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



I am emphatically against the construction of a coal-fired power plant in Steptoe Valley.

It is a terrible mistake to give or sell a huge tract of **public** land for private profit, that will substantially damage even more public land, damage and destroy large ecosystems, injure and kill public nearby (and far away), and contribute to extreme climate change – that may ultimately result in trillions of dollars in losses, kill millions of people, and lead to the extinction of maybe as many as a million species.

Cleaner, safer, and less destructive energy generation technology exists that will ultimately be better for the economy in the long run.

113-1 Please, do not allow the White Pine Energy Associates LLC Environmental Impact Statement to fast track through your system. The document is flawed, omits numerous impacts, and ignores real world conditions – all to promote short-term profits for a callus corporation that apparently doesn't care about anything other than short-term profits.

Thank you,

Signature Demetri Mellos

Name Demetri Mellos

Address #45th Street Po Box 766

City McGill

State NV

Zip 89318

I13-1 See the response to Comment I12-1.

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Thank you,

Signature 

Name Jeffery Stanger

Address 3392 N 3370 E

City Kimberly

State JP

Zip 89341

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Thank you,

Signature     Matt Miller    

Name     MATT Miller    

Address     767 Sunnyside Court    

City     Gardnerville    

State     NV    

Zip     89460

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Thank you,

Signature Justin Joyner

Name JUSTIN JOYNER

Address P.O. BOX 88

City Lund

State NV

Zip 89317

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Thank you,

Signature Andrew L. Joyner

Name Andrew L. Joyner

Address 4 Cottonwood Ln

City Yerington

State NV

Zip 89447

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Thank you,

Signature 

Name LEON TREANTS

Address 11 LIDA CIR

City CARSON CITY

State NV.

Zip 89706

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Thank you,

Signature Valerie Telleria

Name Valerie Telleria

Address 1671 Suckskin Dr.

City Ely

State NV

Zip 89301

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Signature Karl Toyner

Name KARL TOYNER

Address PO Box 88

City Lund

State Nevada

Zip 89317

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Thank you,

Signature 

Name Katy DeLatoro

Address 844 Ave. H

City Ely

State Nevada

Zip 89301

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Signature TS RN

Name Thomas Brunson

Address HC 33 Box 33123

City Ely

State NV

Zip 89301

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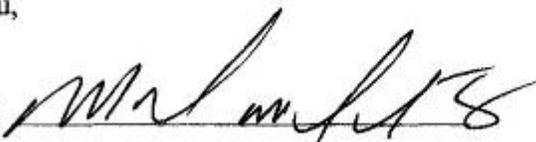
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Thank you,

Signature 

Name Manuel L DEL TORO

Address 1224 Jessie Rd

City Henderson

State NV

Zip 89002

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Signature 

Name MANUEL A. DELGADO

Address 844 AVE. H

City ELY

State NV

Zip 89301

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Thank you,

Signature           Jessica Brady            
Name           Jessica Brady            
Address           ~~7097 Tison~~ 844 Avett            
City           Ely            
State           NV           Zip           89301

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Thank you,

Signature *Carolan Grant Smith*

Name *Carolan Grant Smith*

Address *P.O. Box 3334*

City *Wendover Nevada*

State *NV*

Zip *89883*

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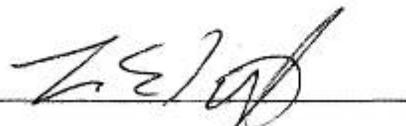
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Thank you,

Signature   
Name Terry E. Trujillo  
Address 6155 So Walker Fieldway  
City Kearns ct  
State Ut. Zip 84118

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Thank you,

Signature

A handwritten signature in cursive script, appearing to read "Anita L. Treants".

Name

ANITA L. TREANTS

Address

11 LIDA CIR

City

CARSON CITY

State

NV

Zip

89706

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Thank you,

Signature Julie Thompson

Name Julie Thompson

Address PO Box 151912

City Ely NV 89315

State NEVADA Zip 89315

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Signature 

Name Robert Horne

Address 390 Subtomas

City Ely

State NV

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Jeffrey A. Weeks  
Bureau of Land Management  
HC33 Box 33500  
Ely, NV 89301



Dear Mr. Weeks,

I have reviewed the Draft Environmental Impact Statement for the proposed White Pine Energy Station (LS Power). As a resident of White Pine County, I feel the need to comment on the proposed actions. This is a major action that will affect the lives of not only White Pine County residents and those that visit our area but will also affect the global community as climate change caused by fossil fuel burning and the emission of greenhouse gases is the number one threat to our environment. Please accept my comments and please take them seriously.

*Need and Background Section*

114-1 In the need and background section of the document (ES-1 and ES-2), a few flaws become clear, namely: A) The location requirements for why the White Pine Energy Associates want to chose White Pine County are not unique to White Pine County. Certainly the towns of Wendover or Wells could also support such a facility, and probably with less impact. There is plenty of water in the East Humboldt Range, plenty of adequate housing facilities along I-80 (Wendover has over 1,000 motel rooms).  
114-2 Railways pass through these communities as well. If not these communities, what about locations that are closer to areas in need of increased supply of power such as Las Vegas or Southern California? To find the best location, I suggest a rigorous GIS analysis that combines that factors that White Pine Energy Associates are considering. This analysis should be included in the EIS.

The need states that the proposed power facility would enhance the quality of life of the residents of Ely and White Pine County. This absolutely wrong – the proposed facility would harm the quality of life here. People live here because of the clean air and abundant natural resources that are dependent on water. The facilities would cause great harm by overcrowding our schools, streets and businesses. I don't personally know anyone in White Pine County that is for the proposed action.

*Alternatives*

114-3 This DEIS only considers the "no action" and a very similar action to the proposed action as alternatives. This is apparent in the summary of likely impacts of the two alternatives (other than the no action) – they have the same impacts other than a few minor acreage differences! The alternatives should have clearly different sets of impacts, otherwise the two proposed actions are essentially the same. The spirit of the National Environmental Policy Act dictates that the alternatives should have different sets of impacts – otherwise the analysis is futile.

- I14-1 As stated in Section 1.2, *Purpose, Need and Background*, of this FEIS, the proposal to locate the Station in Steptoe Valley was based on the following factors: (1) the proposed site is located near the NNR, which would be used to supply coal to the power plant; (2) the proposed site is near an existing utility corridor that is permitted for a new 500 kV electric transmission line; (3) the proposed site can be easily accessed via US Highway 93 and is within a short driving distance from Ely and McGill; (4) the site is centrally located to existing, permitted ground water sources held by White Pine County that have a designated use of power production.

The availability of a previously permitted water supply was among the key factors in WPEA's decision to undertake the proposed project and to site it at the proposed location in White Pine County. A reliable and economical water supply is central to a low-cost baseload, steam-generating power plant.

Siting the Station in White Pine County would also meet long-held county objectives of attracting a coal fired electric generation facility to bring needed and desired economic benefits to the county, strengthening and stabilizing the county economy, and, therefore, improving the quality of life for county citizens. See the response to Comment G1-28 for a discussion of the importance of considering the goals of local governments such as White Pine County.

While it is possible that other sites in the region share some site characteristics in common with the Steptoe Valley location, the combination and close proximity of all necessary factors makes the Steptoe Valley location a unique site. Additionally, the proposed site in White Pine County may be considered optimally located with respect to minimizing impacts to protected Class I airsheds by maximizing the distance between the proposed project and the various Class I airsheds in the region. Locating the proposed project at Wendover or Wells as the commenter suggests would move the White Pine energy Station significantly closer to the Jarbidge Wilderness Area, increasing the impacts to air quality related values at this protected area. Thus, the potential alternate locations mentioned by the commenter would not be expected to result in environmental improvements.

- I14-2 No applicable requirement mandates that the DEIS or this FEIS include a siting analysis evaluating all areas of the western United States or a GIS analysis combining all the factors considered in siting the proposed project. Alternative plant locations are evaluated in Section 2.5.3, *Alternative Power Plant Site Locations*, and geographic information is included in Figure 2-19, which shows the various study areas included in the analysis of alternative locations. See the response to Comment I14-1 for a discussion of the important factors considered in siting the proposed project. Additional siting analyses are not required.
- I14-3 The DEIS and this FEIS consider, evaluate, and compare a number of project features and components that were used in developing the Proposed Action and Alternative 1, which are summarized below. National Environmental Policy Act (NEPA) requires that a range of alternatives, including the No Action Alternative, be considered but NEPA does not dictate that the alternatives have different sets of impacts. Nonetheless, the impacts associated with the various alternatives are not identical, as demonstrated in the impact discussions in Chapter 4 of the DEIS and this FEIS. Also see the response to Comment F1-4 and Section 2.5, *Alternatives Considered but Eliminated from Detailed Evaluation*, in the DEIS and this FEIS for a discussion of alternatives considered but eliminated from further consideration and the screening process that was used.

Regarding siting for the proposed project, see the responses to Comments I14-1 and I14-2.

114-4 There are certainly more actions available that would create a supply of energy to meet increased demands and at the same time cause much less environmental impact than the proposed action. For an action so large it is imperative to consider more than just a no action alternative under the letter of the law (NEPA). Alternative actions could consist of some combination of renewable energy development such as wind and solar power as well as energy conservation. Alternative locations could even be considered as alternative actions – maybe Steptoe Valley isn't the best place for this, but who knows? Other areas were excluded from rigorous analysis.

The six criteria for determining “the alternatives considered during scoping but eliminated from further consideration” are not adequate for rejecting an alternative, especially:

114-5 “Place water held by White Pine County for power production in Steptoe Valley to beneficial use for power production” – Why should we eliminate alternative energy generating technologies simply because they don't use water? Given that water is a limiting resource and needed by many interests including ranching and wildlife, it makes more sense to me to look specifically at sources of energy that don't use water or at least minimize their use of water.

114-6 “Provide traffic for the NNR” – why is it imperative that the energy generating source provide traffic for the NNR? Does this meet any of the points of the BLM's mission statement?

It seems that these criteria were created simply to reject alternatives such as wind and solar, which would otherwise be viable when considered in unison with energy conservation.

114-7 This DEIS does not consider energy conservation as an alternative. It is not even an alternative considered by eliminated from analysis. If we're getting by right now, why can't we conserve and use more efficient technologies on the user end? It is not apparent from this document if this is a viable option or not.

#### *The Affected Environment and Environmental Consequences*

114-8 This DEIS does mention that the proposed action and alternative 1 could lead to an increase in spread of invasive weed cheatgrass. But this DEIS does not consider the impacts of increased spread of cheatgrass and the impacts that this could have on the fire regime, i.e. increase in fire frequency and size which would cause additional loss of wildlife habitat, increased costs of fire suppression and post-fire stabilization and rehabilitation treatments, and further degradation of air quality due to increased levels of smoke.

114-9 The Visual Resource section of this DEIS does not address the impacts caused by increased haze or smog by the proposed actions, only the “facilities”. The impacts of reduced visibility would likely cover a large area including Great Basin National Park and even into Utah. Eastern Nevada has some of the best visibility in the United States and impacts to this resource would be a great loss.

- 114-4 The White Pine Energy Station has been proposed in response to the need for baseload energy that exists 24 hours per day, 7 days per week. As discussed in the response to Comment G1-28, renewable energy (such as wind or solar) is not capable of producing baseload power. Additionally, as discussed in the responses to Comments G1-28 and F1-10, conservation and energy efficiency do not supplant the need for new baseload generating capacity. As a result, a combination of renewable energy with energy efficiency/conservation is not considered a reasonable alternative to the proposed project.
- 114-5 It is noted that no potential alternative was eliminated based solely on the beneficial water use criterion. Additionally, see the responses to Comments G1-5 and G1-28.
- 114-6 In a letter from the White Pine County Board of County Commissioners to the BLM dated July 11, 2007 (White Pine County, 2007), the County stated that using the City of Ely's Nevada Northern Railroad (NNR), which is being rebuilt by local government entities, should be part of the Purpose and Need Statement and the alternatives screening criteria. The county reasoned that the White Pine Energy Station would use the NNR, thereby providing revenues to help ensure the success of that venture. NNR railroad facilities were included in the Interim Development Agreement between White Pine County and WPEA for the proposed White Pine Energy Station (see Appendix A). Inclusion of the use of the NNR in the Purpose and Need Statement and as an alternative screening criterion in the DEIS and this FEIS is appropriate because it was a significant factor in locating the proposed White Pine Energy Station in Steptoe Valley.
- 114-7 Conservation was considered as an alternative and is described in Section 2.5.2, *Conservation/Energy Efficiency*, of the DEIS, but it was not carried forward for detailed evaluation because it did not meet the purpose and need. Additional information has been added in Section 2.5.2 of this FEIS to further discuss conservation and energy efficiency as potential alternatives. As reflected in FEIS Section 2.5.2, a current and future need for baseload power exists in the Western United States, even considering reasonably anticipated conservation and energy efficiency programs. Therefore, conservation and energy efficiency are not considered reasonable alternatives to the proposed project. Also, see the responses to F1-10 and G1-28.
- 114-8 The potential effects of cheatgrass are discussed in Section 4.5.2.1.1 under the *Power Plant* heading in this FEIS. This section discloses anticipated impacts associated with cheatgrass. Detailed information that was collected and assessed during the noxious weed risk assessment completed for the proposed project is provided in Appendix C, *Biological Resources Supplemental Information*, of the DEIS and this FEIS (Appendix J). Noxious and invasive weeds will be mapped prior to construction in order to document all populations within the project area prior to disturbance. For purposes of the DEIS and this FEIS, a protocol was agreed to by the BLM to obtain sufficient information to assess the risk of further spread of noxious weeds in the project area. See the Risk Assessment for Noxious/Invasive Weeds document provided in Appendix C of the DEIS and this FEIS (Appendix J).
- 114-9 Additional text was added to Section 3.7, *Visual Resources*, of this FEIS to clarify the differences between the two analyses. The commenter may be confusing two separate analyses (that is, Section 4.7, *Visual Resources*, vs. Section 4.6, *Air Quality/Visibility Impacts*). The Visual Resources evaluation in Section 4.7 focuses on the visual effects of placing new structures on the landscape and discusses the impacts from physical changes associated with the project (for example, buildings, stacks, towers, bridges, etc.) that may affect the visual or scenic characteristics of the landscape from key observation points (KOPs). The *Air Quality/Visibility* evaluation in Section 4.6 addresses the predicted changes in visibility (light absorption or scattering resulting from air emissions) associated with the proposed project and discusses the potential visibility impacts due to the emissions of air pollutants (for example, nitrogen oxides, sulfur dioxide, and particulate matter) from the proposed project at areas of interest, including Zion National Park, Jarbidge Wilderness Area, Ruby Lake National Wilderness Area, and Great Basin National Park. The Visual Resources evaluation is based on terrain information and lines of sight, and therefore is not affected by changes in light absorption or scattering. Thus, the visibility analysis documented in the Air Quality evaluation is separate from and not related to the Visual Resources evaluation.

Comment Letter I14

I14-10 | The recreational resources section fails to acknowledge a plethora of recreational activities that occur outside of developed recreational areas. I know this because I personally recreate in these areas. The Schell Creek Range receives a fair amount of backcountry skiing use. This area is becoming well known for this activity. Skiers travel from all over the state to ski in the Schells. Off-trail hiking is wonderful in the Schell Creek Range. The recreation section does not even mention hunting, which is by far the most popular sport in White Pine County. These backcountry recreational opportunities are the gem of Eastern Nevada. Those engaging in these activities enjoy them for the sense of solitude and feeling of remoteness. Having to observe a coal-fired power generating facility would greatly impact these recreational activities and therefore also hurt the economy of White Pine County.

I14-11 | The Wilderness section of Environmental Consequences states that the proposed actions would have little effect on wilderness visitation. It is obvious that the proposed action will create less visitation of wilderness because wilderness visitors will no longer want to recreate in these impacted areas because of the impact to visual resources that the proposed facilities will cause. Furthermore, there are more impacts to wilderness than just visitation. The proposed action will impact the naturalness of wilderness through degradation of air quality, deposition of pollutants, and changes to the water supply.

Thank you for your consideration of my comments. I believe that the creation of the proposed facility will be a great harm to White Pine County and its residents. White Pine County is on the brink of change: tourism is on the increase, and we need to decide if we want to promote growth and economic development through tourism or through degrading activities such as coal fired power. I believe that choosing a future that allows for economic development through tourism is one that will allow us to grow and at the same time protect our valuable natural resources.

Sincerely,



Neil Frakes  
135 Ely Ave  
PO Box 151523  
Ely, NV 89315  
nofrakes@yahoo.com

- 114-10 Section 3.8, *Recreation Resources*, of the DEIS and this FEIS details the variety of outdoor recreational opportunities, including hunting and hiking, within a 50-mile radius of the proposed project areas. Section 4.8, *Recreation Resources*, describes the potential effects of the proposed project on recreational resources within the same radius. The text in Section 4.8 states that there could be a slight increase in the use of recreational resources resulting from the presence of additional workers in the area during project construction and, to a much lesser extent, during project operation. Based on best available information, while the non-local construction workers would contribute to a short-term increase in the use of developed and dispersed recreation facilities and areas, no adverse effect to those resources are anticipated. This evaluation also applies to areas outside of the developed recreation areas.
- 114-11 As indicated in Section 4.11.1.1.1, *Wilderness Areas*, of the DEIS and this FEIS, some project features would be seen from a few selected higher points in all four Wilderness areas surrounding Steptoe Valley. However, the conclusion is that the proposed project would have little or no effect on Wilderness access or visitation rates.

Section 325 of the White Pine County Conservation, Recreation, and Development Act of 2006 does not create protective perimeters or buffer zones around Wilderness, nor does it preclude non-Wilderness activities that can be seen or heard from within a Wilderness from being conducted outside of that Wilderness. While it would be possible to see parts of the structures associated with the proposed White Pine Energy Station from within Wilderness locations, they are not precluded based on a potential impact to the visual seen area of the Wilderness.

**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.

I think we are losing sight on what attracts most people to white pine county, the scenic vistas, beautiful mountains, wilderness areas, National Park, hunting, fishing... Basically its an outdoor persons dream area. A power plant or both power plants will definitely have a negative impact on whats most important to this area, its precious natural resources. I really don't think B.C.M wants to be responsible for destroying the valley forever. I own a ranch in Northern White Pine & bought it for all the reasons I mentioned above. I would not have considered buying the ranch if I knew a power plant or 2 was going to be built. Please don't let this happen!

Date:

5-8-07

Signature:

Name (printed):

Michael C Hastie

Address:

P.O. Box 73

Reno, NV, 89411

Indian Creek Ranch

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 letter shown on the facing page.



Mark Henderson  
1001 Canyon Street  
Ely, Nevada 89301-2104

19 June 2007

Jeffrey A. Weeks  
Ely Field Office  
Bureau of Land Management  
HC 33, Box 33500  
Ely, Nevada 89301-9408  
Las Vegas, Nevada 89130

Subject: Draft Environmental Impact Statement for the White Pine Energy Station Project

Dear Mr. Weeks:

Thank you for the opportunity to review the above listed Draft EIS. My comments are primarily confined to the disclosure of impacts on historic properties and archaeological resources that may be affected by the proposed action.

116-1 My major concern is the lack of specificity of treatments to mitigate adverse effects on historic properties that would be affected by the proposed action and alternative one. The document repeatedly refers to impacts on the setting of the Pony Express Trail, Nevada Northern Railroad, Lincoln Highway and various historic ranches (such as Magnuson [*sic*. Mungerson?] Ranch on the Lincoln Highway). All specific treatments appear to be deferred to after a decision on the approval of the action as described in Section 4.13.3.1.2 (Draft EIS Page 4-179). Deferring treatments to after approval is not consistent with EIS requirements to disclose impacts of undertakings. Specific measures should be proposed such as interpretive signs, brochures, stabilization of deteriorating and neglected properties (such as the Lincoln Highway) and encouraging public stewardship and knowledge of these properties. Otherwise costs both tangible and intangible can not be calculated. [Note that specific mitigation measures have been agreed upon for wildlife values that would be affected.]

It is BLM's responsibility to propose measures to negate or treat adverse effects in consultation with "interested parties" under the regulations of 36 CFR 800. I believe it would be a flaw in the NEPA procedures if BLM were to issue a Record of Decision (ROD) prior to this disclosure of treatments. Since no specific measures are recommended at this time I would like to be identified as an "interested party" to assist BLM in developing appropriate treatments prior to the BLM ROD.

116-2 A second and related issue is the lack of consideration of indirect and cumulative effects if the action is approved and constructed. With hundreds of workers during the construction phase and scores of workers and families during operations, there can be expected region-wide effects as a result of increased recreation and sightseeing use of public lands. As is well known one of the

- 116-1 The mitigation described in the DEIS and this FEIS avoids the potentially significant direct and indirect impacts to historic properties through avoidance or development of a site-specific treatment plan. The mitigation described in the DEIS and this FEIS is consistent with the Programmatic Agreement (PA) between the BLM and Nevada SHPO for the project in compliance with Section 106 of the National Historic Preservation Act (NHPA), as noted in relevant portions of Section 4.13.3, *Assessment of Direct Visual Impacts*, and Section 4.13.4, *Assessment of Indirect Visual Impacts*, of the DEIS and this FEIS. Section 4.13.3.4.2 of the DEIS and this FEIS describes procedures that have been developed for the potential discovery of cultural resources during construction. These measures are consistent with the PA. Stipulation C of the PA outlines the methods to be used in avoiding or mitigating adverse effects to historic properties. Specifically, the PA indicates that the BLM, in consultation with SHPO, Indian tribes, and interested persons, shall determine the precise nature of effects to historic properties identified in the APE, if the project is approved by the BLM. All treatment shall be done in a manner consistent with the BLM/SHPO Protocol. Additionally, Stipulation I of the PA requires that the terms of any right-of-way granted by the BLM for the project shall provide for the posting of sureties for the protection of cultural properties. This stipulation also states that a bond will be posted with the BLM in an amount sufficient to cover all post-fieldwork costs associated with implementing a treatment plan or other mitigation activities, as negotiated by the project applicant when they contract for services in support of the PA.
- 116-2 Discussions have been added to each resource area in Chapter 4 of this FEIS on potential effects resulting from project-related short-term (construction) and long-term (operation) population increases where such effects are anticipated. Generally, the analyses indicated that long-term population increases in the area resulting from project operation would not be great enough to adversely affect project area resources. Construction-related population increases would exceed those during project operation and potentially have a minor effect on some project-area resources (for example, see discussions of Recreation Resources, Wilderness) where such effects are anticipated. However, these effects would be temporary and cease with the completion of construction activities and workers leaving the project area.

The DEIS and this FEIS examine the difference between temporary and permanent workforces. Project area recreational resources were determined to be capable of accommodating the recreation demand associated with the construction and operation of the White Pine Energy Station. It is possible that as a group, especially with any significant overlap in the timing of construction periods between cumulative projects like the Ely Energy Center with the White Pine Energy Station, that influx of temporary workforces would increase pressure on existing recreational resources in the Ely area. The numerous Wilderness areas could prove to be attractive to those looking for a recreational opportunity slightly further afield. Additional information on the cumulative projects that were considered in the cumulative analysis of each of the resources analyzed is available in Section 4.19, *Cumulative Impacts*, of this FEIS.

attractions for new residents in this region are the opportunities for unconfined recreation and use of public lands. This results in increased purposeful and inadvertent damage to archaeological resources and historic properties and new opportunities for educating the public on proper use of public lands. These impacts have often been monitored by periodic checking of site condition in the area of indirect project effects and particularly where historic properties and archaeological resource were identified and direct effect avoided by project design. Additional support for the citizen based site steward program would seem to be a reasonable means for informing the public of proper use of these resources and recruiting citizen volunteers in assuring that unintended and inadvertent damage are minimized. A monitoring plan would be an appropriate component of the "Historic Properties Treatment Plan" that must be developed prior to the ROD.

I16-3

Another important issue is the extent to which historic and archaeological data are used to establish the appearance of the historic landscape of the period of significance of the historic properties. It is not just the geomorphology of the viewshed that is important in establishing the effects on the setting of the Pony Express Trail, the Nevada Northern Railroad and the Lincoln Highway. The extent to which the vegetative cover is evocative or altered from the period of significance of these linear historic properties is an important issue and reason for considering impacts on the region. BLM is in possession of considerable evidence that the vegetation landscape may be highly altered from the period of significance of these properties. Disclosure of the nature and trends of these vegetative changes should be discussed and considered in developing the kinds of specific treatments for historic properties that are currently lacking in the Draft EIS.

I16-4

One specific error can not go unmentioned because it hopefully does not reflect other similar errors which taken together cause some to become hyper-critical. On page 4-190 (column 2, Section 4.13.4.5.4, paragraph 1, sentence 2) there is reference to the "Ely Historical Society Museum." I know of no such institution in Ely, but surmise that this is reference to the White Pine Public Museum, Inc. I fully understand the difficulties of coordinating necessary outside expertise, local knowledge and internal review. However this sort of error causes me as a member of the local public to be very suspicious of the overall quality and attention to detail of which I know the expert BLM staff in Ely is capable.

I16-5

There is likewise a glaring error in the preservation process reflected on page 4-177 where it is stated that "Final determination of eligibility will be made by SHPO upon receipt and review of cultural resources reports." This is not true. It is the Agency responsibility to make the determinations of eligibility and seek SHPO comment. This underlies a dysfunction in the compliance with regulation that goes beyond this document and action, but results in harm to historic properties and archeological resources. This harm is the failure to follow the spirit of the regulations in 36 CFR 800.8 which require coordination of the National Environmental Policy Act and the National Historic Preservation Act. If this part of the regulation were followed more diligently in letter and spirit, true "consultation" would be taking place on the effect of this proposed undertaking on historic properties and many of the major and minor issues mentioned above would probably disappear.

I16-6

**I16-3** A plan for monitoring construction activities for the protection of historic properties will be considered during development of the Construction, Operation, and Maintenance Plan for the project, but is not required for compliance with National Environmental Policy Act (NEPA). Construction monitoring may also be a component of a historic properties treatment plan. Also see the response to Comment I16-1 regarding the PA.

**I16-4** Changes to the vegetative cover that have occurred in the past were considered during evaluation of the cultural resources in the project area, including those within the viewshed of the proposed project, in accordance with the regulations implementing Section 106 of the NHPA (36 Code of Federal Regulations Part 800).

To the extent that vegetative cover, and historic or project-related changes to vegetation, are relevant to the impacts on historic properties, these issues would be considered in the development of resource-specific treatment plans as noted in the response to Comment I16-1.

**I16-5** The referenced text has been revised in this FEIS as requested, stating that the station has been moved to the town of Ely and now serves as the White Pine Public Station.

**I16-6** The referenced text has been revised in this FEIS as requested, stating that the BLM has made determinations of eligibility and requested concurrence from the Nevada SHPO, in accordance with Section 106 of the NHPA and the Programmatic Agreement. SHPO provided a comment letter on August 26, 2007. BLM shall ensure that all cultural resources located within the APE are evaluated for eligibility to the NRHP prior to the initiation of activities that may affect historic properties.

Comment Letter I16

I16-7

Finally, there is no apparent effort to assure compliance with the Archaeological Resources Protection Act (ARPA) in this document. While compliance with NHPA often results in appropriate actions under ARPA, it does not necessarily constitute such compliance. The document should be revised to explicitly address ARPA compliance.

I hope you find these comments useful. If I can be of any service to better protect archeological resources or enhance historic properties in this action please do not hesitate to contact me through information provided in the letterhead (or by cell phone at 702 250-6512).

Sincerely,



Mark Henderson

Cc: Greg Seymour, President, Nevada Archaeological Association  
Sali Underwood, Site Steward Coordinator

116-7 The Archaeological Resources Protection Act (ARPA) is a federal law that applies to the excavation or removal of archaeological resources on public or Indian lands, and is not specific to the proposed project. Reference to the applicability of ARPA to this project is provided for in Stipulation E7 of the Programmatic Agreement (PA), which states "...Information on the location and nature of all cultural resources, and all information considered to be proprietary by tribes, will be held confidential to the extent provided by the NRHP, the Native American Graves Protection and Repatriation Act (NAGPRA), ARPA, and other applicable Federal laws."

Section 3.13.3 of this FEIS has been revised to include an additional bulleted item: Archaeological Resources Protection Act of 1979 (16 USC 470aa-mm).

Also, text has been added to Appendix P, *Cultural Resources Background Information*, of this FEIS that describes the Archaeological Resources Protection Act of 1979 (16 USC 470aa-mm).

BLM  
Ely Field Office  
Jeffrey A. Weeks  
HC 33, Box 33,500  
Ely, NV 89301-9408

June 19, 2007



RE: Comments on White Pine Energy Station Draft EIS

Dear Mr. Weeks,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the White Pine Energy Project.

The EIS focuses on the site details and glosses over the big regional long-term environmental impacts, and the socio-economic impacts.

117-1 | The overriding concerns for me are the long-term impacts of the combustion by-products emitted by the proposed plant. Almost 11,000 tons/year of acid forming oxides of sulfur and nitrogen will be emitted by this plant. This will affect the regional visibility and also native plant life wherever acid rain falls. The dry scrubber technology proposed is not state of the art and I am surprised that it would even be proposed.

117-2 | At this point in time, given the emerging consensus about atmospheric carbon dioxide (CO<sub>2</sub>) concentrations and global warming, it is unacceptable to not even discuss CO<sub>2</sub> emissions. If this plant is to be constructed, it must be able to sequester CO<sub>2</sub> emissions or at least be capable of retrofit within five years of construction. A 50-year economic commitment to less than state of the art coal burning technology is unacceptable at this point in time.

117-3 | This EIS ignores cumulative impacts in most areas of concern. The decision by the U.S. Fish and Wildlife Service to not list the Greater Sage Grouse as an endangered or threatened species was based in large part of the Conservation Plans developed across the West. The transmission line (part of SWIP) that goes through Butte Valley, Robison Summit, and Jakes Valley will impact some of the best Sage Grouse habitat in Eastern Nevada. Many biologists feel that the Sage Grouse cannot successfully reproduce within a mile of a powerline due to the sight advantage it provides to avian predators.

117-4 | The EIS is deficient in not evaluating the cumulative impacts that will occur if Sierra Pacific Power also builds a coal fired power plant in Steptoe Valley.

117-5 | The section on air pollution doesn't address the issue of temperature inversions which routinely occur in Eastern Nevada valleys in the winter and that trap pollutants and raise pollution levels far above the stated concentrations. When atmospheric conditions create inversions with fog, that fog could be an acid fog which will be very toxic to pine trees and other vegetation. This is not addressed in the EIS. Average levels of pollutants don't

117-1 As part of the Nevada Division of Environmental Protection (NDEP) Prevention of Significant Deterioration (PSD) permitting process a case-by-case Best Available Control Technology (BACT) analysis was conducted by WPEA that lead to the conclusion for recommending dry scrubbers. The NDEP is the agency responsible for determining the BACT for the proposed White Pine Energy Station. When the final air construction permit for the Station is issued, NDEP will respond to comments from the public regarding the selection of BACT for the facility. Section 2.5.4, *Alternative Air Pollution Control Technologies*, and Appendix D, *Evaluation of Alternative Control Strategies*, of this FEIS describe the BACT process, including the range of technologies evaluated and the factors used to select the appropriate technology for the White Pine Energy Station.

See the responses to Comments F1-34, F2-5, and F3-7 regarding acid deposition.

117-2 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 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. The climate change discussion in Section 4.19.3.6.1, *Air Quality*, has been revised and moved to a new Section 4.19.3.6.2 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 White Pine Energy 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 equipment. As part of this requirement, approximately seven 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, *Carbon Capture and Sequestration*, and the MOU is included in Appendix F of this FEIS. For additional discussion of carbon dioxide mitigation, see the response to Comment G1-34.

117-3 The cumulative impacts analysis in 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 (see Section 4.19, *Cumulative Impacts*). Cumulative impacts were analyzed for all of the resources addressed in this FEIS. The size of the cumulative impact analysis area for each resource is defined and varies according to the nature of the resource, the geographic area in which impacts from the proposed White Pine Energy Station would occur, and the potential for overlapping cumulative effects of the White Pine project with other projects also located in the analysis area. Projects located outside the defined analysis area for a given resource would not contribute to cumulative impacts when combined with the effects of the proposed White Pine Energy Station and, therefore, were not included in the cumulative impacts analysis. Projects that were considered in the cumulative analysis of each of the resources analyzed in Section 4.19 are identified and briefly described in that section of this FEIS.

Regarding biological resources, the DEIS (pp. 4-267 and 4-268) and this FEIS state that construction and operation of multiple energy developments in Steptoe Valley would result in cumulative impacts to wildlife and special status species, including greater sage-grouse. These impacts would include, among others, further removal and fragmentation of foraging habitats and of winter, summer, and breeding habitats for a variety of wildlife species.

The discussion of cumulative impacts on biological resources In the DEIS and in Section 4.19.3.5 of this FEIS examines the contribution that the White Pine Energy Station may have on habitat loss, disturbance, and direct mortality of wildlife in conjunction with other projects and other known activities in the project area. In addition to the referenced greater sage-grouse, the DEIS examined

other ground-nesting birds, and wildlife species and the needs for those respective habitats. Section 4.19.4.3 of the DEIS and this FEIS outlines the residual unavoidable adverse effects on wildlife that would potentially occur from all projects.

- 117-4 Section 4.19, *Cumulative Impacts*, of both the DEIS and this FEIS analyzes the potential cumulative impacts if the Ely Energy Center coal-fired power plant in Steptoe Valley is constructed. The Ely Energy Center was one of 11 projects described in Section 4.19.2 of the DEIS and this FEIS that were considered in the cumulative impact analysis.
- 117-5 The air dispersion modeling analyses for the White Pine Energy Station were based on a full year of onsite meteorological data. Thus, the dispersion modeling results take into account any inversion periods that occurred during the onsite monitoring period from January 2005 to January 2006. See the response to Comment G8-35 for additional discussion of inversions.

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117-5 (cont.) ↑ adequately describe the negative impacts of what happens during less common conditions, but these less common events may be when the most damaging conditions occur.

117-6 | On page 4-93 the document states that the U.S. Forest Service was contacted to identify designated Roadless Areas and that there are none in Nevada. Of course not, this is not a land use category on the Humboldt-Toiyabe National Forest. There are designated Wilderness Areas (which are roadless areas) in the region. The recently designated High Schells Wilderness is only a few miles southeast of the proposed project and the Ruby Mountains Wilderness lies to the north northwest.

The socio-economic impacts of this project are dismissed as minor and only associated with the population increase. The biggest impact will come when the construction phase is finished, and the construction workers and their families leave the area. The community's infrastructure buildup will leave a high level of unemployment, empty class rooms, and a depressed housing market following the boom associated with the arrival of construction workers. For every construction job another support job will be created so that the end of the construction phase will be devastating to the economy of Ely and White Pine County.

117-7 | In conclusion, the environmental and socio-economic impacts of this project are not adequately addressed in this EIS. Based on the strongly negative long-term impacts of this proposed power plant the BLM should not issue a right of way for the power plant or its' associated transmission lines.

Sincerely,



John E. Hiatt  
8180 Placid Street  
Las Vegas, NV 89123

- I17-6 The referenced text has been revised and discussion added to Section 3.11, *Wilderness and Areas of Critical Environmental Concern*, of the DEIS, which has been renamed Special Designations in Sections 3.11 and 4.11 in this FEIS, noting the presence of Roadless Areas in Nevada that are associated with Wilderness areas in the vicinity of the proposed project.
- I17-7 This is a summary comment about environmental and socioeconomic impacts. Specific comments on these topics are found earlier in the letter and each has a specific response (see the responses to Comments I17-1 through I17-6).

Printed for Doris Metcalf206/11/2007



"Brendan Hughes"  
<jesusthedude@hotmail.com  
>

06/11/2007 12:17 PM

To doris\_metcalf@nv.blm.gov

cc

bcc

Subject Comments on White Pine Energy Station Project DEIS

Re: 2850 (NV040) N-78091

My name is Brendan Hughes and I would like to comment on the Draft Environmental Impact Statement for the White Pine Energy Station Project. I encourage the BLM to take the No Action Alternative for this project for several reasons.

First, the creation of more coal-fired power plants is contrary to current information on human-induced climate change. There is no reason for the United States, the most advanced nation on the planet, to be constructing new power plants that have significant outputs of greenhouse gases. It is widely recognized that the burning of coal at current levels cannot continue without dire consequences for the planet. The BLM and other government agencies should be encouraging energy efficiency and bringing renewable energy sources to the consumer. There is no reason why every home in Las Vegas, and in the rest of Nevada, should not have solar panels on them. All greenhouse gas producing energy facilities should be discouraged. The same amount of energy could be saved as would be generated at this new facility if the people and the government made the effort to do so. Then 2,000 acres of land would not need to be destroyed to build the energy station, along with more acreage destroyed by the mining of the coal to power the station.

Second, this new development will have an unknown impact on groundwater resources in the region. The pumping of 5,000 acre-feet of water per year can potentially damage springs in the area. These springs are vital water sources for wildlife and for the ecological health of the watershed. The No Action Alternative is the only option that can ensure that these springs are not adversely impacted.

Additionally, this new power plant will have an adverse impact on the air quality of eastern Nevada and western Utah. Emissions of nitrogen oxides, carbon monoxide, sulfur dioxide, lead, and fine particulate matter will be increased across the region, and this could be compounded by more power plants planned for the area. This pollution will decrease the air quality and, by extension, the quality of life in an area with some of the cleanest air in the country. Additionally, visibility will be decreased in several wilderness areas and National Parks. Also, acid deposition will be increased, impacting sensitive ecosystems. These exceedances are unacceptable, and by approving this project BLM will be facilitating violations. The No Action Alternative avoids this degradation of the environment and the quality of life in eastern Nevada.

Moreover, the White Pine Energy Station will have a negative visual impact on the rural Steptoe Valley. Anyone can agree that the artist's rendition of the Steptoe Valley after project completion is not pretty. It takes away from the natural, rural character of the valley. Also, it will negatively impact the recreational experience of visitors to surrounding wilderness areas and

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

## Comment Letter I18

Printed for Doris Metcalf206/11/2007

other public lands. I, and people in general, do not want to see a huge power plant when I am enjoying the outdoors. The No Action Alternative will prevent this project from ruining the landscape.

Finally, this project will create a hazardous waste dump in the Steptoe Valley. With hundreds of Superfund sites already polluting the nation, the BLM does not need to allow the creation of another one. Hazardous wastes are a danger to the environment, as well as human and especially worker health. The No Action Alternative prevents the creation of a hazardous waste dump.

Other avenues for energy conservation and generation must be explored and encouraged by the government and its agencies. This new coal-fired power plant is unacceptable in an age of climate change. The No Action Alternative will prevent all of the aforementioned problems from occurring.

I thank you for your consideration.

Brendan Hughes  
316 Mesquite Ave  
Ridgecrest, CA 93555  
jesusthedude@hotmail.com

Picture this – share your photos and you could win big!

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