

Grace West
30911 JJ Highway
Norborne, MO 64668-7137

March 5, 2007

Ms. Stephanie A. Strength
USDA, Rural Development, Utilities Programs
1400 Independence Avenue SW, Mail Stop 1570, Room 2244
Washington, D.C. 20250-1570

Re: Draft Environmental Impact Statement
Associated Electric Cooperative, Inc.
Proposed coal-fired power plant near Norborne, MO

Dear Ms. Strength:

These comments are in addition to those I submitted in writing at the hearing at the Rupe Center in Carrollton, MO, on February 8, 2007. They will be directed at various impacts of the proposed plant on the environment, specifically some which I do not feel were adequately addressed.

1. Utility Waste Landfill: For both the leachate collection pond and coal pile runoff treatment pond there is no verification that the hydraulic conductivity of the soil at those locations has been determined. There is no verification of the hydraulic conductivity of the soil where the utility waste landfill will be placed. There is also no description of the corrective action that would be taken to restore groundwater if it is contaminated by leaks from any of these areas.
2. Hazardous Air Pollutants: Mercury is well known to cause various neurological conditions, especially in newborn. The DEIS states that an activated carbon injection system for mercury control would be an option. There is no corroborative data in AECE's Air Quality DNR permits for their New Madrid and Thomas Hill plants to indicate they have, or will, actually will employ this "option". There is no indication that any baseline studies of open water (rivers, lakes, ponds) in the area have been done to determine the current level of mercury contamination. This should be done to determine if mercury emissions need stricter control to prevent a cumulative toxic level of mercury. AECE must comply with Missouri mercury rules, notwithstanding the probability of federal exemption. The EPA allows states to set greater restriction; therefore, RIS must require such state compliance be included in its EIS, and specifically address the local impact, mitigation and support such findings with appropriate baseline studies.

There have been no baseline studies of the ambient air in the vicinity of the proposed site, especially downwind near schools, for PM 2.5, PM10, ozone,

carbon dioxide, lead, sulfur dioxide and nitrous oxides. Results of air monitoring at locations 30 to 60 miles from the site do not represent air quality at the site.

3. Impact to Vegetation: The DEIS states impacts to any high quality native plant communities are the major issue. The types of impacts are not described. If there are adverse impacts to native vegetation, wouldn't these apply to row crops as well? Impacts to corn and soybeans grown in proximity to the power plant were not addressed. What about area vegetable gardens and fruit trees? Area crops are not "native plant communities." It appears this DEIS is using legal phrasing to usurp a specific duty necessitating review of direct impacts to the immediate area.
4. Phase I Survey and Phase II Testing: Phase I survey included pedestrian coverage of existing farmsteads by qualified personnel. The type of survey was not described. One area labeled Farmstead 4 is not a farmstead. It originally (early to mid 1960's) contained a building that housed some type of secret government facility. A sixth farmstead was also evaluated, but this evaluation was not described either. Since this is private property, it would be interesting to know what kind of evaluation was performed and how this evaluation was done.

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

5. Green House Gases: There is no plan for mitigation of green house gas emissions. It is quite likely this will become necessary in the near future. It is not likely that coal-fired power plants already built will be "grandfathered-in." The statement in the DEIS that "...the proposed project would not have a significant impact on global warming," is simply not true. The cumulative effect of green house gases is significant and AECI needs to address this in this project.
6. Closure Due to Lack of Financial or Political Feasibility: This plant could become financially unfeasible if carbon regulation imposes fees for CO₂ emitted or if the cost and/or transportation of coal become prohibitively expensive. Other factors could cause the plant to be only partially constructed, then closed. An analysis of the socio-economic and environmental impacts that would occur should AECI pass carbon taxes on to the consumer or if the plant faced closure should be performed, including what will happen to the land used and how it will be restored.
7. Floodplains: This project is sited within the Missouri River floodplains. The Flood Insurance Rate Maps used to assess flood impact are over 20 years old and outdated. They pre-date the 1993 flood. The "simplistic analysis" that was done to assess the magnitude of the displaced floodwater was just that—simplistic. The DEIS offered no historical support for its findings. Without having viewed firsthand the *many* floods in this area over the past 60 years it

is impossible to comprehend how they impact this floodplain, as well as the Wakenda Creek floodplain.

The DEIS states, "The Norborne Plant site would require fill to raise it above the 100-year flood elevation. Current elevations at the proposed plant site are between 685 and 689 feet, compared to the 100-year flood elevation of 687.1 feet and a 500-year of 689.5 feet. Fill would be added to bring the grade elevation of the power block buildings, the outlying buildings, the access road, rails, and coal pile to three feet above the 100-year flood level (AECI, 2005f)." The elevation of the proposed rail spur from the south will constitute an obstruction. These things are dismissed as not being significant in the event of a flood. They WILL be significant. Each major flood has reached a higher level than previous ones. In 1993 the water poured over the railroad tracks south of the plant site. Once the flood crest was passed, water in most areas began to go down. However, on the north side of the railroad tracks, the water could not get away because of the railroad, and it took weeks for it to drain out under the railroad trestle. How does the power plant propose to deal with that type of impact?

8. Wetlands: The DEIS states the Region of Influence (3.9.1.1) would be 0.5 mile around the power plant site and associated facilities. Directly across the road north of the plant site is a wetlands area of 33 acres. Impact to this area or its mitigation is not mentioned at all.
9. Farmland Protection Policy: There are discrepancies in information entered on Form AD-1006 Farmland Conversion Impact Rating as compared to a statement in the DEIS that says approximately 1200 acres of farmland would be taken out of production (3.6.2.4.1). This would affect the result in Part V, Relative Value of Farmland to be Converted, by about 22%. There is also some question as to the accuracy of points assigned in Part VI (#7). Furthermore, this proposed project is inconsistent with the Guide Plan for Land Use and Future Development and specifically with Article XVII Flood Overlay District.

It is my understanding that these and all other questions submitted to Rural Utilities Service will be addressed in the final Environmental Impact Statement. Serious consideration of these issues will be appreciated.

Sincerely,



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