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1160 Avenue L
Ely, Nevada 89301
June 18, 2007

Bureau of Land Management
JUN 18 2007
RECEIVED
Ely, NV

Jeffrey A. Weeks
Bureau of Land Management
Ely Field Office
HC 33, Box 33500
Ely, Nevada 89301-9408

Dear Mr. Weeks:

Please accept this letter in support of the White Pine Energy Station.

My children are the fourth generation of my family to live and grow up in White Pine County and we have remained here because we absolutely love the area. I attended school at UNLV during the early 80's just after Kennecott had closed. I must admit it became quite depressing to come home intermittently to see more and more boarded up businesses on Aultman Street. I witnessed the disheartening results of the economic depression left in the wake of the Kennecott closure.

I started my own family in Las Vegas and sought a more wholesome environment to raise my children. I was fortunate enough to find a great job in Ely and moved back to enjoy the advantages I had taken for granted in my youth. Within about six months after moving back, the mining operation in Ruth announced it was down-sizing and a few months later closed. Although the economic impacts were not as severe as the previous mine closure, they were significant. Over a period of five years, employment dropped by 23%, the County population dropped by 12%, the number of students dropped by 23%, assessed valuation dropped by 40% and taxable sales dropped by 40%. Approximately one out of every four families were displaced and had to leave their homes. As Chief Financial Officer of the school district, I was immersed in the devastating caused by the dramatic loss of revenue and destruction it had on public services including our education system. Budget cuts were severe, teachers lost their jobs, student educational services reduced and employee morale plummeted.

The need for economic stability and diversification has been, and still is, critical to the fiscal health of the local governments, business and industry and citizens. The existing mining operation will close. It is a matter of time. It is imperative that we do everything in our power to prevent future generations from having to suffer through the imminent, devastating and abrupt impacts of another mining industry collapse.

Provided the White Pine Energy Station meets federal and state guidelines for air quality and other environmental issues, this project could be a catalyst for economic development and provide the power transmission infrastructure to advance renewable energy. These projects are ideal for development because the impact on assessed

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

valuation significantly outpaces the relatively nominal demand on public services. Greater assessed valuation without demand means local governments can improve the quality and appearance of the communities or provide amenities that are currently not available. Options such as bond issues for an indoor public swimming pool, park and recreation improvements and/or new and improved schools can be entertained by voters. Without development, these items can not be addressed regardless of the apparent need.

Power transmission and renewable energy development are essential to the stability and availability of energy in Nevada and the southwestern United States. Development of diverse and stable energy sources would directly benefit energy supplies and consumers.

The White Pine Energy Station proposed by LS Power would occupy approximately 1,280 acres. White Pine is one of the largest counties in the United States, covering 8,941 square miles, or 5,722,240 acres, and is larger than the State of Massachusetts. The proposed site would occupy approximately 0.022% of the County. According to the Nevada State Demographer, there are approximately 9,542 people living in White Pine County. This means there is approximately 600 acres per person. The physical impact of the plant appears to be relatively insignificant compared with these statistics. Approximately 93.5% (5,350,294 acres) of White Pine County is owned or controlled by the federal government[1]. This should ensure that the predominant portion of White Pine remains essentially unchanged.

It appears that the many positive impacts of the project to White Pine County and Nevada appear to significantly outweigh the physical and environmental disturbance. The local economy will be strengthened and diversified which will directly, positively impact the communities and citizens in White Pine County. Nevada and other western states will receive a much needed supply of energy. Transmission lines will increase the feasibility of renewable energy sources. Rail freight services can be re-instated and groundwater can be put to beneficial use for development that directly and positively impacts White Pine County.

I am hopeful that the BLM will approve the proposed site, approve the right of way and permit the project to proceed as planned.

Sincerely,

Paul Johnson

[1] Analysis of Socio-economic Data and Trends for White Pine County – January 2004; Thomas R. Harris, Director University Center for Economic Development University of Nevada Reno.

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

Curt Leet
<cwleet@yahoo.com>
06/19/2007 06:12 AM

To jeff.weeks@nv.blm.gov
cc
bcc
Subject White Pine Energy Station Draft EIS

I am writing to question the contents of the recently released draft EIS for the White Pine Energy Station. First of all the public meeting was a total farce. The questions that were written on the cards and submitted by the public were generally not adequately addressed by the panel and the moderator did not make sure the questions were thoroughly/adequately answered. Further the public was not allowed the opportunity to speak regarding the answers.

I20-1 The air quality section does not address the brown cloud that the plant will produce. The brown cloud effect on the quality of life was not addressed and is not tolerable. One reason I and many others live and recreate in this area is to enjoy the clear skies and clean air - we value the excellent air quality that currently exists. Tourism and outdoor recreation are important to our local economy. Dirty air would reduce the recreational, economic and aesthetic values of this area - all which could effect the county monetarily.

I20-2 EIS are supposed to address cumulative impacts and global warming was not even addressed in the document. The production of CO2 is a well documented waste product of coal fire power plants and a major contributor to global warming. Global warming is a well documented disaster and is completely overlooked in this document and needs to be addressed.

I20-3 The power company needs to be held responsible for any draw down of the water tables feeding both domestic and agricultural wells. If any wells need to be deepened due to the potential draw down, the power company needs to be held responsible for deepening any affected wells for the life of the power plant.

I20-4 The waste pile need not be left in place. It should be hauled back to the coal mine in the empty cars that are going back for more coal.

I20-5 The Draft EIS mentions temporary housing for only 200 employees. The expected construction workforce will be about 1,200 employees. The proposed temporary housing is inadequate and needs to accommodate at least 1,000 workers. The boom and bust caused by power plant construction has very significant impacts on local communities, This needs to be minimized by the appropriate temporary housing.

Considering all of these serious environmental concerns, I believe that the long term damage done if this power plant is built will far out way the potential benefits of a few local jobs.

Please thoroughly address these concerns in the final EIS.

Thank you for your attention to my concerns.
Curt Leet

I20-1 It is not clear what the commenter means by the brown cloud. Emissions from modern power plant stacks are usually imperceptible to the naked eye, unless, as in the winter, when the water vapor condenses when leaving the stacks and it appears as a white cloud (steam).

Predicted visibility impacts of the proposed project are disclosed and discussed in FEIS Sections 4.6.1.3.8 *Class I Area Dispersion Modeling Results*, 4.19.3.6.1, *Air Quality,* and Appendix L, *Cumulative Analysis for Air Quality*.

I20-2 Additional information regarding climate change has been added to this FEIS. Section 3.6.1.1.12, *Climate Change,* has been revised and moved to new Section 3.6.2 to include a broad discussion of the currently observed impacts to resources associated with climate change. Section 4.6.2, *Climate Change*, has been added to this FEIS to describe projected future changes in climate, along with discussions of the various factors thought to influence climate. Section 4.19.3.6.1, *Air Quality*, has been revised to discuss the potential incremental cumulative impacts of emission sources on climate change. Finally, Appendix M, *Understanding and Evaluating Climate Change* has been added to this FEIS.

I20-3 The DEIS and this FEIS assess potential ground water level declines in existing permitted wells in Section 4.4.1.4 for the Proposed Action and Section 4.4.3.4 for Alternative 1. Based on the results of an analysis of potential water level decline (drawdown) for the Proposed Action (see Section 4.4.1.4), five pumping permits are located in areas where ground water levels would be lowered within Steptoe Valley by between approximately 4 and 8 feet as a result of Station pumping. The only permits that would be affected by more than 8 feet are those associated with the production wells for the Proposed Action. These results represent the extreme case of 40 years of continuous pumping from all eight production wells at the constant rate of 387 gallons per minute per well. This rate corresponds to the maximum annual water demand of 5,000 acre-feet by the Proposed Action power plant and assumes the instantaneous and continuous requirement of this amount of water over a 40-year period. Under Alternative 1 (see Section 4.4.3.4), pumping ground water from the basin-fill aquifers in Steptoe Valley to meet the Station demand for water would result in ground water level declines of between 2 and 4 feet in the vicinity of two locations where other users have permits to pump ground water. Ground water level declines of 4 feet are not considered to represent a substantial adverse impact. These levels of drawdown for the Proposed Action and Alternative 1 are not expected to require the deepening of any existing wells.

In addition, Appendix G, *Ground Water Monitoring Program*, in this FEIS outlines the components of the proposed ground water monitoring and mitigation program (subject to approval by the Nevada State Engineer) that would be implemented under either the Proposed Action or Alternative 1. This program has been included as a component of the proposed project in Chapter 2 of this FEIS and has been augmented from that presented in the DEIS to include more information on the location of monitoring wells, spring monitoring locations, monitoring frequency, and contingency actions in the event that the discharge from known springs may experience a potentially adverse reduction as a direct response to continued pumping and it is determined that the production well is the actual cause of that potential impact or contamination associated with WPEA activities is anticipated above applicable water quality standards. The ground water monitoring program includes potential corrective or mitigative actions that WPEA is committed to follow in the event impacts to ground water resources and existing water users are anticipated as a result of WPEA activities.

I20-4 The waste stream to be disposed onsite is a non-hazardous solid waste. Onsite solid waste disposal facilities for coal combustion byproducts and other material will be regulated under a Class III industrial solid waste permit as required by the NDEP. The solid waste disposal facility at the White Pine Energy Station will be equipped with a synthetic liner and will utilize a ground water monitoring program to minimize the potential for any environmental impacts associated with storage of the waste.

I20-5 Temporary onsite housing and in-town housing would be provided for all of the employees, and thus for many more than the 200 employees referred to in this comment. In-town housing would be built for up to 300 workers with families, and as described further in Chapter 2 of the DEIS and this FEIS (see Section 2.2.4.2.1, *Construction Worker Housing*, additional housing would be provided onsite for a total of 1,000 workers that do not bring their families with them.

cwleet@yahoo.com
HC 32 Box 32120
Ely, NV 89301

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No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

White Pine Energy Station Draft Environmental Impact Statement

Comment Form

We would appreciate your comments on the Draft Environmental Impact Statement for the White Pine Energy Station Project. Please use this form (attach additional pages if required). You may either return it before you leave this public meeting or mail to the address at the bottom of the form. The comment period ends on June 19, 2007. Thank you for participating.

I21-1 1. Renewable energy sources should be considered as alternatives, particularly with the 20% mandate for renewable energy by 2015. An environmentally preferred alternative needs to be considered along with the proposed action.

I21-2 2. Environmental effects on air quality have not been adequately considered, particularly as there are due to be 3 coal powered plants proposed, so cumulative impacts need to considered.

I21-3 Increased train traffic bringing the coal in to the plants will also have adverse effects, directly and indirectly, and need to be considered.

I21-4 An increase in the amount of greenhouse gases and SO_x and NO_x contribute to acid rain need to be considered as an adverse event.

Date: 31 May 2007

Signature: Sheila D. Lehman

Name (printed): Sheila D. Lehman

Address: 10661 April Rose Court
Las Vegas, NV 89135

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

LV FIELD OFFICE

I21-1 The 20 percent renewable portfolio standard is applicable to utilities regulated by the Public Utilities Commission of Nevada. WPEA is an independent power producer (not a regulated public utility); therefore, the 20 percent renewable mandate is not applicable. Renewable clean energy alternatives such as solar, wind, geothermal, and hydroelectric, were considered in the analysis of alternatives to the use of pulverized coal for the proposed project (see FEIS Section 2.5). In brief, the potential renewable energy sources are not capable of meeting the purpose and need for the proposed project and are therefore not considered reasonable alternatives. See the response to Comment G1-28 for additional discussion.

I21-2 Additional details have been added to this FEIS to provide further information regarding cumulative air impacts. See FEIS Section 4.19.3.6.1 and Appendix L, *Cumulative Analysis for Air Quality*. These sections consider air emissions from multiple sources in the region, including the six existing and proposed power plants (including White Pine energy Station, EEC, Toquop, Newmont, IPP3, and Nevco- Sevier).

I21-3 Predicted locomotive emissions from Wyoming's Powder River Basin to Shafter, Nevada, have been included in Table 4.6-5 of this FEIS. The emissions have been updated to reflect the latest information and are discussed in Section 4.6.1.3.3, *Magnitude of Emissions During Operation*, of this FEIS.

I21-4 See the response to Comment G1-8 regarding greenhouse gases. For sulfur and nitrogen deposition, see the responses to Comments F1-34, F2-5, and F3-7.

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I21-5 3. The effects of the solid waste facility storing the fly ash were not considered, particularly because Duck Creek is only approx. 0.5 miles from the proposed action. Potential

I21-6 impacts due to flooding need to be considered, especially because this could contaminate surface and groundwater.

I21-7 Cumulative effects of this also need to be looked at.

I21-8 The potential effects of an accident on the rail line going over Duck Creek also needs to be considered.

Date: 31 May 2007

Signature: Sheila D. Lehman

Name (printed): Sheila D. Lehman

Address: 10661 April Rose Court
Las Vegas, NV 89135

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

LV FIELD OFFICE

I21-5 The potential effects of project-related solid wastes on the environment were evaluated and results summarized in Section 4.12, *Wastes, Hazardous and Solid*, in the DEIS and this FEIS. Section 2.2.3.1.3, *Solid Waste Disposal*, of the DEIS and this FEIS describes the design, construction, and management of the onsite solid waste disposal facility to comply with all applicable federal and state regulations to prevent the release of contaminants and protect the environment. Sixteen Best Management Practices (Appendix C), contained in the Hazardous Material Storage, Handling, and Disposal and Safety Measures Section provide detail on these environmental protection measures. Table 3.12-1 in the DEIS and this FEIS identifies applicable federal regulations and/or the administering agencies for the management of hazardous materials. Locally, White Pine County's 2006 Solid Waste Landfill Management Plan has been approved by the Nevada Division of Environmental Protection and considers the proposed White Pine Energy Station. Also see the response to Comment G2-60.

I21-6 Water on the White Pine Energy Station power plant site would be managed under two different NDEP permits to comply with all regulations and requirements promulgated under the Clean Water Act. Surface water, storm water runoff, and wastewater from the power plant site that has been collected after coming in contact with potential pollution sources (for example, coal piles and active solid waste disposal facility cells) would be routed and stored in the plant's onsite zero-discharge evaporation pond in accordance with applicable federal and state regulations (see Section 2.2.3.1.3, *Solid Waste Disposal*, of the DEIS and Section 2.2.3.1.4 of this FEIS). Additionally, see the response to Comment G2-27.

I21-7 No contamination and no direct or indirect impacts to surface or ground water quality are anticipated under the Proposed Action or Alternative 1. No cumulative surface water or ground water quality impacts are anticipated to occur. See the responses to Comments I20-4, I21-5, and I21-6.

I21-8 Section 4.12.3.2, *NNR*, of the DEIS and this FEIS describes the potential for an accidental spill along the NNR corridor (estimated to be low) and the potential for resultant impacts to wildlife (estimated to be unlikely). The analysis notes, however, that if an accidental spill were to occur in wetland/riparian areas along the corridor (for example, along Duck Creek), site remediation would be critical in keeping adverse impacts short-term in duration and re-establishing riparian and wetland areas.

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White Pine Energy Station Project Draft Environmental Impact Statement

Comment Form

We would appreciate your comments on the Draft Environmental Impact Statement for the White Pine Energy Station Project. Please use this form (attach additional pages if required). You may either return it before you leave this public meeting or mail to the address at the bottom of the form. The comment period ends on June 19, 2007. Thank you for participating.

It is inconceivable to me that while the rest of the world is concerned about global warming and utilizing alternative forms of energy sources such as wind and solar power, you are actually considering a coal fired power plant, one of the major causes of global warming. To say you will be within federal emission standards is meaningless. Under the Bush administration these standards have been lowered and air polution has gotten worse, not better. So-has writing this been a waste of time? Are you listening to what this and other letters of protest are telling you or

Date: May 23rd, 2007

Signature: Elizabeth Lucas

Name (printed): Elizabeth Lucas

Address: 734 Ely Street
Ely, Nevada 89301

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

ELY

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

do they just get filed in the nearest trash can? Please, this far more important than a few jobs or a few bucks in someone's pocket. We should be closing coal burning plants, not building new ones, There is no such thing as "clean" coal!

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

June 18, 2007

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33 Box 33500
Ely, NV 89301-9408

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Ely, NV

Dear Mr. Weeks:

Please accept this letter as my endorsement in support of the proposed action regarding the White Pine Energy Station. I believe the following items support the Proposed Site over Alternative 1:

- Less visual impact to the Duck Creek Basin.
- The use of northern well for water supply will keep the water closed to McGill available for future economic growth near Ely/McGill should it be needed.
- Less construction of linear facilities outside the Utility Corridors since the Proposed Action site is closer to US 93, the NNRy and the SWIP Corridor.
- Coal trains will have shorter commutes into Steptoe Valley, lessening air emissions and impacts to private property owners further south in Steptoe Valley.
- Proposed Action will require 110 acres less permanent ROW and permanently disturb 59 fewer acres.
- The Proposed Action does not overlap with private property.

It is my hope that the BLM, through there EIS process, find that supporting the Proposed Action is needed over No Action for the following reasons:

- No Action will not supply for growing energy needs.
- No Action will provide **NO** economic benefits to Ely and White Pine County.
- No Action could preclude putting White Pine County's water to beneficial use.
- No Action could preclude investments in electric transmissions infrastructure. Investment in electric lines will likely spur renewable energy projects in rural Nevada.

Please accept these comments in support of the White Pine Energy Station. The completion of this project is crucial in ensuring the vitality and stabilization of the economies of White Pine County and the City of Ely. Potential impacts from the project can be mitigated, but the loss of this project and its positive financial impacts cannot be recovered. I've been a life long resident of White Pine County and have its future at heart. I would never endorse a project that I believe would have a detrimental impact to our way of life or futures.

Best Regards,

Stephen Marich
Ely City Councilman

No comments on the White Pine Energy Station DEIS were delineated for the letter shown on the facing page.

CAROLINE MCINTOSH
<wpcaroline@sbcglobal.net>
06/18/2007 10:22 PM

To jeff_weeks@nv.blm.gov
cc
bcc
Subject White Pine Energy Station Comments

Dear Mr. Weeks,

Please accept the following comments in the official White Pine Energy Station EIS comments.

As a resident of White Pine County, I would like to offer my support to the White Pine Energy Station Project. LS Power has worked closely with the citizens of White Pine County to mitigate any potential concerns regarding the project. LS Power is sensitive to the lifestyle values held by our residents, and has gone to great lengths to explain the dry scrubber process, including potential trade-offs with the process.

The war on terrorism has proven that the United States of America must become less dependent upon foreign energy sources. The White Pine Energy Station is a positive step in providing for the energy needs of the citizens of Nevada. We must to do all we can as a nation and state to become independent in our energy sources.

Finally, the White Pine Energy Project will bring a much-needed tax base to White Pine County. Our local school system and county government have been forced to short-change the students and citizens of much needed funding to run proper schools and county services. The White Pine Energy Project will bring long-term stability and resouces. I welcome the White Pine Energy Project to White Pine County.

Many thanks to the Ely District BLM Office for your professionalism during this rigorous process.

Sincerely,

Caroline McIntosh
2695 Mineral Drive
Ely, NV 89301

No comments on the White Pine Energy Station DEIS were delineated for the letter shown on the facing page.

Jeff Weeks
BLM
Ely Field Office
HC33, Box 33500
Ely, NV. 89301-9408

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Ely, NV

Attn: White Pine Energy Center EIS

Thank you for the opportunity to comment on this proposal. As a resident of Ely, a frequent visitor to our areas public and federal lands, and a concerned citizen I would like to express the following concerns and suggest issues to be analyzed in the EIS that appear to be lacking in the DEIS

1. The Proposed location is very close to the communities of Ely and McGill. It would certainly be visible from both communities and potentially have adverse impacts to air quality, water quality, and public health. Prevailing winds are out of the Southwest which would blow particulates and any emissions away from the population centers; **however it is common to receive winds from all directions. During the winter we often have winds out of the North which would blow emissions toward the two towns, and there are also periods of cold high pressure and temperature inversions which could trap pollutants near the ground causing public health issues, poor air quality, and visual impacts.**

2. There are currently some perspectives touting the positive economic benefit to White Pine County. This will be short term and not significant. Who wants to live in the shadow of a coal fire power plant? It is imperative that the long term negative economic and social impacts be analyzed. There are obvious adverse impacts such as decrease in Quality of life, potential health issues, destruction pastoral qualities, and tourism economy that are not adequately analyzed. Ely is a rare place where the air is clean and there are abundant outdoor recreation activities. This is the real economic future of this area, and this potential could be significantly reduced if these power plants are constructed. I25-1

3. How will the coal fly ash be stored? Is there a risk of this blowing into aquatic systems, surrounding public and federal lands, or affecting adjacent communities? I25-2

4. It appears that the impacts to air quality are not adequately addresses. Current EPA standards are for to lenient and allow for unhealthy air that may cause harm to those sensitive to pollutants. This is an environmental impact statement and needs to go beyond legal standards and address any changes to air quality including providing mitigation and monitoring. I25-3

5. Both the preferred and the alternative site are surrounded by Forest Service and BLM federally designated Wilderness areas. The Schell Creek Wilderness Area is less than eight miles downwind from the alternative site. Land Management

I25-1 Section 4.17, *Socioeconomics*, of the DEIS and this FEIS assesses both the positive and negative socioeconomic impacts that would be associated with the proposed White Pine Energy Station. Potential adverse effects on tourism in White Pine County were considered during the project construction phase and in designing the project to avoid or minimize the potential for such impacts. For example, a substantial amount of worker housing was included in the project description in Chapter 2 of the DEIS and this FEIS to, in part, help avoid and minimize adverse effects on tourism that could occur if a large number of local motel rooms were used by project construction workers and would thus not be available for tourists.

A number of potentially adverse socioeconomic effects were assessed in Section 4.17 of the DEIS and this FEIS, and many of these involve issues that affect the quality of life of local residents in Ely and McGill. For example, a potential increase in crime during project construction was assessed as were related effects on the sheriff's department, and Best Management Practices (BMPs) were developed to help minimize the risk of crime and to expand existing jail capacity. Other quality of life issues addressed in the socioeconomics analysis include potential increases in local traffic volumes during construction and the need for traffic control measures, potential reductions in the quality of emergency services provided to local residents, and potential effects on schools and social services. The project's BMPs related to these issues were designed to help minimize adverse impacts to the quality of life of local residents. In addition, the major new tax revenues associated with the project should allow White Pine County to improve both the quality and quantity of a number of different types of public services, thus improving the quality of life of residents that use these services. Potential project effects that could affect the quality of life of local residents also were assessed in the air quality, visual resources, recreation, and transportation sections of the DEIS and this FEIS.

Potential effects directly or indirectly related to public health resulting from the Proposed Action and Alternative 1 are addressed in various sections of the DEIS and this FEIS, including Section 4.3, *Surface Water Resources*, Section 4.4, *Ground Water Resources*, Section 4.6, *Air Quality and Noise*, Section 4.12, *Wastes, Hazardous and Solid*, and Section 4.14, *Environmental Justice*. Federal, state, and local laws and regulations governing air quality, water quality, and the storage of hazardous and solid wastes are designed to protect human and biological health. Air quality emissions from the proposed power plant must comply with State of Nevada laws, regulations, and permit requirements, which are below thresholds that would result in adverse impacts to humans, domestic animals, and wildlife. Similarly, storage requirements for ponded water and hazardous and solid wastes are designed to prevent the release of foreign materials and thus maintain conditions below thresholds that would result in adverse impacts to human and biological health. For the these reasons, no adverse health effects in humans or animals or other public health threats are expected to result from the construction and operation of the White Pine Energy Station.

I25-2 Coal fly ash would be stored in the onsite solid waste disposal facility, which is described in detail in Section 2.2.3.1.3, *Solid Waste Disposal*, of the DEIS and Section 2.2.3.1.4 of this FEIS. As required by the air permit for the White Pine Energy Station, inactive areas of the solid waste disposal facility would be controlled by surface sealants (crusting agents), and active areas of the solid waste disposal facility would be controlled by water sprays. As individual sections (or "cells") of the solid waste disposal facility reach maximum capacity, they would be covered with soil and reclaimed to natural vegetation. Therefore, air emissions associated with the solid waste disposal facility would be minimized. Additionally, the air dispersion modeling results presented in Section 4.6.1.3.5, *Class II Air Dispersion Modeling Results*, take into account the estimated maximum dust emissions from the solid waste disposal facility. These results show that the White Pine Energy Station is not expected to cause or contribute to any violation of an ambient particulate standard; therefore, adverse effects associated with fly ash are not anticipated.

I25-3 The air quality analyses in Section 4.6.1 of the DEIS and Sections 4.6.1 and 4.19 of this FEIS demonstrate that predicted impacts (including cumulative impacts) are below U.S. Environmental Protection Agency's (EPA's) National Ambient Air Quality Standards, which are set to protect human health and welfare, including the health of sensitive populations. The commenter has presented no evidence to support the claim that current EPA standards are too lenient and allow for unhealthy air that may cause harm to those sensitive to pollutants. Because the White Pine Energy Station would meet NDEP-BAPC and EPA standards for air quality, the BLM does not propose additional mitigation. If the commenter believes the existing air quality standards are not sufficiently stringent, the commenter may wish to submit comments to NDEP-BAPC and/or EPA during the public comment periods for future regulatory actions.

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Agencies are charged with managing these federally designated areas to preserve Wilderness qualities for all people and future generations. The DEIS suggests that there are no impacts to Wilderness areas, this is ludicrous. It appears the contractor writing the document has no understanding of Wilderness or roadless characteristics or the importance of preserving these qualities. Impacts to the following Wilderness characteristics need to be addressed and analyzed.

a. Natural Integrity – Emissions and fly ash transported by wind, and dust during construction and operation would likely blow toward one or all of the surrounding Wilderness areas degrading the Natural Integrity.
b. Apparent Naturalness – The large power plant complex and smoke would be visible for many of the Wilderness areas and take away from this quality. In addition adverse affects to vegetation, wildlife, air quality and water quality would degrade the apparent naturalness.
c. Remoteness, Solitude and Opportunities for Primitive Recreation – These are important benefits that Wilderness offers to locals and visitors to the area, which would certainly be adversely impacted with coal fire power plants and associated disturbances and emissions visible from any Wilderness areas. I25-4
d. Soil, Air and Water Quality – it is important to thoroughly analyze and study these potential impacts before moving forward with this project. Is it possible that emissions could change air, water or soil quality, or PH of soil or water? Vegetation, amphibians, and macroinvertabrates are very sensitive to PH change. Emissions containing nitrogen, mercury, sulfur, or carbon can be very harmful to many species and can alter air, soil or water quality. This analysis needs to go beyond EPA health standards and address environmental impacts hence the term "Environmental Impact Statement."
e. If any Wilderness areas are affected at all there should be mitigation steps such as air quality monitoring, reducing emissions etc.

6. It is 2007 and the technology to utilize less destructive energy alternatives exists. It is important to ask the questions, should destructive and hazardous coal energy even be an option? The purpose and need of this project is too specific and is geared toward profit for the power companies rather than allowing for sustainable energy projects such as wind or solar. I25-5 The coal is proposed to be transported from Wyoming, where the landscape is being torn apart to mine the coal. The energy required to transport this coal to Nevada, and construct the infrastructure to do so seems wasteful. The energy produced from these power plants will be utilized in population centers hundreds of miles away. Why not build the power plants there, or better yet, why not use solar power that will be far less destructive and more economically feasible in the long run? It is important that these cumulative effects of mining in Wyoming, and the energy to transport the coal, as well as the cumulative effects of the entire infrastructure (power lines, train tracks, multiple trains rolling through the Steptoe valley, and water wells, pipelines, and diversion structures) be analyzed in the EIS. I25-6

I25-4 The elements of natural integrity, visibility, solitude, soil, air, and water quality are described and evaluated under the resource topics of water (surface and ground water), biology, air quality, visual, and Wilderness in Chapters 3 and 4 of the DEIS and this FEIS. Appendix C of this FEIS includes BMPs designed to reduce the potential for short-term and long-term impacts on these resources from the proposed White Pine Energy Station. See the response to Comment I14-11 for a discussion of Section 325 of the White Pine County Conservation, Recreation, and Development Act of 2006 and Wilderness areas.

I25-5 The DEIS and this FEIS respond to a specific application for a right-of-way to construct and operate a 1,590-MW coal-fired power plant in Steptoe Valley to meet base-load energy need and to provide economic benefits in White Pine County. The Purpose and Need statement relates to the Applicant's (WPEA's) specific project proposal. The BLM is obliged to assess that Proposed Action, the No Action Alternative, and other alternatives, including alternative power generating technologies. Section 2.5.1, *Alternative Power Generating Technologies*, in the DEIS and this FEIS discusses in detail the various alternative generation technologies, including renewable energy sources (such as solar, geothermal, and wind). The DEIS considered a variety of technologies for meeting the purpose and need for the project, including technologies not proposed by WPEA. Additionally, see the response to Comment G1-28.

It is further noted that the transmission infrastructure supported by the proposed Station would facilitate the development of renewable resources (for example, wind and solar) in the area that would not be viable without the transmission infrastructure.

I25-6 The direct, indirect, and cumulative effects of mining coal in Wyoming are addressed in numerous EISs that have been prepared specifically for proposed coal mining activities in that state. The direct, indirect, and cumulative effects of using the mined coal to fuel the White Pine Energy Station power plant are addressed in the DEIS and this FEIS. Also, predicted emissions from locomotives transporting coal on the NNR between Shafter and the proposed White Pine Energy Station for use in the power plant are addressed in the DEIS and this FEIS in Section 4.6.1.3.3, *Magnitude of Emissions During Operation.* Connected action effects of the SWIP and NNR and cumulative effects of the SWIP, NNR, and proposed White Pine Energy Station, as well as other projects considered in the cumulative effects analysis, are described in Chapter 4 of the DEIS and FEIS.

Types of impacts on other resources from rail traffic carrying coal from the Powder River Basin to Shafter would be similar to those impacts described for the NNR between Shafter and the White Pine Energy Station power plant site. Likely rail road routes and estimated current rail traffic from the Powder River Basin in Wyoming to Nevada were reviewed (Cambridge Systematics, 2007). Estimated current rail traffic on track segments between the Powder River Basin and Wells, Nevada, which is approximately 30 miles northwest of Shafter, is approximately 700 to 1,400 trains per week in Wyoming, 175 to 350 trains per week in Utah, and 66 trains per week between the Kennecott Smelter in Utah and Wells, Nevada (Maier, 2008). For the proposed White Pine Energy Station, 12 trains per week would carry coal from the Powder River Basin to Shafter and 12 trains per week would return to the Powder River Basin, for a total of 24 trains per week. The additional rail traffic of 24 trains per week compared to the current rail traffic by track segment listed in the preceding text would be increases in rail traffic of approximately 1.7 to 3.4 percent in Wyoming, 6.9 to 13.8 in Utah, and 36.4 percent from the Utah-Nevada line to Shafter based on the Kennecott Smelter to Wells estimate. Because of this, there would be slightly increased overall noise levels (but no increase in peak noise) and the potential for slightly increased wildlife collisions compared to current conditions proceeding west from the Powder River Basin to Shafter.

7. This proposal will require considerable water. It is claimed there are adequate water rights, but that is a legal determination, not an environmental one. Given the number of other proposals that may use the areas ground and surface water, cumulative impacts to vegetation, soil and potential effects from water table drop need to be addressed. I25-7

8. The power company needs to be required to use the latest and most effective technologies to reduce emissions, not just the minimal legal requirements. I25-8

9. Global warming has been an obvious and considerable problem for decades, and it is finally being recognized by even politicians that support dirty energy such as coal. It is backwards to build more coal power plants that will contribute to global warming. Most science predicts that there will be drastic visible impacts from global climate change in the next decade, such as complete melting of ice caps etc. As these problems become more apparent to the public the demand for greenhouse gas producing energy sources will dry up, making coal power obsolete. The possibility of this issue needs to be addressed as well. It may not be prudent or feasible to construct power plants that may only operate for a few years. I know this is a difficult effect to address but it is important none the less and needs to be mitigated before allowing this project to continue. I25-9

10. Visual impacts are not adequately addressed in the Draft. The model maps showing where the power plant will be visible from are completely inadequate. As an example the crest of the Schell creek Range is shown as an area where the power plant will no be visible from. The entire valley can be seen from the crest and certainly a 600 ft high smoke stack and accompanying emissions will be seen. Please put some thought and actual science into analyzing and mitigating visual impacts. I25-10

I25-11 **For the above reasons the alternative location near Duck Creek, just north of McGill is completely unacceptable, and any coal plant construction is suspect and likely not a feasible energy source. Please take these comments into consideration. If clean energy solutions are not profitable enough for the power companies and coal power plants must be constructed they need to be much further north, away from existing communities, sensitive natural resources, public recreation opportunities and designated Wilderness areas, and also need to incorporate the latest technologies to reduce emissions and mitigate environmental and social impacts. New technologies need to be utilized as they become available (rather than deemed to be affordable), and power companies need to move toward using 100 percent clean energy.**

I25-7 The Nevada State Engineer is responsible for the allocation of ground water in the project area. In 1980, the State Engineer issued an order designating Industrial/Power Generation as the preferred use of ground water in Steptoe Basin. Following a public hearing in 1983, the Nevada State Engineer granted White Pine County the rights to withdraw up to 25,000 acre-feet per year of ground water in Steptoe Valley for industrial purposes, including power generation. The State Engineer also designated ground water in that portion of Steptoe Valley surrounding Ely and north to McGill for municipal uses and elected to curtail future appropriation of water for irrigation in that area. The City of Ely holds municipal water rights of 14,476 acre-feet, which the City estimates would serve a population of approximately 20,000 and be adequate for the City's long-term growth. However, the City of Ely uses less than 3,000 acre-feet of its municipal water rights to meet current needs for a population of 4,325 (White Pine County, 2007).

The White Pine County Board of County Commissioners' letter of July 11, 2007, points out that if the water rights granted to White Pine County by the State Engineer for power production are not used for that beneficial use, they could be lost to the county. Further, any change in use by the county would require approval by the State Engineer and would be subject to protest and/or denial. It should also be noted that in response to public concerns, WPEA revised its proposed cooling system to reduce ground water annual consumption from 25,000 acre-feet to 5,000 acre-feet.

The annual demand for 5,000 acre-feet of water by either the Proposed Action or Alternative 1, together with the most recent known ground water demand by other permitted ground water users, would use less than 15,000 acre-feet of ground water. These values are only a small fraction of the annual ground water perennial yield of Steptoe Valley (70,000 acre-feet). Water rights held by White Pine County are senior to many of the other water rights in the basin, and pumping of these senior water rights (up through White Pine County power production water rights) would not exceed the perennial yield of the basin. The Nevada State Engineer would restrict pumping of water rights junior to those of White Pine County for power production if issues regarding perennial yield were to occur.

The exact location of the wellfield that would serve the proposed Ely Energy Center has not yet been selected, as discussed in Section 4.19.3.4, *Ground Water Resources,* of this FEIS. However, the only location within the Steptoe Valley Hydrographic Basin that has the potential for cumulative impacts to ground water resources would be the Ely Energy Center wellfield located near Lages Station that could cause an overlap between the zones of ground water drawdown for the White Pine Energy Station and the Ely Energy Center. However, the most likely overlap area does not contain springs. Therefore, cumulative impacts to springs from the projects are unlikely. The zone of potential overlap does contain one permitted well, which is shown in Figure 4.4-3 in this FEIS north of the White Pine Energy Station drawdown zone and southwest of Lages Station. It is uncertain whether that well would be impacted because it is outside the 2 foot drawdown zone of the White Pine Energy Station wellfield and the drawdown zone for the Ely Energy Center is unknown at this time. It is anticipated that once the exact location of the wellfield for the proposed Ely Energy Center is known for certain and its effects analyzed, this information would be used in the EIS for the Ely Energy Center to analyze potential cumulative effects on ground water resources resulting from the proposed Ely Energy Center and the White Pine Energy Station. It also is anticipated that a ground water monitoring and mitigation program generally similar to that for the White Pine Energy Station would be developed for the proposed Ely Energy Center, and implemented and enforced according to Nevada State Engineer requirements.

Section 4.19, *Cumulative Impacts,* of this FEIS considers the effects of all past, present, and reasonably foreseeable future actions with the potential to result in cumulative impacts when combined with the potential effects of the proposed White Pine Energy Station. Cumulative impacts were analyzed for all of the resources addressed in this FEIS.

I25-8 The rationale for the selection of the various emission control technologies is summarized in Section 2.5.4, *Alternative Air Pollution Control Technologies*, and detailed in Appendix D, *Evaluation of Alternative Control Strategies*, of this FEIS. The selection of control technologies weighs competing factors, including energy efficiency and collateral environmental impacts. These competing factors are documented in detail and discussed in Appendix D of this FEIS. The NDEP has determined that the control technologies selected for the White Pine Energy Station satisfy the requirement to apply the Best Available Control Technology.

I25-9 Additional information regarding climate change has been added to this FEIS. Section 3.6.1.1.12, *Climate Change,* has been revised and moved to a new Section 3.6.2 to include a broad discussion of the currently observed impacts to resources associated with climate change. Section 4.6.2, *Climate Change*, has been added to this FEIS to describe projected future changes in climate, along with discussions of the various factors thought to influence climate. Section 4.19.3.6.1, *Air Quality*, has been revised and moved to new Section 3.19.3.6.2 to discuss the potential incremental cumulative impacts of emission sources on climate change. Finally, Appendix M, *Understanding and Evaluating Climate Change*, has been added to this FEIS.

A memorandum of understanding (MOU) between WPEA and the State of Nevada, signed on November 20, 2007, would require the Station to be designed and constructed in a manner to be "Carbon Capture Ready" so that the facility can be retrofitted in the future with carbon dioxide capture and sequestration. As part of this requirement, approximately 7 acres of land would be set aside for each coal-fired boiler to allow for the installation of this technology. The land set aside is discussed in the revised Section 2.2.3.1.2, *Land Set-Aside for Future Carbon Capture Technology*, and the MOU is included in Appendix F of this FEIS. Potential carbon dioxide control technologies are evaluated in FEIS Section 2.5.4 and Appendix E, *Carbon Capture and Sequestration*.

I25-10 The seen area analysis reveals that views of the Station from portions of the crest of the Schell Creek Range would be screened by intervening ridgelines between the crest and the Station. The photo simulations in the DEIS and this FEIS used the best available information on the size of the Station features to create a possible image of the Station from various Key Observation Points (KOPs). The simulations provide a reasonable image for comparative purposes.

In the example of the Schell Creek Range, two KOPs (KOP 3 and KOP 4) were selected to assist in the analysis of possible visual impacts from that area. Table 4.7-2 in the DEIS and this FEIS shows that under the Proposed Action the power plant site would be visible at KOP 3, Lincoln Highway, because of the scale of the cooling towers, generator stacks, and, to a lesser degree, the power plant. It would, therefore, not meet Visual Resource Management (VRM) Class III objectives. Under Alternative 1, features at the power plant site would be visible at KOP 4, U.S. 93 Turnoff, for the same reasons.

Ultimately, the visual analysis found that facilities associated with the Station would be viewed to varying degrees throughout much of Steptoe Valley based on scale (see Section 45.7.3.4, *VRM Consistency*, in the DEIS and this FEIS). As described in Appendix C, *Best Management Practices*, the BMPs would help reduce the visual impacts of facilities except for the cooling towers and generator stacks under both the Proposed Action and Alternative 1.

I25-11 Alternative 1 has been fully assessed at the same level as the Proposed Action, and potential effects are described in the DEIS and this FEIS. That assessment will be used by the BLM in deciding whether the Proposed Action, Alternative 1, or the No Action Alternative will be approved.

This page intentionally left blank.

Please provide me with a copy of the final EIS and any associated documents, upcoming public meeting dates, or other pertinent information concerning this or similar projects.

Thank you,

Daniel H. Morris
695 Campton
Ely, NV. 89301
775-289-6958
danielmorris@fs.fed.us

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

White Pine Energy Station Project Draft Environmental Impact Statement

Comment Form

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I26-1 1) Need to analyze impacts to wilderness values including opportunities for solitude / primitive recreation, scenic values, Air / water Quality (any degredation is not acceptable in wilderness), Natural integrety, apparant naturalness, etc.

I26-2 2) Negative Socio-economic impacts are significant, these need to be addressed as well. Quality of life, Health issues, Tourism economy impacted.

3) Its 2007, should we really be constructing coal power plants, why not wind and solar? Keeping costs to the consumer low, and profits high is not an adequate answer!!

4) Alt. 1 is completly unacceptable, to close to ELY/McGill

I urge No action

Date: 5/8/07

Signature: [signature]

Name (printed): Daniel H. Morris

Address: 695 Campton, ELY NV. 89301

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

I26-3 Mitigation is needed for Air quality beyond EPA standards ~~and~~ ~~This is a~~ Clean air is an important characteristic of all wilderness areas, not just class 1 air sheds. ELY

I26-1 See the response to Comment I25-4.

I26-2 See the response to Comment I25-1.

I26-3 See the response to Comment I25-3. The proposed White Pine Energy Station will be required to meet, not exceed, the standards set by the Clean Air Act and the NDEP.

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I27-1 1) 5000 ACRE FEET of WATER PER YEAR are ALLOCATED - WELLS are 1000 FEET (x8). HOW DOES THIS AFFECT WELLS IN THE AREA (RESIDENTIAL + AGRICULTURAL) AS FAR AS DRAW DOWN? WHAT IS THE ESTIMATED REPLENISHMENT RATE of THE AQUIFER?

~~2) IF WELLS ARE AFFECTED IS THERE ANY PROPOSED FUND OR RECOURSE FOR REMEDY?~~

Date:

Signature:

Name (printed):

Address:

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

ELY

I27-1 The DEIS and this FEIS assess potential ground water level declines in the vicinity of existing permitted wells in Section 4.4.1.4 for the Proposed Action and Section 4.4.3.4 for Alternative 1. See the response to Comment I20-3 for a discussion of these effects. Published estimates of the annual rate of recharge to the basin-fill aquifer in Steptoe Valley range from approximately 85,000 acre-feet to 132,000 acre-feet (see Table 3.4-7 in the DEIS and this FEIS). See the response to Comment I25-7 for a discussion of ground water allocations, uses, and replenishment as related to proposed Station needs. Appendix G in this FEIS outlines the components of the proposed ground water monitoring and mitigation program (subject to approval by the Nevada State Engineer) that would be implemented under either the Proposed Action or Alternative 1. See the responses to Comments G1-6 and I20-3 for further discussion of this program.

White Pine Energy Station Project Draft Environmental Impact Statement

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I28-1 1.) WHAT Road Route will Construction MATERIAL will be TAKEN To plANT Site?

Date:

Signature:

Name (printed):

Address:

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

ELY

I28-1 Several routes may be utilized to transport construction materials to the plant site. For aggregate material that originates from the mineral materials sale area shown on FEIS Figure 2-1, the material could either be transported (a) south along White Pine County ("WPC") Road 27 to WPC Road 24 (Monte Neva Road) to US Highway 93 and north to the Proposed Action access road, or (b) north along WPC Road 27 to WPC Road 18 to US Highway 93 and south to the Proposed Action access road. For construction materials that originate outside of the area, U.S. Highways 93, Alternate 93, 50, 6, or State Route 318 could be used to transport materials into the area. U.S. Highway 93 would be utilized more than any other route because this is the main highway that would be used to access the site. Section 4.18.1.1, *Impacts*, details the potential impacts of the proposed Station on the transportation network.

White Pine Energy Station Project Draft Environmental Impact Statement

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I29-1 1.) ASH (Solid waste) To Keep ASH From Blowing

Date:

Signature:

Name (printed):

Address:

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

ELY

I29-1 NDEP-BAPC requirements for the solid waste disposal facility, such as requirements for water sprays and surface sealants, will minimize the potential for fugitive dust emissions.

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I30-1 1.) THERE IS A FUND FOR WILDLIFE WHAT ABOUT RESIDENTAIL WELL DRAW DOWN MITIGATION

Date:

Signature:

Name (printed):

Address:

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

ELY

I30-1 See the responses to Comments I27-1 and I20-3, which summarize the analysis of potential ground water level declines that would result from either the Proposed Action or Alternative 1, and the responses to Comments I20-3 and G1-6 regarding the monitoring and mitigation program contained in Appendix G of this FEIS that would be implemented to protect ground water resources. Analyses indicate that current ground water permits (that is, existing wells) would not be adversely affected by the proposed Station. The projected levels of drawdown for the Proposed Action and Alternative 1 are not expected to require the deepening of any existing permitted wells. Accordingly, no mitigation for drawdown in existing residential wells would be necessary.

Printed for Doris Metcalf105/11/2007

Doris Metcalf/EYFO/NV/BLM/DOI
05/11/2007 08:39 AM

To Robbin Palmer <rpalmer@nnps.reno.nv.us>
cc
bcc
Subject Re: coal fired energy plants

Thank you for your comments, we will add your name to the interested party list.
****

Doris A. Metcalf
Lead Realty Specialist
HC33 Box 33500
Ely, NV 89301
phone 775-289-1852
fax 775-289-1910
****

Robbin Palmer <rpalmer@nnps.reno.nv.us>

Robbin Palmer <rpalmer@nnps.reno.nv.us>
05/10/2007 07:51 AM

To doris_metcalf@blm.gov
cc
Subject coal fired energy plants

Dear Ms. Metcalf,

I hope my comments aren't too late. I am opposed to the building of new coal fired energy plants in White Pine County-- or anywhere in Nevada, for that matter.

It's time for the US, and NV in particular, to develop clean, alternative energy sources. We have the natural resources here in NV to become a leader in alternative energy sources through solar and/or/wind energy generation. Burning coal for energy contributes to global warming--a real, and grave threat to all life on earth. For this reason alone, coal fired energy plants will soon be antiquated. Additionally, water is a precious, diminishing resource in NV and a coal fired plant would suck up tremendous amounts of this resource.

Building a new coal fired energy plant is contrary to developing clean, renewable energy.

Robbin Palmer
Reno, NV

No comments on the White Pine Energy Station DEIS were delineated for the letter shown on the facing page.

5-31-07

White Pine Energy Station Draft Environmental Impact Statement

Comment Form

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I32-1 1 *What will you do to improve the landscape? In exchange for violating the land with the purposed plant?

I32-2 2 * Will you plant grass lands?

I32-3 3 * Will you put in a lake for the wild life?

I32-4 4 * Will you create park, usable lands for the area people away from the plant not around the plant?

I32-5 5 * What will you do to relocate the animals that will be left homeless, (reptiles, etc, scorpions, such...?) tortoise?

I32-6 6 * If L.V. is suppose to get its water, sometime day from Ely, what are the dangers of leakage or contamination into the ground water?

Date: 5/31/07

Signature: Candace M Palmerston

Name (printed): C. M. Palmerston

Address: 6148 Carl Ave
LV, Nv 89108

Please submit to: **Bureau of Land Management**
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

LV FIELD OFFICE

* I32-7 7 Suggestion: Why not offer to "improve" the land in exchange ie plant grass what ever it takes in exchange for the amount of land you will be using? or double the land Planted for grass for the Horses!? :)

I32-1 The project will follow the Best Management Practices (BMPs) described in the DEIS (Appendix A) and this FEIS (Appendix C), Sections on Landscape Preservation and Impact Avoidance (6 BMPs listed), Erosion and Sediment Control (7 BMPs listed), Noxious and Invasive Weed Management (13 BMPs listed), Reclamation (14 BMPs listed), and Visual Resources (7 BMPs listed) to improve the landscape or reduce landscape effects resulting from construction/operation of project features. Examples include recontouring to original conditions and revegetating disturbed areas by planting native, representative grasses, forbs, trees, and shrubs. See the response to Comment I8-2 for Visual Resources BMPs, including night lighting practices, that will be followed. Reseeding 700 to 900 acres using a native seed mix as part of the Moriah Ranches Seeding Project also would enhance landscape appearance, contribute to better ecological condition, improve forage for livestock, and provide an opportunity to create a habitat mosaic that provides cover for sage-grouse and antelope.

I32-2 See the response to Comment I32-1. Grasslands disturbed by the construction and operation of project features will be revegetated using native, representative grasses as described in Appendix C. Also, several species of native grasses will be contained in the seed mix for reseeding 700 to 900 acres under the Moriah Ranches Seeding Project, which is described in Chapter 2 as a proposed enhancement measure.

I32-3 No lakes for wildlife are proposed.

I32-4 No parks or usable lands are proposed.

I32-5 No relocation of animals is proposed. However, establishment and proponent/applicant funding of a habitat mitigation fund is suggested in Section 4.5.3.1.3, *Mitigation*, of this FEIS under the discussion of wildlife and fisheries resources to help offset the temporary and permanent losses of wildlife habitat. No desert tortoises are in the project area for either the Proposed Action or Alternative 1.

I32-6 Process water and stormwater from the proposed Station will be regulated under the applicable NDEP-BWPC permit programs. Solid waste stored onsite will be regulated under the NDEP solid waste permit program. These permit programs require protective measures to minimize the potential for impacts to ground water. Thus, no contamination and no direct or indirect impacts to surface or ground water quality are anticipated under the Proposed Action or Alternative 1 as discussed in Sections 4.3 and 4.4 of the DEIS and this FEIS.

I32-7 Grasslands disturbed by the construction and operation of project features will be revegetated using native, representative grasses as described in Appendix C, *Best Management Practices*. Also, several species of native grasses will be contained in the seed mix for reseeding 700 to 900 acres under the Moriah Ranches Seeding Project. This project would enhance landscape appearance, contribute to better ecological condition, improve forage for livestock, as well as wild horses, and provide an opportunity to create a habitat mosaic that provides cover for sage-grouse and antelope.

White Pine Energy Station Draft Environmental Impact Statement

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Coal is a very dirty way to generate energy.
Mojave in Mohave, CO AZ was shut down
due to excess pollution in the canyon.
Now we want to build another polluter so Grand Canyon + White Pine will be dirty too!
Just so that developers can make profits
We need to develop alternative, renewable sources of power
More efficient uses of CO_2 How is this going to
Reduce Global warming? I am concerned
about the 1,500 acres of land permanently
disturbed and bald eagle habitat destruction.
It seems another Bush sponsored project to privatize our National
heritage! I do not like it

Date: 5/31/07

Signature: Norma J. Price

Name (printed): Norma J. Price

Address: 6237 Laredo St.
Las Vegas, NV 89146-5248

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

LV FIELD OFFICE

No comments on the White Pine Energy Station DEIS were delineated for the letter shown on the facing page.

White Pine Energy Station Draft Environmental Impact Statement

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NO WAY!! There are absolutely no justifications for building yet another filthy, pollution-spewing coal-fired power plant. No matter what the "mitigations" implemented, the fact remains that there is no such thing as clean coal. Asthma is epidemic in this country and airborne pollution is a leading cause, with much of it coming from dirty coal plants. The money, time & resources would be much better spent on making renewable more viable, not in old business-as-usual technology. Investors have much more to gain because the future lies with renewables. Oh, by the way, have you folks heard of global warming? We need to stop burning fossil fuels! You folks are trying to →

Date: May 31, 2007

Signature: Rita L. Ranson

Name (printed): Rita L. Ranson

Address: 4925 Glenarden Dr.
Las Vegas, NV 89130

Please submit to: **Bureau of Land Management**
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

LV FIELD OFFICE

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

sell us a bill of goods, but we're not buying it!

The artist's rendering of the proposed plant sickens me. Talk about visual blight against that gorgeous backdrop. And I think of the wildlife habitat disturbed, the plant life destroyed by this monstrosity — it sickens me even more.

This plant would be an environmental nightmare. Think of the future and invest in renewable energy instead.

No comments on the White Pine Energy Station DEIS were delineated for the part of the letter shown on the facing page.

ERIK B. RYBERG
ATTORNEY AT LAW

Bureau of Land Management
MAY 21 2007
RECEIVED
Ely, NV

May 15, 2007

Jeffrey A. Weeks
Bureau of Land Management
HC 33 Box 33500
Ely, NV 89301-9408

Dear Mr. Weeks:

Please accept these comments on the White Pine Energy Station Project. I am a frequent visitor to the Ely area, as well as other areas in northern Nevada that will be affected by this project, such as the Jarbidge Wilderness Area. I note the Jarbidge, which has some of the cleanest air in the nation, will be affected by pollutants from this power plant.

I also note that this project will use approximately 200,000 acre feet of water over its projected life, or approximately 5,000 acre feet per year. That is enough water to fill a swimming pool one square mile in size approximately seven feet deep, per year. There is no possible way that in this arid landscape such an immense water withdrawal—enough nearly to double what is currently being used—will not have an impact on the plants, animals, and perhaps even soils and climate of the local area.

Your plans for mitigation are really just a plan to observe the conditions of springs and then, if something starts happening, toy around with pumping schedules. There are no plans to reduce the water needed, and if your "mitigation" does not succeed, the springs will die. This must be disclosed, rather than disguised, as it is now.

I am further opposed to the construction of this new coal-fired power plant because of the impact it will have on global climate change. There is no single source of greenhouse gas emissions more significant than that posed by coal-fired power plants. No other single source puts so many tons of emissions into the air. Indeed, this plant is predicted to add over 20 million tons of greenhouse gases into our atmosphere per year, or 4.5 million pounds *per hour*. This is the approximate equivalent, in sheer tonnage, of five hundred and thirty-five H2 Hummers per hour launched into the atmosphere, for twenty years.[1]

Just as coal-fired power plants like this one are the most significant contributors to greenhouse gas emissions, greenhouse gas emissions themselves are likely to be the
I35-1 ↓ most significant environmental concern of our lifetimes and beyond.[2] Yet I can find no

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[1] Estimated by using the figures provided on Table 4.6-31 and the estimated gross vehicle weight of an H2 Hummer of 8,400 lbs.

[2] *See e.g.* the primer from NASA at http://earthobservatory.nasa.gov/Library/GlobalWarmingUpdate/. The document should contain at least this degree of information about global warming considering it is championing a coal-fired power plant.

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I35-1 Further analyses of climate change have been added to this FEIS. Section 3.6.2, *Climate Change*, has been added to this FEIS and includes a broad discussion of the currently observed impacts to resources associated with climate change. Section 4.6.2, *Climate Change*, has been added to this FEIS to describe projected future changes in climate, along with discussions of the various factors thought to influence climate. Section 4.19.3.6.2, *Climate Change*, has been added to this FEIS to discuss the potential incremental cumulative impacts of emission sources on climate change. Finally, Appendix M, *Understanding and Evaluating Climate Change*, has been added to this FEIS. The potential cumulative impacts of all global carbon dioxide emissions are summarized in Section 4.19.3.6.2 and in Appendix M of this FEIS.

I35-1 (cont.) analysis in this document that describes the impact of this plant on global warming or any discussion that alerts the public and the decision-maker to the importance of curbing carbon emissions such as those this plant will produce in great quantities. This defect must be cured and the agency must front up to the contributions it is making to the destruction of earth's climate and the biological systems that depend on that climate. It must also include an assessment of the predicted impacts of global warming on the planet as a whole as well as what is known from models about the impact of global warming to the local (very arid) area. It seems far more likely that global warming will change the biological makeup of this area much more so than the small physical disruptions to the landscape that this DEIS dwells upon, yet global warming gets virtually no discussion.

I35-2 The tonnage of emissions produced by this plant should be compared to the total tonnage that treaties like the Kyoto treaty aimed to reduce on an annual basis. My belief is that by comparing such figures a true picture of the significance of the contribution made by this plant will more easily be seen. Moreover, the significance of the electrical contribution must be asked alongside the significance of the global warming contribution: how much does this plant contribute to the total sum electrical generation of the planet, versus how much does this plant contribute in greenhouse gas emissions?

Sincerely,

Erik B. Ryberg

I35-2 See the response to Comment I35-1. Emissions comparisons are included in Table 4.6-31 in this FEIS and Appendix M.

From: mark.schaffer@unlv.edu [mailto:mark.schaffer@unlv.edu]
Sent: Friday, June 01, 2007 1:14 AM
To: Haislip, Tom/AUS
Cc: chris@nevadaconservationleague.org; steve@solarnv.org
Subject: New MIT study that should be included in White Pine Energy Station Project

Hello Mr. Haislip,

I36-1 I enjoyed our brief conversation after the meeting tonight. My comment on the draft EIS for the White Pine Energy Station Project is that a proper evaluation of all energy alternatives is not possible without having included the latest valid research being done on those alternatives by credible investigators. Rather than include the ~14 Mbyte pdf file directly I have referenced the URL that provides the file in all its cautious glory here:
http://web.mit.edu/newsoffice/2007/geothermal.html

The other article I mentioned provides a different rationale for preferring energy efficiency over simply trying to increase supply to meet demand and is needed to balance that mantra in this EIS. Here is a link to the original article and a piece that provides more context:

http://homepages.mtn.org/iasa/mirage.html

http://www.gi.alaska.edu/ScienceForum/ASF15/1546.html

Take care,
Mark Schaffer

I36-1 Page 1-7 of the referenced Enhanced Geothermal Systems (EGS) report (Massachusetts Institute of Technology, *The Future of Geothermal Energy,* 2006) shows that EGS systems have not yet been developed on the commercial prototype scale. Because the technology has not yet progressed to the commercial prototype scale, EGS is not considered a reasonable alternative for the proposed White Pine Energy Station.

White Pine Energy Station Draft Environmental Impact Statement

Comment Form

We would appreciate your comments on the Draft Environmental Impact Statement for the White Pine Energy Station Project. Please use this form (attach additional pages if required). You may either return it before you leave this public meeting or mail to the address at the bottom of the form. The comment period ends on June 19, 2007. Thank you for participating.

We oppose construction prefering solar, wind and geothermal power sources.

Thank you.

Date: 5 31 07

Signature: Sandra L Schwab

Name (printed): Sandra L Schwab

Address: 1620 E Viking Rd 2
LAS Vegas
NV 89119

Please submit to:

Bureau of Land Management
Ely Field Office
Jeffrey A. Weeks
HC 33, Box 33500
Ely NV 89301-9408

LV FIELD OFFICE

No comments on the White Pine Energy Station DEIS were delineated the letter shown on the facing page.

"steven s."
<socastevie@yahoo.com>
06/19/2007 02:39 PM

To jeff_weeks@nv.blm.gov
cc
bcc
Subject Comments: White Pine Energy Station

To Whom It May Concern,

It has just this week come to my attention that you are taking public comments on a proposed coal-fired power plant proposed near Ely.
I have not had time to examine the DEIS for this plant in depth, but I do have strong feelings about this plant, which I'd like to share for the record.

While I understand Nevada's growing need for energy due to its rapidly increasing population, I feel strongly that we need to look to environmentally safer and friendlier resources. From my studies and meetings attended on coal power, I understand that coal is a very polluting and damaging source of energy. Even with the newest technologies, such as liquid, or diverting by-products and waste underground, there will still be a huge amount of toxic waste. Even if pumped underground, it will eventually find its way out of any receptacles and into our environment. With Nevada being one of the dryest states in the country, we can't risk contaminating the water table.
We here in Utah, being downwind, are very concerned for the mercury levels produced by coal, as well as other comparably toxic by-products, not to mention haze. We experience wintertime temperature inversions which trap this air in our valleys, homes, and lungs for weeks at a time.
We also understand there are economic attractions in the local economy to quickly set up a plant and provide jobs for the local community, but safer and renewable technologies should also provide jobs. Of course this should not be the focus of Environmental Impact.
Wind power and Solar power are both very viable options, wih perpetually renewable and free sources.
I understand Methane is now being used effectively for electricity generation as well, and is another renewable resource, as it is a by-product from not only landfills, but animal and human waste.
Thank you for your time. I urge you to consider denying the toxic and dangerous outputs of coal powered electricity for Nevada, and instead help lead the way to a renewable energy source that will be better for everyone.

Respectfully,
Steven Seftel and family
2500 south 600 east
Salt Lake City, Utah 84106

No comments on the White Pine Energy Station DEIS were delineated the letter shown on the facing page.