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Minnesota Department of Commerce
Energy

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Mr. Bill Storm
Minnesota Department of Commerce
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St. Paul, MN 55101-2198

Mr. Richard Hargis
Department of Energy
PO. Box 10940
Pittsburg, PA 15236-0940

Re: Meaba Energy Project, PUC Docket No. E 6472/GS-060668 DOE Draft EIS for the Mesaba Energy Project (DOE/EIS-0382D (Comments on draft EIS)

Dear Mr. Storm and Mr. Hargis:

I am a graduate natural resources scientist, with 3 years of federal, 31 years of state, and 7 years of contractual experience. Following are my comments on the above stated draft EIS for the proposed Mesaba Energy IGCC electric generating plant to be built on the West Range site near Taconite, Minnesota. The comments apply **only** to the preferred West Range location near Taconite, Minnesota.

After reviewing the above stated draft EIS, it is my professional opinion that the "No Action" alternative is unquestionably the only feasible alternative, for the following reasons:

1. The draft EIS clearly states that the proposed plant siting will be a major source of CO2, SO2, NO2, and mercury. Of particular concern is CO2, to be released into the atmosphere (presuming the very likely absence of carbon sequestration) at the rate of 10 million tons per year, and the mercury, whose health risks have been well quantified. With changing climate and changing prevailing wind directions, more study is needed beyond what the draft EIS mentions as standards and "current data."
2. The draft EIS clearly states that there will be adverse impacts from erosion and sedimentation.
3. The draft EIS states that clean water demands of 8,800-10,300 gpm., with a peak demand of 15,200 gpm. will have no adverse impacts; this needs to be proven beyond what the EIS states. The draft EIS fails to clarify where the wastewater will exit, and the adverse impacts of this deposition.
4. The draft EIS states that 155 acres of vegetation will be eliminated on site, plus dozens of additional acres for rail lines, etc. I could not find where any mitigation is defined for either these acres, or for any wetland acres.
5. The draft EIS lessens the possible adverse health impacts, and data are lacking to quantify and substantiate stated impacts. In fact, approximately 70 health care professionals in the immediate area stated in the Grand Rapids Herald review (about one year ago) that health risks from Mesaba Energy are potentially great. Unless I missed it, the health concerns from coal dust along the railway in urban Grand Rapids are not mentioned in the draft EIS.
6. The draft EIS inadequately addresses the economic burden placed on local communities and Itasca County for infrastructure changes such as Co. Rd 7 ("Scenic" Highway), railroads, crossings, etc. The draft EIS fails to quantify whether this burden will be passed on to taxpayers, and if so, to what extent?

7. The draft EIS mentions the economic benefits in terms of increased employment resulting from Mesaba. It fails to quantify how many of these new jobs will be from local, non-local, or transient sources. Increased jobs should never be used as a prime reason to build such an industrial facility with so many adverse impacts as Mesaba Energy.
8. The draft EIS quantifies 1,000-1,600 tons per day of waste slag as a result of Mesaba operation. It fails to specify what will be done with this waste, or what harmful elements it contains.
9. The draft EIS states that "IGCC technologies are more efficient, economical, reliable, and more environmentally favorable than conventional coal steam generating electric generation." Neither Mesaba Energy nor any other coal gasification facility meets any of these criteria, especially with no CO2 sequestration.

Just because Congress has authorized the Clean Coal Power Initiative Program, it does mean that Federal funds in the amount of $36 million should be allocated to Excelsior Energy, Inc. for start-up of Mesaba Energy, especially on the West Range site. The draft EIS speculates that if these funds are not allocated to Excelsior Energy, Inc., another IGCC facility might not be built elsewhere. This speculation is totally without merit, and should not be included in the draft EIS. In fact, there are likely several other sites where an IGCC facility could be built, with far fewer adverse environmental consequences, and in an area that might be able to handle carbon sequestration on site.

Any of the above items as stated in the draft EIS are by themselves reasons to not build the Mesaba Energy facility on the West Range site. But when considered together, they are an enormous justification for the Minnesota Department of Commerce and the U. S. Department of Energy to decide on the "NO ACTION" Alternative.

Very sincerely,

William E. Berg

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