is being continuously propagated by both Carroll County supporters and AECI is the 135-139 high income employment opportunities this will create for residents of Carroll County. Again, this is more falsehood, and additional indication that URS performed no socioeconomic EIS research. Had they actually looked at realistic records, rather than skewed information provided by AECI, they would have realized that AECI has a contract with International Brotherhood of Electrical Workers, (IBEW). *Union!* In fact, in sworn testimony during a Planning & Zoning Hearing, Jan 10, 2006, AECI stated,

"1 A. Yeah. I brought a copy of our agreement with the
2 International Brotherhood of Electrical Workers, and our
3 general utility, first period -- so, it's a starting job,
4 the very beginning level of somebody starting at the power
5 plant -- in 2005, was making \$16.69 an hour"

There are few, if any, IBEW union members in Carroll County, (URS should, at the minimum, have checked this from sources other than AECI.), and so the workforce will NOT be obtained locally. Nor will any imported workforce contribute significantly to the local economy. There is little infrastructure in Carroll County, compared to the adjacent Ray County and nearby Kansas City area, to offer basic living incentives. This is a predominately agro-business community. (I also suspect that few utility workers who are familiar with coal-plant emissions would care to live down-wind from the site!) C13

Response: Thank you for your comment.

I still haven't had the county officials explain where 139 jobs is going to go in a non-union county. C13

Response: Thank you for your comment.

The area work force (Countywide) may find five (5) qualified people with pipefitting (welding) experience which may be beneficial in AECI's construction phase, yet finds no qualified personnel for operational purposes. AECI has let it be known during its local permitting process that a trained operating staff will be brought in... leaving little, if any, available jobs for the local population (other than limited menial labor positions). C15

Response: Thank you for your comment.

Related Manufacturing: review of the areas current workforce capabilities, in conjunction with the limited commercial and retail services, provides little incentive for the influx of entities geared to manufacture parts, assemblies or subassemblies necessary to maintain the proposed project. In order for expansion in manufacturing enterprises educational avenues must be created... this proposed project, however, provides no collegian or vocational incentive in this area of Missouri, as the project lacks research interests... this area is agriculturally based. C15

Response: Thank you for your comment.

Employment: the project's job availability for local and area workforce is another matter. It was suggested, during public comments, the workforce in Carroll County has a number of qualified individuals with college degrees that could take advantage of such opportunities. I agree... there may be certain persons within this county holding college degrees (yet, nothing was offered in the way of support that the degrees held by these persons are related to power-plant operations) but do not support the premise that AECI will entertain applications from such persons. My statement, to the contrary, is supported by the public record (created through AECI's project approval process (Transcripts available)) where AECI has stated: it will bring in a qualified staff for operations; and in addition, announcing the project would be operated under a Union Contract. With due consideration given Union involvement, elimination of almost the entire local workforce from participation in the project's job opportunities is very realistic (Union Seniority requirements). Accordingly, it may be some time before any locals see an opportunity for employment. C15

What was witnessed during this public meeting was nothing more than prescribed propaganda... geared exclusively towards promotion of this project... a means of securing forced project approval... at the expense of the local population, their health, their safety and their environment. (See AECI Publication, attached). C15

Response: Thank you for your comment.

I own an economic development firm located in Chillicothe. I represent the City of Chillicothe as well as others; other communities, other businesses and other clients. I'm here for the Environmental Impact and part of that is the economic impact. And let me tell you, someone who deals in economic development all day long, the questions that I had and

companies that want to come in and provide jobs for our children, that provide the jobs for you and for your neighbors.

One of the first questions in the top three is do you have adequate electricity? If we don't have adequate electricity, we don't have the jobs. And as Robert stated, our population in north Missouri has gone down since 1900, it has not gone up. It's gone down. The only way we're going to continue to be able to have a chance to bring it back up is to be able to provide the jobs. *C91*

Response: Thank you for your comment.

5. Another aspect is an economic situation of all these neighbors of the co-op that are going to be seeing huge, huge rate increases to pay for this power plant and I think that some of the information has already been sent out -- I'm sure Farmer's Electric has already been notified that they're rates are going up something like 8 percent -- 8 to 10 percent, and I'm not sure how many years that's going to continue. *C29*

Response: Thank you for your comment.

Because Carroll County does not have an infrastructure suited to meet the needs of many of its residents it can also be concluded that the 130 or so permanent employees may very possibly choose not to reside within the county itself. Instead these employees may wish to reside in Ray County where goods and services are more readily available, as well as being closer to the luxuries that nearby Kansas City and surrounding suburbs and communities have to offer. This leaves yet another negative impact on Carroll County's economy. AECl has informed Carroll County residents that the jobs produced at the plant will not be reserved for local residents and the employees will not be required to reside within the county. What good to the economy is a 660 MW power plant that produces significant pollution and other hindrances to local residents when the employees and taxable income will not even benefit the county's economy? *C16*

Response: Thank you for your comment.

After construction, it is estimated the plant will provide 137 full-time well paying jobs with a competitive benefits package. These jobs will no doubt attract people to move to this area. *C25*

Response: Thank you for your comment.

I'm not a member of an electric cooperative. I live in Chillicothe and have municipal utilities. I didn't ride the bus. I had to drag myself down because I thought it was that important. I'm involved in economic development in Chillicothe. I do it as a volunteer basis and help bring about 400 to 500 jobs through Chillicothe. Most of those are sighted in the industrial park that gets served by Farmers Electric. Without those -- without electric power and without the ability to have cheap and reliable and stable power we cannot bring those jobs to north Missouri.

I've looked at -- I didn't grow up in north Missouri, I grew up in south Missouri but a few people migrated north, and one of the things I noticed up here is we've had a loss of population since about 1900. And the only way we can turn around that loss of population is to bring jobs and good jobs to this community. These are good jobs for this community.

I realize it will have some impact both positively and negatively, but if it means that the impacts really underestimates the impact of those types of jobs in this community and those types of jobs in north Missouri. So I believe the Environmental Impact Study, if anything, understates the impact of those jobs and the importance to this community. I'm a business owner in this community. I think it understates its impact in letting other communities in north Missouri bring jobs in the areas where we need jobs. So thank you very much. C90

Response: Thank you for your comment.

6. Housing construction and accelerated real estate sales expected under the proposed plan will not materialize when the following is considered:

the placement of an immense electrical generation plant in close proximity to the Town of Norborne, Missouri,

the known environmental impacts from the electrical generation plant (emissions and noise, etc.),

the genuine fear that locating the electrical generation plant in a flood plain will increase the severity of potential floods, and create additional environmental impacts by further contaminating surrounding lands and water supply when flood waters recede,

the limited available services i.e. commercial, retail, medical and entertainment,

the use of eminent domain²² (utilized for a portion of land deemed necessary by AECL.),

and... last, but surely not least..., AECL's planned expansion of the proposed project to approximately twice its original size. (new information made known via the DEIS) (See Pg. 4-1) Planned project expansion has historical probability... to a relative certainty... based upon prior projects (Thomas Hills & New Madrid Facilities). C15

Response: Thank you for your comment.

7. We're going to pursue this from an educational perspective and the benefits we think it can bring to all our school and all the area schools in our community. The tax dollars it brings into our community and the area community schools supports our education of our children. It allows for up to date technology, which, if you've been in school systems you can never keep up. That money will help us keep up with that technology. It allows for us to provide quality training to our children and our students. It brings community wide prosperity in the sense of residential construction. It supports a lot of different businesses there. It impacts all community business in a positive way. We feel it's an educational institution. It stimulates population growth and promotes community pride. Our students at our school are very, very proud of this project and I really hope that it comes to our community. C54

Associated came to Carrollton a couple of years ago and looked at us from the educational standpoint. The career center here in Carrollton, we run through approximately 120-125 seniors every year and every year I'm asked to do follow up on every single one of those students and I just finished that and got the report on my desk. I have 53 percent of our graduates and we serve three public schools besides Carrollton: Stet, Keytesville and Brunswick and of those students that we put through and graduate, 53 percent of those are continuing their education in four year institutions. That's not a very high number if you compare that across the state.

Our students are leaving at \$6.77 per hour, those that are leaving our school and going straight into the work force, the military and so forth. With the kind of benefits that Associated are telling us that they're going to bring to our community, our children are going to be able to graduate from

²² It is a known fact that the use of eminent domain is a deterrent to further development... and will adversely impact local real estate sales and development in this area for the foreseeable future.

our area schools, get the training they need at the Carrollton Area Career Center, not only through our welding and building trades programs but we are also now a satellite campus for State Fair Community College and are offering classes there at night. We have just jointly visited with State Fair Community College and Moberly Area Community College who is directly associated with Associated Electric --

And at that particular time they were able to come to an agreement that we would also be able to offer the industrial power plant degree at the Carrollton Area Career Center to provide training for AECEI employees and our families and when our children come back to Carroll County and live with their families, even on the family farm.

I'm a former ag teacher and I've got agriculture at heart and AECEI seems to be a friendly company that seems to help out in the agricultural aspect as well as put forth the economics that are needed in our schools and educational facilities and help the community to grow. C55

Response: Thank you for your comment.

Also, in some of the previous meetings we asked questions on education which, I believe, George Eiser had come up here and was talking about the education, and we asked if there was going to be any available training for this plant and we were told no. So I'm glad you got something out of them because we sure couldn't. C77

Response: Thank you for your comment.

8. I want to talk about the EIS and the socioeconomic benefits. As an example of what I think is a non-benefit would be the town surrounding Thomas Hill's power plant. The town of Clifton Hill and the little town of Thomas Hill and College Mound are -- I don't know the words to use to describe -- the buildings are dilapidated. The town's run down. If that's what having a power plant in our area is going to bring to Norborne, I don't think anybody wants that. C29

Response: Thank you for your comment.

NOI-1600 Noise-related Issues

1. Will the Proposed Action, if built, be required to provide attenuation on the Induced Draft fans? If they intend to be the good neighbor they claim to be, every possible noise abatement will be installed. C23

Response: Noise abatement will be installed as appropriate to meet applicable noise standards, as discussed in Section 3.16.2 *Environmental Consequences*. It is likely that fans will require abatement.

WAS-1700 Handling and Disposal of Wastes

1. Again, no chemistry baseline data was presented for either site. Mitigation details should flooding and/or leaks occur were also absent. This Reserve is also adjacent to the area's main drainage system, Booker Slough, so any mishap would also affect Turkey creek and Moss creek, which empty into the Missouri River, approximately 7 miles south. *C13*
2. The department [MDNR] advises that no burning or burial of wastes may occur. This includes paper, pallets or untreated wood. *C17*

The department suggests that wastes generated through the construction project should be stored in an orderly fashion and avoid the appearance of disposal. The stockpile of waste must not create a public nuisance. Plastic and paper waste should not be stockpiled but disposed as generated. Any waste washing or blowing off of the site would constitute a violation. *C17*

The department advises that in the event of a fire involving stockpiled wastes, the company will be held responsible for improper disposal. *C17*

The department advises that any waste generated during the project would be subject to a timely hazardous waste determination. *C17*

Response: Waste management and compliance with applicable laws, regulations and ordinances is addressed in Section 3.17 *Waste Management*. Open burning is allowed under certain conditions and by permit (MO 10 CSR 10-3.030). These regulations and the permit requirement has been added to the Final EIS *Appendix A Relevant Federal and State Environmental Laws and Regulations*.

3. Throughout this DEIS, AECI has inundated us with charts, graphs, and needless verbiage regarding their anticipated controls and estimated emissions, yet, nowhere is it clearly stated how they intend to remove "HAPS" from the flu gasses, waste water, or solid wastes. I don't consider burying these toxic substances in a hole adjacent to a Federal Wetland Reserve an appropriate method of "removal". I don't believe this to be in compliance with the EPA's or DNR's regulations concerning toxic materials handling either. Seems AECI has differing opinions here ... they don't live

here either. At any rate, no permit for a toxic or hazardous waste disposal site was included in the DEIS. AECI does, however, propose "self monitoring" their emissions. How convenient. In view of their oft demonstrated tendency towards prevarications, and history of misrepresenting data, this must *not* be allowed! Monitoring instrumentation can now relay results directly to regulatory offices. There *must* be some rigid oversight plan where AECI is involved. C13

Response: As discussed in Section 3.1.1.2.4 *Hazardous Air Pollutants (HAPs)*, mercury is the primary hazardous air pollutant (HAP) that would be emitted from the plant. As that section also states: "There are two other HAPs, hydrogen chloride and hydrogen fluoride that, absent the air pollution controls incorporated into the design of modern coal-fired power plants, could be emitted in significant quantities." Mercury is discussed in detail in Section 3.1.1.2.4 *Hazardous Air Pollutants (HAPs)*. AECI will need to obtain an air permit from MDNR. Emissions will be monitored in accordance with the air permit and MDNR regulatory requirements. The plant will include a wastewater treatment and collection system (Section 2.4.6 *Wastewater Collection and Treatment*), also permitted by MDNR. Fly ash and flue gas desulfurization waste will be disposed of in an on-site landfill that will be permitted by MDNR (Section 2.4.8 *Ash and Flue Gas Desulfurization Waste Handling*). A Toxic/hazardous waste disposal permit was not discussed in the Draft EIS because there will be no toxic or hazardous waste, as define by applicable regulations, disposed of on the site.

4. Section 3.2.1.2.2 discusses the soil in the area of the plant. In particular the site of the proposed landfill is described as having about 18 inches of topsoil, then a silty clay to about a 25 foot depth. Below that they found 5 feet of sand, but went no further. I own land almost exactly 2 miles east, on the same hill (first bluff N of the Missouri River). When I wanted to rebuild a pond on the side of the hill, similar to the location of the landfill, Keith Stark, a Natural Resources Conservation Service representative for Carroll County informed us that the soil did not contain enough clay to build a farm pond. If there is not enough clay to hold water, why are we trusting that soil to hold potentially toxic waste? Since the area northwest of Norborne does not have Rural Water, our drinking water sources will likely be contaminated by the leaky landfill, assuming of course that we still have water after the de-watering during the construction phase and high operational water usage. C23, C30

Utility Waste Landfill: For both the leachate collection pond and coal pile runoff treatment pond there is no verification that the hydraulic conductivity of the soil at those locations has been determined. There is no verification of the hydraulic conductivity of the soil where the utility waste landfill will be placed. There is also no description of the corrective action that would be taken to restore groundwater if it is contaminated by leaks from any of these areas.

I didn't see anything in the EIS that addressed the first line or the under liner or the clay under liner of the landfill as to whether or not that's the right kind of soil to put a landfill. There's a lot of sand in that clay. Is that -- does that meet requirements? It wasn't even mentioned in the EIS.
C29

Response: MDNR has requirements for the permeability of the landfill liner, which will be part of the landfill permit. If the local clay does not meet the requirement, suitable clay would need to be brought from off-site. A synthetic liner is also required, in combination with the clay liner. (Section 2.4.8.3 *Utility Waste Landfill*).

The coal pile would have a clay liner and the coal pile runoff cleanout basin would have a bottom of 12-inch reinforced concrete (Sections 2.4.6.2 *Coal Yard Areas* and 2.4.7 *Coal Handling System and Coal Piles*). The leachate collection pond will have a double liner and a leak detection and removal system (Section 3.3.2.4 *Actions Incorporated Into the Proposed Action to Reduce or Prevent Impacts*).

Groundwater in the vicinity of the landfill will be monitored, as required by MDNR regulations and the landfill permit, which also identify compliance standards and corrective action.

Note that the landfill will be permitted by the MDNR as a utility waste landfill, not a toxic waste landfill. The reason for this is that the material to be placed into the landfill is not considered a toxic waste.

CUM-1800 Cumulative Impacts

1. AECI has also removed from consideration the cumulative impacts of burning coal. Global warming is a cumulative phenomenon by its very nature, but the DEIS refuses to consider these impacts; they are entirely omitted from Part 4, Cumulative Impacts. Yet AECI's estimate that

Norborne will supply 0.1% of domestic and 0.03% of global GHG emissions (Part 3.1.2.4.1, p. 3-49) is actually a very impressive figure, one that cannot be so blithely dismissed. C10

The Norborne plant, together with the numerous other new plants, will greatly increase the demand for coal. The effects in terms of GHG, criteria pollutants under the Clean Air Act, and depletion of a nonrenewable resource are direct, indirect and cumulative all at once (40 CFR 1508.7-.8). The impacts of new coal demand need to be evaluated. C10

There is no plan for mitigation of green house gas emissions. It is quite likely this will become necessary in the near future. It is not likely that coal-fired power plants already built will be "grandfathered-in." The statement in the DEIS that "...the proposed project would not have a significant impact on global warming," is simply not true. The cumulative effect of green house gases is significant and AECI needs to address this in this project. C29

Response: A discussion of cumulative impacts of burning coal has been added to the cumulative impacts section in the Final EIS (Section 4.4.1 Air Resources). The irreversible and irretrievable commitment of resources represented by burning coal is discussed in the Draft EIS Section 5.1.4 Natural and Mineral Resources.

2. The DEIS, Part 3.1.2.4.1, p. 3-47, admits that the cumulative effects of mercury pollution have not been studied. This is important given the bioaccumulative effects of mercury, the widespread contamination of waters leading to statewide advisories against eating fish, and the leading role of coal-fired power plants as a source of mercury. C10

The air quality impacts of non-carbon pollutants are deemed insignificant (ES, p. 9) without taking into account the cumulative effects of numerous coal plants. The conclusions of the Cumulative Impacts discussion in Part 4.4.1, that modeling is unavailable and that issuance of an air permit will automatically result in no significant impacts, are unacceptable. Also, the radius of 50 km beyond the affected environment is much too small; global warming is a global phenomenon, and other pollutants like SO₂ and NO_x can travel great distances and lead to, for example, acid rain in other states in the north and east. C10

In section 4.5, Summary of Cumulative Impacts, AECI states "if the proposed action receives an air quality permit from MDNR, there would be no significant cumulative impacts" on air quality. This is a ridiculous statement. A permit only means that the data AECI provides to MDNR fits

within the politically formatted requirements of the permitting process. The permit does not negate the negative impact, as the requirements likely do not reflect the latest scientific information and are heavily influenced by political lobbying. C23

Response: A discussion of cumulative impacts of mercury and other non-carbon emissions has been added to the Final EIS Section 4.4.1.1 *Regulated Emissions*.

A 50 km radius of influence is a typical distance used in air quality modeling analyses. Concerns such as impact on acid rain are dealt with by limiting emissions of SO₂ and NO_x in accordance with the requirements of the federal acid rain control program. The proposed project will have to comply with these requirements.

In addition AECI can manipulate their numbers in the application process to fit within the requirements. AECI only mentioned one power plant at the Norborne location until the Draft Environmental Impact Statement was released. Now they say they are allowing for the construction of 2 more 660 MW plants!! This is a clear manipulation of information for their benefit. I'm sure this is not the only example. Why would they stop now? C23

Response: Only the single 660 MW unit is planned at this time. To allow for future flexibility, it is prudent for AECI to design the plant so that it does not preclude adding capacity. If additional units are proposed in the future, they will be required to go through the analysis process appropriate for those units at that time.

3. More narrowly, USDA/RD should consider the cumulative impacts of the assistance, financial and otherwise, that it gives to coal electric generating projects. C10

Response: The number of projects USDA/RD provides assistance to is very small in relation to the number of projects proposed in the U.S. and globally. Regarding GHGs, refer to the cumulative impacts discussion in the Final EIS, Section 4.4.1.2 *Unregulated Emissions – Greenhouse Gases*.

4. I will again refer you to Exhibit A.²³ I informed both RUS and URS of the ethanol and biodiesel plants that will be operating in Carroll County. Neither these plants, nor their contribution to the economical and environmental

²³ Exhibit A: Email to URS Corporation cc: Stephanie Strength, RUS

impacts were mentioned in this document. It seems that, although AECI is capable of using local newspapers to mislead the public, they neglect to read these same sources! Since I, personally, made the effort to apprise the consultant of the situation, one would think they would at the least, check and add to the DEIS, if true. Not so ... only prose from AECI was included. C13

In discussing cumulative environmental impacts, the proposed bio-diesel plant near Carrollton was not included. C23

Response: Please refer to Draft EIS Section 4.3.3 *Other Projects* for a discussion of the operating ethanol plant near Malta Bend and the proposed ethanol plant near Carrollton. A reference to the planned biodiesel plant has been added to this section in the Final EIS.

There are 2 additional plants under construction in Carroll County; ethanol and biodiesel production. Is the EPA/RUS looking at cumulative impacts? C78

Response: The cumulative modeling results are not available. In its air permit application to the Missouri Department of Natural Resources, AECI must demonstrate that the cumulative effect of the proposed action and all other existing and planned sources will not result in a violation of National Ambient Air Quality Standards. This is discussed in Section 4.4.1 *Air Resources*.

5. It is distressing that in section 4.4.6, Farmland, AECI/URS used the "excuse" that since farmland is being lost all over the country, it's OK if this project takes a bit more. Who is going to step up and be responsible? We need agricultural land. We don't need urban/industrial sprawl. Certainly the USDA be supportive of agriculture. C23

Response: Thank you for your comment.

MIT-1900 Mitigation

1. 40 C.F.R. §1502.14(f) and 16(h) require the EIS, in its analysis of alternatives to the proposed action, to include "appropriate mitigation measures not already included in the proposed action or alternatives" that will mitigate adverse environmental impacts of the action.

Three types of mitigation are proposed:

- Energy efficiency programs

- Generation from waste biomass
- Programs to promote carbon sequestration and GHG reduction in agriculture and rural areas

Mitigation Alternatives And Demand-Side Resources. 40 C.F.R.

§1502.14(a) implementing the NEPA requirements for EIS requires the EIS to "rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." 40 C.F.R.

§1502.16(e) requires the EIS to discuss "energy requirements and conservation potential of various alternatives and mitigation measures."

Section 2 of the DEIS is dedicated to this evaluation of alternatives. It discusses supply-side alternatives, but includes no consideration of the possible use of demand-side resources to help meet load requirements. Implementation of demand-side measures would not be likely to meet the full load requirements identified in Section 1.4 of the DEIS. However, these measures could meet part of the load requirements and may influence the timing and nature of optimal supply-side additions to the system.

Energy efficiency programs

The department supports consideration of energy efficiency programs that could reduce total demand for baseload generation. This should lead to a reduction in CO2 emissions from a baseload plant, if not the Norborne plant, then some other baseload plant operated by AECI or another utility within AECI's ISO region. As stated in the EIS, the impact of CO2 emissions is not location-specific. Therefore the reduction in demand would mitigate the effect of operating the Norborne plant regardless of where the reduction occurs. A recent statewide market study indicates that there are significant opportunities for electric utilities throughout Missouri to promote and implement cost-effective energy efficiency measures. (RLW, 2006 Missouri Statewide Residential Lighting and Appliance Efficiency Saturation Study, February 2007)

Programs to Promote Carbon Sequestration and GHG Reduction in Agriculture and Rural Areas

A third area for mitigation would be AECI programs to encourage and provide resources to the local distribution cooperatives to partner with USDA to promote carbon sequestration and GHG reduction in agricultural and rural areas.

In 2003, USDA announced an initiative to encourage "management practices that store carbon and reduce greenhouse gases [when] setting

priorities and implementing forest and agriculture conservation programs." In conjunction with this initiative, then-Secretary Veneman emphasized the role of farmers and forestland owners in "reducing the greenhouse gas intensity of the U.S. economy." A USDA fact sheet provided specific greenhouse gas reduction and sequestration goals and described plans for the USDA initiative including financial incentives, technical assistance, demonstrations, pilot programs, education and capacity building to reduce greenhouse gas emissions and sequester roughly 12 million tons of greenhouse gases annually by 2012.

Generation from Biomass

The department supports consideration of generation from biomass as a measure to mitigate the adverse environmental impact of CO2 emissions. Section 2.2.4.2 discusses possible projects to generate electricity from waste biomass. The EIS discusses several possible technologies and waste streams such as biomass co-firing and generation from landfill gas (LFG).

The DEIS cites several considerations that may eliminate generation from waste biomass as an alternative to meeting full baseload requirements. These technologies may still serve as viable measures to mitigate the proposed Norborne plant's GHG impact. Biomass co-firing could occur elsewhere and would not necessarily have to be implemented at the Norborne site to mitigate the impact of Norborne's GHG emissions. In addition to generating from a renewable source, landfill gas projects prevent emissions of methane, a highly potent GHG.

Wind Generation

The EIS also includes extensive discussion of wind as an alternative approach to meeting AECI's baseload needs and concludes (Section 2.2.3.3.6) that wind could not meet the need for two reasons -- the intermittent character of wind generation and the lack of adequate wind resources in AECI's service territory.

It should be acknowledged that AECI committed to support of two 50 MW wind farms in NW Missouri during the same time period that the utility was developing its proposal for the Norborne plant. These renewable energy projects can be considered to partially mitigate the plant's CO2 emissions.

C17

Response: Regarding Demand Side Resources and Energy Efficiency, a detailed discussion of energy efficiency and conservation as an alternative, and AECI's recent related activities has been added to the Final EIS as Section 2.2.13 *Energy*

Conservation and Efficiency. This section includes a discussion of USDA's programs. Section 2.2.4.4 ***Advantages and Disadvantages of Biomass*** discusses AECl's use of biomass. Section 2.2.3.3.4 ***Wind Energy Project in Missouri*** discusses AECl's participation in wind energy projects.

2. Where are any *real* mitigation plans included in this report? AECl blithely states that both Norborne and Stet schools fail the criteria for visibility impact. However, since they aren't a State or Federal park area, this is insignificant. Our children are less important than a park 295 km away? These determinations are all highly questionable as: Their air dispersion models, with the exception of the "visibility" model, aren't divulged, and the parameters actually used were either meteorological data from the Kansas City International, (KCI) airport, or not listed at all. This EIS fails to inform readers that anything that can be seen as "haze" will also be breathed. This is only one of many instances where no mitigation is excused by determination of "insignificance"! C13

Response: The proposed project would meet all air requirements established by agencies with responsibility for environmental protection.

OTH-2000 Consideration of Irreversible and Irretrievable Commitment of Resources and Short-term Uses Verses Long-Term Productivity

1. Under NEPA, § 102(2)(C)(iv), the EIS must consider the relationship between short-term, local uses of the environment and long-term productivity. In context, this means 50-odd years of power generation from the Norborne plant versus a long-term loss of environmental productivity due to the potential ravages of climate change, which include severer droughts and stronger, more damaging storms, events that will harm agricultural productivity, the basis of the local economy. DEIS Part 5.2 says that the overall air pollutants, including GHG, will have impacts only "in a very small way." Set against this the socioeconomic benefits that AECl uses to justify the plant—temporary construction jobs and a small number of permanent jobs mostly not performed by local people (70 of 139 would be newcomers, DEIS Part 3.14.2.3.3) —pale into insignificance. Payouts in lieu of taxes (Part 3.14.2.3.1) would then serve only to fund a welfare economy. C10

Response: The referenced paragraph has been deleted.

AECI and their supporters have repeatedly argued that they are a wonderful corporate neighbor, that they enhance the communities they build near. In fact, section 5.2 states: "The short-term social gains associated with the Proposed Action discussed in Section 2.14, Socioeconomics and Environmental Justice, would result in beneficial long term socioeconomic productivity in the vicinity of the project site." I would suggest taking a look at College Mound and Clifton Hills, Missouri, communities near the Thomas Hill plant they built in the 1960's and 1970's. These are communities which have been essentially abandoned since their agricultural economic base was destroyed. They look like ghost towns, the buildings are dilapidated, and even basic retail services are no longer available. Is this what the USDA/RD wants to promote in agriculture communities across the country? C23

Response: Thank you for your comment.

2. NEPA § 102(2)(C)(v) requires analysis of irreversible and irretrievable commitments of resources. The DEIS, Part 5.1.4, estimates that the Norborne plant will burn 100 million tons of coal in its lifetime; this two-line statement does not attempt to give any rationale at all for disregarding the effects of this commitment. Not only is this an irrevocable addition to GHG in the atmosphere but the investment in coal will displace investment in more advanced renewable generating technologies, conservation and efficiency programs. C10

Response: The referenced NEPA section requires a detailed statement of irreversible and irretrievable commitments of resources; it does not require an analysis.

3. Section 5.1, Irreversible and Irretrievable Commitment of Resources, is very important. If this plant is built this 2000+ acres is lost, even if the all structures are removed they believe it is unlikely in the foreseeable future to renew the landscape (5.1.1). C23

Response: Thank you for your comment.

4. While they have told the public that there would be no noticeable flood plain impact, section 5.1.2 ends with: "The floodplain impacts are irreversible as long as the fill used to raise the plant elevation remains in place." C23

Response: The floodplain impacts are very small, but nevertheless irreversible as long as the fill remains.

5. In section 5.2 they admit that loss of topsoil will be “essentially permanent” and recovery to pre-project status would take several decades after completion of restoration activities. Are they committing to restoring the site when they abandon it? This should be a requirement of receiving federal money. C23

Response: Restoration of the site is not included.

CON-2100 Consultation and Coordination

1. I have read the transcript of the scoping meeting held in Carrollton, Missouri, on February 8, 2007, and was appalled at the number of “cheerleaders” AECl brought in from all over the state to sing their praises, without ever addressing the DEIS. Hopefully, the USDA/RD recognizes that these were comments borne of fear mongering on the part of AECl, and totally unrelated to the Draft Environmental Impact Statement. C23

Response: Thank you for your comment.

I was beginning to think that I had written a speech for the wrong subject. I actually intended to talk about the information that’s in this draft Environmental Impact Statement and the first 13 speakers, was it, I thought, kind of missed the mark. I kind of wondered if Associated Electric had brought them all in on the same bus. C29

Response: Thank you for your comment.

I also think it’s a really nice to meet all those representatives of electric cooperatives, but I also think that what they’re doing is they’re advertising here and saying and has nothing to do with the EIS. C65

Response: Thank you for your comment.

I can’t believe what’s happened here tonight. I honestly can’t. Really, I’m appalled. What we’re here for tonight is right here. Isn’t that correct? This is exactly and only what we’re here tonight. All we’ve heard from tonight is a lot of nonsense. People from other cooperatives who aren’t even -- aren’t even concerned about any of this. All they’re concerned about is cheap electricity, that’s it.

AECl on one hand has resorted to a smokescreen for this meeting. It’s all it is, a smokescreen. In Congress you call it a filibuster, don’t you, to keep the other people who have good concerns from talking. I’m concerned

about that. I think we'd be interested to stop a while ago but if you give me a few minutes maybe I can do a little bit of the same in getting--. C95

Response: Thank you for your comment.

I would make a comment. You've only had two people who have talked about the Environmental Impact Statement. I think it's very nice and all that people come to visit us in Carrollton but they can all stand up and give a cheer for the association and then goes home and that's not the kind of thing we're here about. -- you said you hold this thing as a facilitator and we're to talk about the Environmental Impact Statement and only person -- Well, can I come up there and sing and dance? C98

Response: Thank you for your comment.

I also request a second public hearing scheduled when we can submit informed comments and hear the rest of our neighbor's concerns and comments. (The contemptible behavior employed by AECl at the Feb 8 public hearing, destroyed such objective...as they intended.) C78

Response: Thank you for your comment.

Please note that allowing the comment period does not serve the same purpose as having a public hearing where we can hear our neighbor's concerns, as well as voice our own. (AECl associates, brought in from outside the county, with the sole purpose of preventing objective comments concerning the stated purpose of the hearing, i.e., the draft EIS, prevented this!) C78

Response: Thank you for your comment.

2. Please ensure that 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. C78

Response: Thank you for your comment.

3. It appears that Hardin, MO, and Richmond, MO, in Ray County, and Lexington, MO in Lafayette County will also be highly impacted by this plant. Please bring all affected MO agencies to the table, and notify citizens in the affected area. C78

Response: See Draft EIS Section 6.4.1 *List of Agencies, Organizations, and Individuals to Whom Copies of the Draft EIS Are*

Sent. See Appendix L *Federal Register Notices* for a list of repositories for the Draft EIS, and a list of newspapers that received the notice of the public meetings.

4. Please create a public website or FTP access so that all documents can be available from a single location. This URL should be included in the EIS as well as the RUS website. C78

Response: The web address for project-related documents is www.usda.gov/rus/water/ees/eis.htm.

Please make all correspondence on all permits submitted to any local, state or federal agency public as the materials become available. None were included in this DEIS. Furthermore, revised agreements between AECl and Carroll County officials are not being publicized, nor were hearings held prior to these agreements open to all the citizens. C78

Response: This information needs to be obtained through the appropriate agency or the county. Refer to Appendix A *Relevant Federal and State Environmental Laws and Regulations* for a listing of required permits and the applicable permitting agencies.

Unless otherwise stated, please make available information on any coal-fired power plant, railroads, power line, transmission link, transmission upgrade, buffer zone lease area, water pipelines, evaporation pond, camp, access roads, waste fill site(s), and all other project facilities and components not listed here. C78

Response: Please refer to Section 2.4 *Description of the Proposed Action* for details of the project components.

Please publicize the names, titles, addresses, phone numbers, and job descriptions of all employees, and outside consultants and contractors who are currently performing any work on the AECl project, or who are anticipated to perform such work. Include labor union affiliation/rank, if any, in these descriptions. C78

Response: This request is outside the scope of an EIS. The EIS does include a list of preparers and contributors (Section 7).

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 process. This request assumes that such studies will be performed. None were part of this DEIS. C78

Response: A number of studies were done to evaluate impacts associated with this proposed project. Refer to the Draft EIS table of contents and list of appendixes.

5. The Rural Utilities Services is on record of stating that public comments concerning this project would be considered. "All the comments that we receive will be incorporated into the final Environmental Impact Statement..."(Feb. 8, 2007) Yet, comments submitted to RUS following their Scoping meeting in 2005 were not addressed in this DEIS. Therefore, please indicate in detail reasons for refusing each request included in these comments. C78

Response: In Section 3 of the Draft EIS, for each resource (air, surface water, etc.), there is a section entitled *Identification of Issues*. This section lists the comments and issues identified in the scoping process. The following subsections then address those comments. Please refer to the table of contents for the page number for the Identification of Issues discussion for the resource of interest.

6. I was impressed with the way you managed the public comment process. Sorry we had to leave early. C20

Response: Thank you for your comment.