



**Minnesota Center for
Environmental Advocacy**

The legal and scientific voice protecting and defending Minnesota's environment

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February 14, 2006

VIA ELECTRONIC AND U.S. MAIL

Sharon Ferguson
Docket Manager
Minnesota Department of Commerce
85 East 7th Place, Suite 500
St. Paul, MN 55101-2148

**Re: Corrected Comments on Scoping of Environmental Impact Statement for
Construction and Operation of Big Stone II Power Plant and
Transmission Project
MPUC Docket No. ET6131,ET2,ET6130,ET10,ET6444,E017,
ET9/TR-05-1275; CN-05-619**

Dear Ms. Ferguson:

Yesterday, I submitted comments on scoping the EIS for the Big Stone II Power Plant and Transmission Project, on behalf of Minnesotans for an Energy-Efficient Economy (ME3), the Izaak Walton League of America - Midwest Office (IWLA), Union of Concerned Scientists (UCS), Wind on the Wires (WOW), and the Minnesota Center for Environmental Advocacy (MCEA). After filing our comments yesterday, I became aware of an error in our comments that I wish to correct by providing a substitute, corrected page 2, which is enclosed herewith. The corrected page 2 is intended to replace that contained in our February 13, 2006, comments. In a telephone conversation with David Birkholz this morning, he indicated that this would be a satisfactory way for me to submit the corrected comments.

I apologize for any inconvenience this may cause. Please contact me with any questions you may have regarding this matter

Sincerely,

Elizabeth I. Goodpaster
Attorney for ME3, IWLA, UCS, WOW and MCEA

Enclosure

Cc: David Birkholz

opportunities. MCEA is a Minnesota nonprofit organization that works in the courts, the legislature, and state agencies to protect Minnesota's wildlife, natural resources and the health of its people.

The Minnesota Public Utilities Commission ("Commission") correctly stated in its December 19, 2005, *Order Accepting Application as Substantially Complete and Requiring Additional Information* that the "need for the [Big Stone II] generation facility and the need for the transmission lines are inextricably linked." The scope of the Environmental Impact Statement ("EIS") that the Department prepares to inform the Commission's need determination must correspond to the scope of the Commission's inquiry, that is, in addition to analysis of the environmental impacts of and alternatives to the proposed Big Stone II transmission line, the EIS must analyze the impacts of and alternatives to the proposed Big Stone II power plant.¹

The scope of the Department's EIS must also match the scope of all statutes that govern the Commission's evaluation of the proposed project. For example, it is a longstanding policy of Minnesota environmental law that increases in "fossil fuel consumption" and "the need for additional electrical generating plants" are to be avoided; such language is found in Minn. Stat. §216C.05, which is incorporated by reference in the Certificate of Need Statute, Minn. Stat. §216B.243. Coupled with the strong preference for renewable energy in Minn. Stat. §216B.243 subd. 3a, and the Renewable Energy Objective requirements of Minn. Stat. §216B.1691, Minnesota has a clear and urgent policy of avoiding new electrical generation by means of non-renewable sources like coal. In view of that established policy, the environmental differences between burning coal to produce energy and obtaining the same amount of energy through non-emitting and low-emitting sources should be a primary focus of the EIS.

These scoping comments identify some of the direct, indirect, and cumulative impacts of the proposed Big Stone II project that are of primary concern to Joint Intervenors, and identify a minimum number of alternatives that the EIS should analyze in depth.

I. MINNESOTA LAW REQUIRES THE EIS TO ADDRESS ALL REASONABLE ALTERNATIVES TO THE PROPOSED GENERATION PLANT AND TRANSMISSION LINE.

Since the inception of environmental review in the 1970s, courts and agencies have recognized that the analysis of alternatives is the heart of the EIS process. Since the EIS will inform both the Certificate of Need proceeding and the Route Permit proceeding, the statutes and rules applicable to both are relevant, and in order to give effect to both, the most stringent should control where there is a divergence. The rules and statutes relating to each of these

¹ Indeed the proposed Big Stone II project must be defined as the proposed power plant and power lines, given that the projects are "connected actions", as defined under Minn. R. 4410.0200 subp. 9b ("two projects are connected actions if . . . one project would directly induce the other") and/or "phased actions", as defined under Minn. R. 4410.0200 subp.60 ("Phased action means two or more projects to be undertaken by the same proposer that . . . will have environmental effects on the same geographic area; and are substantially certain to be undertaken sequentially over a limited period of time.")



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FEB 14 2006

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opportunities. MCEA is a Minnesota nonprofit organization that works in the courts, the legislature, and state agencies to protect Minnesota's wildlife, natural resources and the health of its people.

The Minnesota Public Utilities Commission ("Commission") correctly stated in its December 19, 2005, *Order Accepting Application as Substantially Complete and Requiring Additional Information* that the "need for the [Big Stone II] generation facility and the need for the transmission lines are inextricably linked." The scope of the Environmental Impact Statement ("EIS") that the Department prepares to inform the Commission's need determination must correspond to the scope of the Commission's inquiry, that is, in addition to analysis of the environmental impacts of and alternatives to the proposed Big Stone II transmission line, the EIS must analyze the impacts of and alternatives to the proposed Big Stone II power plant.¹

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These scoping comments identify some of the direct, indirect, and cumulative impacts of the proposed Big Stone II project that are of primary concern to Joint Intervenors, and identify a minimum number of alternatives that the EIS should analyze in depth.

I. MINNESOTA LAW REQUIRES THE EIS TO ADDRESS ALL REASONABLE ALTERNATIVES TO THE PROPOSED GENERATION PLANT AND TRANSMISSION LINE.

Since the inception of environmental review in the 1970s, courts and agencies have recognized that the analysis of alternatives is the heart of the EIS process. Since the EIS will inform both the Certificate of Need proceeding and the Route Permit proceeding, the statutes and rules applicable to both are relevant, and in order to give effect to both, the most stringent should control where there is a divergence. The rules and statutes relating to each of these

¹ Indeed, the proposed project must be defined as the proposed power plant and power lines; per Minn. R. 4400.0200, which provides that a high voltage transmission line includes "associated facilities", defined as buildings, equipment, and other physical structures that are necessary to the operation of a large electric power generating plant or a high voltage transmission line. The proposed Big Stone II high voltage transmission line includes, at a minimum, the new generation unit as an "associated facility" since the proposed plant is necessary to the operation of the transmission line.

governmental approvals contain requirements for environmental review that include analysis of the environmental impacts of the project as proposed, and of alternatives to the project.

Although the particular construction in Minnesota for which the Big Stone Co-owners seek a Certificate of Need and Route Permit, are transmission lines, those lines, as the Commission noted in its December 19, 2005, Order, are a *sine qua non* of a single project, which includes the 600 MW expansion of the Big Stone generation plant. The alternatives required to be examined include any feasible and prudent alternative methods of meeting the Big Stone II Co-owners' claimed needs for power, including alternative methods, timing, or size of power generation as well as conservation and efficiency.

Significantly, the instant CON application is made by a group of seven separate utilities, each of which claims a need for additional power from this project. Thus, the EIS should address alternatives available to each utility, separately, as well as collectively.

In summary, the Minnesota statutes and rules, as more fully discussed below, specifically require the following alternatives:

- Energy conservation, including existing and potential new programs
- Load management
- Increased efficiency
- Renewable energy sources
- Upgrading of existing generation and transmission facilities
- Distributed generation
- Purchased power
- Facilities of a different size, type or timing
- Facilities using a different energy source
- Generation rather than transmission
- The no build alternative
- Other alternatives required by the Department

The starting point in defining the contents of the EIS is the Certificate of Need statute itself, Minn. Stat. §216B.243, subd. 3, which prohibits the issuance of a certificate of need "unless the applicant can show that demand for electricity cannot be met more cost effectively through energy conservation and load management measures..." Minn. Stat. §216B.243 subd. 3(2) further requires an analysis of "the effect of existing or possible energy conservation programs under sections 216C.05 to 216C.30 and this section or other federal or state legislation on long-term energy demand..."

Minn. Stat. §216B.243 subd. 3(6) specifies also that the PUC must consider "possible alternatives for satisfying the energy demand or transmission needs including but not limited to potential for increased efficiency and upgrading and of existing energy generation and transmission facilities, load management programs and distributed generation." The EIS should address all of these subjects set forth in Minn. Stat. §216B.243 subd. 3.

In addition, the Certificate of Need statute provides at subd. 3a that renewable energy sources and their costs, including environmental costs, must be examined; if the renewable energy alternatives are less expensive, the Commission cannot grant the certificate of need for a nonrenewable energy plant or its associated transmission line.² Subdivision 4 further requires that the Commission may not approve a non-renewable energy facility "unless the utility has demonstrated that a renewable energy facility is not in the public interest".³ The inescapable result of these provisions is that the EIS on which the Commission relies will be required to look at renewable energy facilities and determine their "public interest" value considering environmental costs, as alternatives to the proposed project.

Thus, while it is ultimately a statutory burden independent of environmental review for the Applicants to demonstrate that building a 600 MW pulverized coal plant is less costly than renewables, taking into account environmental costs, the EIS should examine the relative impacts of renewable energy alternatives to the proposed project.

The Minnesota Rules governing the environmental review for the certificate of need application also take a broad view of alternatives. Minn. Rules 4410.7060 provides that an EIS that covers both need and routing, as the Commission has directed the Department to prepare in this case, must include the analysis of alternatives required by Minn. Rules part 4410.7035.

Minn. Rules 4410.7035, provides in subp. 1B that the environmental review document shall contain:

A general description of the alternatives to the proposed project that are addressed. Alternatives shall include the no-build alternative, demand side management, purchased power, facilities of a different size or using a different energy source than the source proposed by the applicant, upgrading of existing facilities, generation rather than transmission if a high voltage transmission line is proposed, transmission rather than generation if a large electric power generating plant is proposed, use of renewable energy sources, and other alternatives identified by the chair.

This rule makes clear that alternatives for both generating plants and transmission lines are to include alternative sources of energy. In addition to the pre-selected alternatives required to be examined, Minn. R. 4410.7060 incorporates the invitation set forth in Minn. R. 4410.7030 subp. 6 to interested persons to submit additional alternatives to the chair for potential inclusion in the EIS.

Finally, in view of the overarching requirement of the Minnesota Environmental Policy Act ("MEPA"), Minn. Stat. §116D.04, subd. 6, any "feasible and prudent" alternative must be examined.⁴

² Minn. Stat. §216B.243 subd. 3a.

³ Minn. Stat. 216B.243 Subd 4.

⁴ See, Minn. Stat. §116D.04 subd. 6. "Prohibitions. No state action significantly affecting the quality of the environment shall be allowed, nor shall any permit for natural resources management and development be granted,

II. THE EIS SHOULD EXAMINE VARIOUS COMBINATIONS OF ALTERNATIVES THAT UTILIZE THE OUTSTANDING WIND POWER POTENTIAL IN THE REGION.

The EIS discussion of alternatives to the Big Stone II project should include at least the following three wind power alternatives, discussed in more detail herein:

1. Wind power with purchased ancillary services;
2. Wind power in combination with existing or expanded hydroelectric generation sources;
3. Wind power in combination with new thermal generation sources; and
4. Energy efficiency in combination with the three alternatives above.

A. THE EIS SHOULD EXAMINE AND DISCUSS THE USE OF WIND POWER WITH ANCILLARY UTILITY SERVICES AS AN ALTERNATIVE MEANS OF PROVIDING THE ELECTRICITY PROPOSED TO BE GENERATED BY THE COAL PLANT.

The EIS should first describe the wind power resource that exists in both South Dakota, Minnesota and in the service territories of the Big Stone II partners. The wind resources in South Dakota and Minnesota are widely regarded as among the best in the nation. As recently as January 31, 2006, Department officials reported that Minnesota has more wind, and more potential to transform it into electricity, than previously estimated.⁵

The EIS should next discuss as an alternative to the proposed coal project the installation of wind power, with ancillary services provided by the Big Stone II Partners' systems and/or purchased from the wholesale market. The discussion of this alternative should address the construction of sufficient wind power to fulfill the stated needs of the Big Stone II Partners (assuming that their need can be demonstrated at the requested level), utilizing ancillary services available due to unused generation capacity already in the system through the resources of the Big Stone II partners, and/or through purchases of such services on the open wholesale market, to be integrated with the wind power.

The recent Minnesota Wind Integration Study done by the Minnesota Department of Commerce had as its purpose "to evaluate the impacts on reliability and operating costs of 1500 megawatts of wind generation capacity on the Xcel Energy system with a projected 10,000 megawatts of peak customer load in the year 2010."⁶ The ancillary services examined in the study —

where such action or permit has caused or is likely to cause pollution, impairment, or destruction of the air, water, land or other natural resources located within the state, so long as there is a feasible and prudent alternative consistent with the reasonable requirements of the public health, safety, and welfare and the state's paramount concern for the protection of its air, water, land and other natural resources from pollution, impairment, or destruction. Economic considerations alone shall not justify such conduct."

⁵ See, January 1, 2006, Star Tribune, "State's wind power potential is greater than first thought".

⁶ Introduction to Minnesota Wind Integration Study, Minnesota Department of Commerce, November 2004, p. 3. The Introduction and Wind Integration Study – Final Report are available on the Minnesota Department of

regulation, load following and unit commitment — are relevant options to the Big Stone II partners, even though the Minnesota Wind Integration Study studied costs of such ancillary services in the context of the Xcel Energy system. The services that should be examined when evaluating the alternative of wind power to the Big Stone II proposal are:

Regulation is the process of maintaining system stability by adjusting certain generating units in response to fast fluctuations in the total system load. These fluctuations typically occur over a period of a few seconds to several minutes and are caused by customer actions as minor as turning on an air conditioning unit or as major as firing up a large industrial arc furnace.

Load following is the process of ramping generation up or down in response to daily load patterns. These patterns are typically predictable as load comes up in the morning and comes down in the evening. Scheduling is the practice of scheduling power plants for the next day based on short term load forecasts and equipment availability.

Unit commitment is the practice of committing generation units several days in advance based on longer-term load forecasts, planned plant maintenance and other variables.⁷

The Minnesota Wind Integration study concluded:

that 1500 megawatts of wind energy can be reliably integrated on the Xcel system. The study also concludes that 1500 megawatts of wind contributes 400 megawatts of effective load carrying capability, or 400 megawatts of reliability. The analysis conducted in this study indicates the costs of integrating 1500 megawatts of wind generation into the Xcel control area in 2010 are no higher than \$4.60 per megawatt hour of wind generation. This represents a wind penetration level of 15% on a projected peak load system of 10,000 megawatts. The total costs include \$0.23 per megawatt hour as the opportunity cost associated with an increase of 7.8-megawatts of reserve capacity to satisfy the regulation requirement; and \$4.37 per megawatt hour of wind generation attributable to unit commitment and scheduling costs. The increase in production cost due to load following was determined by statistical analysis of the data to be negligible.⁸

Since the Minnesota Wind Integration study demonstrates that 1500 megawatts of wind power could be integrated into the Xcel system, it is reasonable to assume that significant wind resources could also be integrated into the systems of the Big Stone II partners, using the same techniques, and existing generation capacity in the region. The EIS should examine the extent to which that is feasible. But in no event should the EIS accept the Applicants' unsupported

Commerce web site,
<http://www.state.mn.us/portal/mn/jsp/content.do?contentid=536904447&contenttype=EDITORIAL&hpage=true&agency=Commerce>

⁷ *Id.* at 3,4.

⁸ *Id.* at 8.

position set forth in their Certificate of Need Application that wind power must be “backed up” with an equal amount of dispatchable generation.⁹

B. THE EIS SHOULD DISCUSS THE ALTERNATIVE OF WIND POWER COMBINED WITH HYDROELECTRIC GENERATION.

A combination of wind power with existing or expanded hydroelectric capacity should also be considered as an alternative to Big Stone II. The EIS should consider hydroelectric capacity that could be available from the WAPA system and/or from other regional sources. Multiple combinations should be studied that couple various amounts of wind capacity with complementary amounts of hydroelectric capacity, as alternatives to the proposed Big Stone II plant.

The Bonneville Power Administration offers wind integration, storage and shaping services for wind projects based on its hydro capacity, and the potential for a similar service should be considered in the EIS from Big Stone II partners or other suppliers in the region. See, http://www.bpa.gov/Power/PGC/wind/BPA_Wind_Integration_Services.pdf. In particular, the hydroelectric power controlled by Big Stone II project partner Missouri River Energy Services should be a specific, additional area of inquiry in connection with this alternative.

C. THE EIS SHOULD DISCUSS THE USE OF WIND POWER PLUS THE USE OF NEW THERMAL GENERATION SOURCES AS AN ALTERNATIVE TO THE PROPOSED PROJECT.

The EIS should describe alternatives that include wind power plus a smaller amount of new dispatchable thermal generation. Potential new thermal sources that would be supplemental to new wind power include a number of possible alternatives, providing base load electric generation with high fuel efficiency but fewer emissions of carbon dioxide, mercury and other pollutants than the proposed Big Stone II project. These alternatives include:

1. Gas turbine with long term gas supply contracts. Gas supply industry experts should be consulted about the availability of long term hedging contracts, to guard against price fluctuations. In addition, an advanced combined cycle gas facility option should be examined, such as that proposed at Calpine Corporation’s Inland Empire Energy Center in southern California, which will use an advanced system developed by General Electric.
2. Community-based energy project potential should be examined in the various service regions of the Big Stone II Partners. District heating projects, for example, which combine the production of heat, cooling and electric power production, may well be the preference of many municipalities, making use of the use of locally available fuels such as agricultural waste, local forestry wood waste, energy crops such as switchgrass, and urban wood waste.

⁹ See, e.g., IWLA/ME3/UCS/MCEA Comments on the Otter Tail 2006-2020 Resource Plan, MPUC Docket No. E017/RP-05-968, p. 20-21, discussing Otter Tail’s erroneous reliance on the Burns & McDonnell, Analysis of Baseload Generation Alternatives contained in Appendix J to the Big Stone II Certificate of Need Application.

3. Industrial co-generation. The EIS should discuss industrial cogeneration as a source of thermal electric generation. Local industrial plants in the Big Stone II partners' region -- such as ethanol plants, and pulp/paper/forest production industries -- generate significant amounts of process steam but generally do not generate electricity. The potential for adding electricity production capabilities at such facilities, and other industrial facilities in the Big Stone II partners regions, should be examined.

D. THE EIS SHOULD STUDY THE POTENTIAL FOR REDUCING THE DEMAND FOR NEW ENERGY THROUGH THE APPLICATION OF ENERGY EFFICIENCY MEASURES BY ALL OF THE BIG STONE II PARTNER UTILITIES.

As the laws cited above show, Minnesota law expresses a distinct preference for improving energy efficiency rather than building new coal plants. The alternatives analysis should therefore give particular attention to determining how much of the stated need for Big Stone II energy could be met through more aggressive demand side investments taken by the Big Stone II partners. Studies of the issue in Minnesota and elsewhere indicate that a very substantial portion of the proposed project production could reasonably be avoided by the application of energy efficiency measures systematically installed between now and 2011.

In Minnesota, a recent (January 2005) report of the Legislative Auditor concerning the cost effectiveness of the Conservation Improvement Program (CIP) in Minnesota, under which utilities are required to spend a percentage of revenues to fund energy conservation matters, concluded:

Minnesota Has More Opportunities for Cost-Effective Conservation CIP should continue to provide Minnesota with cost-effective conservation into the future. Over the last several years, the effectiveness of CIP has not declined much, if at all, with its societal benefit-cost ratios remaining in the range of two-to-one or three-to-one.¹⁰

The Legislative Auditor concludes that "between 10 and 30 percent of Minnesota's future energy needs could be met through cost-effective conservation."¹¹

Extensive studies in other parts of the country support the conclusion that a 30 percent reduction of Minnesota's energy needs can be met through conservation and efficiency. For example, a 2004 American Council for an Energy Efficient Economy analysis of 11 recent energy efficiency studies found a median technical potential of 33% for electricity, and median economic potential for electricity of 20%. The median achievable potential is 24% for electricity (an average savings of 1.2% per year).¹²

¹⁰ Minnesota Office of the Legislative Auditor, "Evaluation Report - Energy Conservation Improvement Program," January 2005, page 3, available at www.auditor.leg.state.mn.us/ped/2005/pe0504.htm

¹¹ *Id.*, at 41.

¹² Steven Nadel, Anna Shipley and R. Neal Elliott, *Technical, Economic and Achievable Potential for Energy-Efficiency in the U.S. - A Meta-Analysis of Recent Studies*, American Council for an Energy-Efficient

Another example is a study by a team of researchers commissioned by Southwest Energy Efficiency Project (SWEEP), and funded by grants from U.S. Environmental Protection Agency as well as the Energy Foundation and the Hewitt Foundation, published in November 2002. SWEEP demonstrated that huge energy savings available in Arizona, New Mexico, Colorado, Nevada and Wyoming.

Accelerated adoption of cost-effective energy efficiency measures, including more efficient appliances and air conditioning systems, more efficient lamps and other lighting devices, more efficient design and construction of new homes and commercial buildings, efficiency improvements in motor systems, and greater efficiency in other devices and processes used by industry. These measures are all commercially available but underutilized today.¹³

An optimistic scenario estimated that the energy savings from efficiency in that region could be 18 percent by 2010 and 33 percent by 2020, from the implementation of a specific set of recommendations.¹⁴

Similarly, the "Fifth Northwest Electric Power and Conservation Plan," prepared by Northwest Power and Conservation Council relies heavily on conservation and "demand response" as foundations of the plan for energy in the Pacific Northwest.¹⁵ The study anticipates that, using these to satisfy the bulk of the anticipated demand, and adding wind, combined cycle turbines, single cycle combustion turbines and IGCC, the region should be able to avoid new conventional coal fired generation in the next 20 years.

The Department's alternatives analysis should look at whether the Big Stone II partners have individually pursued demand side options consistent with Minnesota energy priorities. It should also look at the alternative of pursuing demand side options collectively, the way the partners are currently pursuing Big Stone II collectively, to identify the additional potential energy savings available.

III. THE USE OF INTEGRATED GASIFICATION COMBINED CYCLE PROCESS (IGCC) ALTERNATIVES MUST BE EXAMINED IN THE EIS.

IGCC must be discussed in the EIS as a less polluting alternative than pulverized coal. Several proposed IGCC plants either applied for or received air permits in 2004 and 2005. In addition, a recent regulatory decision in Kentucky advised the state permitting agency for a proposed

Economy, from the proceedings of the 2004 ACEEE Summer Study on Energy Efficiency in Buildings, online at: www.aceee.org.

¹³ "The New Mother Lode: The Potential for More Efficient Electricity Use in the Southwest", a report in the Hewlett Foundation Energy Series. November 2002 (www.swenergy.org/nml/index.html).

¹⁴ *Id.*

¹⁵ See, The Fifth Northwest Electric Power and Conservation Plan, www.nwcouncil.org.

pulverized coal plant to include IGCC as an alternative in its Best Available Control Technology analysis under the federal Clean Air Act.¹⁶ Under Minnesota law, Minn. Stat. §216B.1694, an IGCC project must be considered as an alternative to any new fossil-fuel-fired proposal.

In light of the global warming pollutant impact and the other adverse impacts of the emissions of the Big Stone II proposed coal plant, as discussed herein, we request that the EIS include the following two alternatives among those considered in the EIS: (1) a coal-fueled, IGCC power plant with CCS and (2) a coal-fueled IGCC power plant that is "carbon capture ready". An IGCC plant with CCS would reduce carbon dioxide emissions by nearly 90 percent compared to a new IGCC or supercritical steam coal plant without CCS.¹⁷ An IGCC plant without CCS that is "carbon capture ready" could more readily be retrofit with CCS later at much lower cost than a conventional coal combustion plant. In light of the likelihood of future carbon regulatory constraints (which should be discussed in the EIS as noted below), the use of "carbon capture ready" IGCC technology, even if CCS is not immediately utilized, may provide a future opportunity for a less costly method to reduce carbon emissions when more stringent governmental restrictions on global warming pollution are imposed.

IV. THE ANALYSIS OF AIR AND WATER IMPACTS MUST EXAMINE THE FULL IMPACT OF CARBON DIOXIDE AND MERCURY.

A. THE ANALYSIS SHOULD CALCULATE THE CUMULATIVE IMPACT ON THE CLIMATE OF THE PROPOSED PROJECT ON A COST PER TON OF CARBON DIOXIDE BASIS.

The gravest environmental threat facing the world today is global warming, and approval of the Big Stone II project would represent the largest single increase in greenhouse gases from Minnesota utilities in many years. It is therefore critical that the environmental review document prominently consider – among other environmental impacts – the greenhouse gas emissions impact of the Big Stone II project. Under Minnesota law, the environmental review required for certificate of need applications must address "the human and environmental impacts of the proposed project associated with the size, type and timing of the project..." Minn Rule 4410.7020 *et. seq.* The greenhouse gas emissions of carbon dioxide and other pollutants that would be emitted by the proposed 600 MW Big Stone II generation unit over its life, and by the existing Big Stone 450 MW unit ("Big Stone I") over its extended life resulting from this project, are clearly human and environmental effects of the Big Stone II proposal.

Both federal and state law dictate the need to conduct analysis of global warming pollution associated with the proposed project. Federal law is relevant here given that the Certificate of Need statute in Minnesota provides that the Commission shall consider "the policies, rules, and regulation of other state and federal agencies and local governments." Minn. Stat. §216B.243 Subd 3(7). The US is legally required to adopt policies and take measures to reduce the country's greenhouse gas emissions under the terms of the Framework Convention on Climate

¹⁶ See, note of decision, www.kentucky.gov/Newsroom/environment/thoroughbredgeneratingplant.htm.

¹⁷ This assumes that a geologically suitable location to store CO₂ is available and used.

Change, ratified in 1992.¹⁸ President Bush has reaffirmed the federal government's commitment to the ultimate objective of the Framework Convention: to "stabilize atmospheric greenhouse gas concentrations at a level that will prevent dangerous human interference with the climate."¹⁹ Considering that the operational life of a coal-fueled power plant is 50 to 60 years long, approval of any of the new coal-fueled plants currently being proposed (especially those constructed without technologies that facilitate implementation of carbon capture and storage) would have a significant impact on the ability of the federal government to meet its stabilization commitment.

The fact that the Big Stone II project is contributing to an environmental problem of global scope does not minimize the obligation to review its impact. MEPA provides strong state policies that underscore the need for an analysis of the cumulative global warming pollution impacts of the existing and proposed Big Stone plants and others. The parent statute for environmental review in Minnesota, MEPA is incorporated by-reference in the rules regarding EIS preparation for power plants and power lines, Minn. Rule 4400.0200 subp. 6b. Not only does MEPA establish a policy to "Practice thrift in the use of energy and maximize the use of energy efficient systems for the utilization of energy and minimize the environmental impact from energy production and use", MEPA also provides policies that require all state agencies and departments to take a global view of environmental problems, and to

Recognize the worldwide and long range character of environmental problems and, where, consistent with the policy of the state, lend appropriate support to initiatives, resolutions, and programs designed to maximize interstate, national and international cooperation in **anticipating and preventing a decline in the quality of the world environment.**²⁰

Therefore, under federal and state law, the EIS for the Big Stone II project must consider the impacts of global warming pollution that would result if this project were built. In view of the critical juncture that the nation and the world now face on the problem of global warming, incremental decisions to build more coal-fired power plants now will collectively push current levels of carbon dioxide higher and could lock in those coal-fired generation plants as sources of electricity for many decades.

As a first step, the Big Stone II EIS should document how much carbon dioxide and other greenhouse gases will be emitted over the life of the proposed plant, and, to the extent that the Big Stone II project extends the useful life of the Big Stone I unit, the additional carbon dioxide emissions from Big Stone I. The EIS should also document the variance in cumulative greenhouse gas emissions from the Big Stone II project as proposed, and all other alternatives to the proposed plant.

¹⁸ *United Nations Framework Convention on Climate Change (UNFCCC), Art. 4, Para. 2, Cls. (a), (b); 138 Cong. Rec. 33521-27 (Oct. 7, 1992) (Senate ratification).*

¹⁹ *Address by President George W. Bush to the National Oceanic and Atmospheric Administration (Feb. 14, 2002).*

²⁰ Minn Stat. §116D.02 subd.2.

Merely identifying the quantity of emissions from the project, however, does not amount to a review of the *impacts* of those emissions. The impact of increased carbon dioxide emissions that would result over the life of the Big Stone II facility (presumably a minimum of 50 years) is potentially immense, especially when viewed in the context of other past, present, and reasonably foreseeable future projects.²¹ The EIS should therefore also analyze the global warming pollution impacts of the Big Stone II project and alternatives to it through a cumulative impacts analysis.²²

Both Minnesota law and federal law require a consideration of the cumulative effect of an action when the incremental effects of the project in combination with past, present or reasonably foreseeable future projects, will have a significant collective or cumulative effect beyond the effect of the project at issue.²³ In combination with emissions from reasonably foreseeable future projects, the two Big Stone units would contribute significantly to the phenomenon of human-forced temperature increases, and make it more difficult for the United States to reduce existing and future carbon emissions. The global temperature effects of the proposed Big Stone II facility, which are clearly "cumulative" with other sources, must be examined in the EIS

The most meaningful way to look at the share of global warming damage that can be attributed to the emissions from the Big Stone II project is to calculate damages on a dollars/ton of CO₂ basis. The PUC has already adopted externality values for CO₂ on this basis pursuant to Minn. Stat. §216B.2422, subd. 3, however nothing in that subdivision in any way limits the state's obligations to comply with environmental review requirements to look at cumulative impacts. Moreover, nothing in the subdivision prevents the PUC from considering cost values in addition to those formally quantified by the PUC itself in any proceeding. The so-called externalities provision requires utilities to use those values when evaluating and selecting resource options, but does not prevent a utility – and certainly does not prevent the PUC or the Department of Commerce in the process of conducting environmental review – from calculating and considering other values.

Minnesota's environmental review laws emphasize the importance of considering "the latest and most authoritative findings" in administrative and regulatory decision making, even establishing advisory councils or other forums to solicit information from the appropriate experts. Minn. Stat. §116D.03, subd. 2(2). The need to rely on the most recent information available is particularly important in situations like this one -- where the science is evolving rapidly, and

²¹ See, e.g., Union of Concerned Scientists analysis of regional environmental impacts from global warming, "Confronting Climate Change in the Great Lakes Region", <http://www.ucsusa.org/greatlakes/>.

²² Minn. R. 4410.0200 defines "cumulative impact" as the "impact on the environment that results from incremental effects of the project in addition to other past, present, and reasonably foreseeable future projects, regardless of what person undertakes the other projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

²³ See, The Guide to Minnesota Environmental Review Rules, <http://www.eqb.state.mn.us/pdf/rulguid3.pdf>, page 5, which includes a discussion of "cumulative effects" and incorporates by reference a federal CEQ guidance document on cumulative effects. While this state guidance document cites rules that are applicable generally to environmental review carried out pursuant to Minn. Stat. §116D, that same statute is the basis for conducting environmental review of power lines and generation plants. Thus, the cumulative impacts of a power line, and its associated generation plant, should be analyzed for the Big Stone II project.

where the project will have long-range environmental impacts. Trying to peer decades into the future to assess a project's impacts is difficult enough without relying on scientific assessments that are already many years outdated.

The externality value established by the Commission for CO₂ reflects anything but "the latest and most authoritative findings." It was adopted in 1997 based on damage-cost estimates calculated by the Minnesota Pollution Control Agency.²⁴ The prefiled MPCA testimony on which the calculation was based was submitted in 1994, and was in turn based largely on the predictions of the Intergovernmental Panel on Climate Change made in 1990.²⁵ Rather than accept the cost numbers recommended at that time by the MPCA (with a high cost value of \$28.57), the ALJ adopted a much lower cost range (with a high cost value of \$2.92). These lower costs were adopted based on a determination that conservative values should be adopted "in the face of uncertainty."²⁶ The PUC adopted the ALJ's value, only slightly modified for inflation, and apart from adjusting it for inflation in the years since, has declined to revisit that number to see to what extent the scientific uncertainty that caused it to choose such a low value in the first place has faded.²⁷ In essence, the PUC's externality value for CO₂ has been frozen in time since the mid 1990s, reflecting the uncertainties it perceived to exist at the time.

Since that time, of course, an intensive global effort has been underway to collect and analyze data related to climate change. The IPCC has issued two additional assessments of the science, most recently in 2001,²⁸ since the 1990 assessment that is the basis of the PUC's CO₂ value, and there have been multiple scientific assessments of the issue from other scientific bodies, including the US National Academy of Sciences.²⁹ During these years, the science of climate change has become far more certain, both because the science has advanced and because the world has warmed dramatically in the last few years. Last summer, in anticipation of the G8 summit at which global warming was at the top of the agenda, the national science academies of 11 nations, including our own, delivered an unprecedented and unsolicited warning to world leaders:

Climate change is real. There will always be uncertainty in understanding a system as complex as the world's climate. However, there is **now strong evidence that significant global warming is occurring**. ... The scientific understanding of climate change is **now**

²⁴ Findings of Fact, Conclusions, Recommendations, and Memorandum, March 22, 1996, *In the Matter of the Quantification of Environmental Costs Pursuant to Laws of Minnesota, 1993, chapter 356, section 3*, Docket No. E-999/CI-93-583.

²⁵ *Id.*, pages 32-33.

²⁶ *Id.*, page 36.

²⁷ Order Updated Externality Values and Authorizing Comment Periods on CO₂, PM_{2.5}, and Application of Externality Values to Power Purchases, May 3, 2001, *In the Matter of the Quantification of Environmental Costs Pursuant to Laws of Minnesota, 1993, Chapter 356, Section 3*, Docket No. E-999/CI-93-1636.

²⁸ IPCC Third Assessment Report, Climate Change 2001.

²⁹ See, e.g., "Climate Change Science: An Analysis of Some Key Questions," 2001, National Academy of Sciences; and "Abrupt Climate Change: Inevitable Surprises," National Academy Press.

sufficiently clear to justify nations taking prompt action.... We urge all nations ... to take prompt action to reduce the causes of climate change ... We call on world leaders ... to [a]cknowledge that the threat of climate change is **clear and increasing**.³⁰

In short, the scientific uncertainty that convinced the PUC to adopt a cost value roughly ten times lower than the MPCA recommended in the mid-1990s has diminished considerably, rendering the PUC's externality value for CO₂ dangerously out of date. It would be violation of both the spirit and letter of the environmental review laws if such outdated values were interpreted to prevent the Department of Commerce from fulfilling its obligations under the environmental review laws to calculate using the latest available data the impact of this enormous energy project on this most serious of environmental problems.

We therefore urge the Department to include in its environmental review of the Big Stone II project an analysis of the costs imposed on society and the environment from the CO₂ emissions associated with this project. In its recent review of the cost-effectiveness of Minnesota's Conservation Improvement Program, the Office of the Legislative Auditor compared the PUC's externality values with values in the peer-reviewed literature (noting that the PUC's values are comparatively low).³¹ We recommend that the Department similarly review the peer-reviewed literature on externalities and values that may have been accepted recently in other jurisdictions, focusing primarily on those values that reflect the most complete and up-to-date science. The search is likely to reveal a range of values, and the most meaningful environmental review would be one that reflected that range, explaining the crucial assumptions reflected in each estimate (i.e., how recent the estimate and the underlying science is, what climate sensitivity was assumed, how far forward costs are calculated, what discount rate was used, what levels of emissions, stabilization, and warming were assumed, whether the risk of abrupt climate change was factored in, what assumptions were made regarding increased mortality and hurricane damage, etc.) It would be appropriate and helpful for the Department to identify the cost value it considers most reflective of actual risk, explaining why, but the larger range of estimates should also be included to help the Commission and public appreciate the importance of varying assumptions. Of course, if none of the published values adequately reflect the most recent scientific evidence of costs, the Department should calculate its own estimate of costs or adjust an existing estimate accordingly.

B. AS PART OF THE ALTERNATIVES ANALYSIS, THE EIS SHOULD EXAMINE THE LIKELIHOOD, COSTS AND MEANS OF COMPLYING WITH FUTURE CARBON REGULATION.

Governmental response to global warming is occurring worldwide. It is evident that future regulation of carbon emissions will occur in the United States, probably early in the life of the proposed Big Stone II plant, and the cost of meeting those carbon constraints will increase the

³⁰ This statement was issued by the US National Academy of Sciences and its counterpart academies in Brazil, Canada, China, France, Germany, India, Italy, Japan, Russia, and the United Kingdom. It is available online at the website of the US National Academies.

³¹ "Energy Conservation Improvement Program: Evaluation Report," Office of the Legislative Auditor, January 2005, page 32.

cost of the proposed plant.³² Such costs should be anticipated and factored into the decision making process, and should be examined and discussed in the EIS.

The costs of constructing and operating the proposed Big Stone II pulverized coal plant are relevant to several aspects of the regulatory permitting process, particularly in comparing the reasonableness and feasibility of alternatives. As noted above, Minn. Stat. §216B.243 Subd. 3a requires a comparison of the cost of the project with the cost of meeting need through renewable energy. In addition, the 2005 Minnesota legislature adopted new language emphasizing the importance of factoring future environmental regulations into the review of new energy facilities.

If the applicant is proposing a nonrenewable generating plant, [the commission shall evaluate] the applicant's assessment of the risk of environmental costs and regulation on that proposed facility over the expected useful life of the plant.³³

Future costs due to regulatory carbon constraints will increase the costs of the proposed Big Stone II plant, and will enhance the reasonableness of the alternatives to be studied in the EIS. These future costs must be evaluated in the EIS. We have proposed methods for conducting such analysis in our recent comments on Big Stone II utilities' pending resource plans.

C. THE EIS SHOULD EXAMINE THE EMISSION AND DEPOSITION OF MERCURY THAT WOULD BE CAUSED BY THE BIG STONE II PROJECT, AND WHETHER THE PROPOSED AIR QUALITY CONTROL EQUIPMENT IS THE MOST EFFECTIVE CONTROL EQUIPMENT FOR MERCURY REMOVAL.

Coal-fired power plants account for 46% of mercury emissions in Minnesota, and are the largest single source of the mercury pollution in the Upper Midwest.³⁴ The Big Stone II EIS should examine the emissions and deposition of mercury that would be caused by the Big Stone II project, and analyze the environmental, public health and educational cost impacts associated with mercury pollution.

Removal of mercury from the emissions of this coal plant, or prevention of mercury emissions through an alternative project scenario, is particularly important to Minnesota, located downwind from the Big Stone generation plants, given the economic size of Minnesota's tourism industry, and the importance to Minnesotans of recreational and subsistence fishing. Currently, the mercury levels in many Minnesota fish are so high that they cannot be eaten safely. Minnesota has listed over 1,400 waters as impaired by mercury contamination. This number is limited only

³² IWLA, ME3, UCS and MCEA have discussed this issue and the basis for such a conclusion in more depth in recent utility resource plan proceedings, including, most recently, Otter Tail Power's 2006-2020 Resource Plan, MPUC Doc. No. E017/RP05-968.

³³ See, Minn. Stat. §216B.243, subd. 3(12).

³⁴ See, MPCA, "Estimated Mercury Emissions in Minnesota for 1990, 1995, & 2000: March 2004 Update", available at <http://www.pca.state.mn.us/publications/reports/mercury-emissionsreport-0304.pdf>; and Izaak Walton League of America - Midwest Office 2000 Report, Mercury in the Upper Midwest, available on the web at www.iwla.org/reports/mercury.html.

by the amount of testing which has been done, since virtually every time mercury levels are tested in fish tissue, they are found to be excessive. The Minnesota Pollution Control Agency has estimated that about 10 percent of mercury deposited in Minnesota's waters is from in-state emissions.³⁵ As such, Minnesota is dependent on other states, particularly those which are up-wind from Minnesota, like South Dakota, to make the fish in Minnesota safe to eat.

The EIS should analyze mitigation measures that would reduce the proposed project's mercury emissions to the maximum achievable control level, and further, analyze the Big Stone II project's proposed mercury controls to determine whether the proposed project configuration could impede the effectiveness of the maximum achievable controls for mercury.

The Facility Siting Permit Application for the proposed Big Stone II plant filed with the South Dakota Public Utilities Commission states that a "fabric filter (baghouse) followed by a wet FGD [flue gas desulphurization] will be installed to control mercury (Hg) emissions."³⁶ These pollution controls may remove a portion of the mercury from the flue gases but are not solely installed to control mercury emissions. By contrast, the process that currently appears to accomplish the highest degree of mercury removal from exhaust gases of coal plants, is activated carbon injection. In the case of western, low-sulfur coals, the addition of halogens, such as iodine, chlorine or bromine, boosts the mercury removal effectiveness of activated carbon-injection. The activated carbon injection control technology has been demonstrated at multiple sites to achieve 80 to 90 percent mercury removal with western coal, and is commercially available today. Moreover, this technology can be readily adopted on existing coal-fired boilers.

In addition to looking at better control measures, the EIS should attempt to calculate the actual environmental impact of the mercury that will be released into the environment. There is no cost value adopted for mercury by the Commission, because when its externality values were adopted the Commission believed that the data was too uncertain to practicably quantify the value.³⁷ As with CO₂, however, in the years since, our understanding of mercury and the substantial dangers it poses has increased, and more estimates of its costs to society have been published. For instance, the Harvard Center for Risk Analysis recently estimated that the mercury removed from the atmosphere from the federal Clear Skies Initiative would be \$3.5 to \$5.2 billion annually.³⁸ The Department should therefore revisit the question of mercury environmental externalities, looking at the most recent science on the subject and reviewing the published literature and values that may be relied upon by other jurisdictions, or if necessary, calculating their own values based on the most recent science. The Department should present the best estimate that current science allows of the costs associated with each pound of mercury emitted (and the total

³⁵ Jackson, A. M., E. B. Swain, C. A. Andrews, and D. Rae. 2000. *Minnesota's Mercury Contamination Reduction Initiative*, Fuel Processing Technology 65-66 (2000):79-99.

³⁶ Big Stone II Facility Siting Permit Application, SDPUC Docket No. EL05-022, p. 14-15.

³⁷ Order Establishing Environmental Cost Values, January 3, 1997, *In the Matter of the Quantification of Environmental Costs Pursuant to Laws of Minnesota 1993, Chapter 256, section 3*, Docket No. E-999/CI-93-583.

³⁸ Glenn Rice and James K. Hammit, Harvard Center for Risk Analysis, *Economic Valuation of Human Health Benefits of Controlling Mercury Emission from U.S. Coal-Fired Power Plants*, Feb. 2005, available online at <http://bronze.nescaum.org/airtopics/mercury/rpt050315mercurvhealth.pdf>.

cost of all emissions over the lifetime of the Big Stone II project): As with CO₂, in addition to selecting a value it considers most representative of costs, it should also present the range of values published, along with a description of the essential assumptions underlying them, to illustrate the importance of various assumptions in these cost assessments.

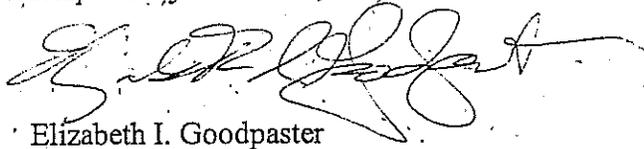
In connection with mercury emissions from the proposed project, the EIS should examine:

1. The amount of mercury that would be expected to be emitted from Big Stone I and II under the proposal, compared to the alternatives analyzed in the EIS.
2. The availability of activated carbon injection technology, or any other technologies, that can achieve the highest rates of mercury removal from a coal plant.
3. The fate of mercury emissions from this plant, and in particular, where and to what extent will it come to rest in Minnesota's or other wetlands, lakes or other water bodies.
4. Whether the feasibility of activated carbon injection is dependent upon the type of air pollution control equipment that is used, and in particular whether the proposed configuration for a wet flue gas desulphurization system will make the most effective mercury control technology unusable or less effective.
5. The extent to which the project proposers may benefit under new federal mercury regulations by achieving a high degree of mercury removal, resulting in potential salable credits.
6. Published estimates of the externality costs associated with mercury emissions into the atmosphere, on a dollar per pound basis.

CONCLUSION

In summary, Joint Intervenors submit that the scope of the EIS for the Big Stone II project must address all reasonable alternatives to both the proposed Big Stone II generation plant and transmission lines. As discussed in more detail herein, these alternatives include, but are not limited to, energy efficiency and conservation, a variety of wind power options, and "carbon capture ready" integrated coal gasification technology. The EIS must also provide analysis of the environmental impacts from the proposed project and alternatives, including but not limited to those impacts that will result from increased carbon dioxide and mercury emissions. Further, the future costs of carbon dioxide emissions regulation need to be considered in evaluating the relative costs of alternatives.

Respectfully submitted,



Elizabeth I. Goodpaster
Minnesota Center for Environmental Advocacy
26 E. Exchange Street, Suite 206
St. Paul, Minnesota 55101

Attorney for Minnesotans for an Energy-Efficient Economy, Izaak Walton League of America – Midwest Office, Union of Concerned Scientists, Wind on the Wires and Minnesota Center for Environmental Advocacy

Birkholz

FEB 13 2006

E017/TR-05-1275



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Comments of Don Groth 5420 135th St NW
 Kerkhoven, Mn 56252. We would live near the
 Wellmar Route I. We do not care to have the
 High line Proposal use that route. It would
 appear more sensible and economical to use
 either of the Morris Routes.

Thank you

Donald Groth
 1/27/06

Complete and turn in today, or mail or fax by February 13, 2006 to:

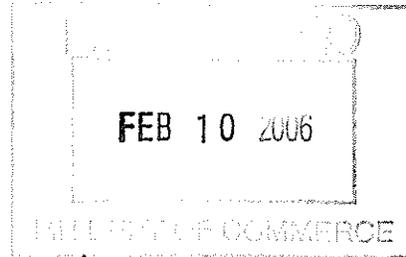
David Birkholz
 Energy Facility Permitting
 85 7th Place East, Suite 500
 Saint Paul, MN 55101-2198

Phone: 651.296.2878
 Fax: 651.297.7891

Email: david.birkholz@state.mn.us

E017/TR-05-1275

David A. Craigmile
3600 140th St.
Boyd, MN 56218
February 9, 2006



E017 | TR-05-1275

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz:

As a long time resident and taxpayer of Western Minnesota I am writing you to relay my opinion regarding the proposed Big Stone II power plant and transmission lines. A series of events following your January 26 public meeting in Granite Falls also served to enforce my concerns and opinion. In the recent State Of The Union address President Bush talked of the dire need for this country to replace fossil fuels with alternative renewable energy. The very next day President Bush visited Minnesota and 3M Company where he cited the fine example 3M Company is in developing advanced technology that is useful for developing and applying alternative energy for everyday public use. And several days later the Minnesota Department of Commerce announced that a new and updated study on potential wind energy in Minnesota showed significant more potential than an earlier study had....that is wind speeds at 80 meters were more stable and more significant than had previously been expected. And on a more negative note I attended a MPCA Impaired Waters meeting in Marshall on February 6 where more Western Minnesota waters were shown listed for mercury impairment and fish consumption advisories. As a Lac qui Parle / Yellow Bank watershed district manger I am aware and concerned that even our Del Clark Reservoir and Recreation Area which was constructed in 1985 has mercury impaired waters with a fish consumption advisory for walleyes of one meal per month.

I am well aware that electricity has the potential to be one of our cleaner and more efficient energy sources in everything from heat pumps to hybrid cars. I am also aware that wind is an intermittent energy source at any one geographic setting but that a distributed regional wind network can capture the wind events as they cross our country from West to East. Of course this wind generated electrical power must be transmitted and paired with more stable output conventional generation infrastructure. Thus I see that both Conventional and Alternative energy producers NEED each other to provide for the publics energy needs now and into the future. The proposed Big Stone II project leaves alternative energy sources out and does not in reality consider them.....that is completely unacceptable! It is also unacceptable that the Ottertail People at least appear to show NO interest, concern or intent in building a new coal fired plant that uses the very latest technologies to reduce mercury and other emissions to acceptable minimum levels.

As a Planning and Zoning commissioner for our county I do not look at necessarily stopping projects that may come before us....but instead requiring those projects to meet certain criteria and provide for the overall public good on into the future. I would urge the Minnesota Public Utilities commission to the do the same with the proposed Big Stone II project! Remember this is the new millennium, 2006, and we are looking to the future and not back to 1906!

Sincerely,

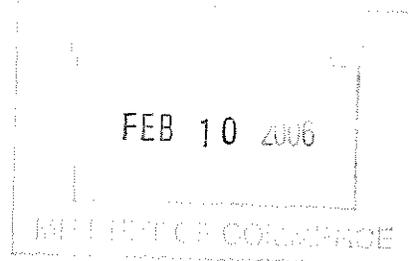
A handwritten signature in black ink, appearing to read "D. Craigmile". The signature is stylized with a large initial "D" and a long horizontal stroke extending to the right.

David A. Craigmile

E017/TR-05-1275

February 9, 2006

E017/TR-05-
1275



David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Dear Mr. Birkholz,

I have been following the controversy regarding the proposed coal fired power plant (Big Stone II) near Milbank, SD and am writing to express my concerns about approving such a project.

I am a commercial lender at KleinBank in Montevideo and as such am very interested in seeing business and industry growth and expansion. It is critical to the economy of our state Minnesota to work toward that end.

However, this does not seem a wise or prudent use of our dollars. Minnesota has taken steps in recent years to add ethanol to our gas, research and utilize renewable energy and improve the standards for reducing the pollutants we allow in our water and air.

While positive steps are being taken to increase our renewable energy usage and in turn improve our economy with increased jobs and commerce, it seems we would be taking a big step backward by building this power plant, particularly when there are no assurances that the additional capacity included in the transmission lines have any reserve for renewable energy sources.

Our Minnesota Governor, Mr. Pawlenty, and President Bush have both stated recently that "we are addicted to fossil fuels". They also indicate changes must be made. When we have so many other options and opportunities in western Minnesota, options that also provide additional jobs and economic growth, why would we choose to build this coal fired plant?

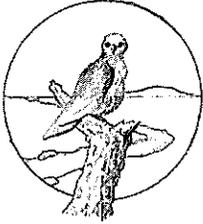
It is disturbing to me to know that the land of 10,000 lakes has so many impaired lakes and waterways due to mercury poisoning, that it is either unsafe to eat fish from those lakes and waterways or we are warned to drastically limit consumption. Is that what we want on our tourism ads?

We need to be looking to a future with less pollution and where health and cleaner air and water takes a higher priority. We have better choices and I urge you to deny the Certificate of Need for this coal fired plant.

Sincerely,

Handwritten signature of Kathy A. Thalberg.

Kathy A. Thalberg
213 N 6th Street
Montevideo, MN 56265



HAWK CREEK WATERSHED PROJECT

Renville County Courthouse, Lower Level
500 East DePue Avenue
Olivia, MN 56277
Phone: 320-523-3666
Fax: 320-523-3668

E017/TR-05-1275

E017/TR-05-1275

February 8, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

RE: Otter Tail Power Plant

Dear Mr. Birkholz:

I've recently learned about the Otter Tail Power Company's effort to build a new coal-fired plant near Milbank, South Dakota. I certainly appreciate the effort to evolve by keeping up with the energy demands of the public and industries in need. I am, however, extremely concerned about the ways in which we choose to evolve. As research and development for renewable energy also "evolves", the facts regarding wind energy benefits are too beneficial to not pursue with more than casual discussion. Studies prove that coal fired power plants are not environmentally friendly. Updates, such as scrubbers, are an option but not considered a wise solution.

Hawk Creek is impaired for Mercury as well as three recreational lakes in the watershed. One of the sources of the Mercury is the Big Stone Facility. Tying up transmission line will seriously hinder if not halt further research into wind energy.

On behalf of the citizens of the Hawk Creek Watershed and those who visit, I urge you to relay these concerns to the Public Utilities Commission. Economically and environmentally, the proposed new plant is not needed.

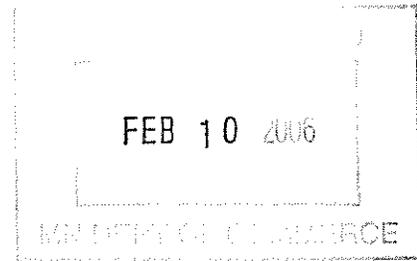
Sincerely,

Loren Engelby, Coordinator
Hawk Creek Watershed Project



E017/TR-05-1275

February 10, 2006



David Birkholz
Minnesota Department of Commerce

E017/TR-05-1275

I am an educator of students who have chronic and long term Physical and Health Disabilities in Southwest Minnesota. I'm writing to share my significant concerns regarding the issues surrounding the Big Stone Transmission Project. Please take a moment to thoughtfully consider the information presented in this letter. Upon doing so I hope you will understand my reasons for suggesting that the transmission requested is not needed. In addition, the Big Stone II power plant is not needed or in our best interest.

From the perspective of mercury contamination, this project gives new meaning to the term catch and release. Sadly enough the effects of mercury contamination does not stop with fish. You probably already know the Big Stone I plant emits 189 pounds of mercury per year. The impact on the human species does not go unnoticed (neurological damage, liver failure, reduced intellectual functioning, kidney damage, etc.) For some reason mercury estimates for the new plant have not been revealed. Given the seriousness of this decision, such information is essential to inform the public as well as policy makers.

Even President Bush is beginning to acknowledge the need to address global warming and its relationship to our dependency on carbon based fuels. It is important to know that the Big Stone II plant does not meet his call for zero emissions for new coal plants. Along with the mercury emissions come sulfur dioxides, nitrogen oxides, and lead, all which pose well documented public health risks.

Wind can be a wonderful ally, but not when we send coal emissions into the air. Even the so called "state of the art" scrubbers do not solve the problems created by burning coal. With a second coal burning plant going on line, it compounds the problems of burning a fuel with a 33-36% efficiency rate. With coal trains projected to deliver each day, it is sad to have a situation where a low efficiency rate equals one in three coal trains to obtain the desired energy. It is astounding that the regulatory process would even consider approving any part of a project with such a low energy return, high pollution, and negative health impacts. Surely we can do better.

How can we stop this runaway train and still meet our energy needs? Protect and advocate for safe and viable options that include wind energy. Instead of sending billions of MN dollars out of state for energy, we can produce the energy here. Data from the Environmental Law and Policy Center, indicates that actively pursuing renewable energy would create more than 200,000 new jobs in the Midwest. Creating 22 direct and indirect construction and manufacturing jobs for each megawatt of installed capacity is quite impressive. The Big Stone II plant with its dedicated transmission lines will interfere with wiser investments that include wind and other safe renewable forms of energy production.

It has been said that we are at a crossroads in relation to climate change. Actually many citizens and people in the scientific community understand we have been going down the wrong road for quite some time. The negative impact on climate and health is well documented and accumulating. Approving the coal based projects will make development of safer alternatives such as wind energy, far more difficult at a time when we urgently need to change direction. We desperately need people in positions such as yours to help steer us back to a safer and more prosperous future by saying no to coal derived energy. Doing so will allow our state to invest in cleaner, safer, and more profitable energy development that includes wind.

Sincerely,

Darwin Dyce
1764 330th St.
Ghent, MN 56239

E017/TR-05-1275

Clean Water Action Alliance of Minnesota
308 East Hennepin Avenue
Minneapolis, MN 55414
612-623-3666

February 13, 2006

Sharon Ferguson
Docket Manager
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

FEB 13 2006

RE: Docket Numbers E-017/TR-05-1275 and E-017/CN-05-619 – In the Matter of the Application for a Certificate of Need and a Route Permit for Two New High Voltage Transmission Lines in Western Minnesota (Big Stone Transmission Project)

Ms. Ferguson:

On behalf of the more than 60,000 members of Clean Water Action Alliance of Minnesota, I appreciate the opportunity to comment on the Big Stone II coal plant and transmission project, including the scope of the Environmental Impact Statement (EIS), which will address both the need-related and route-related alternatives. Since this coal plant could produce adverse health, environmental, and economic impacts for more than forty years, this proposal must be analyzed carefully. The scope of the EIS review should include the power plant, the transmission lines and all associated infrastructure, including new roads and impacts on rail traffic.

When completing the environmental review of Big Stone II, please consider the following in the scope of the Environmental Impact Statement:

1. Costs on ratepayers and residents associated with increased healthcare, environmental, and economic costs from the impacts of air pollution.
2. Financial risk and environmental regulation risk to ratepayers if the spot market sales outlined in Otter Tail Power Company's Resource Plan do not materialize.
3. Impact of air pollution on the health of surrounding communities, including the effects from: global warming gases, ozone precursors that contribute to regional haze, and particulate matter.
4. Impact of mercury contamination on the health and economic well-being of surrounding communities, especially since most of the lakes in the region already have fish consumption advisories for mercury.
5. Costs on ratepayers and citizens of future carbon regulations to reduce global warming gases.
6. Effectiveness rates of various mercury control technologies.
7. Environmental, health, and economic impacts of the disposal of coal ash waste.

8. Environmental and health impacts of coal dust from increased coal handling operations at the plant.
9. Analysis of the adverse impacts from increased road and rail traffic, including increased vehicle and train emissions.
10. Thorough analysis of the plant's impact on water quality, including the impact on fish and the aquatic ecosystems of nearby Big Stone Lake and the Minnesota River.
 - a. Thermal pollution will be a critical issue at Big Stone Lake, which is an important walleye fishery. Thermal pollution at low flow should be assessed down the line to at least Lac qui Parle.
 - b. The Minnesota River flow can already be quite low to non-existent at the Big Stone Dam. Restoration of the Whetstone River to below the Big Stone Dam at Ortonville should be considered as mitigation if appropriations affect lake levels.
 - c. Low flows will impact the Big Stone National Wildlife Refuge at Odessa, Marsh Lake, and Lac qui Parle Lake in the Lac qui Parle Wildlife Management Area. These are critical and outstanding resources. The MN Department of Natural Resources, U.S. Army Corps of Engineers, and U.S. Fish and Wildlife Service have been working to figure out how to integrate management of flows in these systems. Taking water out at low flow will impact all these systems.
 - d. If the plant plans to use groundwater, studies should be undertaken to determine if the aquifers can provide the needed volumes of water.
 - e. What are the implications for the Minnesota River system if the plant takes groundwater and discharges during high flow periods into the river? The river already suffers from altered hydrology.
11. Economic impact on the Big Stone Lake area, including the ability of the area to continue to attract sportspeople, hunters, birders, and outdoor enthusiasts.
12. Impacts on state and federal endangered and threatened plants and animals from deposition of coal plant emissions, including nitrogen, sulfur dioxide, mercury, and other pollutants.
13. Impacts on state and national parks and other special natural and cultural resource areas in the region, including Minnesota Class I areas of the Boundary Water Canoe Area Wilderness and Voyageurs National Park.
14. Cumulative impacts from the existing coal plant, a new one, and any other pollution sources in the area.
15. Radioactive emissions from burning coal, which contains trace amounts of radionuclides.
16. Environmental and health impacts due to upgrading existing transmission lines and building new ones.
 - a. Transmission upgrades can lead to the taking of property and the loss of, or damage to, habitat.
 - b. One of the preferred routes for an upgraded transmission line (the "Morris" line) would go through a waterfowl production area. Although there is currently an existing transmission line in that area, what would be

the impacts related to upgrading the line? How long and to what extent will waterfowl habitat be disturbed?

17. Alternatives to a coal-burning power plant:

- a. No-build option for the coal plant and the transmission lines. Minnesota's projected energy needs might be able to be met with Demand Side Management and through the vast Midwest windshed that can provide clean wind power.
 - i. As stated in the Department's comments on the Otter Tail Power Company's 2006-2020 Resource Plan, much of Big Stone II's output actually serves the spot market and not OTP ratepayers. According to the Department, "it is not reasonable to conclude that retail customers need the Big Stone II resource in the manner planned by OTP. The size is too big, the timing is too soon, and the type may not be appropriate. Therefore, the Department concludes that OTP has not shown that the decision to add Big Stone II is least-cost in terms of the size, type, and timing of the addition for purposes of serving retail load." (Public Comments of the Minnesota Department of Commerce on Otter Tail Power Company's 2006-2020 Resource Plan, January 3, 2006)
- b. Integrated Resource Plan that utilizes the region's wind and biomass potential, as well as conservation and energy efficiency measures. This is especially important in light of the fact that the MN Department of Commerce recommended in January 2006 that Otter Tail Power Company's 2006-2020 Resource Plan be rejected until the Company updates the plan based on the Department's recommendations.
 - i. The Department concluded that it was unreasonable for OTP to refuse "to consider the addition of peaking units that may be needed to balance additional wind resources." The Department went on to say that OTP's Resource Plan "prevents renewable resources from competing to meet that need both directly and indirectly." (Public Comments of the Minnesota Department of Commerce on Otter Tail Power Company's 2006-2020 Resource Plan, January 3, 2006)
- c. Wind with natural gas or biomass.
- d. When considering the alternatives, please analyze the following:
 - i. Economic development opportunities and health benefits of wind.
 - ii. Real costs of a new coal plant versus a wind project.
 - iii. Ability of wind projects to more adequately meet growing electricity needs, since wind can be ramped up more quickly and can be installed in phases as needed. The Big Stone II coal plant and corresponding transmission lines is expected to come online by the year 2011. Smaller, renewable projects can be created faster within that time frame, and producing clean energy that is good for local economies.
 - iv. Cost of burning biomass versus coal.

Since the proposed plant is expected to operate for at least forty years, the true consequences of its pollution potential must be examined. And because the region has such amazing renewable energy potential, the EIS must show conclusively that building a new coal plant is really less costly, in health, environmental, and economic terms, than developing wind and biomass resources.

Due to MISO requirements, small wind developers in Western Minnesota (those living in the communities that would be directly affected by new lines) will not have access to the lines to be wind, solar, or biomass power providers. Building a new coal plant, and new transmission lines with primarily coal plants in the queue, creates a serious long term obstacle to economic opportunity in struggling agricultural regions that can take advantage of clean and efficient wind, solar, and biomass power.

Minnesota is already the nation's number one importer of electric power. The environmental and health costs of coal, in addition to the rising cost of fossil fuels, does not make new transmission lines for coal a wise choice. These costs would further hinder Minnesota from expanding its economic potential by investing in clean, renewable technology that matters to the communities that would be affected by these lines. Before another coal plant is built in the region, the public health and economic development benefits of renewable energy options must be considered.

Thank you for the opportunity to comment.

Erin Jordahl-Redlin
Energy Campaign Coordinator
Clean Water Action Alliance of MN

Cc: David Birkholz

David Birkholz

E017/TR-05-1275

From: tom kalahar [kalahar@Yahoo.com]
Sent: Monday, February 13, 2006 3:24 PM
To: David.Birkholz@state.mn.us
Subject: Big Stone II Power Plant

Attachments: 1263826676-February 13, Big Stone II.doc

FEB 13 2006



February 13, Big
Stone II.doc...

Project comments.

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February 13, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN. 55101-2198

Dear Mr. Birkholz,

I am contacting you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. The proposed project is "Old School" coal technology as it will be designed to operate using pulverized coal. Under this technology there is no feasible way to capture the massive carbon dioxide emissions before they are released to the atmosphere. Why anyone would build a plant such as this, in this day and age, knowing what we now know about global warming and climate change is beyond me.

From what I understand under South Dakota law the co-owners must demonstrate that the project will not pose a threat of serious injury to the environment or the social economic conditions in the area. This plant surely cannot do that. Coal burning power plants emit roughly 50 tons of mercury into our environment each year. From what I understand one teaspoon of mercury is enough to poison a fifty acre lake so that the fish cannot be safely eaten. I understand that the current Big Stone Plant is emitting at least 189 pounds of mercury per year. How can the Public Utilities Commission issue a permit to the Big Stone II project knowing this?

This proposal takes us in the wrong direction; it moves us further away from renewable energy solutions and keeps us in a dangerous dependency on fossil fuels. There are many renewable energy options available and all need to be considered in place of this archaic proposal. It is time that we think of more than just the bottom line and add the effects to the environment and people into the decision making process.

Sincerely,

Tom Kalahar
Conservation Technician
Renville County Soil and Water Conservation District
1008 W. Lincoln, Ave.
Olivia, MN. 56277
320-523-1559

E017/TR-05-1275

David Birkholz

From: Duane Ninneman [cure-dd@info-link.net]
Sent: Monday, February 13, 2006 5:29 PM
To: David.Birkholz@state.mn.us
Cc: cure-dd@info-link.net
Subject: EIS Scope Big Stone II Transmission
Attachments: Letter to DOC Birkholz.doc

FEB 13 2006

Dear David,

I've attached a formal letter for you to use as part of your scoping process.

I appreciate the way you conducted the meetings here in Western Minnesota on a topic that will surely be contentious in the coming year. If I can assist in any way, please feel free to contact me.

Duane Ninneman
1-320-808-3101

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

February 13, 2006

Dear Mr. Birkholz,

I am writing to urge you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. **It is my contention that the transmission requested is not needed because the new Big Stone II power plant is not needed.**

Economics and Renewable Energy

The potential economic benefits of meeting our future energy needs through a combination of real conservation and integrated renewable energy development are **available to us now**. Minnesota is currently America's largest consumer of energy imported from outside the country, primarily from Manitoba Hydro. In addition, 75% of our energy already comes from coal paid for with more than \$6 billion Minnesota dollars which leave our state. There are many renewable energy options available, the most obvious being wind.

Wind is tried and tested. It may be the cheapest new power available and wind is abundant over much of Minnesota. A recent article in the *Star Tribune* (February 1, 2006) states that we can rely on data collected from our own Department of Commerce where **Mike Bull cites the potential for wind energy to benefit rural economies the way that ethanol plants have.** Instead of sending our money out of Minnesota to support our growing electricity appetite (estimated at more than \$13 billion spent on energy here) we should support the public's desire for renewable energy investment (estimated at 89% of Minnesotans) within our own state.

Investment in clean energy makes sense. According to data from the Environmental Law and Policy Center, advancing renewable energy production would create more than 200,000 new jobs in the Midwest region by 2020. **In fact, wind power alone would create 22 direct and indirect construction and manufacturing jobs for each megawatt of installed capacity.** Your own Department of Commerce statistics will attest to the fact that there is no greater need for sustainable economic development than in the counties of Western Minnesota, and for that matter, in the entire wind belt of Minnesota.

Minnesota can lead the nation in reducing Mercury and Harvesting Wind. Along with the dramatically rising costs of health care, a future scenario of costly and dirty

energy is waiting to smother the next generation of Minnesotans. Natural gas prices have increased four fold in a very short period of time. Crude was near \$70 a barrel this week and even **coal has increased about 50% in about the last two years.** But in Minnesota we have what all other states will envy: We have the brain power and the public will to invest in and benefit from the many renewable energy opportunities on the horizon.

Unlike the commodities of the fossil fuel world, installed wind delivers a reliable energy product at a fixed price usually over a twenty year contract. It is no accident that the **Southwest Minnesota Foundation** has branded their region “*the renewable energy marketplace.*” Let us invest in ourselves, our own communities, in our own future. Renewable energy is that opportunity.

Five Minnesota Utilities have chosen to go across the border, outside of Minnesota regulatory control, and against the will of their own customers to meet perceived future energy needs. Power generated in South Dakota may provide short term economic benefits to that state, but what are the benefits to Minnesota other than more Pollution and inaccessible Power lines? Instead of standing by while the entrenched utilities in Minnesota resist the public desire to rethink energy as a way to sustain our communities and our environment, our citizens and leaders must create a long range vision for Minnesota. **We need to shape a vision that delivers clean energy within our borders, to the benefit of the consumers being served, without the pollution from coal being delivered back to us at the same time.**

Environmental Impacts

In Western Minnesota we can stand on the eastern shore of Big Stone Lake and watch the existing Big Stone Plant in action, burning a train load of lignite every other day, sending a plume of pollution on the northwest wind right into the Minnesota River Valley. In the summer, southwesterly winds deliver that brown plume to the central lakes of Minnesota. After Big Stone II is built, a train load of lignite per day, paid for almost totally with Minnesota consumer dollars, will be burned at an appallingly low efficiency (33% -36% converted to power, only one train car in three becoming electricity) and the pollutants delivered to our state will be enormous and unacceptable.

According to Governor Pawlenty: “**The basic fact is we are still as a country horribly addicted to fossil fuel in its various forms**” Speaking at the University of Minnesota Initiative for Renewable Energy and the Environment (IREE), Governor Pawlenty stated that “our country is not giving its best with respect to energy policy, and we haven’t for some time.” The governor also warned, “...if we continue to use fossil fuel at the rate and pace and scope that we are with the level of technology and emissions, it’s a major environmental problem.”

Minnesota waters are compromised by mercury coming to us from outside our state. The Minnesota Pollution Control Agency (MPCA) works to test and monitor Minnesota’s lakes and rivers. Several western Minnesota lakes and rivers have been recently added to the MPCA’s impaired waters list. About two-thirds of the waters on

the current list contain enough mercury to warrant Department of Health fish consumption restrictions. Since coal fired power plants deliver most of that mercury to our waters from plants outside our borders, how can we consider adding potentially more mercury to the mix from Big Stone II when we aren't adequately addressing the 189 pounds per year that are already being produced by the Big Stone I Plant?

Minnesotans need stronger protection from mercury pollution. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants. The technology exists to reduce these emissions. The Minnesota Environmental Partnership is asking our policy makers to reduce mercury from coal-burning power plants by 90% in the next five years. Our neighboring states to the south and east that receive much of these toxins are demanding us to act also. If we accomplished this goal, the expected output of mercury from the Big Stone I and II Plants would exceed the total mercury emissions produced from coal over the entire state. The people of Western Minnesota watch this mercury conveyor delivering this poison into Minnesota every day. We don't want any more.

As citizens of the world Minnesotans must take steps now to reduce Greenhouse Gas emissions in order to reverse catastrophic climate change. Most of the industrialized world sees the wolf at the door in the form of **Minnesota can lead the nation in reducing Mercury and Harvesting Wind.** Along with the dramatically rising costs of health care, a future scenario of costly and dirty energy is waiting to smother the next generation of Minnesotans. Natural gas prices have increased four fold in a very short period of time. Crude was near \$70 a barrel this week and even **coal has increased about 50% in about the last two years.** But in Minnesota we have what all other states will envy: We have the brain power and the public will to invest in and benefit from the many renewable energy opportunities on the horizon.

As citizens of the world Minnesotans must take steps now to reduce Greenhouse Gas emissions in order to reverse catastrophic climate change. Most of the industrialized world sees the wolf at the door in the form of global warming, but America still refuses to acknowledge the danger. Minnesota needs to buck the current national trend and own up to the fact that half of the greenhouse gases contributing to climate change come from coal-fired power plants. For decades to come, Big Stone I and II will spew literally millions of tons of CO₂ into the atmosphere. How can we, in good conscience, knowing what we know about global warming alone, proceed with plans to build this plant?

Minnesota can deliver its energy future on the wind and with other renewable energy options. Wind generated electricity with no air emissions; no fuel to mine, transport, or store; no cooling water; no water pollution; and no wastes. An integrated approach to renewable energy will include bio-fuels, energy from consumer and industrial wastes, gas from manure and field waste, storing wind as compressed air, solar energy, and perhaps the most exciting opportunity; wind to hydrogen for electricity, cars, and fertilizer. Research projects to demonstrate how this is possible are currently being

conducted at the University of Minnesota Morris. A broader vision for Minnesota integrates a renewable energy plan in a way that mitigates other problems that face us at the same time. **The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota while compromising the health of our people and environment.**

Public Health and Children

Coal-burning power plants spew roughly 50 tons of mercury into our environment each year, according to the *Waterkeeper Alliance*. This research group also notes that just one teaspoon of mercury is enough to poison a fifty acre lake so that the fish cannot be safely eaten. We know that the current Big Stone I Plant is emitting at least 189 pounds of mercury per year. The popular fishing destinations of Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters by the MPCA. What is the Public Utilities Commission going to do to address this public health problem if not to deny the Certificate of Need to Big Stone II?

Human beings exposed to Mercury face a grim inventory of terrible illnesses (again, according to the *Waterkeeper Alliance*) including neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Tiny exposures of this toxin to pregnant women can cause mental retardation and permanent IQ loss in their children.

According to the Environmental Protection Agency (EPA), one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for these diseases. Minnesota follows this statistical pattern. With alternatives for clean energy production available now, why would our state allow our utility companies to continue to produce poisonous emissions?

The real future of our state and the sustainability of our communities depend on a healthy population. In President Bush's State of the Union address this year, he not only touted the bright future of renewable energy, but he called for more coal-burning power plants to be built with **zero emissions**. The Big Stone II plant does not meet this criteria. *The citizens of Minnesota should settle for nothing less.* The mercury, sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health), nitrogen oxides (a powerful lung irritant in the form of smog) and lead emitting from the current configuration of this Power Plant are not acceptable public health risks.

Negative Impacts on Recreation and Tourism Economy

The Upper Minnesota River Watershed is experiencing a resurgence of biological integrity due to millions of dollars of state and federal investment through the Conservation Reserve Enhancement Program (CREP). As a result of this return of wildlife to the region a nascent tourism and recreation economy is emerging. The new Big Stone II power plant threatens to derail this new form of badly needed sustainable economic development in this region.

Outdoor recreation is a \$9 billion dollar industry in Minnesota. The proposed Big Stone II power plant and other proposed plants in the Dakotas threaten this industry by threatening our rivers and lakes with mercury pollution.

The Minnesota Department of Natural Resources is putting the finishing touches on a master plan for the Minnesota River Trail — a recreational trail from Ortonville to LeSuer. How will the use of this trail be affected by the emissions from the Big Stone I & II plants? How many people will want to use a trail that follows the shadow of the plume from these plants?

Most Sincerely,

**Duane Ninneman
Renewable Energy Consultant & Development Director
Clean UP the River Environment
114 South 1st Street West
Montevideo, MN 56265
1-877-269-2873**

E017/TR-05-1275

David Birkholz

From: Julia Frost Nerbonne [jnerbonne@hecua.org]**Sent:** Monday, February 13, 2006 9:27 PM**To:** David.Birkholz@state.mn.us**Subject:** Big Stone Transmission Project

FEB 13 2006

February 13, 2006

Dear David -

I am writing because I understand this is the last day for public comments regarding concerns about the Big Stone Transmission Project. I am the director of an Environmental Sustainability program, and the parent of a 3 year old boy. *I believe that the transmission requested is not needed because I believe that the power plant is should not be built* for the following reasons:

- 1) It is unjust for Americans to be contributing an unequal amount to global CO2 levels. Future generations may suffer in unknown ways from global climate change.
- 2) Coal burning plants are the largest source of mercury in our lakes and rivers. It is a known developmental toxin. We should choose alternative sources for electricity even if we have to pay more.

I am strongly opposed investing in such an old-fashioned and harmful technology.

Thank You for your time and please feel free to contact me with questions.

Julia Frost Nerbonne

Julia Frost Nerbonne, Ph.D.
Environmental Sustainability Program Director
Higher Education Consortium for Urban Affairs
2233 University Ave. West, Suite 210
St. Paul, MN 55114
651-287-3308 (office)
612-721-4009 (home office)
jnerbonne@hecua.org

Learn more about the Environmental Sustainability program at:
http://www.hecua.org/es_mn.html

E017/TR-05-1275

David Birkholz

From: Bruce and Coleen Hoium [bnchoium@frontiernet.net]**Sent:** Sunday, February 12, 2006 6:32 PM**To:** David.Birkholz@state.mn.us**Subject:** Power Plant

I am writing from Madison, MN. Last week as my wife was returning from Watertown, SD, she questioned a brown streak in the sky to the north, wondering what it was. After reading an editorial in our local newspaper on the expansion of the Big Stone Ottetail Power Plant, we learned what it was plus more information that we find very frustrating. We are writing to you as our representative to act on our behalf. Our state has invested many dollars on our natural resources only to allow our neighboring state to heavily pollute our air and water. We need to encourage environmentally friendly energy sources to be able to develop. Studies which have been funded by tax dollars have shown the pollution levels which are dangerous. Don't ignore those findings when making decisions on our behalf. In Lac qui Parle County, we value our sports in fishing and wildlife. We have our sports stadium in nature and it is being ruined. We value our health and wonder if it too will be compromised. Please keep our best interest in mind when you make decisions. We value our lives and our lifestyle.

Bruce Hoium
516 4th Ave
Madison MN

FEB 13 4:00 PM

David Birkholz

E017/TR-05-1275

From: Don Buesing [donbuesing@yahoo.com]
Sent: Monday, February 13, 2006 9:27 PM
To: David.Birkholz@state.mn.us
Subject: EIS Scope

FEB 13 2006

Dear Mr. Birkholz:

I am writing you out of concern of the Transmission routes between the Big Stone project to Granite Falls. I own and rent farmland that is already affected by the existing 230KV line and I own and rent farmland on the proposed new line route.

I would prefer to leave the route as it is and update it to 345KV. I see no advantage to moving the line as it would be more of a deterrent to our farming operations for a very longtime. Thank-you. Don Buesing 320-564-4598

Brings words and photos together (easily) with
PhotoMail - it's free and works with Yahoo! Mail.

David Birkholz

From: shirley mueller [srsmueller2002@yahoo.com]
Sent: Thursday, February 09, 2006 5:45 PM
To: Aaron Peterson; sen.gary.kubly@senate.mn; David.Birkholz@state.mn.us
Subject: Otter Tail Big Stone Power Plant

I am writing to ask you to NOT support the building of the Big Stone Otter Tail Power Plant and NOT ALLOW them to place two new power lines in Minnesota. We need to reduce coal-burning plants to reduce mercury emissions into our environment. A retiree from the U.S. Fish and Wildlife Service has said that one teaspoon of mercury is sufficient to make all the fish in a 50 acre lake too poisonous to eat. Mercury accumulates in the human body causing neurologic damages in children especially. We need to move to wind and solar energy and renewable energy and quit using more coal. We need to move toward using the sun's energy first as it is abundant. Please know that I strongly oppose the building of the Big Stone Otter Tail Power Plant and spreading its energy and emissions into Minnesota or wherever they spread them.
Please do what you can to stop it. Thank you. Sr.
Shirley Mueller

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FEB 13 2006

From: Jill Nelson [jillynnnelson@earthlink.net]
Sent: Saturday, February 11, 2006 2:21 PM
To: David.Birkholz@state.mn.us; sen.gary.kubly@senate.mn; rep.aaron.peterson@house.mn;
Tim.Pawlenty@state.mn.us
Subject: Mecury in our water!!

I am writing in hopes that one of you can do something about the Mecury in MN lakes and rivers!!! With all of the knowledge we have about what is poluting our water, I hope that we can put laws in place to stop it!!! Please do something to stop this and allow cleaner and smarter engery production - wind and solar energy - This is the future and they need your help!!!!!!!

Thank you very much!

Jill Nelson

FEB 13 2006

E017/TR-05-1275

David Birkholz

From: Timmy Bothun [timmyj@maxminn.com]
Sent: Sunday, February 12, 2006 4:00 PM
To: David.Birkholz@state.mn.us
Cc: sen.gary.kubly@senate.mn; rep.aaron.peterson@house.mn
Subject: Mercury in MN fish, powerlines

Sunday, 2/12/06

Gentlemen:

I've never sent an email to people I don't know before, but this is a very important subject to my family. As I write this, my husband and Grandson are out ice fishing on Lac qui Parle Lake, on this bitter cold Sunday afternoon. This is the lake closest to us in Montevideo, so we've used it a lot over the years. The thought of mercury pollution is very scary to us! Please consider saving our lakes for future families like ours who love them. Power is essential, but wind and solar are good future options. Please decide against Otter Tail this time.

Sincerely,
Mrs. Wayne Bothun
3055 70th St SW
Montevideo, MN 56265

FEB 13 2006

David Birkholz

E017/TR-05-1275

From: Mary Louise Gillespie [alotaibi@batelco.com.bh]
Sent: Monday, February 06, 2006 10:29 PM
To: David.Birkholz@state.mn.us
Subject: Big Stone power plants

David Birkholz,

I'd like to voice my objection to any more coal fired power plants in the Big Stone area. The watershed should be protected from any additional pollution. This is an opportunity to be a leader in the area of wind and other renewable energy!

Mary Gillespie

Granite Falls, MN

Visit my wonderful old octagon house www.holthouse.org

David Birkholz

From: jhegland@MAC.COM
Sent: Monday, February 06, 2006 3:20 PM
To: David.Birkholz@state.mn.us

Dear David:

Please do all you can to stop the construction of the proposed expansion of the Big Stone City, SD Otter Tail power plant.

Jonathon Hegland

LQP County

FEB 13 2006

FEB 13 2000

EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Docket No:
E-017 / CN-05-619

From: Linda Schmidt
42176 Co. Hwy 36
Correll, MN 56227
320-273-2390

RE: Certificate of Need from the Seven utilities.

The drive-by view in the vicinity of the plant is an eye sore seen for miles pumping toxic chemicals into our area. Most serious is the chemical mercury. TAKE a drive out here during the morning hours & for about 50-75 miles you can see a brown streak in the sky (the direction of whichever the wind is blowing that day). The Big Stone plant has been in operation for about 25 years constantly spewing toxic waste into the air. A short while ago area residents were advised NOT to eat fish from area lakes more than one to two times per month because of high levels of mercury contamination. Do we need more contamination with another plant?

Already, we have an ethanol plant that has been erected right next to the power plant. Perception is that they co-exist using left over steam & water from the power plant. In reality, with the additional ethanol plant pollution, this area is becoming polluted at an alarming rate. To add another

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Page 2

Linda Schmidt
43176 Co Hwy 36
Correll, MN 56227

Certificate of Need

plant at the present site will only increase the problems. Another plant may even draw more industrial activity with more pollution. As a state (Minnesota) we want to put the plants in someone else's backyard (South Dakota) & let them deal with the pollution while we receive the benefit... electrical power.

In my opinion, I believe the Seven power plants have gotten together to request a "need" that really isn't essentially there. Since we have a capitalistic entrepreneurial society, if there was truly a distinct "need" for additional power, ONE company (NOT seven "for comfort") would be stepping up to the plate to deliver that need... for profit, of course. If the need really isn't there, then everyone in the group doesn't suffer too much by owning a power plant together.

Sincerely,

Linda Schmidt

E017/TR-05-1275

David Birkholz

From: Jon Boese [jboese@fedtel.net]
Sent: Monday, January 30, 2006 1:20 PM
To: David.Birkholz@state.mn.us
Subject: Big Stone Transmission Project

FEB 13 2006

Re: Big Stone Power Plant expansion and Transmission line construction.

I have some objections to the routing of the Willmar Corridor line. I live in sec 24 Moyer Twp Swift Co. Our home is on the south side of Hwy 12, just a few hundred feet from the proposed preferred route for this corridor. I have attended numerous meetings from the beginning about this line and have voiced my concerns, apparently to no effect at this point. My concerns about the proposed route are as follows:

1: The proposed line runs very close to our house and farm site. The line would be 230 ft from our home. This will have a very negative affect on the value of our home. One also has to wonder about the health effects of living and working every day, all day, so close to a large power line. The proposed line would limit future expansion of our farm site to the north towards highway access. There is no need for this, as this is a sparsely populated area with ample options for routing.

2: It seems rather odd to run a major transmission line alongside miles of US Hwy 12, a major east west highway that links I90 in Miles City Montana with Minneapolis and points east. Is this what we want travelers to see as they enter our state from the west? What impression does this give people about us and our priorities? Why not move it off to either side of Hwy 12?

3: I have a North/ South grass runway adjacent to our home and farm site. I built a new hangar for our plane in 2004. The proposed routing along Hwy 12 will make this runway unusable due to having overhead lines located in the approach path to the runway. The line would be approx 250 ft from the end of the runway. This means my investment in the hangar and runway would now be totally lost, and the utility of the airplane severely restricted, as it would no longer be able to be based at our farm. Even the alternative route on the east side of our home quarter will have an impact on the safety zone that normally surrounds airports. Take off and landings involve low altitude flight and if anything goes wrong, any obstructions in the vicinity of the runway reduce the margin of safety. One of the factors in my decision to invest in a hanger and runway on the farm was the lack of powerlines near the runway. I have repeatedly begged and pleaded at previous meetings to keep the line away from the runway, only to have both proposed routes within ¼ mile of the runway.

4: The alternative route runs right through a wetland on the east side of sec 24 Moyer twp. This wetland is DNR protected and has a Fish and Wildlife easement on it. It really does not make sense to run a line through a wetland the government saw fit to spend tax dollars preserving.

5: There are already small transmission lines running 1 mile south of Hwy 12 adjacent to our farm. Why not follow the example of this corridor? It avoids all of the problems listed above and does affect any other homes as there is no one living along this route for miles to the east. It should not be hard to find a route that is off the main roads, avoids people's farm sites and gets the job done with minimal visual, environmental, and economic impact.

6: If this project is built, it should be built with sufficient capacity that it can handle the loads from Wind Turbines to be built in the future. If this project proceeds, it should be mandated that the existing Big Stone plant be brought up to the best possible standards for reducing emissions of mercury, greenhouse gases etc.

Sincerely, Jon & Maggie Boese

1435 Hwy 12 SW

Holloway MN 56249

1/31/2006

320 567 2161

E017/TR-05-1275

David Birkholz

From: Jon Boese [jboese@fedtel.net]
Sent: Monday, January 30, 2006 1:20 PM
To: David.Birkholz@state.mn.us
Subject: Big Stone Transmission Project

FEB 13 2006

Re: Big Stone Power Plant expansion and Transmission line construction.

I have some objections to the routing of the Willmar Corridor line. I live in sec 24 Moyer Twp Swift Co. Our home is on the south side of Hwy 12, just a few hundred feet from the proposed preferred route for this corridor. I have attended numerous meetings from the beginning about this line and have voiced my concerns, apparently to no effect at this point. My concerns about the proposed route are as follows:

1: The proposed line runs very close to our house and farm site. The line would be 230 ft from our home. This will have a very negative affect on the value of our home. One also has to wonder about the health effects of living and working every day, all day, so close to a large power line. The proposed line would limit future expansion of our farm site to the north towards highway access. There is no need for this, as this is a sparsely populated area with ample options for routing.

2: It seems rather odd to run a major transmission line alongside miles of US Hwy 12, a major east west highway that links I90 in Miles City Montana with Minneapolis and points east. Is this what we want travelers to see as they enter our state from the west? What impression does this give people about us and our priorities? Why not move it off to either side of Hwy 12?

3: I have a North/ South grass runway adjacent to our home and farm site. I built a new hangar for our plane in 2004. The proposed routing along Hwy 12 will make this runway unusable due to having overhead lines located in the approach path to the runway. The line would be approx 250 ft from the end of the runway. This means my investment in the hangar and runway would now be totally lost, and the utility of the airplane severely restricted, as it would no longer be able to be based at our farm. Even the alternative route on the east side of our home quarter will have an impact on the safety zone that normally surrounds airports. Take off and landings involve low altitude flight and if anything goes wrong, any obstructions in the vicinity of the runway reduce the margin of safety. One of the factors in my decision to invest in a hanger and runway on the farm was the lack of powerlines near the runway. I have repeatedly begged and pleaded at previous meetings to keep the line away from the runway, only to have both proposed routes within ¼ mile of the runway.

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6: If this project is built, it should be built with sufficient capacity that it can handle the loads from Wind Turbines to be built in the future. If this project proceeds, it should be mandated that the existing Big Stone plant be brought up to the best possible standards for reducing emissions of mercury, greenhouse gases etc.

Sincerely, Jon & Maggie Boese

1435 Hwy 12 SW

Holloway MN 56249

1/31/2006

320 567 2161

David Birkholz

From: Donna Somerville-Arends [donnapatricia@yahoo.com]
Sent: Thursday, February 02, 2006 9:55 AM
To: David.Birkholz@state.mn.us
Subject: Otter Tail Power Lines

Mr. Birkholz, I was at the informational meeting in Benson on the Otter Tail Power Line requested to be run through Southern Minnesota. My assumptions from that meeting is NO! I feel it was built in South Dakota in the first place because S. Dakota is considerably more lax on enviromental issues and they could get by with it easier there than they could in Minnesota. I'm very concerned about the mercury hazards from these forms of energy already and would like to see us move on to a safer energy source as wind power. Donna Arends 4060 140th ave ne Raymond MN 56282 donnapatricia@yahoo.com

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FEB 13 2006

E017/TR-05-1275

David Birkholz

From: Saunders [saunders@willmar.com]
Sent: Wednesday, February 01, 2006 12:23 PM
To: David.Birkholz@state.mn.us
Subject: Propped Power Line

EIS SCOPE

FEB 13 2006

To: David Birkholz

From: Allen Saunders
555 10th ST. S.E.
Benson, MN 56215
saunders@willmar.com

David,

I attended your latest meeting in Benson Mn and will take this opportunity to comment on the power line proposals being presented.

Unfortunately more money may be spent on legal requirements than what the new power line will cost. I trust you will do your part to stream line this process wherever possible.

With the amount of information I have to work with I would tend to prefer the use of the existing corridors. I live near highway 12 and may be effected by the routing of a line in our area. Due to the fact that I am a Farmer I would be impacted more by the placement of power lines in my fields than many others. I am not against this line if it must be placed in the highway 12 corridor but I can see where it would create an inconvenience for the farm operators in my area. The equipment that we use is no longer conducive to working around poles, trees, rock piles etc. We have attempted to remove obstructions where ever possible to speed the process of tillage, planting, weed control and harvesting. Safety is a factor while working with large equipment and placing poles in our fields may adversely affect the safety of works as well as the public.

Best Regards,

Allen Saunders

EIS SCOPE

FEB 13 2006



- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

For Development of our Wind Potential in the Carley area we need access to this Transmission Network via Sub Stations 1 is not Adequate - We need at least 3 in the area to provide access to Future Wind Generators we need Future Green Access

*Pat Hauler
Carley Chamber of Commerce (Past Chair)
Carley Planning & Zoning Commission (Chair)
Carley Economic Development (Board member)*

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

E017/TR-05-1275

FEB 13 2006



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
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(Use the back of this page for additional comments.)

Dear Mr. Birkholz:

I would like to see an agreement with the land owners along the power line route to be able to install wind generators by the lines. These land owners would then be able to sell and send power via the proposed line, at retail rates if possible.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Grant Krieger'.

Grant Krieger
320-264-8021

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Chippewa County Historical Society

151 Pioneer Drive - P.O. Box 303 - Montevideo, Minnesota 56265 CCHS@maxminn.com



February 8, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

E017/TR-05-1275 820-269-7636

Dear Mr. Birkholz,

I am writing to express my concerns and to ask you to relay these concerns regarding the proposed Big Stone Transmission Project to the Public Utilities Commission.

My first and utmost concern is the environmental impact this plant would have, most importantly the amount of mercury. Lac qui Parle Lake and the Chippewa River are already listed as mercury impaired waters by the MPCA. Do we continue to poison our natural resources? More importantly, mercury has been linked to a number of health issues in children. I am truly astounded that one in six women of childbearing age has unsafe mercury levels! Do you know what the ramifications of this exposure means to an unborn child--possible mental retardation and permanent IQ loss! Is this what we want for our children, for our future?

My second concern is for the negative impact this plant will have on recreation and tourism. I serve on both a regional and a local tourism board. Outdoor recreation, such as hunting and fishing, are extremely important to southwest Minnesota. How will this proposed plant affect our wildlife and fishing habitats? Can we even afford to 'take a chance'? Thousands of dollars and hundreds of hours have been spent promoting tourism in southwestern Minnesota. With our farm economy struggling, tourism is emerging as a sustainable factor to our economy.

Renewable energy must now be used. I watched a report on KARE 11 TV regarding temperature changes and their impact just in Minnesota. One single degree has almost decimated the moose herds in northwestern Minnesota. In the late 1980's, 4,000 head of moose were in this region, today they number 250. We MUST invest in renewable energy now to protect our future. Wind power has been tried and tested. Let us focus in that direction, not only for the economic benefit to our state, but also for the positive environmental impact.

Minnesota has an opportunity to be a leader, and to show an entire nation that renewable energy is our future. Wind power is clean and environmental friendly. We need to invest our money in this direction for the future of all generations throughout the world. As Neil Armstrong said, "That's one small step for man, one giant leap for mankind". Let us be the ones who take that small step so that others can follow and take the giant leap!

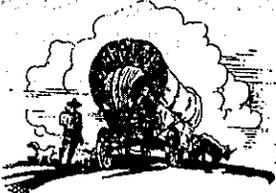
Sincerely,

June Lynne

Executive Director

Chippewa County Historical Society

FEB 10 2006





EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
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E017/TR-05-1275

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(Use the back of this page for additional comments.)

With the intent of utility power lines coming through our area, we are impacted irregardless of whether the SD route or the MN route is used. We own land in South Dakota, and also land in Minnesota.

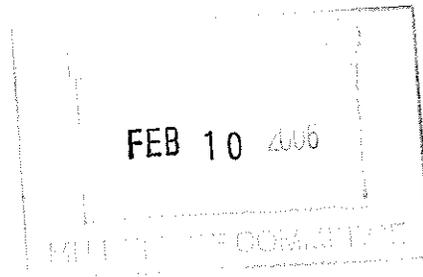
It is my understanding the primary permitted route is through South Dakota. The SD route would be better for us than the alternative route through Minnesota due to a towable irrigation system on section 21, Manfred Township 116, Range 46 which will likely be affected if the Minnesota route is considered.

Thank you for your time and consideration in this matter.

Sincerely,

Paul Theisen
Diana Theisen

Paul Theisen
Diana Theisen
1280 121st Ave N
Canby MN 56220



Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

THOMAS BIRKEY, M.D
725 North First Street
Montevideo, MN 56265

2017/ TR-05-1275

February 7, 2006

Mr. David Birkholz
Energy Facility Permitting
85 7th Place E. Suite 500
St. Paul, MN 55101-2198



Dear Mr. Birkholz:

It was my sense that the January 26th meeting in Granite Falls did not play out as the Big Stone Project presenters had planned. Many in the audience felt that the discussion of where the transmission lines would be placed was immaterial until the issue of the appropriateness of a new coal burning electrical generation plant had been decided upon. It seemed as if the proponents of the new plant had not fully considered the health and environmental impact, particularly in regards to mercury emissions that could/would occur. (the plan to use a "wet scrub" rather than a "dry scrub" was not accompanied by the specifics of the amount of reduction of mercury emissions that would result.)

I have been a physician in Montevideo for the past forty years. In October, 2002, I attended a seminar in Minneapolis titled: "In Harm's Way: Toxic Threats to Child Development". It was presented by the University of Minnesota Medical School, but jointly sponsored, collaborated, and supported by a large number of other organizations and institutions. The crux of the seminar was that developmental disabilities (i.e. learning, behavior, and physical developmental problems) are the subject of growing public health concern with twelve (12) million American children (17%) suffering from one or more of these disorders. And the percentage seems to be on the increase!

While there may be many reasons for the frequency of childhood developmental problems, toxins in our environment are important factors. Well-known toxins to neurodevelopment include lead, mercury, as well as alcohol and nicotine; there are others now-known and yet unknown. The known toxin pertinent to this project discussion is mercury---atmospheric mercury, of which 70% is due to pollutants and coal combustion is currently the largest source. When it comes down in rain and snow some of it is converted to methyl mercury by natural bacteria. The aquatic food chain biomagnifies the methyl mercury by over a million-fold factor. The result of this is that fish--some species more than others and especially older ones of those species, have flesh that is toxic in mercury. This toxin is critical in pregnant women and in children under the age of six years. The Environmental Protection Agency and the National Academy of Sciences have established Exposure Limits and Reference Doses. These limits are exceeded by eating the fish from many of our Minnesota lakes!

Minnesota has greatly reduced the atmospheric mercury from most sources during the past thirty years, but little from coal burning, in part because of lack of action by the Bush administration. It would seem to me that we need to look very carefully at the "big picture" when we plan for our future production of electrical power we are able to produce.

Thank You.

Tom Birkey
Tom Birkey

TO: David Birkholz, Energy Facility Permitting

FROM: Thomas G. Birkey, M.D.

REGARDING: Big Stone Transmission Project

725 North First Street
Montevideo 56265-1311

Greetings:

It was my sense that the January 26th meeting in Granite Falls did not play out as the Big Stone Project presenters had planned. Many in the audience felt that the discussion of where the transmission lines would be placed was immaterial until the issue of the appropriateness of a new coal burning electrical generation plant had been decided upon. It seemed as if the proponents of the new plant had not fully considered the health and environmental impact, particularly in regards to mercury emissions that could/would occur. (the plan to use a "wet scrub" rather than a "dry scrub" was not accompanied by the specifics of the amount of reduction of mercury emissions that would result.)

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While there may be many reasons for the frequency of childhood developmental problems, toxins in our environment are important factors. Well-known toxins to neurodevelopment include lead, mercury, as well as alcohol and nicotine; there are others now-known and yet unknown. The known toxin pertinent to this project discussion is mercury---atmospheric mercury, of which 70% is due to pollutants and coal combustion is currently the largest source. When it comes down in rain and snow some of it is converted to methyl mercury by natural bacteria. The aquatic food chain biomagnifies the methyl mercury by over a million-fold factor. The result of this is that fish-some species more than others and especially older ones of those species, have flesh that is toxic in mercury. This toxin is critical in pregnant women and in children under the age of six years. The Environmental Protection Agency and the National Academy of Sciences have established Exposure Limits and Reference Doses. These limits are exceeded by eating the fish from many of our Minnesota lakes!

Minnesota has greatly reduced the atmospheric mercury from most sources during the past thirty years, but little from coal burning, in part because of lack of action by the Bush administration. It would seem to me that we need to look very carefully at the "big picture" when we plan for our future production of electrical power. The bottom line, I believe, has more to do with our health and environment than to the amount of electrical power we are able to produce.

Thank You.

A handwritten signature in cursive script that reads "Tom Birkey". The signature is written in black ink and is positioned in the lower right quadrant of the page.

**Tokheim
Stoneware**

EO17/TR-05-1275

FEB 10 2006

CE

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198
February 6, 2006

Dear Mr. Birkholz,

I am writing to urge you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. The new Big Stone II power plant is not needed, and the pollutants delivered to our state will be enormous and unacceptable.

My husband and I have lived near Lac Qui Parle since 1975. We built our well-known Tokheim Stoneware pottery business here because of the beauty of the Minnesota River, rich in wildlife and history. My husband remembers Lac Qui Parle in the 1950's as swimming and fishing destinations. Now we are cautioned not to eat much fish caught in Lac Qui Parle: Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters by the MPCA.

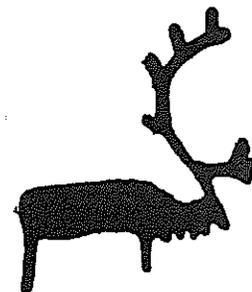
We know that the current Big Stone I Plant is emitting at least 189 pounds of mercury per year. One teaspoon of mercury is enough to poison a fifty-acre lake so that the fish cannot be safely eaten. Mercury can cause neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression.

Minnesotans need stronger protection from mercury pollution. The technology exists to reduce these emissions. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants.

What is the Public Utilities Commission going to do to address this public health problem if not to deny the Certificate of Need to Big Stone II?

Sincerely,

Lucy and Gene Tokheim



gene & lucy tokheim 2057 361st ave. dawson mn. 56232
fax 320/769-2424

320/769-2142
www.tokheim-stoneware.com



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
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E017/TR-05-1275

FEB 10 2006

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Mr. Birkholz

I attended the meeting in Benson about Big Stone II. I was rather surprised that the need for an increasedⁱⁿ coal production and that a coal producing energy system is our best option.

I would much prefer a conservation & efficiency plan before undertaking such a drastic risk. I am not convinced that a wind/biomass/natural gas plan or combination is not the more sensible approach. Other fall tells me that more energy is needed & this HUGE plant is the option. I disagree, ~~if I've not given all the sides o~~^{error} ~~error~~ Wind projects are much more adaptable to growing needs, not to mention the significant health implications. The mercury content in our lakes & rivers ~~is~~ already is disgraceful; this state cannot afford a coal plant solution.

Thank you,
Erica Karger-Gatzow
Morris, MN

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

6 7


Wojtalewicz
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ATTORNEYS:

James Kruzich
(1950-1983)

* Brian Wojtalewicz

139 North Miles Street - PO Box 123
Appleton, Minnesota 56208-0123
Fax: 320-289-2369
Ph. 320-289-2363

STAFF:

Janine Wojtalewicz
Laura Ascheman
Norma Iseminger
Carol Warner
Jodi Sterud

February 8, 2006

EO17/TR-05-1275

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

FEB 10 2006

Re: EIS -- Big Stone Transmission Project

Dear Mr. Birkholz:

My wife and I are natives and have been residents of western Minnesota for decades. Our children are lifelong residents. We buy electricity for both our home and business in Appleton from Ottertail Power, one of the owners of the Big Stone II project.

I am attaching an editorial that I placed into the Appleton Press and other area newspapers of western Minnesota. I submit that the proposed Big Stone II power plant is unnecessary, and would be a huge mistake for our state and communities. There are five general areas underlying my position.

#1 -- National Security

Terrorism has unfortunately become a fact of life in our global community. The more we concentrate energy production into huge, focal facilities like coal or nuclear plants, the more susceptible we are to attacks that would be crippling, perhaps devastating. Have the extra costs for security really been factored into the claims of the coal plant proponents? In contrast, energy production that is scattered out into hundreds or thousands of production points dramatically decreases our security risks.

#2 -- Economics and Renewable Energy

Wind energy production is a tested, proven source of power, and western Minnesota in particular provides a broad energy field. Our area has also long been in need of an additional base for economic growth. We have started with ethanol plants as an alternative energy source, but we are missing a terrific opportunity on wind production.

Offices in Alexandria & Appleton
Alexandria Phone: 320-762-8382

**Civil Trial Specialist, Certified by the Minnesota State Bar Association
& the National Board of Trial Advocacy*

PRINTED ON RECYCLED PAPER

David Birkholz
Page 2
February 8, 2006

It is also clear that allowing new coal plants, and transmission lines that will be devoted to those coal plants, will slash the accessibility and opportunity for wind, methane and other diversified energy for our communities of western Minnesota. I believe that this fact alone warrants denial of Big Stone II's request for the Certificate of Need. I have read that Minnesota is already the state that is the largest importer of energy from outside the country, mainly from Manitoba Hydro, and that 75% of our energy already comes from coal paid for with more than \$6 billion of Minnesota wealth leaving our state. It strikes me that agreeing to the proposal of Big Stone II would be economic stupidity by our State of Minnesota.

I have also read that the Environmental Law and Policy Center estimates that over 200,000 new jobs could be created in the upper Midwest by 2020 if we concentrate on renewable energy production. It has also been estimated that wind power alone would create 22 direct and indirect construction and manufacturing jobs for each megawatt of installed capacity. Have the Big Stone II proposers calculated that, and compared it to their current proposal? Shouldn't your agency, our state government, demand that analysis? It seems to me that you owe it to me, my family and the other citizens of this state. I believe our state also should weigh the fact that the tax base and primary employment and other micro-economic advantages of the Big Stone II proposed plant would go to South Dakota, not Minnesota.

Instead of caving to the proponents of Big Stone II, our Department of Commerce and State should insist on the common sense economic development pattern that could make Minnesota an economic renaissance state for alternative energy production and technology innovation.

#3 -- Poison and the Environment

We residents of western Minnesota have watched the long brown plume float down our Minnesota River valley for years. Of course, the wind isn't always from the northwest, so this polluting emission, containing mercury, has been landing on our ground and lakes for years. They claim to have it down to 189 pounds per year at this point, but it is clear that they were emitting at least 400 pounds per year only a few years ago. How much do the Big Stone II proponents care? Not much. If they did, they would be planning a new plant that had zero emissions of mercury. We know that the technology is there, but they apparently are unwilling to do it. Why not, because it would cost more? How much more? Did they calculate any of the costs to our communities of having this deadly mercury poison our land and water? **Who should be demanding this answer and this analysis more than our Department of Commerce, our MPCA and our political leaders?**

The demand for zero emissions of pollutants on energy production plants clearly is a politically **bipartisan** demand. In his most recent State of the Union speech, President Bush demanded zero emission coal plants. What is unreasonable about demanding that of Big Stone II, if we let them run transmission lines in our state? Because they chose to build just across the border, into the less regulated State of South Dakota, we Minnesotans should reward them for that?

Have they calculated the impact of the emissions of sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health) and nitrogen oxides (powerful lung irritants in the form of smog) in the air of western Minnesota?

Minnesota, from its current governor to us ordinary citizens, seems to be intent on slashing mercury emissions from power plants located within our state. Wouldn't it be a colossal, stupid mistake to assist Big Stone II in a new power project that would dump more mercury and other pollutants onto Minnesota soil and water than all the power plants in Minnesota combined over the next several decades? **Why should our state be a willing participant in the Big Stone II proponent scheme to make a profit off of Minnesota citizens while unnecessarily continuing to dump dangerous poisons on us?**

We see highly qualified global climate experts issuing stark warnings about a catastrophic future for our human community if something serious isn't done to reduce greenhouse gases. While our political "leadership" on a federal level is paralyzed (likely due to money donations from huge energy corporations), does this mean that our state government officials should also participate in this stupidity? It is unquestionable that a huge amount of the greenhouse gases are coming from coal-fired power plants. The plant proposed by Big Stone II will unnecessarily add to this. Please don't allow it.

#4 -- Children's Health

Exposure to mercury brings terrible health consequences, including neurological, kidney, liver and heart damage. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Minute amounts of this toxin in pregnant women can cause mental retardation and permanent I.Q. loss to their children. Coal-burning power plants reportedly emit about 50 tons of mercury into our environment each year across the country, and just one teaspoon of mercury is enough to poison a 50-acre lake to the point where the fish cannot be safely eaten. These facts have been reported by the Waterkeeper Alliance.

David Birkholz
Page 4
February 8, 2006

According to the Environmental Protection Agency, one in every six American women of childbearing age has unsafe mercury levels already, which puts more than 630,000 American children born each year at high risk for these diseases. **Isn't it the responsibility of our state agencies to protect us from these poisons?**

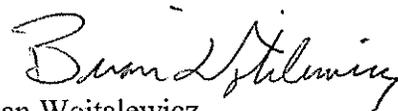
#5 -- Tourism Economy

Western Minnesota agencies, communities, businesses and individuals have been making a great deal of effort to build tourism in our area. How would the continued poisoning of our lakes and rivers affect this effort?

Communities along the whole Minnesota River, like mine in Appleton, have been trying to establish a Minnesota River Trail. How popular will this trail be if a smog plume, most visible on clear, sunny days, is one of its features? I understand that the proposed Big Stone II is just one of a number of proposed new coal fired power plants that the energy corporations intend to build in the Dakotas. This Big Stone II plant proposal may be the only opportunity Minnesota has to force positive change on these plans. Please don't let it slip by.

In conclusion, I respectfully urge that you, our public servants, seize this historic opportunity to make our state a leader in a society that is desperate for huge corrections in how we obtain our energy, and in protecting we, the people, from unnecessary poisons.

Sincerely,



Brian Wojtalewicz
brian@wojtalewiczlawfirm.com

BW/la



Chippewa River Watershed Project

629 North 11th Street, Montevideo MN 56265

www.chippewariver.com

Fax: 320-269-6395

February 8, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
St Paul MN 55101-2198

2017/TR-05-1275

FEB 10 2006

Dear Mr. Birkholz:

I am writing to urge you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. **It is my contention that the transmission requested is not needed because the new Big Stone II power plant is not needed.**

The Minnesota State Legislature is currently looking at ways to fund the **\$40 million "Clean Water Legacy" to CLEAN UP THE WATERS OF THE STATE**, yet a decision in St. Paul could allow more pollution to enter our state, one hand doesn't seem to be connected to the other hand with respect to CLEAN WATER.

Please look at the enclosed maps of all the major River Basins in the State of Minnesota. Most of Minnesota's streams and many of Minnesota's lakes are suffering from Mercury (Hg) pollution. It does not look like we need any more mercury in Minnesota and I don't want anymore mercury in Minnesota. We need to shape a vision that delivers clean energy within our borders, to the benefit of the consumers being served, without the pollution from coal being delivered back to us at the same time.

We know that the current Big Stone I Plant is emitting at least 189 pounds of mercury per year. Just one teaspoon of mercury is enough to poison a fifty acre lake so that the fish cannot be safely eaten. The popular fishing destinations of Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters. What is the Public Utilities Commission going to do to address this public health problem if not to deny the Certificate of Need to Big Stone II?

Our Chippewa River Watershed Project is working hard out here in western Minnesota to present solutions to landowners that **IMPROVE** water quality. We do this with state and federal grant dollars to help them accomplish best management practices that benefit water quality. Our landowners are not the major source of the mercury pollution in the Chippewa River much of our mercury comes from Big Stone coal burning plants. The real future of our state and the sustainability of our communities depend on a healthy population. In President Bush's State of the Union address this year he calls for power

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plants to be built with zero emissions. The Big Stone II Plant does not meet this criterion. **The Citizens of Minnesota should settle for nothing less.**

The potential economic benefits of meeting our future energy needs through a combination of real conservation and integrated renewable energy development are available to us now. One example is the largest dairy operation in the State of Minnesota recently permitted by the Swift County Board of Commissioners; **if the dairy were required to install a methane digester it could power 7800 homes, almost, if not all, the homes in Swift County!!! And do it through existing transmission lines.** Would the Public Utilities Commission (PUC) partner with the Minnesota Pollution Control Agency and make it mandatory for all large feedlot operations in Minnesota to install methane digesters for energy production? We could produce renewable energy and produce water quality benefits at the same time!

An integrated approach to renewable energy will include bio-fuels, energy from consumer and industrial wastes, gas from manure and field waste, storing wind as compressed air, solar energy, and perhaps the most exciting opportunity; wind to hydrogen for electricity, cars, and fertilizer. Research projects to demonstrate how this is possible are currently being conducted at the **University of Minnesota Morris**. A broader vision for Minnesota integrates a renewable energy plan in a way that mitigates other problems such as water quality at the same time. **The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota while compromising the health of our people and environment.**

The Minnesota Department of Natural Resources is putting the finishing touches on a master plan for the Minnesota River Trail – a recreational trail from Ortonville (directly across the Minnesota River from Big Stone) to LeSeuer. How will the use of this trail be affected by the emissions from the Big Stone I & II Plants? How many people will want to use a trail that follows the shadow of the plume from these plants? Outdoor recreation is a \$9 billion dollar industry in Minnesota. The proposed Big Stone II power plant and other proposed plants in the Dakotas threaten this industry by threatening our rivers and lakes with mercury pollution.

I ask you to please realize the seriousness of this issue and the health of Minnesota's people and water and urge the PUC to deny the Certificate of Need to Otter Tail Power.

Sincerely,

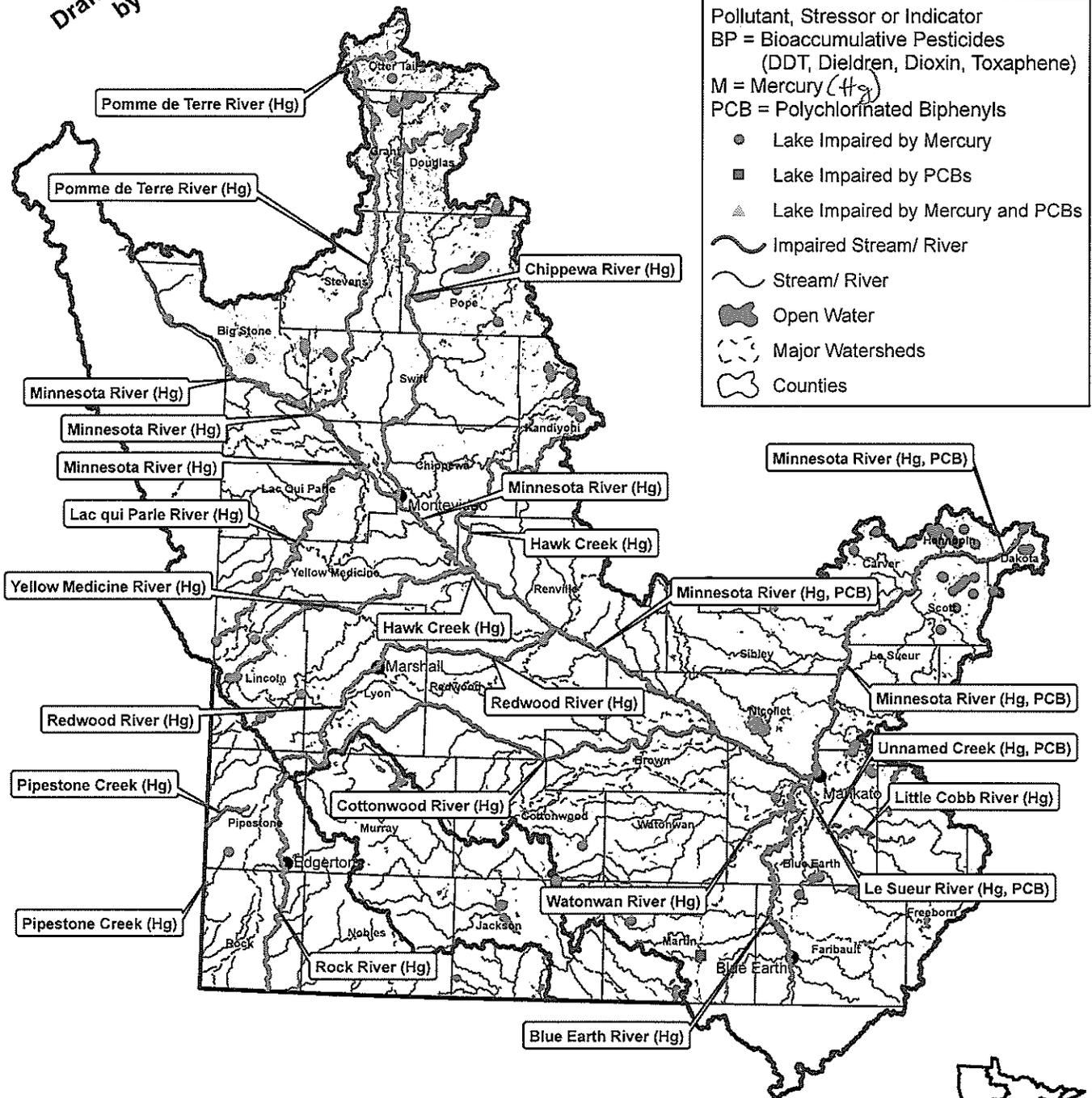


**Kylene Olson, Mayor of Watson, Minnesota and
Executive Director, Chippewa River Watershed Project**

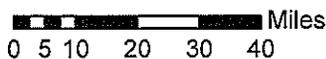
Minnesota, Missouri, and Des Moines River Basin: Bioaccumulative Toxics

2006 Impaired Waters Requiring a TMDL
(per Section 303 (d) Clean Water Act)

Draft until approved
by US EPA



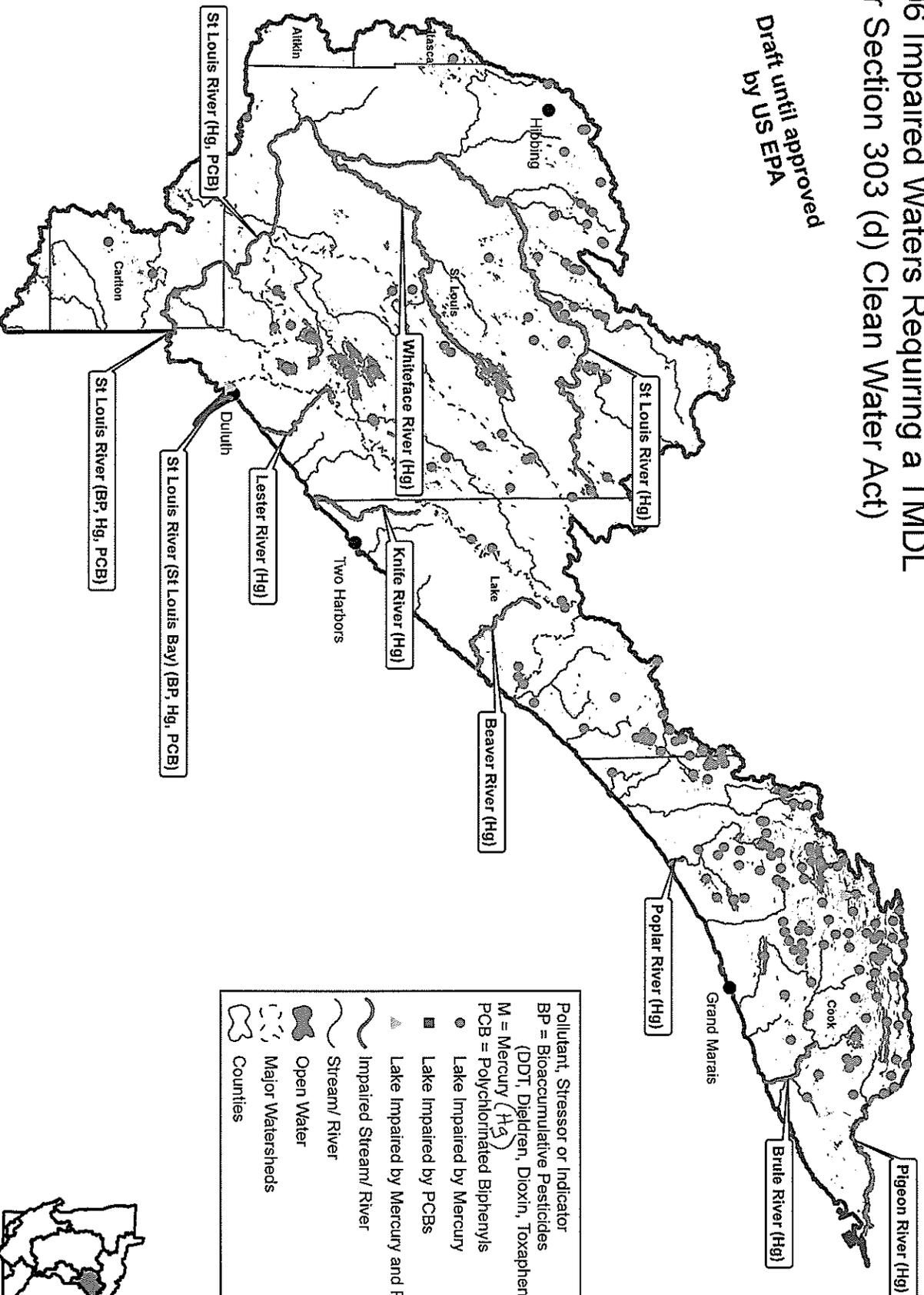
For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/edaWater>



Lake Superior Basin: Bioaccumulative Toxics

2006 Impaired Waters Requiring a TMDL (per Section 303 (d) Clean Water Act)

Draft until approved
by US EPA



Pollutant, Stressor or Indicator
 BP = Bioaccumulative Pesticides
 (DDT, Dieldrin, Dioxin, Toxaphene)
 M = Mercury (Hg)
 PCB = Polychlorinated Biphenyls

- Lake Impaired by Mercury
- Lake Impaired by PCBs
- ▲ Lake Impaired by Mercury and PCBs
- ~ Impaired Stream/ River
- ~ Stream/ River
- ~ Open Water
- ~ Major Watersheds
- ~ Counties

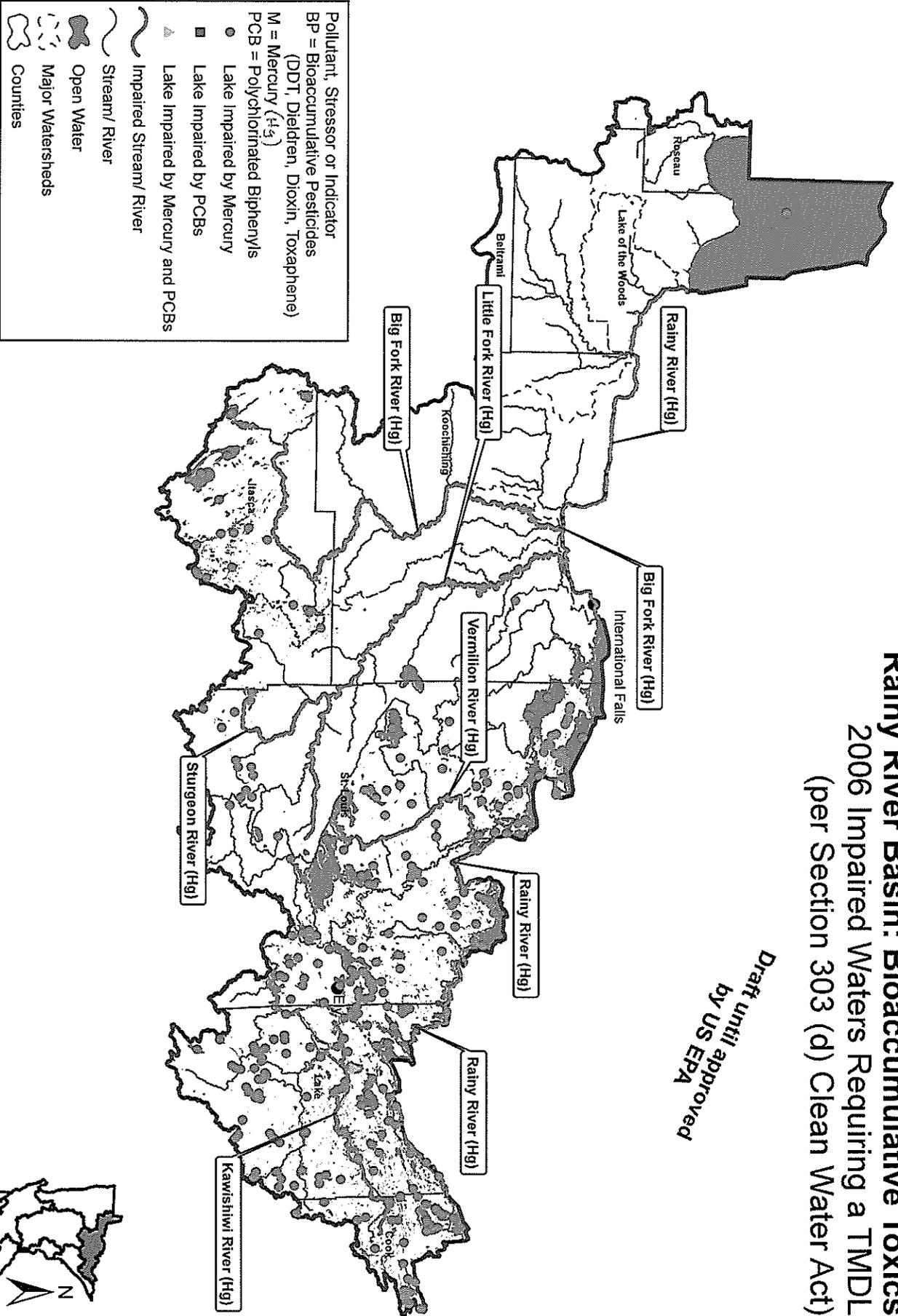


For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/edaWater>

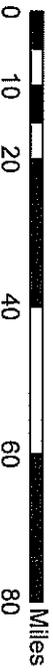


Rainy River Basin: Bioaccumulative Toxics 2006 Impaired Waters Requiring a TMDL (per Section 303 (d) Clean Water Act)

*Draft until approved
by US EPA*



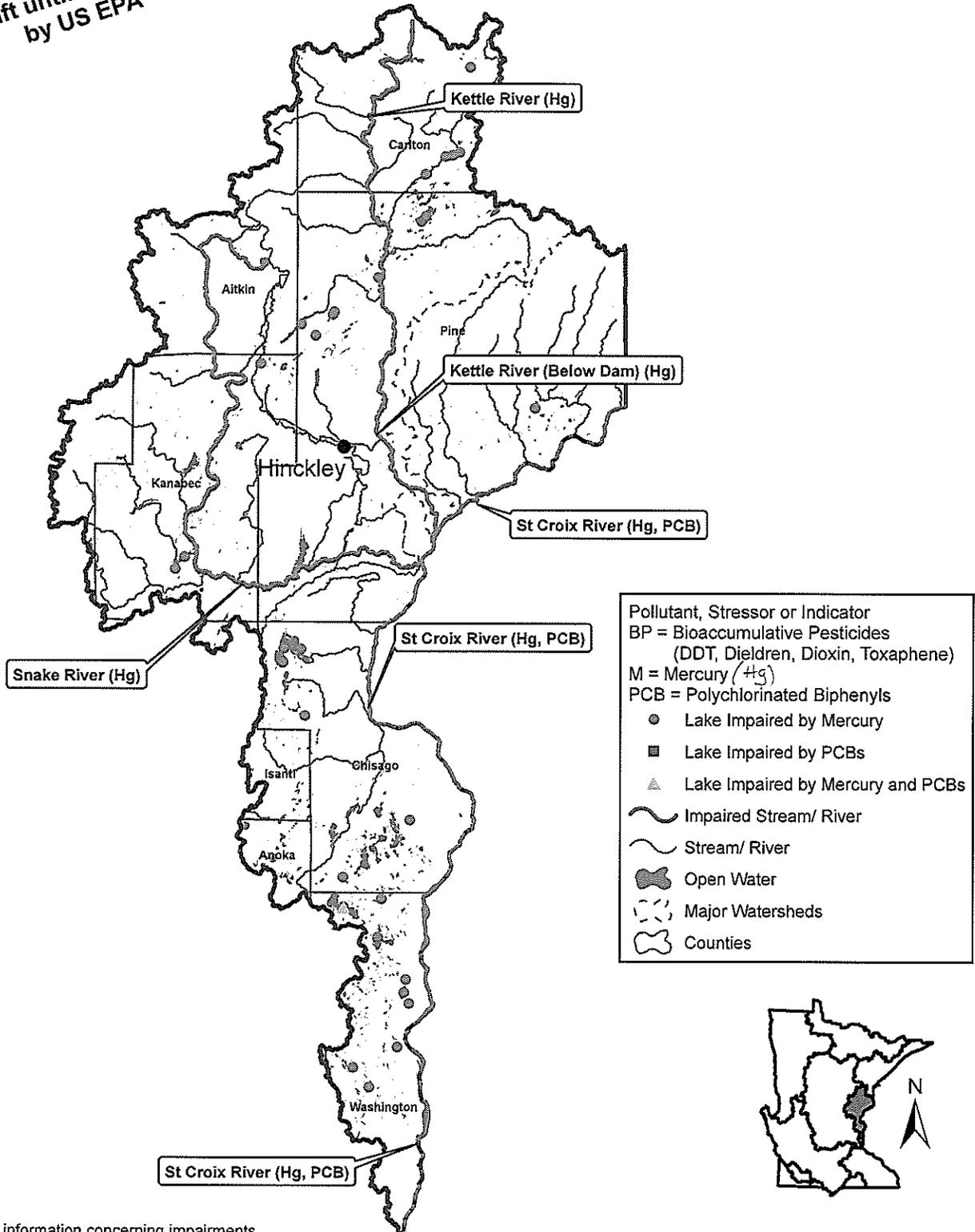
For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/dataWater>



St. Croix River Basin: Bioaccumulative Toxics

2006 Impaired Waters Requiring a TMDL
(per Section 303 (d) Clean Water Act)

Draft until approved
by US EPA



For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/edaWater>

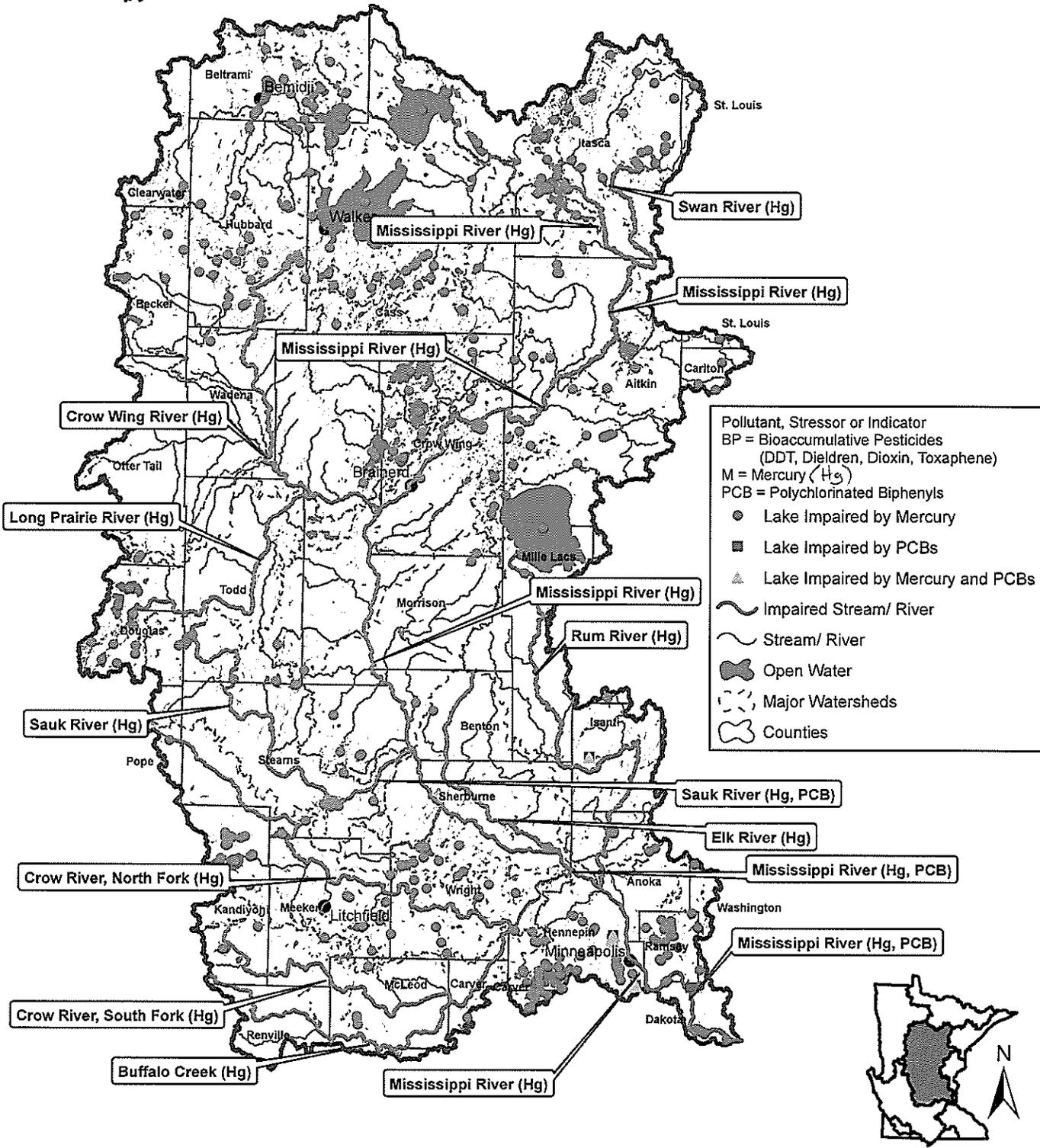


Minnesota Pollution Control Agency
October, 2005

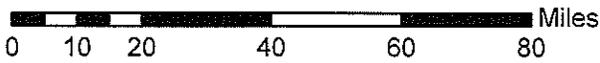
Upper Mississippi River Basin: Bioaccumulative Toxics

2006 Impaired Waters Requiring a TMDL
(per Section 303 (d) Clean Water Act)

Draft until approved
by US EPA



For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/edaWater>

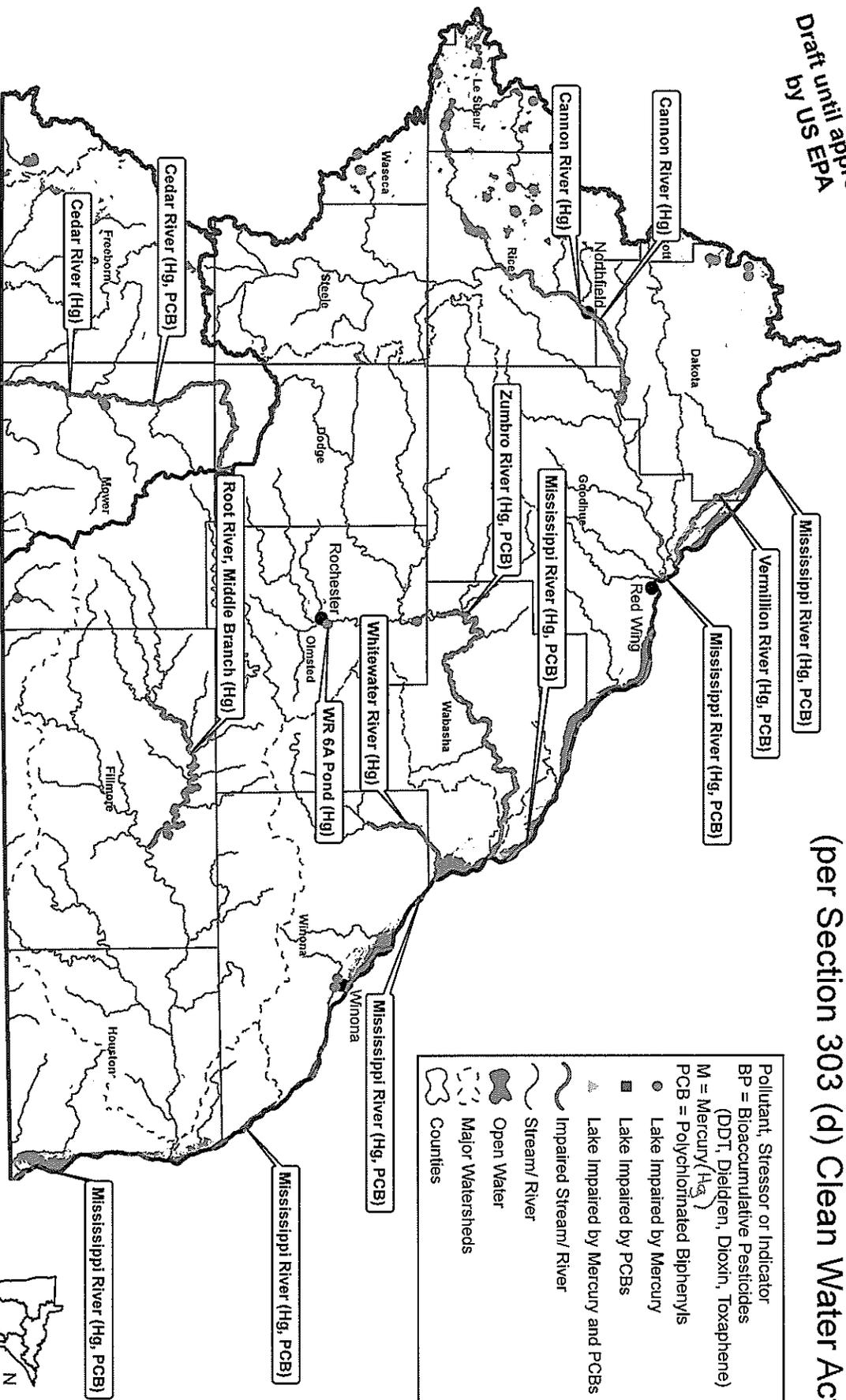


Minnesota Pollution Control Agency
October, 2005

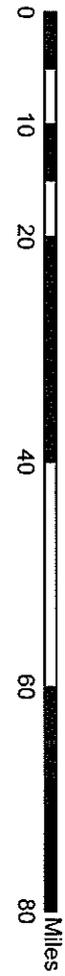
Draft until approved
by US EPA

Lower Mississippi and Cedar River Basins: Bioaccumulative Toxics

2006 Impaired Waters Requiring a TMDL (per Section 303 (d) Clean Water Act)



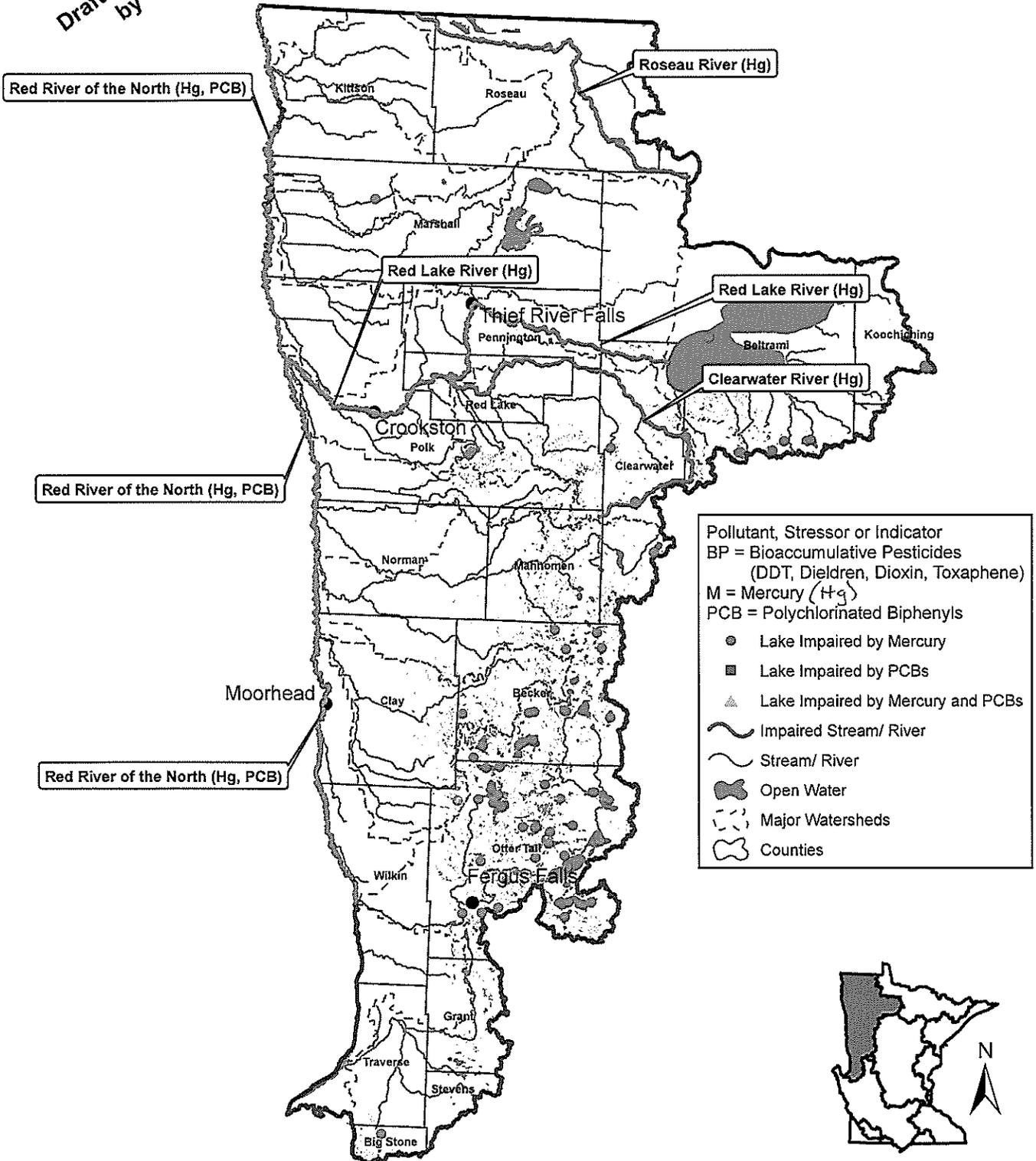
For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/edaWater>



Red River Basin: Bioaccumulative Toxics

2006 Impaired Waters Requiring a TMDL
(per Section 303 (d) Clean Water Act)

Draft until approved
by US EPA



For additional information concerning impairments, such as station information and monitoring data, see the MPCA Environmental Data Access System. <http://www.pca.state.mn.us/data/edaWater>

0 5 10 20 30 40 Miles

Minnesota Pollution Control Agency
October, 2005



Upper Minnesota Valley Regional Development Commission

Big Stone • Chippewa • Lac qui Parle • Swift • Yellow Medicine

323 WEST SCHLIEMAN AVENUE

APPLETON, MN 56208-1299

320.289.1981

FAX: 320.289.1983

umvrdc@umvrdc.org

Date: February 13, 2006

To: David Birkholz
Energy Facility Permitting

From: Paul Michaelson *PM*

Re: Comments from RDC sub-committee

David, it is my understanding that I was to fax you the comments I received back from Commission members today, the 13th and then forward the hard copies by mail. I have at this time heard from 4 of the 5 members. Their comments are as follows:

Paul Pillatzki: Feels that there should be an answer to the Mercury questions before any permit is issued. What is the extent of mercury emissions and what is the potential impact on people living down wind? If the plant can't clean up the emissions then don't build the lines.

Also, feels that there should be some demand and or condition that will allow new renewable energy providers (eg. wind) access to any new transmission lines before they are approved.

Rusty Dimberg: Use existing routes. Do not change just to please DNR. Protecting private land ownership and humans is more important than DNR concerns.

Warren Rau: Please see attached copy of the county zoning ordinance pertaining to electrical transmission lines over 69 kilovolts. It is the zoning administrators viewpoint that any additional issues that may exist would surface during this process.

Ron Anderson: Attached

General: All members feel that there is not adequate time in this process to identify all issues related to the proposed route. What are the potential negative impacts associated with having inadequate time for citizens and local units of government to respond?

Swift County

all sewage facilities shall be connected to septic tanks and disposal fields in accordance with Minnesota Pollution Control Agency's Rule #7080.

Upon a change in ownership of any parcel involving a dwelling structure or structure requiring an onsite sewage treatment system, or at any time construction is proposed for an addition to such structure, the onsite sewage treatment system shall be inspected for conformance with MPCA's Rule #7080. For the purpose of this provision, a sewage treatment system shall not be considered nonconforming if the only deficiency is the system's improper setback from the ordinary high water level or property line.

If the Zoning Administrator determines that an onsite sewage treatment system is a nonconforming system, that system shall be upgraded and brought into conformance within 90 days.

13.8 Easements

No easements may be obtained, nor land purchased, for any of the following uses without first obtaining a conditional use permit for such use:

Exploration and/or extraction of mineral materials including, but not limited to the commercial removal of topsoil, stone, sand or gravel.

All pipelines.

All commercial transmission towers.

X → Electrical transmission lines over 69 kilovolts.

In order to protect prime and good agricultural land, no electric overhead transmission lines over 69 kilovolts shall cross agricultural lands diagonally, and future transmission lines will follow existing roadways or section lines. No exceptions will be made for State and Federal lands where such lines are being proposed.

The purchase of waterfowl easements by the Department of Natural Resources and the U.S. Fish & Wildlife Service will be included in this subsection.

The construction of all underground pipelines must conform to Minnesota Statutes 1161.06, subdivisions 1-10.

In the event that it becomes necessary for the Swift County Board of Commissioners or the individual landowner to construct new legal or private (county and judicial) drainage ditches and tile lines in the future, crossing underground

Paul Michaelson

From: Ronald Anderson [paparon69@hotmail.com]
Sent: Saturday, February 11, 2006 11:37 AM
To: ryan.krosch@umvrdc.org; paul.michaelson@umvrdc.org
Subject: POWER LINE INPUT

GREETINGS, As I have looked at the Power Transmission Lines issue, I find it very hard to comment, as Chippewa County, which I represented actually has no geographical connection to this matter. Chippewa County will benefit from this lines existance, but we will also encure liabilities due to these lines.

My concerns/issues are:

1. Mercury contamination of local bodies of water, soils, fish, animals, and eventually humans. Granted this is not a concern of the power transmission line licensure, but it is an item of fact and concern. More advanced methods of mercury removal should be mandated for the generating plant.
2. Access to the power grid, by renewable energy sources/suppliers must be mandated and guaranteed. If additional renewable energy sources are allowed to access and use these lines; a good argument for the need of these transmission lines can be made.
3. Degradation of property values due to actual site location, cosmetic appearance of lines, adverse effect on wildlife, and concern for health issues of/for residents who live along the lines.
4. Public involvement- make sure that the PUBLIC IS INVOLVED AND LISTENED TO! If the people aren't asked for comments/inputs adverse public acceptance/reaction will occur.
5. Credence to other peoples concerns- don't ridicule or degradate anyone else's beliefs/concerns.
6. BASICALLY, proper community involvement, proper addressing of environmental concerns for the transmission lines, but especially on the Power Plant.

Ron Anderson- Mayor of Milan, Chippewa County Power Line Representaive

E017/TR-05-1275

David Birkholz

From: Heather Cusick [heather.cusick@sierraclub.org]
Sent: Monday, February 13, 2006 4:53 PM
To: David.Birkholz@state.mn.us
Subject: Big Stone II Comments
Attachments: Big Stone II HVTL EIS Sierra Club Comments.doc; Big Stone WAPA EIS Comments (2).doc

Mr. Birkholz,
Please find attached Sierra Club North Star Chapter comments on the scope of the Big Stone II proposal.
Thank you.
Heather Cusick

Heather Cusick
Conservation Director
Sierra Club North Star Chapter
2327 East Franklin Avenue
Mpls. Mn 55406
ph: 612.659.9124
fax: 612.659.9129
www.northstar.sierraclub.org

FEB 13 2006



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CLUB**
FOUNDED 1892

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-VIA FACSIMILE AND ELECTRONIC MAIL-

February 13, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, Minnesota 55101-2198

RE: Scope of the Big Stone II Transmission Environmental Impact Statement

Dear Mr. Birkholz,

On behalf of the Sierra Club and its 24,000 members in Minnesota, we formally request that the Minnesota Department of Commerce (DOC) address all of the issues referenced in these comments when determining the scope and drafting the Environmental Impact Statement (EIS) for the Big Stone II project.

Generally, the scope of the EIS for Big Stone II transmission lines should consider the environmental, social, and economic impacts mentioned in these comments, as well as alternatives that would produce cleaner energy and be more cost-effective in the long-term. The EIS should contain a complete analysis of the impacts of the proposed project on these critical areas of concern, in part because the application submitted by Otter Tail Power Company (Otter Tail) and six other utilities (the Applicants) for the proposed project does not adequately address these issues.

Better alternatives exist in both Minnesota and South Dakota for producing energy and contributing to local economies – alternatives that would produce fewer and lesser environmental impacts, improve economic development, enhance quality of life, and invest in an energy future we can support.

Sincerely,

Christopher Childs
Chair, Conservation Committee
North Star Chapter of the Sierra Club

I. THE EIS SHOULD ADDRESS BOTH THE NEED FOR AN ADDITIONAL COAL PLANT AND THE CUMULATIVE PUBLIC HEALTH, SOCIAL, AND ENVIRONMENTAL IMPACTS ASSOCIATED WITH BURNING COAL FOR ENERGY

The proposed Big Stone II coal plant would be designed to burn 2.5 to 3 million tons of Powder River Basin sub-bituminous coal annually. Two high voltage transmission lines (HVTL) have been proposed in conjunction with this project to carry power from South Dakota to substations in Minnesota. The Sierra Club believes it is critical that the review process for the proposal includes both the examination of need of the coal plant construction and the very serious environmental and health impacts and costs associated with burning coal.

Energy Efficiency and renewable energy options exist in Minnesota and serve the public's interest. The Applicants do not explore either the true environmental and social cost of their proposal, nor do they provide a thorough assessment of energy efficiency and renewable alternatives. It is in the state's interest to pursue energy sources that are more favorable to the environment, our public health, and to our local economies.

The proposed Big Stone II coal fired power plant construction raises significant environmental and public health concerns including increased emissions of sulfur dioxide, nitrogen oxides, and other pollutants that contribute to many of our local and global air pollution problems including acid rain, ozone formation, and smog. Additionally, the proposed plant will emit harmful mercury pollution, which is threatening Minnesota's water quality, our public health, and the state's significant tourism economy. Finally, even though there is ever increasing knowledge of the devastating impacts of global warming, Big Stone II has proposed no controls on carbon dioxide emissions. Big Stone II would be a significant contributor to the region's global warming footprint.

Otter Tail's application does not include the true costs of cleaning up pollution emitted by coal plants, dealing with health consequences of emissions, or the long term impacts of global warming. In determining the scope and drafting the EIS for the proposed project, the Sierra Club requests that the Department (1) conduct a thorough analysis of the public health, social, and environmental costs of burning coal for energy, including disposal costs, (2) compare those costs to those of energy efficiency and renewable energy alternatives, and (3) to discuss the impacts that these costs have on the Applicants' ability to meet the criteria outlined in Minnesota Rule 7849.0120.

II. THE EIS SHOULD CONSIDER THE FULL RANGE OF ENVIRONMENTAL IMPACTS THAT WOULD BE CAUSED BY THE PROPOSED EXPANSION, NOT JUST THOSE THAT WOULD RESULT FROM THE CONSTRUCTION OF TRANSMISSION LINES.

The Department's evaluation of the proposed construction of Big Stone II and its associated transmission lines should consider the environmental and health impacts of the

entire Plant. Any EIS for the Plant, or the new HVTL that would be constructed to transmit its electricity, should consider the scale, need, and externalities of the entire project: including the mining operations, the burning of the coal at the power plant, waste disposal, water use, transmission lines, and supporting infrastructure.

The Sierra Club submitted scoping comments on the Big Stone II plant as part of the federal review process. We believe the issues raised in these comments pertain to the Minnesota proceedings and we incorporate them herein by reference. (Please see Attachment, Sierra Club Comments to the Western Area Power Administration dated August 26, 2005)

We believe that the Department and the Minnesota Public Utilities Commission has both the legal authority and the responsibility to examine this project in its entirety. Since the primary motivation for new transmission lines is the proposed Big Stone II construction, the HVTL EIS should focus not only on the transmission lines themselves, but also the greater impact of the entire Plant.

For your convenience, a brief synthesis of Sierra Club concerns is summarized as follows. Please review the attached comments in full for a detailed analysis of the basis of our concerns regarding the Big Stone II construction and address these concerns in the Department's forthcoming EIS.

- **Sulfur Dioxide, Nitrogen Oxides and other Criteria Pollutants**

SO₂, NO_x, particulate matter and other criteria pollutants contribute to many local and global air pollution problems, including acid rain, ozone formation (smog), and fine particulate matter (soot). These problems have significant negative ramifications for environmental and human health, and coal-fired power plants are one of the largest sources of these pollutants. The EIS should include a detailed analysis of emissions and air impact data, ramifications of compliance with the Clean Air Act, and effects on crops, visibility, and health, from Big Stone II emissions. Included in this analysis should be a consideration of the new PM_{2.5} national ambient air quality standards that U.S. EPA proposed in December 2005 and will be finalized in December 2006. In particular, the EIS should consider the range of PM_{2.5} limits U.S. EPA is proposing, the current PM_{2.5} levels in all downwind counties, and the impact Big Stone will have on those existing levels and whether it will result in, or exacerbate, nonattainment problems downwind.

- **Mercury and other Hazardous Air Pollutants**

Coal-fired power plants are the single largest source of mercury emissions in the nation. Mercury emitted from coal plants, like Big Stone II, becomes methylmercury in the environment where it becomes toxic in even minute amounts, and has significant impacts on the health of affected humans and wildlife. As proposed, Big Stone I and Big Stone II will not install additional mercury controls capable of upwards of 90% reduction

and would emit near the limit of mercury for the entire state of South Dakota as defined by the controversial Clean Air Mercury Rule (CAMR). The EIS should analyze the cumulative environmental, health, and economic impacts (including costs) of mercury pollution from Big Stone II.

- **Carbon Dioxide and Climate Change**

Anthropogenic climate change is occurring – the only questions are the magnitude of the problem and the world’s response to the threat. Utilities, especially coal plants, are the single largest source of carbon dioxide emissions - the primary driver of the greenhouse effect and global warming - in this country. Big Stone II has proposed no controls on carbon dioxide emissions, and does not take advantage of coal gasification technology with carbon capture and storage as one option for mitigating carbon dioxide emissions. Thus, Big Stone II would be a significant contributor to the region’s global warming footprint. The EIS should model annual and lifetime CO₂ emissions, assess the cumulative impacts of those emissions taken together with other existing and planned CO₂ sources, and estimate the ramifications of its emissions through carbon dioxide cost/ton externality value methodology. In addition, the EIS should consider the possibility of future federal regulations on carbon dioxide emissions, and incorporate that cost/risk into the economic justification for the Plant. Finally, the EIS should consider ultra supercritical pulverized coal and IGCC technology with carbon capture and storage in its alternatives analysis. There are multiple IGCC proposals moving through the permitting process in multiple states, including the IGCC Excelsior project in Minnesota. The EIS should include a thorough and detailed comparison between pulverized coal (including sub-critical, super-critical, and ultra supercritical pulverized coal and IGCC technologies).

- **Solid Waste/Ash Management**

A proper solid waste and ash management plan for the forty plus year life of the plant is critical to avoid unnecessary environmental impacts from fugitive dust emissions and environmental contamination from leakage. The EIS should thoroughly address the adequacy of the existing on-site landfill. In doing this analysis, consideration should be given to the details of the storage plan, its location, the safety of long-term storage, a chemical analysis of the proposed waste (include what percentage of the ash is unsuitable for sale and the composition and risk of on-site storage of this ash), the feasibility of marketing ash as a commodity, and the impact of waste disposal on ground water supplies and nearby ecosystems. Additionally, the costs for cleaning up environmental contamination from poor ash management should be considered.

- **Water Quality and Wetlands**

The EIS should analyze the environmental, recreational, and economic impacts of the destruction of all wetlands affected by the Big Stone II construction, operation, and transmission. Specifically, the EIS should include: a thorough discussion of isolated wetland destruction and alternatives; a full accounting of economic loss due to negative impact on recreational use of wetlands including hunting, fishing, and birdwatching; a full accounting of the impact of carbon dioxide emissions on global warming, and global warming's impact on the wetlands of the Prairie Pothole Region; a full accounting of environmental and economic impacts on pollution control, water quality, and flood control due to wetland loss; and a full accounting of wetland impacts from transmission routing.

- **Threatened and Endangered Species – Federal and State listings**

The EIS should provide a thorough review of the impacts of emissions on Threatened and Endangered Species in Federal and State listings including plant species affected by excess nitrogen and sulfur soil loadings.

- **Local Impacts from Coal Handling and Transport, from Construction and Operation**

The EIS should include an analysis of a detailed plan for coal handling and all forms of transportation from construction through continued operation. This analysis should minimize fugitive dust emissions from coal handling, construction, and transportation. In addition, it should include air emissions of transportation of coal, type of road surface and potential for fugitive dust emissions, physical design of the coal storage area, an examination of health risks associated with emissions from coal handling and transportation during construction and operation.

- **Local Economic Impacts on Existing Economies and Future Development**

The EIS should consider economic impacts of existing economies and future development, both with regard to the Plant and its transmission. These economic impacts should not be considered in isolation, but should be considered in light of any tax breaks/subsidies received, and in comparison to alternatives to an equivalent amount of power generation – specifically energy efficiency, and wind and solar power, which could generate more jobs and a greater benefit to the local economy.

The impact of the Plant development should also consider the economic impact of air pollution from a proposal that does not include the best available control technology, and precludes the development of cleaner alternatives. Specifically, the EIS should consider the opportunity cost of the Plant and its emissions of carbon dioxide, mercury, criteria pollutants, and others – emissions that may prohibit future economic development due to pollution controls that have been exceeded by Big Stone II.

III. THE EIS SHOULD INCLUDE A COMPLETE ASSESSMENT OF THE POTENTIAL FOR DEMAND SIDE MANAGEMENT AND CONSERVATION TO OFFSET THE ENERGY NEED DESCRIBED BY THE APPLICANTS,

It is critical that the Big Stone II proposal undergo rigorous review of environmental impact and costs as well as rigorous review of alternatives to building Big Stone II. It is not in the Applicants best interest to present a full picture of the potential to decrease our dependence on polluting coal sources. The EIS should include a complete assessment of the potential for demand side management (DSM) and conservation to offset projected need and to create a clear and complete picture of the true environmental and societal costs associated with burning coal.

Sierra Club agrees with issues raised by the Minnesota Center for Environmental Advocacy (MCEA) and the Minnesota Department of Commerce (DOC) about the inadequacies of the Otter Tail Resource Plan as it relates to Big Stone II.¹ MCEA and the Department of Commerce raise critical questions about the need for the Big Stone construction. According to the Department of Commerce's own analysis "It is not reasonable to conclude that retail customers need the Big Stone II resource in the manner planned by Otter Tail. The size is too big, the timing is too soon, and the type may not be appropriate." (See DOC comments)

The EIS should consider whether energy of the magnitude generated by Big Stone II is necessary. If so, the EIS should consider whether DSM would more appropriately address the projected energy need. Through this proceeding, the Department should continue to examine the DSM investment levels and achievements of the utilities in question, and assess if their systems have invested in maximum efficiency improvements that would achieve the same equilibrium of supply and demand at a lower total cost to society than the Big Stone II unit would impose. The EIS should thoroughly examine whether conservation programs and incentives could more effectively and efficiently address any new power demands than could a massive increase in supply from a coal plant. The EIS should consider the market signals, fostered by utilities, which may be driving an increase in demand.

The EIS should consider whether or not increased demand could be more effectively met by smaller energy projects, such as wind turbines, that can be constructed without certificates of need, and can be constructed in a more expedited time frame as needed to satisfy demand. Other alternatives (with alternative transmission requirements) should be more thoroughly discussed, both in terms of power generated and also regulatory costs and environmental, health, and economic impacts (e.g. job creation). These alternatives include, but are not limited to wind, responsible biomass, solar, IGCC technology, or some combination thereof. It should not be forgotten that Minnesota and South Dakota

¹ Comments submitted by the Minnesota Center for Environmental Advocacy *In the Matter of Otter Tail Power Company's 2006-2020 Resource Plan, Docket E017/RP-05-968*, January 3, 2006 and Comments submitted by the Minnesota Department of Commerce, *Public Comments of the Minnesota Department of Commerce, Docket No. E017/RP-05-968*, January 3, 2006

have arguably the greatest wind resources in the world, and could generate enough wind power to satisfy all in-state demand multiple times - and still export renewable power.

Renewable energy technology is rapidly developing. By the time Big Stone II's outmoded energy source and transmission lines come online, Minnesota will have a wider array of more affordable, clean energy available to meet projected energy needs, and boost Minnesota's economy.

Moreover, the escalating costs of Powder River Basin coal makes the economic justification for this project questionable, and should be considered. According to the Wall Street Journal "the price of Powder River Basin coal, lower-quality coal mined in open pits of the Western U.S., more than tripled in 2005 to \$18.25 a ton because inventories at power companies were tight."² Alternatives, such as wind power, that have negligible fuel costs should be compared to Big Stone II. The EIS should consider all costs of constructing and operating the transmission lines and the Big Stone II facility itself. Applicants cannot demonstrate that Big Stone II will be the most cost-effective project in terms of capital costs, transmission costs, and fuel costs.

The EIS should consider the role of the HVTL and Big Stone II in encouraging future development, both for future energy and transmission capacity, as well as traditional economic development. There are concerns that Big Stone II would not be cost effective, and would have negative ramifications for the Minnesota economy, especially in light of alternative wind power development that it would supersede. For example, due to MISO requirements, small wind developers in Western Minnesota (those living in the communities that would be directly affected by new lines) will not have necessary access to the lines to be wind, solar, or biomass power providers. Building a new coal plant, and new transmission lines with primarily coal plants in the queue, creates a serious long term obstacle to economic opportunity in struggling agricultural regions that can take advantage of clean and efficient wind, solar, and biomass power. Minnesota is already one of the largest importers of electric power.

CONCLUSION

Before a power plant expansion of the magnitude of the Big Stone II proposal is allowed to proceed, it must undergo a rigorous examination of prospective costs and benefits. Its impacts on energy markets, the economy, and the environment must be carefully considered. Similarly, the two proposed transmission lines that would accompany this project must not only be considered independently on the merits of particular routes; rather, the transmission lines must be considered in the broader context of the entire project. In other words, the transmission lines would not occur without the proposed increase in energy supply, and this specific proposal would not occur without Big Stone II; therefore it is incumbent upon the Department to assess the impacts of the proposed expansion in its entirety.

² Coal Prices Are Forecast to Rise, But Pace Is Expected to Moderate, Article by Paul Glader, Wall Street Journal, January 13, 2006, page A2

Coal plants are demonstrably dirty, and have clearly negative externalities on the environment and public health. Considering the pace of technological change, one could consider it a rather antiquated form of energy generation, even with the important inclusion of pollution control mechanisms. It will seem even more anachronistic decades down the road.

The Sierra Club is not trying to obstruct necessary energy development. Rather, the Sierra Club wants to ensure that any energy development is absolutely necessary, and that demand forecasts legitimizing any project are accurate. This is especially crucial in a power plant construction of this magnitude. Secondly, we want to be satisfied that any projected need in energy demand cannot be met more effectively and efficiently through conservation measures and other forms of demand side management. Finally, if the expansion of energy supply is imperative, our organization wants to ensure it is the most economical, adaptive, and effective use of society's resources, and that such an assessment does not only consider current capital costs, fuel costs, or costs per kilowatt hour. It also must consider future prices, economic development incentives, and an accounting of health, environmental, and other social costs.

Transmission lines are an inextricable piece of this larger puzzle, and should be considered as such. We believe strongly that an appropriate assessment of the costs of the Big Stone II proposal, through the Department's EIS, will show that there are better alternatives to building Big Stone II. It is our hope that the Department, after thorough analysis, will recommend that the Public Utilities Commission reject the Applicant's proposal on the grounds that it does not satisfy the requirements for a Certificate of Need and that the proposal is not in the best interest of the people of Minnesota



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August 26, 2005

NEPA Document Manager
Nancy Werdel
Big Stone II EIS A7400
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

RE: Scope of the Big Stone II Environmental Impact Statement (FR Doc. 05-10662)

Dear Nancy Werdel,

On behalf of the Sierra Club and its 25,000 members within the state of Minnesota and 900 members in the state of South Dakota, we formally request that the Western Area Power Administration (Western) include the following recommendations in the scope of the Environmental Impact Statement (EIS) for the Big Stone II facility. The notice outlining the draft scope of the EIS does not adequately address the environmental, social, and economic impacts of the Big Stone II conventional coal-fired power plant proposal or consider alternative sources of energy production.

For our members and, we believe, the majority of the citizens of Minnesota and South Dakota, it is a common sense matter to require that the scope of the EIS for Big Stone II consider the environmental, social, and economic impacts mentioned in our comments; as well as, alternatives which do not commit forty more years and \$1 billion dollars to dirty, fossil fuel technology and pollution.

Both Minnesota and South Dakota have better alternatives to produce this energy, create jobs, and reduce environmental impacts – alternatives which would improve economic development, enhance quality of life, and invest in an energy future we can support.

Sincerely,

Christopher Childs and Russ Adams
Co-Chairs, Clean Air Committee
North Star Chapter of the Sierra Club

Jim Margadant
Chair, South Dakota Chapter
Sierra Club

I. OVERVIEW

Construction and Operation of Big Stone II, the 600 MW coal fired power plant in Grant County, South Dakota.

Construction of the proposed Big Stone II Power Plant is to take place adjacent to the existing Big Stone plant. The existing plant is located on an approximately 2,200 acre site. Otter Tail Energy owns a 295 acre parcel adjacent to the existing site and has an option to purchase an additional 623 acres. The proposed plant is expected to share existing infrastructure, including cooling water intake structure, pumping system and delivery line; plant road and rail spur; coal unloading facilities; and solid waste disposal facilities.

The plant would be designed to burn 2.5 to 3 million tons of Powder River Basin sub-bituminous coal annually. The project Co-owners also intend to market ash as a commodity. Excess ash will be disposed of at the existing Big Stone plant on site landfill and may also require the development of an estimated 95 acre landfill. Raw water for the cooling system would be supplied from the existing Big Stone facility's cooling pond which is to be supplied from Big Stone Lake via an existing water line an intake structure. Potable water is to be supplied from the area's rural water system.

We urge the Western Area Power Administration (Western) to conduct an extremely thorough environmental review of this project for three reasons:

1. Large-scale, long-term impact: Coal-fired power plants have an immense environmental impact both on the local environment and throughout the region, nation, and world. Big Stone II will almost surely be the largest source of air pollution built in South Dakota since the construction of Big Stone I, which is currently the only operating coal unit in the state, and with a likely working life of decades, Big Stone II would continue to pollute for a good portion of the century. While the Sierra Club commends Otter Tail Power et al. for proposing to install pollution control equipment at Big Stone I during the construction of Big Stone II, we believe it is necessary to minimize the environmental, economic, and health impacts of the proposed coal plant before considering the net benefit of additional controls at Big Stone I. Therefore, the Sierra Club requests that when net benefits are considered in the EIS that they are also broken down to each individual unit.

2. Evolving science: In the last several years, society has learned a great deal about how environmentally destructive coal plants are, particularly their air emissions. For example, air pollution from coal plants has now been linked to thousands of premature deaths yearly in the U.S. from heart and lung disease¹ from particulate matter,

¹ EPA factsheet: "Health and Environmental Effects of Particulate Matter," <http://www.epa.gov/ttn/oarpg/naaqsfm/pmhealth.html>.

and to brain damage in children due to mercury exposure.² In 2000, power plants (primarily coal) emitted 32% of the nation's carbon dioxide which causes global warming. Conventional coal-fired power plants, like the Big Stone II proposal, have no pollution control technology for carbon dioxide.

3. Conflicting use of resources: The air pollutants emitted from coal plants are increasingly the focus of our nation's environmental laws. Only months ago the EPA adopted new rules to substantially reduce emissions of sulfur dioxide and nitrogen oxides from the power industry in a region encompassing much of the nation (including Minnesota, just across the border from the new plant), in part to reduce the number of premature deaths those emissions cause. The EPA has also adopted mercury rules intended to reduce national mercury emissions from power plants. As proposed, Big Stone I and Big Stone II will not install additional mercury controls capable of 90% reduction and would emit near the limit of mercury (144 pounds) for the entire state of South Dakota. As we discuss below, the nation is moving closer toward the rest of the developed world by considering some form of regulation of greenhouse gases from power plants, and it is highly likely such laws will be in place well within the working life of this coal plant. Building this coal plant runs counter to all these environmental efforts, putting pollutants into the air that would have to be offset by pollution reductions elsewhere if society is to achieve its environmental goals. In essence, a new coal plant will consume a significant portion of the atmosphere's pollution-absorbing capacity, creating a serious unresolved conflict concerning alternative uses of that capacity of the sort described in section 102(E) of the National Environmental Policy Act (NEPA).

For these reasons and additional ones set forth below, the goals of NEPA cannot be met without a far-ranging and thorough scrutiny of the proposed plant's impacts. In part II below we describe the major environmental impacts, socio-economic costs, and resource conflicts related to the coal plant, all of which should be considered in the EIS. In part III we describe some of the alternatives to the proposed project that should be considered. Given the scale of environmental impact this plant would have over at least the next forty years, and the many alternatives already available to it -- particularly given the rich wind resource South Dakota possesses -- we believe that a thorough alternatives analysis is critical.

II. COAL PLANT IMPACTS

A. Sulfur Dioxide, Nitrogen Oxides and other Criteria Pollutants

If built, Big Stone II would emit thousands of tons of sulfur dioxide (SO₂), nitrogen oxides (NO_x), and other criteria pollutants under the Clean Air Act. Sulfur dioxide and nitrogen oxide contribute to several of our nation's most stubborn air pollution problems, including acid rain, ozone formation, and visibility limitations. Moreover, they transform into very small particulates, known as PM_{2.5} (particulate matter smaller than 2.5 microns) when they travel through the atmosphere. PM_{2.5} has been linked with thousands of premature deaths annually from heart and lung disease.

The EIS should thoroughly examine the impacts of all the criteria pollutants, with an emphasis on SO₂ and NO_x, and because these pollutants are known to travel hundreds of miles from their source, the analysis must be similarly broad in scope. The analysis should contain the following elements:

1. Detailed emissions and air impact data: The EIS should precisely quantify the tons per year of criteria pollutant emissions from Big Stone II, and air quality modeling should be done to determine the impact of these emissions on pollution levels in the local and regional air, including their contribution to PM_{2.5} and ozone formation.

2. Impacts on compliance under the Clean Air Act: The EIS should look at the impact the new emissions would have on attainment with Clean Air Act standards, on increment consumption under the Prevention of Significant Deterioration provisions of the Clean Air Act, and on all air quality related values (AQRVs) of regional Class I areas, including the Badlands Wilderness Area, the Wind Cave National Park, the Boundary Waters Canoe Area, Voyageurs National Park, and the Rainbow Lake Wilderness Area. The impacts analysis should include the Twin Cities, particularly looking at what impact the plant might have on PM_{2.5} and ozone levels. If the analysis shows measurable increases in those pollutant levels, it should go on to consider what the additional compliance costs that would be incurred to offset those emissions from other pollution sources.

3. Health impacts. When the EPA adopted more stringent air standards for PM_{2.5} in 1997, it estimated that the new standards would save some 15,000 lives annually, result in thousands fewer hospital admissions and emergency room visits, and reduce the symptoms of chronic bronchitis and asthma, especially among the elderly and children.³ However, it did not claim that the new standard would eliminate all mortality and morbidity impacts associated with PM_{2.5} pollution, and indeed evidence suggests that such impacts will occur even in areas in compliance with the new standards. Given the importance of these impacts, the EIS should quantify the impact that emissions from Big Stone II will have on mortality and morbidity, including premature deaths from heart and lung disease, hospital admissions and emergency room visits, bronchitis symptoms, and asthma attacks.

The EIS should also look at the health impacts associated with other criteria pollutant emissions, including the contribution of NO_x to ozone formation.

4. Crop impact. Ozone formation also has an impact on crop production. The EIS should look at the impact of plant-related ozone formation on crops, particularly given the agricultural nature of the region.

5. Visibility impact. Coal plant emissions also contribute to regional haze. The EIS should quantify the extent to which pollutants from the plant will limit visibility in the region.

³ EPA Factsheet: "Health and Environmental Effects of Particulate Matter," July 17, 1997, available online at <http://www.epa.gov/ttn/oarpg/naaqsfm/pmhealth.html>.

B. Mercury and other Hazardous Air Pollutants

The EIS should analyze the environmental, health, and economic impacts of mercury pollution from Big Stone II. Coal-fired power plants are the single largest source of mercury emissions in the nation. Mercury emitted from coal plants, like Big Stone II, becomes methylmercury in the environment where it becomes toxic in even minute amounts. According to the FDA standard, it would only take 1 pound of methylmercury to contaminate 500,000 pounds of fish which when consumed by humans and wildlife increases their mercury levels. The U.S. EPA has found that 1 in 6 women have levels of mercury in her blood above the safe standard, putting her future children at risk for learning and behavioral problems associated with mercury poisoning.

As proposed, Big Stone I and Big Stone II will not install additional mercury controls capable of 90% reduction and would emit near the limit of mercury for the entire state of South Dakota as defined by the controversial Clean Air Mercury Rule (CAMR.) Therefore, the Sierra Club requests modeling of the impact of mercury emissions on local deposition and accumulation in regional water bodies, and consideration of the reduction of mercury emissions and contribution to deposition and accumulation of mercury in the environment with the installation of existing mercury control technologies capable of 90% or greater reductions. In this consideration, the healthcare costs and future damages of lost productivity should be quantified. A Mt. Sinai Medical School study has quantified the economic impacts of mercury exposure, specifically on lost productivity due to reductions in IQ.⁴ The cost in lost productivity from methylmercury exposure (largely through the consumption of contaminated fish) is estimated to be \$8.7 billion annually with \$1.3 billion of this cost attributable to U.S. power plants. These costs, which measure only the costs from reduced productivity in adulthood due to reduction in IQ, do not consider the additional costs associated with IQ reduction, for example: poverty, out-of wedlock birth, low-weight births, welfare reciprocity, and dropping out of high school, special education costs.

In addition to these costs on human health, mercury contaminated fish also risk the well-being of wildlife, such as: bald eagles, loons, and otters. The Wisconsin DNR has long studied the impact of mercury on the common loon, and discovered that loons have high mercury levels that contribute to low fecundity rates. Minnesota DNR is in the process of doing its own studies. The EIS should also consider the impact Big Stone II will have on wildlife by choosing not to install existing mercury controls which can achieve 90% or more reductions.

In addition to mercury, coal plants emit other hazardous air pollutants, including lead, arsenic, beryllium, nickel, and cadmium. The EIS should at a minimum consider the

⁴ *Protecting Children from Mercury Exposure Is Cost Effective*, Kathleen Schuler, MPH, and Christopher S Williams, MD, Institute for Agriculture and Trade Policy, March 8, 2005, available online at http://www.iatp.org/iatp/library/admin/uploadedfiles/Protecting_Children_From_Mercury_Exposure_is_C.pdf

impact of the above-mentioned HAPs (including mercury) in air modeling and in healthcare cost estimates.

C. Carbon Dioxide and Climate Change

In 2005, the national science academies of 11 nations, including the United States, sent the following message to the G8 summit:

Climate change is real. There will always be uncertainty in understanding a system as complex as the world's climate. However, there is now strong evidence that significant global warming is occurring. The scientific understanding of climate change is now sufficiently clear to justify nations taking prompt action.... We urge all nations to take prompt action to reduce the causes of climate change.... We call on world leaders ... to [a]cknowledge that the threat of climate change is clear and increasing.”⁵

This is not the first time scientists have expressed the severity of global warming. In addition, the Intergovernmental Panel on Climate Change, the National Academy of Sciences, the American Geophysical Union have all forewarned of the dangers of continued inaction regarding global warming (climate change.)⁶ One only has to look at the Kyoto Protocol and compare the efforts and levels of CO₂ emissions of other nations to realize that the United States must take serious steps to reduce CO₂ emissions in order for our planet to address global warming.

1. CO₂ Emissions. Coal plants are a major source of emissions of the greenhouse gas: carbon dioxide (CO₂). In 2000, coal plants contributed 32% of all carbon dioxide emissions in the U.S. In the EIS, the emissions of Big Stone II should be quantified and expressed in terms of tons per year and percent increase from the South Dakota power sector. In addition, it should be calculated in both annual terms and over the working lifetime of the facility.

2. Environmental Impact of CO₂ Emissions. The CO₂ emissions released by the coal plant will mix with global emissions and contribute to global impacts. It is thus impossible to allocate particular environmental impacts to particular plant emissions. However, NEPA particularly urges federal agencies to “recognize the worldwide and long-range character of environmental problems.” NEPA, section 102(F).

⁵ This statement was issued by the US National Academy of Sciences and its counterpart academies in Brazil, Canada, China, France, Germany, India, Italy, Japan, Russia, and the United Kingdom. It is available online at the website of the U.S. National Academies at <http://nationalacademies.org/onpi/06072005.pdf>.

⁶ See, e.g., IPCC TAR; “Climate Change Science: An Analysis of Some Key Questions,” 2001, National Academy of Sciences, <http://books.nap.edu/books/0309075742/html/>; and “Human Impacts on Climate,” December 2003 statement by the American Geophysical Union, http://www.agu.org/sci_soc/policy/climate_change_position.html.

Since global climate change is probably the greatest single environmental threat the planet faces, and since coal plants are such an enormous source of greenhouse gases, the fact that particular impacts cannot be associated with particular emissions should not be an excuse for failing to consider the environmental impacts of the plant's CO₂ emissions. Indeed, the EIS cannot be considered adequate unless it makes a serious effort to estimate the plant's contributions to global warming.

It is possible to at least roughly estimate the costs of CO₂ and other greenhouse gas emissions from the plant using the cost/ton externality value methodology. The EIS should survey the most recent literature estimating total global warming costs and allocating those costs on a cost/ton of CO₂ basis. Given the wide range of externality values available, the EIS should reflect low estimate, best estimate, and high estimate externality values and explain how each were calculated. These cost/ton externality values should then be multiplied by the estimated lifetime CO₂ emissions of the plant to attempt to put some boundaries on the contribution of this plant to global warming.

3. Alternative Sources of Emissions Reductions. If society is to prevent dangerous climate change, it will need to make dramatic reductions in its CO₂ emissions during the next half century – perhaps on the order of 60-80% in developed countries. If Big Stone II is allowed to be built, its millions of tons of annual CO₂ emissions will have to be offset by other CO₂ sources in society. The EIS should look at the costs imposed on society by having to offset these CO₂ emissions from other sources. For example, how many automobiles would have to be removed from the roads to offset this new coal plant? It has been estimated that a 1000 MW coal plant emits roughly the same as 2 million cars; the Big Stone II plant CO₂ emissions would probably equal over a million cars. What cost would that impose on society? The EIS should attempt to quantify some of the costs such a plant imposes on a society that is unavoidably going to be looking for ways to dramatically reduce emissions of CO₂ in the decades ahead.

D. Solid Waste/Ash Management

A proper solid waste and ash management plan for the forty plus year life of the plant is critical to avoid unnecessary environmental impacts from fugitive dust emissions and environmental contamination from leakage. The EIS should thoroughly address the adequacy of the existing on-site landfill. In doing this analysis, consideration should be given to the details of the storage plan, its location, the safety of long-term storage, a chemical analysis of the proposed waste (include what percentage of the ash is unsuitable for sale and the composition and risk of on-site storage of this ash), the feasibility of marketing ash as a commodity, and the impact of waste disposal on ground water supplies and nearby ecosystems. In addition, the costs for cleaning up environmental contamination from poor ash management should be considered.

E. Water Quality and Wetlands

The EIS should analyze the environmental, recreational, and economic impacts of the destruction of all wetlands affected by the Big Stone II application. Specifically, the EIS should include:

- 1) Thorough discussion of isolated wetland destruction and alternatives.
- 2) A full accounting of economic loss due to negative impact on recreational use of wetlands including hunting, fishing, and birdwatching.
- 3) A full accounting of the impact of its carbon dioxide emissions on the wetlands of the Prairie Pothole Region.
- 4) A full accounting of the environmental and economic impacts on pollution control, water quality, and flood control due to the loss of wetlands.

The EIS should include a thorough discussion of isolated wetland destruction and mitigation.

The Big Stone EIS should fully account for the destruction of isolated wetlands. Because of the unique value of isolated wetlands to South Dakota and because the question of federal jurisdiction over isolated wetlands is an area of unsettled interpretation the EIS should account for any destruction of isolated wetlands and alternatives to that destruction.

Isolated wetlands are extremely important to South Dakota, financially, aesthetically, and functionally. Isolated wetlands provide vital nutrients for many species, decrease impact of flooding, purify water, create habitat for a wide range of plants and animals and provide waterfowl habitat benefiting bird-watchers, hunters, and other outdoor enthusiasts. The EIS should examine the cumulative impacts of the disappearance of isolated wetlands and the impact on species, flooding, water purification, and both game and non-game wildlife habitat.

Isolated wetlands have long been protected by the Environmental Protection Agency (EPA) and the US Army Corps of Engineers (USACE), whose jurisdiction came from the Clean Water Act (CWA).⁷ The broad federal jurisdiction over wetlands provided for an enormous decrease in the amount of wetlands that were lost. Annual losses went from almost 500,000 acres annually pre-CWA, to just about 58,500 acres annually between 1986 and 1997.⁸

In 2001, a US Supreme Court decision resulted in confusion in the federal jurisdiction over isolated wetlands when it ruled in *Solid Waste Agency of Northern Cook County v. USACE (SWANCC)*.⁹ Under the authority granted by the CWA the USACE enacted the Migratory Bird Rule, which required a federal permit for any action

⁷ 33 U.S.C. § 1344 (2000).

⁸ Mark A. Chertok & Kate Sinding, *Federal Regulation of Wetlands*, SJ101 Am. Law Inst. – Am. Bar Assn. Continuing Leg. Educ. 1051, 1053 (June 23-26, 2004).

⁹ *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers*, 531 U.S. 159 (2001).

that may impair a wetland that is used by birds who have traveled across state lines.¹⁰ The Court held that this rule was invalid because it exceeded the authority of the USACE.¹¹

Jurisdictional issues over wetlands are anything but settled. Patrick Parenteau, Director of the Environmental and Natural Resources Law Clinic and Professor of Law, Vermont Law School wrote in the 2004-2005 Vermont Journal of Environmental Law the following review.

“Four years after a sharply divided Supreme Court handed down its decision in Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers (SWANCC), there is both good news and bad news for wetlands protection under the Clean Water Act (CWA). The good news is that, contrary to the expectations in some quarters, there has been no massive rollback of CWA jurisdiction. The lower courts have, almost uniformly, rebuffed attempts to read the decision broadly and have, in some cases, actually extended CWA jurisdiction into places it had not been before. To date there have been some fifty-four decisions interpreting SWANCC, the vast majority of which have upheld the assertion of jurisdiction over all manner of tributaries, whether natural or artificial, perennial or intermittent, by surface or underground connection, as well as their adjacent wetlands. In addition, the ill-advised “Advanced Notice of Proposed Rulemaking,” a de-regulatory trial balloon floated by the White House, fizzled in the face of overwhelming opposition from the states, the public, and a sizeable number of members of Congress.” (See <http://www.vjel.org/articles/articles/Parenteau2005.htm> for full Law Review and associated citations)¹²

Because of the unique value of isolated wetlands to South Dakota and because of the unsettled interpretation of the SWANCC decision, the Big Stone EIS should include impact on isolated wetlands and provide alternatives to their destruction and/or detailed mitigation plans.

The Big Stone EIS should account for economic loss due to negative impact on recreational use of wetlands including hunting, fishing, and birdwatching.

¹⁰ 51 Fed. Reg. 41206, 41217 (Nov. 13, 1986).

¹¹ *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers*, 531 U.S. 159, 174 (2001).

¹² “Bad Calls: How Corps’ Districts are Making Up Their Own Rules of Jurisdiction Under the Clean Water Act” Vermont Journal of Environmental Law, Volume 6, 2004-2005, Patrick Parente, Director of the Environmental and Natural Resources Law Clinic and Professor of Law, Vermont Law School

The Big Stone EIS should assess the loss of income to the state of South Dakota from hunting, fishing, and birdwatching as a result of continued loss of wetlands and cumulative impact of wetland destruction.

Wetlands across the nation provide breeding, nesting, and feeding habitats for millions of birds of all types. Wetlands are especially important for migratory birds, which follow special routes during migration. These routes are typically aligned with wetlands crucial to the survival of these birds. As the number of wetlands is reduced, these birds are forced to change their flight paths, which in turn reduce their chances of survival and successful reproduction.¹³ Minnesota, along with the Dakotas and Iowa, has historically been of vital importance to these migration paths, producing up to 75 percent of all waterfowl because of their abundance of small, scattered, highly productive wetland areas.¹⁴

South Dakota once contained approximately 2.7 million acres of wetlands. Recent estimates of the remaining South Dakota wetlands range between 1.3 million acres (Wittmier, 1982) and 1.7 million acres (Dahl, 1990). Estimates are that 20,000 acres of unprotected wetlands are lost from the Prairie Pothole Region each year (Dahl, 1990).¹⁵

Losses of vital migratory habitats have a profound effect on the bird population, as the bird population continues to decrease as wetlands are destroyed. In the past 15 years alone, the continental duck breeding population fell from 45 million to 31 million birds, a decline of 31 percent.¹⁶

Every five years the U.S. Fish and Wildlife Service conducts a survey through the U.S. Census Bureau that includes information on the economic impact of hunting and fishing by state. According to survey figures from the *2001 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*, South Dakota enjoys a \$366 million boost.

Here is a breakdown of hunting expenditures in South Dakota by resident and nonresident hunters:

Hunting	Trip Expenditures	Equipment	TOTALS
Residents	\$28.5 million	\$42.6 million	\$71 million
Nonresidents	\$83.9 million	\$38.5 million	\$122 million
Totals	\$112.4 million	\$81.1 million	\$193 million

¹³ Natural Resources Conservation Serv., *Wetlands Values and Trends: RCA Brief #4*, "Wetlands – A Valuable Asset," <http://www.nrcs.usda.gov/technical/land/pubs/ib4text.html> (Nov. 1995).

¹⁴ Natural Resources Conservation Serv., *Wetlands Values and Trends: RCA Brief #4*, "Wetlands – A Valuable Asset," <http://www.nrcs.usda.gov/technical/land/pubs/ib4text.html> (Nov. 1995).

¹⁵ Big Sioux Water Festival Web Site, Wetlands Factsheet, <http://www.brookings.com/bswf/teachers/tp11.htm>

¹⁶ U.S. Env'tl. Protec. Agency, *Threats to Wetlands 1*, <http://www.epa.gov/owow/wetlands/pdf/threats.pdf> (Sept. 2001).

It is estimated that these hunters bring almost \$13 million in state sales and motor fuel taxes to South Dakota. There are over 5,500 jobs related to hunting activities resulting in over \$100 million in salaries and wages.¹⁷

The Big Stone EIS should account for the loss of wildlife and its associated recreation as a result of the proposed Big Stone II. The EIS should examine the impact of habitat destruction for migratory birds and other wildlife. According to the 2001 survey by the U.S. Fish and Wildlife Service, there are 66.1 million people who participate in wildlife watching in the United States. They spend \$38.4 billion directly on wildlife watching activities. South Dakota has one of the highest percentages of state population involved in wildlife watching activities. There are an estimated 358,000 wildlife watchers in this state. They spend \$92 million (primarily travel, equipment and food) and account for \$3.8 million in state sales tax revenue.¹⁸

The Big Stone EIS should account for the impact of its carbon dioxide emissions on the Prairie Pothole Region.

The Big Stone EIS should account for the impact of its carbon dioxide emissions on the Prairie Pothole Region. Coal plants are a major source of emissions of the greenhouse gas carbon dioxide (CO₂). In 2000, coal plants contributed 32% of all carbon dioxide emissions in the U.S. The EIS should consider the environmental impacts of disappearing wetlands as a result of CO₂ emissions and associated global warming.

A recent article written by Russel Daniels in the Argus Leader discussed expert opinions on the impact of global warming on wetlands.

“Shallow, seasonal ponds and sloughs are indispensable habitat for ducks and a larder of insects and other tiny critters that ducklings need. Farmers have drained more than 90 percent of the wetlands in western Iowa and Minnesota, said Carl Madsen, a retired U.S. Fish and Wildlife Service official.

Drainage has affected only about one-third of South Dakota's wetlands. But Carter Johnson, a professor of ecology at South Dakota State University, said climate change could finish the job.

Long-term data has documented rising air and ocean temperatures, and a large body of research links it with a concurrent rise in carbon dioxide from human industrial activity. Various studies predict that will lead to an increase of anywhere from 2 to 6 degrees Celsius in the next 50 to 100 years.

¹⁷ Economic Importance of Hunting, South Dakota Game Fish and Parks, Wildlife Division Website, August 23, 2005, citing the 2001 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, South Dakota, <http://www.sdgfp.info/wildlife/Economics/Huntingeconomics.htm>

¹⁸ South Dakota Game Fish and Parks, Wildlife Division Website, August 23, 2005, Other Wildlife Associated Activities <http://www.sdgfp.info/wildlife/Economics/Otheractivities.htm>,

An average warming of 3 degrees Celsius - which is 5.4 Fahrenheit - would accelerate evaporation, lowering water levels in most wetlands, according to forthcoming research by Johnson and colleague Bruce Millett.

That would reduce the value of most South Dakota wetlands for ducks, pushing them eastward and driving their populations well below current levels, Millett says. Previous research said warming could shrink crucial pothole wetlands by 90 percent and duck populations by 70 percent.

A 3-degree warming would clearly cause other major problems, such as a rise in sea levels of perhaps three feet and major shifts in agriculture, Johnson said. But a catastrophic loss of wetlands could be one of the most noticeable and irrevocable changes in the region, he said.

And it would have implications far beyond South Dakota.

The "prairie pothole region" of the Dakotas and Montana produce 95 percent of the ducks born in the continental United States, Tawney said. Loss of wetlands here would rob the avid duck hunters of Arkansas and Louisiana of their game."¹⁹

The EIS should attempt to quantify some of the costs such a plant imposes on South Dakota as it will inevitably strive to protect its remaining wetlands from disappearance.

The Big Stone EIS should account for the environmental and economic impact on pollution control, water quality, and flood control.

Wetlands act as natural sponges, storing water and slowly releasing it.²⁰ By acting as reservoirs that fill up with excess water, wetlands have the ability to act as flood control agents and reduce erosion. This has the potential of saving billions of dollars of crops, homes, and even people's lives. Measured in constant dollars, damages from three major floods in the Mississippi in 1927, 1973 and 1993, were US\$ 236 million, 425 million and 12-16 billion respectively.²¹

¹⁹ "Global Warming May Threaten Ducks: South Dakota's Wetlands Could Evaporate with Climate Change", Russel Daniels, Argus Leader, July 7, 2005
<http://www.argusleader.com/apps/pbcs.dll/article?AID=2005507020314>

²⁰ Natural Resources Conservation Serv., *Wetlands Values and Trends: RCA Brief #4*, "Wetlands Help Us in Many Ways," <http://www.nrcs.usda.gov/technical/land/pubs/ib4text.html> (Nov. 1995).

²¹ The Ramsar Bureau, *Wetland Values and Functions 2*, http://www.ramsar.org/info/values_floodcontrol_e.pdf (accessed Aug. 4, 2005).

The destruction of these natural flood control sponges was a significant factor in the flooding of the Mississippi River.²² Restoration of natural wetlands would save millions spent annually on artificial flood management structures and insurance, and potentially save billions in future flood damage.

The Big Stone EIS should consider the benefits and harms associated with flood control and protection of wetlands. The cumulative benefits provided by small wetlands in the Prairie Pothole Region are enormous. Beneficial functions include flood control. Prairie pothole wetlands total 5.3 million acres in 2.7 million basins. 2.1 million basins, containing 689, 000 acres, are less than 1 acre in size. Small wetlands catch runoff from snowmelt and rain. This is downstream flood prevention. Each acre of small wetland reduces flood damage to roads by \$6.11 per year. Each acre of small wetland also provides \$29.23 worth of flood damage protection to agricultural land per year.²³

In addition to flood control, wetlands have the ability to act as natural pollution control, removing nutrients, pesticides, and sediments from surface waters.²⁴ When water enters a wetland, it slows and moves around plants, which removes sediment from the water. This filtration process removes much of the water's pollution by the time it leaves the wetland. Some types of wetlands are so good at this filtration function that environmental managers construct similar artificial wetlands to treat storm water and wastewater.²⁵ For example, a study on the bottomland hardwood wetlands in South Carolina showed that the least-cost substitute to provide the same amount of pollution removal would require a water treatment plant costing \$5 million (in 1991 dollars) to construct and even more to maintain.²⁶ The Big Stone EIS should examine water quality issues related to the destruction of wetlands and proposed mitigation.

F. Threatened and Endangered Species – Federal and State listings

We know at least the following federally listed endangered species are potentially at risk from construction and operation of Big Stone II: Bald Eagle, Topeka Shiner, and the western prairie fringed-orchid. In section 4.3.3 of Otter Tail Power's Application for Energy Facility Siting Permit with the South Dakota Public Utilities Commission for Big Stone II, there is mention of at least one bald eagle nest identified and mapped "approximately 1700 feet (0.3 mile) north of an existing east water storage and cooling pond" for Big Stone I. The EIS should include a current survey of the surrounding area to ensure adequate protection of the Bald eagle. The U.S. Fish and Wildlife Service

²² Richard P. Novitzki, R. Daniel Smith & Judy D. Fretwell, *Wetland Functions, Values, and Assessment*, <http://water.usgs.gov/nwsum/WSP2425/functions.html> (accessed Aug. 4, 2005).

²³ *Small Wetlands in the U.S. Prairie Pothole Region Values Worth Conserving!* U.S. Fish & Wildlife Service Website August 23, 2005 <http://southdakotapartners.fws.gov/sd10.htm>

²⁴ See Virginia Carter, *Wetland Hydrology, Water Quality, and Associated Functions*, "Maintenance of Water Quality," <http://water.usgs.gov/nwsum/WSP2425/hydrology.html> (accessed Aug. 4, 2005).

²⁵ U.S. Env'tl. Protec. Agency, *Functions and Values of Wetlands 1*, http://www.epa.gov/owow/wetlands/pdf/fun_val.pdf (Sept. 2001).

²⁶ Natural Resources Conservation Serv., *Wetlands Values and Trends: RCA Brief #4*, "Wetlands Help Us in Many Ways," <http://www.nrcs.usda.gov/technical/land/pubs/ib4text.html> (Nov. 1995).

restricts construction within ¼ (.25) mile of an active Bald eagle nest. In the same section of the Site Permit application, Otter Tail Power discusses a July 11, 2005 survey of a specified land area for the western prairie fringed-orchid. The EIS should include another survey of the land if there is any question that the orchid was not identified because it persisted in a vegetative state this year.

In addition to the federally listed endangered and threatened species, South Dakota's state listings should be considered in the EIS. The Department of Game, Fish, and Parks has a November 2004 "Threatened, Endangered, and Candidate Species of South Dakota" listing that includes 35 species, including 27 that have state level endangered or threatened status.²⁷

G. Local Impacts from Coal Handling and Transport, from Construction and Operation.

The EIS should include an analysis of a detailed plan for coal handling and all forms of transportation from construction through continued operation. This analysis should minimize fugitive dust emissions from coal handling, construction, and transportation. In addition, it should include air emissions of transportation of coal, type of road surface and potential for fugitive dust emissions, physical design of the coal storage area, and an examination of health risks associated with emissions from coal handling and transportation during construction and operation.

H. Local Economic Impacts on Existing Economies and Future Development

The EIS should consider economic impacts of existing economies and future development. With existing economies, the EIS should consider the impacts on tourism and fishing near Big Stone Lake and the Whetstone River.

Regarding future development, it is important to remember that we are talking about a 40 plus year commitment to this facility that will have a long-lasting ripple effect on economic development in Grant County and beyond. Big Stone II, as proposed, is a \$1 billion dollar investment, not including the substantial tax breaks it has pursued. Otter Tail Power has quantified the expected economic advantages in terms of jobs and local and state taxes. The EIS should quantify the potential lost economic opportunities in terms of jobs, taxes, and local income from choosing Big Stone II over the alternatives highlighted in section III of our comments.

Another aspect of impact on future development is Big Stone II's mercury emissions. The controversial federal Clean Air Mercury Rule establishes a slight increase in mercury emissions allowed from the state. The Big Stone II proposal with the existing Big Stone I coal plant will consume near all the state's allowed mercury emissions. The Sierra Club believes this is not only bad for the environment and public health, but it also poses the risk of thwarting future economic development. The EIS should quantify lost economic opportunity and the potential future mercury reduction costs associated with

²⁷ <http://www.sdgap.info/Wildlife/Diversity/TES.htm>

allowing Big Stone II to consume the state's allowable mercury emissions, rather than installing cost-effective controls which could achieve 90% or greater reductions of mercury emissions from the facility.

III. ALTERNATIVES TO THE PROPOSED ACTION.

A. Factors to Consider in Alternatives Analysis

The EIS should include a very thorough analysis of alternatives to the Big Stone II coal plant. This is particularly important given the tremendous changes currently underway in the power sector, as renewable technologies like wind and biomass achieve ever greater levels of efficiency and economic viability, and as future CO2 regulations are likely to emerge, further changing the economics and technology of power production and use. The fact that the Big Stone II unit would be located in a region with some of the best wind resources in North America means there are even more alternatives worth looking at than if it were located somewhere else.

The alternatives analysis should address three fundamental questions:

1. Is the energy needed at all? Or could greater investment in demand side management (DSM) meet our needs without any of the environmental or health impacts of this coal plant? Studies have shown that investments in energy efficiency can yield demand reductions at lower cost than building new power sources. The EIS should look at the DSM investment levels and achievements of the utilities in question, to see if they have squeezed from their systems all the efficiency improvements they could at a lower total cost to society than the Big Stone II unit would impose. The EIS should also consider the utilities' demand forecasts and consider whether they are reasonable.
2. If additional energy is needed, is pulverized coal really the appropriate choice? The region that would be served by the Big Stone II unit has an enormous amount of unexploited wind energy potential, and as an agricultural area, it also has great biomass potential. The EIS should explore and compare various clean energy alternatives to Big Stone II; including a discussion on environmental, economic, and health impacts for the local community and the areas affected by Big Stone II's proposed plume.
3. If a coal plant is chosen, can it be altered in ways that would reduce the plant's environmental and health impact and make it more compatible with the goals of NEPA? There have been improvements in coal technology that are not reflected in the Big Stone II plant design. The EIS should look at their potential to mitigate environmental and health impacts. Otter Tail Power has identified that it plans to include substantial pollution reduction efforts at Big Stone I as part of the Big Stone II proposal. The Sierra Club requests a discussion of the costs, environmental impacts, and feasibility of moving forward with pollution

reduction at Big Stone I regardless of the construction of Big Stone II or an alternative project.

B. Economic and Social Factors Must be Considered

The EIS alternatives analysis should look not merely at direct environmental impacts of the various alternatives, but at the socioeconomic ones too. NEPA encourages federal agencies to use “a systematic, interdisciplinary approach, which will insure the integrated use of the natural and social sciences” in looking at the impact of projects. NEPA, section 102(A). Particular attention should be paid in the analysis to two major socio-economic factors:

1. Likelihood of future CO₂ allowance costs. When comparing the costs of the various options, it is critical to keep in mind that the era when CO₂ could be emitted for free is almost surely coming to an end. When it does, it will dramatically change the economics of electricity production and use, greatly disadvantaging coal power compared to all other sources of power production. This will surely trigger additional improvements in renewables like wind and biomass, as these industries mature and take advantage of technological advances, government incentives, and economies of scale.

Increasingly the realization of the impacts of carbon dioxide on the environment in the form of global warming is leading to actions to reduce carbon dioxide emissions. Fitch Ratings Global Power Group released a report in October 2004 that anticipated carbon regulation within 10 years. Additionally, in 2003, Xcel Energy’s Vice President of Resource Planning and Acquisition testified before the Colorado Public Utilities Commission that carbon regulations should be considered by utilities purchasing the power rather than the generation owner to avoid double payment by the utility and its customers.²⁸ Further, the testimony estimates proposed \$6/ton; however, recognized a range between \$12/ton to \$40/ton. The Colorado Public Utilities Commission decided on a cost of \$8/ton CO₂.

In December 2004, the California Public Utilities Commission “. . .will now require utilities to account for carbon and other heat-trapping gases when considering the use of fossil fuel plants, and considers cleaner sources more cost-effective if they prevent carbon emissions at a cost of less than \$8-25/ton.”²⁹ The Sierra Club believes this is further proof that carbon regulations are a reality that Big Stone II must consider and requests running an analysis with carbon regulations at four levels: \$8/ton with a 9% and 10.5% annual increase and

²⁸ Eves, David. Rebuttal Testimony before the Public Utilities Commission of the state of Colorado, Docket No. 04A-214E – 04A-216E, p. 18

²⁹ “California Utilities Required to Account for Global Warming Gas Costs”, Union of Concerned Scientists, www.ucsusa.org/clean_energy/renewable_energy/page.cfm?pageID=1600

\$20/ton with a 9% and 10.5% annual increase.³⁰ To avoid future impacts on rates, these costs should be considered in the costs of the facility.

2. Alternative economic development region could enjoy from pursuing wind and biomass.

As a windy, agricultural region, there is great potential for regional benefits from electricity production. Big Stone II would use up a major share of the power market and transmission line capacity, crowding out renewable energy development that could be much better both economically and environmentally.

C. Particular Alternatives to consider:

1. Demand Side Management (DSM) Alternative

Otter Tail Power justifies its projected baseload need with its Resource Plan (IRP.) In its most recent IRP filing with the Minnesota Public Utilities Commission, Xcel Energy is proposing 16.8% DSM. The Sierra Club requests the scope of the EIS includes an analysis and discussion of an alternative to Big Stone II which addresses energy efficiency and demand side management. In this analysis and discussion, we request information on each utility's current DSM programs and what they are proposing in the next 5-15 years.

2. Wind + biomass + DSM

Otter Tail Power is evaluating the potential use of biomass as a fuel source. The Sierra Club requests the scope of the EIS includes an analysis and discussion of an alternative to Big Stone II which incorporates wind energy, biomass, and DSM to reduce and serve the projected baseload need.

3. Wind + natural gas or biomass

The areas in Minnesota and South Dakota near the proposed Big Stone II site have high wind energy potential. The Sierra Club requests the scope of the EIS includes an analysis and discussion of an alternative to Big Stone II which incorporates a majority of the baseload need from wind energy with adequate back up generation from natural gas or biomass.

4. Wind + IGCC with carbon capture technology

Orlando Public Utilities is in the process of demonstrating an IGCC plant using sub-bituminous coal. Otter Tail and others' proposed Big Stone II facility will likely be in operation for at least forty years. The Sierra Club requests the scope of the EIS includes an analysis and discussion of an alternative to Big Stone II

³⁰ McFarland, James R. et al., "The Future of Coal Consumption in a Carbon Constrained World", 4/29/2004, M.I.T., <http://web.mit.edu/10.391J/www/proceedings/McFarland2004.pdf>.

which incorporates the maximum wind energy potential with an IGCC plant that utilizes carbon capture technology.

5. IGCC with carbon capture technology

Unlike pulverized coal plants, IGCC plants allow more efficient and effective capture of most coal plant pollutants, including mercury, and even offer the opportunity to capture and sequester carbon dioxide. IGCC plants are the only coal plants that would have the possibility of meeting future CO2 emission standards. Other utilities in the region, such as Cash Creek Generation LLC, are shifting to IGCC proposals in order to avoid increased regulatory costs and permitting delays and to provide certainty to their customers with respect to the delivery and price of their electricity. The Sierra Club requests the scope of the EIS to include an analysis and discussion of an alternative to Big Stone II that relies on an IGCC plant that utilizes carbon capture technology.

6. Lignite coal with carbon capture and state-of-the art pollution controls.

Vattenfall, a Swedish company, plans to start construction of a lignite coal plant with carbon capture technology utilizing an Oxyfuel process in Schwarze-Pumpe, Germany. The Sierra Club requests the scope of the EIS includes an analysis and discussion of an alternative to Big Stone II which incorporates the use of the Oxyfuel process and state-of-the art pollution controls for criteria pollutants and mercury.

7. Pulverized coal which includes existing technologies to control more than 90% mercury emissions.

Otter Tail Power et al. have stated that the pollution controls they propose for Big Stone II has been optimized for removing mercury as well. The Sierra Club requests the scope of the EIS includes an analysis and discussion of an alternative to Big Stone II which incorporates installing mercury controls beyond the existing pollution control equipment being proposed to reach 90% reductions of Big Stone II's mercury emissions.

February 6th, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
St. Paul, Minnesota 55101-2198



Dear Mr. Birkholz,

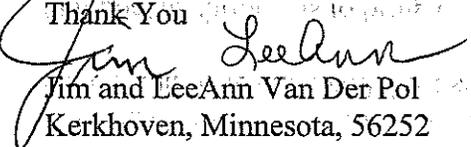
We are farmers in Chippewa County in western Minnesota and we are writing to you of our concern over the permitting and building of another coal fired power plant in South Dakota and the high voltage transmission lines to carry the current into Minnesota. A better use of the state's considerable influence would be to encourage the power industry to pursue the benefit of wind power for additional electrical generation, beyond that already supplied by coal. Wind power is pollution free, it is much more amenable to decentralization than is coal, and it is local. Our farms and small communities could benefit in a large way from a state effort on wind similar to the push that brought the ethanol industry to its present strength. And if thought were given to smoothing out the ups and downs which naturally occur with wind by use of various off peak schemes, it should not be necessary to access additional standby generation for calm days. Farms could pump and store (water tower) livestock water instead of using on-demand pressure systems. Livestock buildings could be designed with natural ventilation standby so fans could be shut down. Corn could be dried with lower heat and longer running systems that could be shut down and restarted. Homes could be built with energy storage right in them similar to the way in which solar is teamed with heat storage.

Our goal as farmers is to bring our farm into the future in as profitable and satisfactory a condition as possible. This has driven the large changes we have made over the last 15 years to reduce our dependence on far away supplies of energy and to begin to understand natural systems of management involving livestock animals and perennial plants so that we may ease our negative impact on the natural environment through reduced use of fuels and fertilizers.

To do this, we must think about what is apt to happen in the next fifty or one hundred years, and plan accordingly so that we have not inadvertently taken our farm too far in the wrong direction. If we apply the same logic to the electrical power supply situation, we must raise large questions about the advisability of coal as a source for power. We already have an alarming level of mercury in our waters, waters that our farm is working to protect. There are regular mercury fish advisories. We are beginning to admit the truth to ourselves as a nation about the reality of greenhouse gas driven climate change, which must be blamed in considerable part upon the use of coal. And it is beginning to occur to large numbers of us that extreme centralization of something as critical as food (and electrical energy) is foolhardy in the present political climate.

This situation is an economic opportunity waiting to happen for rural Minnesota and for its farms. We do not need another coal fired power plant. We ask you to deny the Certificate of Need.

Thank You


Jim and LeeAnn Van Der Pol
Kerkhoven, Minnesota, 56252
phone (320) 847-3432



WESTERN MINNESOTA PRAIRIE WATERS

323 West Schlieman Avenue · Appleton MN 56208
320-289-1981 · Toll Free 1-866-866-5432 · Fax 320-289-1983
E-mail: prairiewaters@umvrdc.org · www.prairiewaters.com
BIG STONE CHIPPEWA LAC QUI PARLE SWIFT YELLOW MEDICINE

DATE: February 7, 2006
TO: David Birkholz, Energy Facility Permitting
FROM: Tom Watson, Regional Tourism Coordinator
RE: Big Stone Transmission Project (aka – Big Stone II Power Plant)

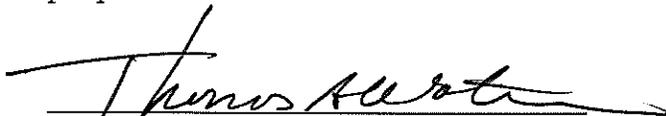
Dear Mr. Birkholz,

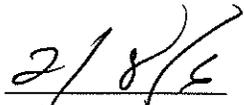
As the regional tourism coordinator for the Prairie Waters region of western Minnesota – Big Stone, Chippewa, Lac qui Parle, Swift, and Yellow Medicine counties I support the sustainable economic development of this region through quality tourism programs that attract the visitor and his/her dollar to our region.

Like the community that lives downstream from effluent of those “up river” so too do we suffer the aftermath of activities up wind of our region.

The Minnesota River and its tributaries are vital to the quality of lifestyle our citizens have come to appreciate, respect and protect. Sadly this system already suffers from Man’s industrial and agricultural influences. We cannot continue to maintain a level of pollution whose affects will be with us and future generations. We must strive for sound economic, environment and social practices that ensure and secure the best life possible for those generations. The Big Stone II power plant runs contrary to all these basic tenets.

As a representative of the tourism effort of our region I am contending that the Big Stone II power plant is not needed. Instead I urge those who control budgets pursue support of alternate energies and the development of such alternatives. Do not pursue this unneeded, mercury-belching facility as proposed.


Tom Watson, Regional Tourism Coord.


Feb. 8, 2006



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Dear sir,

Feb. 6, 2006

I am writing in regard to up grading the Big Stone 115 KV line to 345 KV. I live in section 30 of Tyro township yellow medicine county. The existing line runs about 1000ft. south of my house. I am a radio amateur. When I aim my beam antenna south on the 15 meter band I have more noise than in any other direction. My concern is will the increase in voltage also increase my noise? Also how will it effect my TV, both on VHF and satellite?

Yours truly

Victor Leppke

2364 340th. N.
Minnesota, Mn. 56264



Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Richard Fish
5345 37th Ave So
Minneapolis, MN 55417-2129
612-729-8068

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198



Dear Mr. Birkholz,

I am writing, because I have concerns about the Big Stone Transmission Project. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. I believe that the transmission requested is not needed because the new Big Stone II power plant is not needed. Please pass my concerns about the transmission project to the Public Utilities Commission.

Other Alternatives

I believe that the economic future of our state is better served through locally produced renewable energy such as wind for electricity. Wind provides income to local land owners and produces energy without the harmful side effects of coal powered electrical generation. I personally support wind powered electrical production by paying a wind surcharge on my electrical bill.

Wind is tried and tested. It may be the cheapest new power available and wind is abundant over much of Minnesota. A recent article in the Star Tribune (February 1, 2006) states that we can rely on data collected from our own Department of Commerce where Mike Bull cites the potential for wind energy to benefit rural economies the way that ethanol plants have. Instead of sending our money out of Minnesota to support our growing electricity appetite (estimated at more that \$13 billion spent on energy here) we should support the public's desire for renewable energy investment (estimated at 89% of Minnesotans) within our own state.

Investment in clean energy makes sense. According to data from the Environmental Law and Policy Center, advancing renewable energy production would create more than 200,000 new jobs in the Midwest region by 2020. In fact, wind power alone would create 22 direct and indirect construction and manufacturing jobs for each megawatt of installed capacity. Your own Department of Commerce statistics will attest to the fact that there is no greater need for sustainable economic development than in the counties of Western Minnesota, and for that matter, in the entire wind belt of Minnesota.

Minnesota can lead the nation in reducing Mercury and Harvesting Wind. Along with the dramatically rising costs of health care, a future scenario of costly and dirty energy is waiting to smother the next generation of Minnesotans. Natural gas prices have increased four fold in a very short period of time. Crude was near \$70 a barrel this week and even coal has increased about 50% in about the last two years. But in Minnesota we have what all other states will envy: We have the brain power and the public will to invest in and benefit from the many renewable energy opportunities on the horizon.

Unlike the commodities of the fossil fuel world, installed wind delivers a reliable energy product at a fixed price usually over a twenty year contract. It is no accident that the Southwest Minnesota Foundation has branded their region “the renewable energy marketplace.” Let us invest in ourselves, our own communities, in our own future. Renewable energy is that opportunity.

Five Minnesota Utilities have chosen to go across the border, outside of Minnesota regulatory control, and against the will of their own customers to meet perceived future energy needs. Power generated in South Dakota may provide short term economic benefits to that state, but what are the benefits to Minnesota other than more Pollution and inaccessible Power lines? Instead of standing by while the entrenched utilities in Minnesota resist the public desire to rethink energy as a way to sustain our communities and our environment, our citizens and leaders must create a long range vision for Minnesota. We need to shape a vision that delivers clean energy within our borders, to the benefit of the consumers being served, without the pollution from coal being delivered back to us at the same time.

Environmental Concerns

In Western Minnesota we can stand on the eastern shore of Big Stone Lake and watch the existing Big Stone Plant in action, burning a train load of lignite every other day, sending a plume of pollution on the northwest wind right into the Minnesota River Valley. In the summer, southwesterly winds deliver that brown plume to the central lakes of Minnesota. After Big Stone II is built, a train load of lignite per day, paid for almost totally with Minnesota consumer dollars, will be burned at an appallingly low efficiency (33% -36% converted to power, only one train car in three becoming electricity) and the pollutants delivered to our state will be enormous and unacceptable.

According to Governor Pawlenty: “The basic fact is we are still as a country horribly addicted to fossil fuel in its various forms” Speaking at the University of Minnesota Initiative for Renewable Energy and the Environment (IREE), Governor Pawlenty stated that “our country is not giving its best with respect to energy policy, and we haven’t for some time.” The governor also warned, “...if we continue to use fossil fuel at the rate and pace and scope that we are with the level of technology and emissions, it’s a major environmental problem.”

Minnesota waters are compromised by mercury coming to us from outside our state. The Minnesota Pollution Control Agency (MPCA) works to test and monitor Minnesota’s lakes and rivers. Several western Minnesota lakes and rivers have been recently added to the MPCA’s impaired waters list. About two-thirds of the waters on the current list contain enough mercury to warrant Department of Health fish consumption restrictions. Since coal fired power plants deliver most of that mercury to our waters from plants outside our borders, how can we consider adding potentially more mercury to the mix from Big Stone II when we aren’t adequately addressing the 189 pounds per year that are already being produced by the Big Stone I Plant?

Minnesotans need stronger protection from mercury pollution. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants. The technology exists to reduce these emissions. The Minnesota Environmental Partnership is asking our policy makers to reduce mercury from coal-burning power plants by 90% in the next five years. Our neighboring states to the south and east that receive much of these toxins are demanding us to act also. If we accomplished this goal, the expected output of mercury

from the Big Stone I and II Plants would exceed the total mercury emissions produced from coal over the entire state. The people of Western Minnesota watch this mercury conveyor delivering this poison into Minnesota every day. We don't want any more.

As citizens of the world Minnesotans must take steps now to reduce Greenhouse Gas emissions in order to reverse catastrophic climate change. Most of the industrialized world sees the wolf at the door in the form of global warming, but America still refuses to acknowledge the danger. Minnesota needs to buck the current national trend and own up to the fact that half of the greenhouse gases contributing to climate change come from coal-fired power plants. For decades to come, Big Stone I and II will spew literally millions of tons of CO₂ into the atmosphere. How can we, in good conscience, knowing what we know about global warming alone, proceed with plans to build this plant?

Minnesota can deliver its energy future on the wind and with other renewable energy options. Wind generated electricity with no air emissions; no fuel to mine, transport, or store; no cooling water; no water pollution; and no wastes. An integrated approach to renewable energy will include bio-fuels, energy from consumer and industrial wastes, gas from manure and field waste, storing wind as compressed air, solar energy, and perhaps the most exciting opportunity; wind to hydrogen for electricity, cars, and fertilizer. Research projects to demonstrate how this is possible are currently being conducted at the University of Minnesota Morris. A broader vision for Minnesota integrates a renewable energy plan in a way that mitigates other problems that face us at the same time. The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota while compromising the health of our people and environment.

Our Children's Health

Coal-burning power plants spew roughly 50 tons of mercury into our environment each year, according to the

Waterkeeper Alliance. This research group also notes that just one teaspoon of mercury is enough to poison a fifty acre lake so that the fish cannot be safely eaten. We know that the current Big Stone I Plant is emitting at least 189 pounds of mercury per year. The popular fishing destinations of Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters by the MPCA. What is the Public Utilities Commission going to do to address this public health problem if not to deny the Certificate of Need to Big Stone II?

Human beings exposed to Mercury face a grim inventory of terrible illnesses (again, according to the Waterkeeper Alliance) including neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Tiny exposures of this toxin to pregnant women can cause mental retardation and permanent IQ loss in their children.

According to the Environmental Protection Agency (EPA), one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for these diseases. Minnesota follows this statistical pattern. With alternatives for clean energy production available now, why would our state allow our utility companies to continue to produce poisonous emissions?

The real future of our state and the sustainability of our communities depend on a healthy population. In President Bush's State of the Union address this year, he not only touted the bright future of renewable energy, but he called for more coal-burning power plants to be built with zero emissions. The Big Stone II plant does not meet this criteria. The citizens of Minnesota should settle for nothing less. The mercury, sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health), nitrogen oxides (a powerful lung irritant in the form of smog) and lead emitting from the current configuration of this Power Plant are not acceptable public health risks.

Negative Impacts on Recreation and Tourism Economy

The Upper Minnesota River Watershed is experiencing a resurgence of biological integrity due to millions of dollars of state and federal investment through the Conservation Reserve Enhancement Program (CREP). As a result of this return of wildlife to the region a nascent tourism and recreation economy is emerging. The new Big Stone II power plant threatens to derail this new form of badly needed sustainable economic development in this region.

Outdoor recreation is a \$9 billion dollar industry in Minnesota. The proposed Big Stone II power plant and other proposed plants in the Dakotas threaten this industry by threatening our rivers and lakes with mercury pollution.

The Minnesota Department of Natural Resources is putting the finishing touches on a master plan for the Minnesota River Trail — a recreational trail from Ortonville to Le Suer. How will the use of this trail be affected by the emissions from the Big Stone I & II plants? How many people will want to use a trail that follows the shadow of the plume from these plants?

Please pass my concerns about the Big Stone Transmission Project to the Public Utilities Commission.

Thank you,

A handwritten signature in cursive script that reads "Richard Fish".

Richard Fish
Minnesota Electrical Consumer

EIS SCOPE



MINNESOTA
DEPARTMENT OF
COMMERCE

RECEIVED
FEB - 9 2006

MN DEPT OF COMMERCE
MAILROOM

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

I have a concern that increasing the capacity of this line will affect the use of electronic controls and G.P.S. satellite systems that we are using on our farm equipment to control rates of fertilizers and chemicals, records yields, and guides the width we drive while doing different operations. When I asked how this line would affect these operations as well as satellite T.V., F.M. radios the engineers were unable to answer how it would affect them. I farm ^{land} 2 miles under this line so if I would be greatly affected by the results of if we couldn't use electronics below or within a distance of this line.

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

(over.)

all that I am asking is for the company to
do some research where they have a 345 KVA. line now
and give me an answer on what effect it has.

If it has an effect that we couldn't use electronics
around this line would have a large impact on my family,
operations now and would be even larger in the future.

I don't think the power company should be able to
build a line that has a large impact on the local
residents now and in the future. I appreciate the commissions
and to get all truths out on this line not just
what the power companies attorneys have told them to
say.

T Hank 409

Arlen Koepf

2406-350th st.

Boyd MN. 56218

Phone - 320-855-2308



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

If South Dakota wants the line to Granite Falls, let them have it. I have enough lines in my area within 2 miles of my residence. I am also concerned of environmental impacts and also the concern of stray voltage.

*Eugene Strei
1356 350th St,
Bellingham, 56212-2040*



Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us



EIS SCOPE

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(Use the back of this page for additional comments.)

David Birkholz

I feel that it would be best if the Big Stone transmission line would use the existing route because it does not effect any additional farm land.

Dean Ruesing

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(Use the back of this page for additional comments.)

Do we really need another coal burning plant? Coal is dirty and we have too much pollution already. Our waters are so polluted with mercury we can only eat fish once a month. Coal burning is the biggest contributor to mercury pollution.

Please re Wind energy. It is a clean renewable source. A new recent report says this part of Minnesota does have enough wind. If we must have another power plant please go with wind energy. I would rather see wind turbines than electric lines. Especially knowing that it's clean.

Nancy Hastings

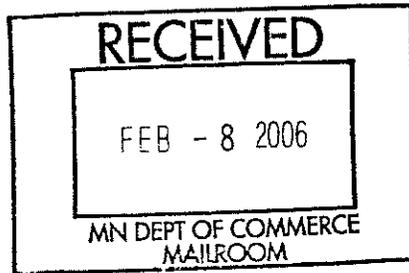
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Saint Paul, MN 55101-2198

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Email: david.birkholz@state.mn.us

Feb. 06. 2006



Dear Mr. Birkholz,

I am writing to express my concerns about the proposed Big Stone II Power plant. I am a parent educator in the Montevideo School District in Minnesota. It is my job to protect and promote the welfare of pregnant women and children, and to try to offer them education that will improve their lives. The pregnant women in our area are advised to avoid eating fish from our local lakes and rivers because of mercury. Mercury is emitted from coal ~~for~~ fired plants. This new plant would create more pollution in our beautiful lakes and streams, creating hazards to our health and the health of our wildlife. In Southwestern Minnesota we are trying out ethanol and windpower for energy. This seems to me to be a way forward that creates less pollution down the road, and ethanol from corn, and ~~wind~~ power from wind are readily available and renewable and safer. I have requested that my electric bill include wind power, and I pay extra, every month, to support alternative sources of energy. This proposed

power plant would create extra energy, so the ~~needed~~ new wind farms and other ~~at~~ alternative energy sources wouldn't be needed. This makes no sense to me. Big Stone II is not needed.

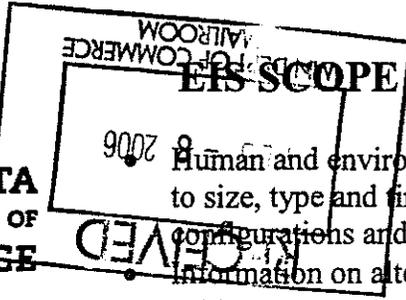
I am hoping you will be able to turn down Big Stone II. I am hoping you will be encouraged to support the health + welfare of our mothers and children, will promote alternative forms of energy and will work towards a future of a cleaner environment.

Sincerely,

Emily Wright,
Parent Educator
112 N. 4th St
Montevideo, MN 56265



**MINNESOTA
DEPARTMENT OF
COMMERCE**



Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage information on alternatives to the project

- Mitigating measures for possible adverse impacts

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Big Stone Transmission Project

I am a resident of Fortier Township, Yellow Medicine County, (Southwest Township of Yellow Medicine County) I am a Director of Tyler-Township Electric out of Tyler.

I believe that in all plans for electric transmission lines that there be plans for use by windpower and other alternative fuel generated electricity. It seems that in Minnesota we are a leader in protecting the environment and promotion of alternate fuels and uses. As the drought or lack of rain for the time in South Dakota continues we must be in favor of developing alternative electric power, and the means to transmit that power around the country. The major ice storm in our area this fall tells us that there must be alternate lines.

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Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

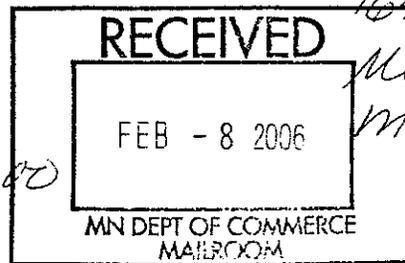
Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

when one area is broken down due
to storms or other disasters that
stop electrical power, more lines are
needed but these lines should serve
different portions of Company.

Jim Stone
1310 200th ave
Condy, MN 56220
507-223-5204

Mr. David Birkholz
Energy Facility Permitting
85 7th Place E. Suite 500
St Paul MN 55101-2118

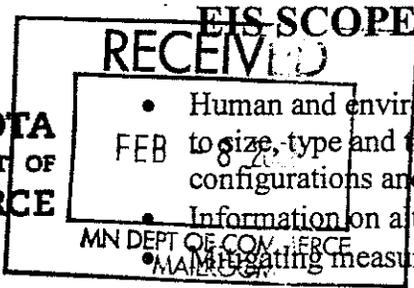


Never in my 56 years of life has it been closer to my heart to speak up for environmental concerns as it is now that I am awaiting the birth of a grandchild! I am concerned about the health of our rivers, in this case the Minnesota River + it's fish, the future of regional renewal energy, the tourism and recreation economy and the need to reverse global warming.

Please tell all involved with energy permitting about my request not to fund the Big Stone Transmission Project because the new Big Stone power plant is not needed. I support the use of wind energy which is a renewable resource & will financially benefit Minnesota. I want our waters free of mercury pollution and I want us free of Greenhouse Gas emissions for our sake & for future generations.

Thank you.

Jinda Bratton, Licensed Social Worker, State of MN
Employer: Chippewa County Family Services, CURE



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(Use the back of this page for additional comments.)

We live in Section 20 in Amro township in Yellow Medicine, Mn. I attended the meeting in Canby Mn. Jan 26th 2006.

At this meeting I learned the alternative route set for rebuilding the Big Stone II Power Transmission line 115Kv to 345Kv is just a few yards south of our house. Please keep the line where it is now, which is 1/2 mile south of our place.

At the meeting a farmer asked about the EMF impact on farm machinery, due to the new developments in technology in farm machinery. His question was not answered. We farm land about a mile long, along this 115Kv line now. My husband said his farm machinery ^{monitors} all go to zero when close to the wires. over--other side

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Saint Paul, MN 55101-2198

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Email: david.birkholz@state.mn.us

Your pamphlets state you do not know how exposure to these lines affect human health, My husband has had a heart attack and stroke within 3 years. I think thats enough in his life time. So we sure don't want this line placed next to our farm house and maybe create more health problems.

Daniel & Rose Marie Doom
2902 240 Ave.
Candy Mow 56220 4045
507 224 2154

February 2, 2006

3360 230th Avenue North
Minneota, MN 56264



David E. Birkholz
Energy Facility Permitting
85 7th Place East
Suite 500
St. Paul, MN 55101-2198

Dear Mr. David Birkholz:

As a landowner and farmer in Omro township in Yellow Medicine County, I have farmed under the Otter Tail Power company power line for my whole farming career.

I have some concerns with the aggravations of farming under this power line. The grief of turning machinery out for each power line setting for each aspect of farming; planting, cultivating, spraying, combining and the tillage work, along with the overlapping of farm chemicals under each tower.

How does this power line going to affect the new electronics within the farm equipment? What effects will it have on the new electronic technologies of the future? Tractors, combines, sprayers, two-way radios, satellite dishes. G.P.S., internet and other electronics are surely in the infancy of technology. Are you willing to improve the power lines in a few years when frequency emissions renders new technology inoperable? Wi-fi laptops currently lose their connection when within this magnetic field. Won't you be taking a step backwards by not allowing agriculture to keep up with technology?

I know of a neighbor who is a ham radio operator who claims problems, and that is with the current 115 kv of power. What will happen at 230 kv of power? The settings are being engineered for 345 kv of power, can you image what problems this may create?

The power line in question, crosses the Department of Natural Resources land. I believe this would raise issues with the wildlife flight patterns. I personally have seen dead wildlife from flying into the existing power lines, from fog, mornings or evenings, not being able to see this line, or even being startled. The hum that the power line makes, must, as I see it, also affect the breeding aspects of wildlife.

I also have concerns over the stray voltage issues involving possible health risks, such as cancer. Could this power line become the target of a possible future lawsuit?

What does this power line do for the value of the land? Nothing, in fact it devaluates the price of the land tremendously. The cosmetic picture would be an eyesore, no one would put up their home near the power lines or the structures. Wouldn't

this inhibit rural development in out state Minnesota? Even developing a little air strip would be out of the question. Are you not putting out state Minnesota at a disadvantage?

I realize that I will not and cannot stop this power line, nor do I want to stop the progress. But I feel that all people use electricity and that we should all bear the burdens associated with this. I have taken my turn supporting the current structures. Should it not be someone else's turn to support the future electrical infrastructures? I would personally like to see the power line be constructed in the county road #3 right of way, east of St. Leo. The proposed alternative route should have the power line settings be in the county road ditch, where the settings would not bother anyone, verses in prime farmland.

In conclusion, it seems to me that the simplest, most fair and equitable, and forward looking resolution, to the matter, would be to insist that the power companies bury the line – or no permit!

Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in cursive script, reading "David Jannus". The signature is written in black ink and is positioned below the word "Sincerely,".



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We do not need any more coal burning plants to come on line. With the mercury emissions in the air & water it causes health problems for all of us. If we learn to conserve and with alternative sources like wind energy etc. we do not need any more power plants. In the western part of the state we do not need big power lines to supply electricity to the eastern part of the state. At night the sky is lit up with all the lights from the bigger cities. Make them turn some of the lights out and conserve.

Thank you

Harold Schulz

1877 HWY 274

WOOD LAKE, MN. 56297

RECEIVED

FEB - 8 2006

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz

MIN DEPT OF Energy Facility Permitting

MAIL ROOM 85-7th Place East, Suite 500

Saint Paul, MN 55101-2198

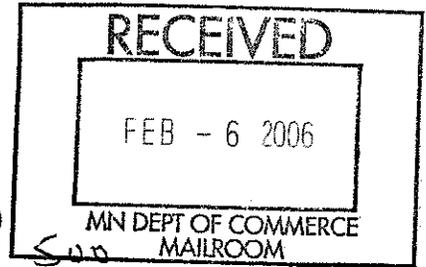
Phone: 651.296.2878

Fax: 651.297.7891

Email: david.birkholz@state.mn.us

201 Garden St.
Duluth, MN 55812
February 2, 2006

Mr. David E. Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101-2198



RE: Big Stone Transmission Project

Dear Mr. Birkholz:

I drove from Duluth to attend the informational meeting in Canby on January 26. As I left the meeting, I commented to a fellow that it seems there ought to be a better way in this day and age to do this. He replied, "I heard a number of good questions and no good answers."

Our family farm is the east half of Section 35 in Manfred Township, Lac qui Parle County, Minnesota. I have concerns based on the information given in regard to need, effect on the land, and effect on people.

A relative of mine was a member of the Minnesota Charities Review Council, and he routinely kidded me about how southwestern Minnesota was the only part of the state that was losing population. I have heard school enrollments are down.

Generally, towns are not increasing in population. Does this translate into a need for more power? Also, with wind energy showing the promise it does and with Buffalo Ridge testing out as the most consistently windy place in Minnesota, then would the proposed project serve the long term or would it soon be obsolete?

Our farm was recently tilled at quite an expense. Our drainage ditches are critical. The pasture to the north and the meadow are in a CREP program, eligible in part due to native grasses and flowers. Land values have increased for both tillable and recreational land. What effect would this project have in regard to land, values, water, and wildlife?

Our tillable land is rented to a farmer who uses large, expensive, computerized equipment. Efforts have been made to enlarge fields, to accommodate equipment. Fences have been removed. What effect will poles, lines, and electricity have on the above? Will there be a hum? Would anyone want to build near these structures? What are the health issues? Who is liable for damages whether they be accidental or natural? Finally, whatever is built will not be a natural, friendly addition to the landscape. It will belong in another category.

In conclusion, I am not convinced the Big Stone Transmission Project is needed. I am concerned about our farm and the community and the inherent dangers and negatives that accompany a project such as this one. Companies are driven by money. And, their profits can be at the costly expense of the citizen - and the State. I hope my concerns are clear.

Sincerely,

Roger Hanson POA for Bernice Hanson

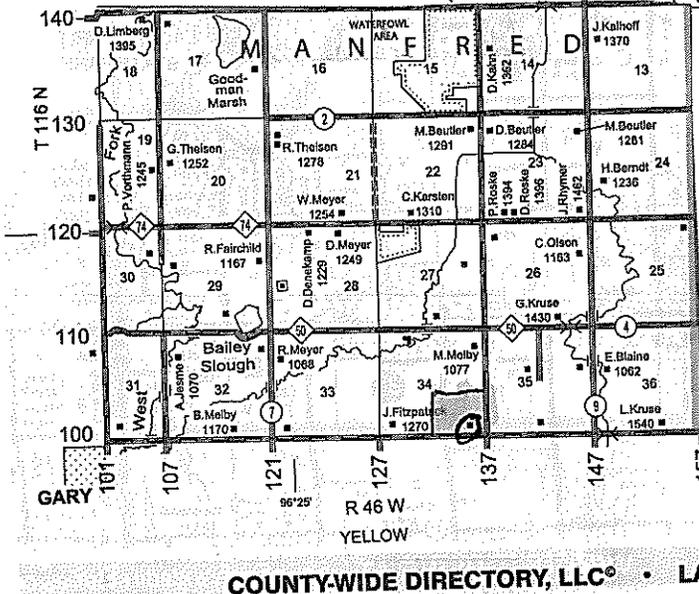


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(Use the back of this page for additional comments.)



MARK SCHUBERT
 1516 155TH AVE W
 CANBY, MN, 56220
 507-223-5229

WE PLAN TO PUT A HOME BACK ON THIS BUILDING SITE IN THE NEAR FUTURE FOR OUR SON. GRAIN BINS WATER & SEWER ALL ALL IN NOW. NO POWER LINE PLEASE.

S.E. 1/4 SEC 34 MANFRED TOWNSHIP.

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
 Energy Facility Permitting
 85 7th Place East, Suite 500
 Saint Paul, MN 55101-2198

Phone: 651.296.2878
 Fax: 651.297.7891

Email: david.birkholz@state.mn.us

February 4, 2006



Mr. David Birkholz
Energy Facility Permitting
85 - 7th Place E., Suite 500
St. Paul, MN 55101-2198

Dear Mr. Birkholz:

As a director of CCMR (Coalition for a Clean Minnesota River), and a former member of the Citizen's Advisory Committee for the Minnesota River, I feel compelled to comment on the plans Otter Tail Power has to construct yet another coal fired power plant near Big Stone City, SD.

Mercury emissions from the Big Stone Power Plant were discussed during Citizen Advisory Committee meetings; however, documentation of fish containing mercury in the Minnesota River Watershed was not readily available.

With information we now have regarding the effects of mercury emissions on the environment, and the technology we have to eliminate those emissions, it is reprehensible that the present Big Stone Plant is still allowed to operate, with yet another one being proposed.

I would urge the State of Minnesota to deny Otter Tail Power company access to lines in Minnesota for the distribution of power that is not being produced with "zero emissions."

Sincerely

Del Wehrspann
4035 Co. Rd. 15 SW
Montevideo, MN 56265

cc: Senator Gary Kubly
Representative Aaron Peterson



EIS SCOPE

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(Use the back of this page for additional comments.)

I am writing about the line running through Dublin Township in Swift County Sections 28 & 29. I would like the poles set on the south side of the minimum maintenance road south of the ditch

John Jones
1065 80th St. S.E.
Murdock Mn 56271



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Saint Paul, MN 55101-2198

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David Berkholz:

Option one going to Willmar is proposed to go right next to my building site my house is located just a few yards away from this proposal

I live in the middle of Corridor 2 have land in all three miles - Do you realize what negative impact this will have on my farming operation - farmstead and land values in the 10's of thousand lost - future irrigation systems - and how about all the unannounced health issues - I am 100% OPPOSED to alternative 2 corridor going to the Willmar area who re-invent the wheel - no grade the lines or in to moving land easements and route already in place OR go south of Hwy 7 on state wildlife land from Ortonville all the way to Appleton - Montevideo - Granite Falls - no individual farmstead or farm land - I have heard the state will not allow lines on their land if this is true - Why the hell should we allow it on our land It's ridiculous to even consider alternative two - cost involved all new easement (which I will not give) poultry and livestock feeding facilities - This is Prime agriculture farm land and what about all the present and future irrigation systems - If MAs need more power Build the plant their.

~~Please provide your contact information. If you would like to receive copies of the Draft EIS, fill in the box on the reverse side.~~

Name: Ron Schmidt Title: OWNER
Mailing address: 43174 CO Hwy 36
City, State, Zipcode: Correll, Mn 56227
Phone: 320-273-2390 Fax: _____ E-mail: _____

Ron Schmidt



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Atten: David Birkholz

Subject: New Transmission Lines in Yellow Medicine Country

Property in Hammer Township: Section 19 TWP-115 RANGE-45 160 Acres NE 1/4

There are a couple issues I would like to call to your attention with respect to the NE ¼ of Section 19 in Hammer Township. They relate to the drainage system on our property and I have spelled them out in detail on the reverse side of this document.

Gene Ferguson
N1376 Fawn Ridge Court
Greenville, Wisconsin 54942

Home Phone: 920-757-6840
Work Phone: 920-731-0822 X20

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

January 31, 2006

Atten: David Birkholz

Subject: New Transmission Lines in Yellow Medicine Country

Property in Hammer Township: Section 19 TWP-115 RANGE-45 160 Acres NE 1/4

Drainage Tile:

There are a couple things I would like to call to your attention with respect to the NE ¼ of Section 19. My dad purchased the farm in 1957 and put a considerable amount of tile in the ground. In those days they didn't prepare tile maps so today we don't really have a clear understanding of where all the lines are located. If a wet spot appeared in the field, they would install additional tile.

Any activity on the property would need to respect our drainage tile system. We want to be certain that any construction processes or transport of heavy equipment won't damage or impair the functionality of the system.

Drainage Ditches:

If you refer to the USDA Aerial Map of Section 19, you will see that the SE ¼ and SW ¼ both drain to the north. There is a major drainage ditch running on the south and east side of our property. Any poles or towers would need to be set back a reasonable distance to avoid any obstruction in the channel and provide for eventual cleaning of those ditches. There is also a shallower ditch to the north that runs diagonally through the property. While probably not in the potential construction path I mention it anyway.

If you wish to contact me for any reason I can be reached at the following:

Home Address:

Home Phone: 920-757-6840

Gene Ferguson

Work Phone: 920-731-0822 X20

N1376 Fawn Ridge Court

Greenville, Wisconsin 54942

Thank you for your kind attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Gene Ferguson". The signature is written in black ink and is positioned below the typed name and contact information.



EIS SCOPE

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OVER

Comments on Back

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Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Re: Big Stone Power Plant expansion and Transmission line construction.

I have some objections to the routing of the Willmar Corridor line. I live in sec 24 Moyer Twp Swift Co. Our home is on the south side of Hwy 12, just a few hundred feet from the proposed preferred route for this corridor. I have attended numerous meetings from the beginning about this line and have voiced my concerns, apparently to no effect at this point. My concerns about the proposed route are as follows:

1: The proposed line runs very close to our house and farm site. The line would be 230 ft from our home. This will have a very negative affect on the value of our home. One also has to wonder about the health effects of living and working every day, all day, so close to a large power line. There is no need for this, as this is a sparsely populated area with ample options for routing.

2: It seems rather odd to run a major transmission line alongside miles of US Hwy 12, a major east west highway that links I90 in Miles City Montana with Minneapolis and points east. Is this what we want travelers to see as they enter our state from the west? What impression does this give people about us and our priorities? Why not move it off to either side of Hwy 12?

3: I have a North/ South grass runway adjacent to our home and farm site. I built a new hangar for our plane in 2004. The proposed routing along Hwy 12 will make this runway unusable. This means my investment in the hangar and runway would now be totally lost, and the utility of the airplane severely restricted, as it would no longer be able to be based at our farm. Even the alternative route on the east side of our home quarter will have an impact on the safety zone that normally surrounds airports. I have repeatedly begged and pleaded at previous meetings to keep the line away from the runway, only to have both proposed routes within ¼ mile of the runway.

4: The alternative route runs right through a wetland on the east side of sec 24 Moyer twp. This wetland is DNR protected and has a Fish and Wildlife easement on it. It really does not make sense to run a line through a wetland the government saw fit to spend tax dollars preserving.

5: There are already small transmission lines running 1 mile south of Hwy 12 adjacent to our farm. Why not follow the example of this corridor? It avoids all of the problems listed above and does affect any other homes as there is no one living along this route for miles to the east. It should not be hard to find a route that is off the main roads, avoids people's farm sites and gets the job done with minimal visual, environmental, and economic impact.

6: If this project is built, it should be built with sufficient capacity that it can handle the loads from Wind Turbines to be built in the future. If this project proceeds, it should be mandated that the existing Big Stone plant be brought up to the best possible standards for reducing emissions of mercury, greenhouse gases etc..



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I would strongly urge anyone making a decision on where the location of the line from Canby to Granite Falls remain where the old line is located. I don't think moving it north 1/2 to a 1 mile would make sense for cost reasons.

Patricia Subud
2471 240th Ave
Canby MN 56220

I would hope wind energy would be taken into consideration. We need to use new alternatives to preserve the environment.

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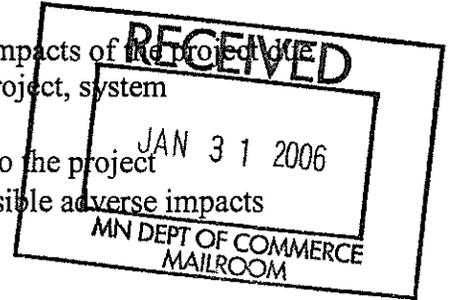
Email: david.birkholz@state.mn.us



Volkman
3607 141st Ave
Odebosa, 56276-2507

EIS SCOPE

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Points I would like to make.

South Dakota is getting the power plants + tax revenue connected with it, let them put up with the power lines.

The option ^{No 4} of placing the line East of the existing Ortonville to Canby ^{line} is a ~~de~~ serious hardship on us as it would come right over the top of one of our farm homes, (either mine or my sons)

Also option 4 is only $\frac{1}{2}$ mile from existing Canby - Ortonville Line, which to me seems to be an unfair burden on a few people

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85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

David,

Enclosed are my remarks. I have also enclosed an earlier letter that I sent to Otter Tail Power Co.

Mil

*Gilbert Larmer
200 Stephen Ave
Marshall 56258-3121*



Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

January 30, 2006

To Whom It May Concern:

I am a landowner in Omro township, Yellow Medicine County, Minnesota.

I have concerns about the proposed upgrading of the present 115kv power line running from Canby to Granite Falls.

The present and preferred route is across about a mile of D.N.R. wildlife refuge in sections 26 & 27 of Omro. Including, across the southern part of Lanners Lake. The largest body of water in the area. The second largest body of water in the area is located about $\frac{3}{4}$ of a mile south of Lanners Lake. There is also another water containing wildlife refuge about $\frac{1}{2}$ mile southeast of Lanners Lake, So there are natural wildlife flyways between these areas. I have observed wildfowl striking the power lines. The result is usually devastating. Also, transmission lines emit an electro magnetic field, have a constant hum and are patrolled by low flying aircraft, all of which may be detrimental to wildlife.

I am very concerned about the electro magnetic field produced in the power line area. Presently, the 115kv line renders useless the satellite produced GPS-WAAS signal, for electronic guidance of farm machinery. It is basic physics that as the voltage of the line is increased, the magnetic field of influence will increase exponentially. It is reasonable to assume that in the, not so distant future, farm machinery will operate robotically from electronic signals. At which time, the land within the area of influence will become useless for agricultural crop production.

Modern farm tractors, combines, sprayers, etc. have numerous electronic controllers incorporated into their manufacture. There are controllers for the engine, transmission, hydraulics and more, that operate on very minimal voltages. I understand that a 345kv overhead line will drive these controllers amuck. Can you imagine a 500-1000 horsepower tractor or combine on the loose!

If you consider this loss of agricultural revenue for generations to come, it is academic that power lines should be buried when crossing prime agricultural land. Power companies will argue that is not feasible. I highly dispute their rational. They only see their side of the situation. Also, the power companies have means of recouping their expenditures, farmers do not.

If it evolves that an overhead line will be built. I strongly believe that the alternate route from Canby to Granite Falls would be the best choice. It would avoid the wildlife areas and problems mentioned in the above paragraphs. And if it was build in the highway #3 right of way, the structures would physically not interfere with farming operations. And there would be fewer agricultural acres involved in the electronic interference.

Thank you, for your consideration of my remarks.

Sincerely,



6/27/05

To Whom It May Concern:

I am the owner of the S.E. ¼ Section 25 T115N R43W. My son has rented the S.W. ¼ of Section 25 T115N R43W for many years and anticipates renting it for years to come. Thus, we have one mile (8 double poled structures) of your power line to contend with. I also own land adjacent to Lanners Lake in Section 26 115N R43W.

Concerning your proposed update, of the line to 230000 kv. I believe my following points should be considered.

My Dad signed the easement for the construction of the present line about 50 years ago for \$100.0 compensation, per setting. It is an insult to your and my intelligence to consider that it be fair and equitable compensation.

My calculation is that each year, each setting, results in a \$7. to \$9. direct loss, due to the land area not being farmed. In addition that figure should be doubled due to farming around the poles and doubling up on seed population, fertilizer and chemical application. Typically, because of the doubling of crop inputs and the difficulty in cultivating the curved rows, that area is lost as well.

Because of the electric field near the present 115000 kv line the use of GPS-WAAS, for electronic guidance of farm machinery, is rendered useless. I project that this very significant problem may very well, in the future, because of agricultural technology advances, render the farm land near the power line, valueless for agricultural production.

In addition, we have had thousands of dollars of damage to farm machinery from striking the power line poles. And the pole sites are a weed source that infects the nearby area.

It is my hope that you relocate the updated line. I feel that after 50 years, the present property owners and renters have been exploited and have well paid their civic and public duties. Let someone else take a turn!

The north and south boundaries of your corridor are both county roads. Why couldn't the line be installed in either county road right of way? That would certainly be more user friendly to both you and the farmers. And it would avoid sensitive wildlife areas, such as Lanners Lake.

If you insist on the present location, it is my thinking that it would only be fair and responsible, that the line be buried (and possibly shielded) irregardless of the cost.

If you insist on the overhead line, please, get rid of the double pole structure and go to a single pole, set exactly on the property lines. The present structures are set about 8 to 10 feet south of the property lines, adding to the aggravation.

Finally, the matter of compensation should be revisited. Form my above comments. I am sure you understand my position on the matter. Please be advised that the 5th amendment and the laws of eminent domain do not allow for the taking of private property without fair and just compensation. I think compensation should be paid annually. And periodically adjusted for inflation and other circumstances that may arise.

Thank you, for any and all consideration that you may be able to extend in this matter.

Sincerely, 

*AMERICAN
SUSTAINABLE
ENERGY
COUNCIL*

80 SOUTH 8TH STREET, SUITE 900
MINNEAPOLIS, MN 55402

February 11, 2006

Mr. David Birkholz
Energy Facility Permitting
85 7th Place East Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

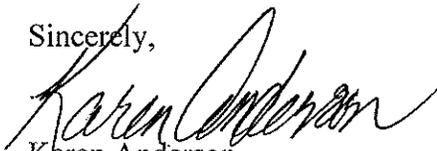
American Sustainable Energy Council is unique in that its mission is to educate businesses, the banking community, and the public about the financial benefits of alternative energy, in particular wind energy. From the frame of what makes the most economic sense, we firmly believe that development of wind power is most important thing that Minnesota can do for itself. It is our opinion that upgrading power lines to Big Stone, S.D. as requested by Otter Tail Power is not in the public's self interest.

In addition, we believe it is financially irresponsible and shortsighted to continue to build fossil fuel power plants. Due to advances in the technology of wind power, electricity generated from wind energy is now cheaper than fossil fuel generated electricity. That is at today's rates. That gap in profitability will only widen as coal, oil, and natural gas prices continue to rise in an unstable world market and as supplies dwindle.

The price of capital outlay per KWH of energy production is comparable between a coal-fired plant and wind turbines. Wind is free and plentiful in much of Minnesota. There are no transportation costs. Why not use a fuel that costs nothing? Perhaps the better question is, "Why use a fuel that causes proven environmental harm, costs more, and sends profits out of state?"

American Sustainable Energy Council believes it is imprudent and a breach of your fiduciary duty to grant Otter Tail Power a Certificate of Need to establish power lines for the greater use of coal-burning facilities. We will be happy to discuss these issues with you and to help you find a better alternative.

Sincerely,


Karen Anderson
Executive Director

Wind energy...not alternative. Preferred!™



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(Use the back of this page for additional comments.)

Dear Mr. Birkholz,

I am a student at Montevideo high school. In my environmental biology class we have been learning about the negative effects of Mercury on humans and the environment. We have also been follow the Big Stone II power plant controversy. I have, from this, come to the conclusion that the Big Stone II power plant is not needed. In addition to that, it is not wanted.

A new power plant means more mercury emission in an area that already has way to much mercury. Mercury is very unhealthy for humans. Even very small amounts of mercury can harm unborn babies, causing them to have hightened risks of autism, dyslexia, blindness, and many other dangerous diseases. That is not something we want to have to deal with, there is no reason for it.

If unborn babies aren't a good enough reason to stop the building of this plant, then perhappes the environment and wild life is. Mercury emisson hurts the environment and kills off wildlife. The death of wildlife will affect the economy of Minnesota because outdoor recreation is a large incommion for the state.

There are other ways for us to get power which are much healthier and will help boost the minnesota economy.

Melanie Richard

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1002 Black Oak Ave
Montevideo, MN 56265
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Fax: 651.296.4501

Email: david.birkholz@state.mn.us

Brittany Tilden
138 Cobble Ave
Monticello 56265

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(Use the back of this page for additional comments.)

Dear David Birkholz,

I'm writing you concerning about the Big Stone Transmission Project. The Big Stone Power Plant is already hurting our environment and our rivers. I enjoy fishing and canoeing and I believe coal is not the answer for keeping our rivers clean.

We do not need a second coal fired plant. It's contributing too much mercury and increasing global warming. We need to be protected from mercury because it stays in our environment. It doesn't go away. I don't want my children and our next generation to have to suffer from illnesses such as liver failure, neurological damage, and even fatal heart disease when it can be stopped. We can get energy from wind generated electricity that has no fuel, no water pollution, and no wastes.

Sincerely,

A Concerned Citizen

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Email: david.birkholz@state.mn.us

Nicholas Krueger, MD
Family Medicine Physician
908 11th Str. N
Montevideo, MN 56265
nkrueger@montevideomedical.com

E0177TR-05-1275

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

February 9, 2006

Dear Mr. Birkholz,

This letter is meant to add to the chorus of voices replying to your call for public comment. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. It is my contention that the transmission requested is not needed because the new Big Stone II power plant is not needed.

Minnesotans need stronger protection from mercury pollution. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants. The technology exists to reduce these emissions. The Minnesota Environmental Partnership is asking our policy makers to reduce mercury from coal-burning power plants by 90% in the next five years. Our neighboring states to the south and east that receive much of these toxins are demanding us to act also. If we accomplished this goal, the expected output of mercury from the Big Stone I and II Plants would exceed the total mercury emissions produced from coal over the entire state. The people of Western Minnesota watch this mercury conveyor delivering this poison into Minnesota every day. We don't want any more.

Human beings exposed to Mercury face a grim inventory of terrible illnesses including neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Tiny exposures of this toxin to pregnant women can cause mental retardation and permanent IQ loss in their children.

As a primary care physician I advise many of my patients of the benefits of eating fish. This is especially true of my patients at risk for heart disease, as fish contain protective fatty acids. But for the foreseeable future, I can not recommend eating fish regularly to any patient due to current levels of mercury for in fish. Clearly, as a matter of fact, we as a society need to stop adding any new sources (regardless of how proficient a wet scrubber would

be) of mercury in the environment. Let alone further limit the current sources. Any new coal burning power plant in this area makes my job as a physician harder.

I also take care of obstetric patients as well as infants and young children. These groups are particularly susceptible to the toxic properties of mercury. Pregnant women essentially cannot eat fish today due to the potential for brain damage of the unborn child. A coal burning power plant as proposed, no matter what kind of scrubber it uses, will add to this problem.

According to the Environmental Protection Agency (EPA), one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for these diseases. Minnesota follows this statistical pattern. With alternatives for clean energy production available now, why would our state allow our utility companies to continue to produce poisonous emissions?

The real future of our state and the sustainability of our communities depend on a healthy population. Coal-burning power plants if they are to be built, must only be built with zero emissions. The Big Stone II plant does not meet this criteria. The citizens of Minnesota should settle for nothing less. The mercury, sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health), nitrogen oxides (a powerful lung irritant in the form of smog) and lead emitting from the current configuration of this Power Plant are not acceptable public health risks.

Thank you for your time and consideration of my thoughts on this matter. Please feel free to contact me if I may be of any assistance to you.

Sincerely,

Nicholas Krueger, MD

Andrew Falk
Private Wind Energy Developer
1170 Hwy 9 NE; Murdock, MN 56271
Phone: (320) 875-4341

E017/TR-05-1275

February 11, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

I am asking you to seriously take to heart and mind the concerns I have about the proposed Big Stone II Power Plant and accompanying Big Stone Transmission Project. Please relay my concerns on to the Public Utilities Commission and to others within the MN Department of Commerce. My position is that **Minnesotans and Minnesota as a whole do not need the Big Stone II Power Plant nor the Big Stone Transmission Project requested.**

Renewable Energy and Wind Development

This transmission project has been hallmarked as a great benefit to renewable energy. Supposedly there will be an additional 800 to 1000 megawatts of transmission capacity available in the lines for renewable energy. **This is not true!** Transmission is given on a *first come, first serve* basis depending on the Midwest Independent System Operator (MISO) Queue¹. After having spoken with the people from MISO, as a private wind energy developer, I was informed that additional transmission capacity had already been spoke for reaching out as far as 2010. I was also informed that much of that transmission capacity would presumably be used for additional coal burning power plants that are scheduled to be built in either South Dakota or North Dakota. Even though this transmission is touted as having space for renewable energy; there are no guarantees that any of that space will go to renewable energy. Similarly, it is highly unlikely that any of it will be available to alternative energy.

Even more disturbing is how the Queue works. As a private wind developer, I could potentially bring a project online by late 2006 or 2007 and be putting clean, renewable energy developed by wind into the grid. I was informed by MISO that I would have access to the grid and be able to produce at full capacity up until 2009 or 2010. However, once one of these new coal plants that were in the Queue before me comes online, I would have to restrict my output of renewable energy to make space for the power being produced by the new coal plant.

The Queue is setup on a first come, first serve basis for when a project enters the Queue; not the actual power grid. Renewable energy could be (and is highly likely to be) bumped because these coal plant projects are in the Queue ahead of renewable (wind) energy projects!

As a result, allowing the Big Stone II Power Plant and accompanying transmission project to be built severely limits the economic potential of western Minnesota. According to the newly released MN Department of Commerce wind energy maps, more than 50% of the state has a developable wind resource. By allowing the Big Stone II Power Plant to be built, it directly affects the number of wind energy projects that could be built. Every year Minnesotans export more than \$6 billion for electricity produced by coal-fired power plants. That money could be spent in-state on renewable energy.

Each and every one of those proposed 600 megawatts of coal-generated electricity of the Big Stone II Power Plant could instead be put into wind generation. That plan would benefit:

- Minnesota's Economy
- Minnesota's Environment
- Minnesota's Renewable Energy Objective

¹ http://www.midwestmarket.org/publish/Document/2a74f7_108e84afbec_-74070a48324a

A Crisis in Rural Minnesota

Currently there is a crisis in rural Minnesota, specifically western Minnesota. The rural economy is dying. Farming no longer can support the region. Farms are becoming larger and more consolidated. Fewer people are able to do more work. As a result many rural towns are dwindling. The biggest telltale sign is school enrolment. In rural communities, the size of incoming school classes is decreasing. People can no longer find good jobs to raise families in the rural communities. The answer to this problem is renewable energy and policies that promote renewable energy development. However, the policies alone are not enough. Those policies must be actually enforced!

According to Mike Bull, one of your own MN Department of Commerce employees, he has stated that wind energy development could benefit rural economies the way that ethanol plants have. Additionally, for every one megawatt of installed wind energy it creates twenty-two direct and indirect jobs. The answer to rural Minnesota's economic crisis is blowing in the wind. There is a cost-efficient, clean, and renewable resource just waiting to be harnessed. Please do your part to make that a possibility.

Big Stone II Power Plant and Pollution

The investors in Big Stone II Power Plant have determined that Minnesota's environmental regulations are too difficult to meet and have consequently decided to build in South Dakota where environmental protection is much less stringent. And, why should they care? With respect to South Dakotans, they will reap all of the economic benefits while almost all of the pollution blows across the state border and is deposited in western Minnesota. With respect to the owners of Big Stone II Power Plant, the CEOs, presidents, and managers all have nice homes far from the areas that will be affected.

It is for these reasons that society has regulatory agencies and departments that have been established to oversee these types of action. It is your job to protect the people from greed, corruption, and all-around bad decision making. The Big Stone II Power Plant is one of those "all-around bad decisions." The public does not wish to purchase power generated by coal nor do they want the negative environmental implications which will be far reaching.

Carbon Dioxide Emissions

If Big Stone II Power Plant comes online, combined Big Stone I and II will burn an entire train (about 115 cars) worth of coal per day. The current plume emitted by Big Stone I Power Plant can be seen for at least 75 miles. Just imagine what will happen to the air quality in the area if the amount of carbon dioxide released is more than doubled. Science is continuing to prove the existence of global-warming. Coal fired-power plants are the leading cause of carbon dioxide emissions. Carbon dioxide is a greenhouse gas and is contributing to global warming. Big Stone II Power Plant adds to the problem.

Mercury

Looking past all of the potential economic benefits and everything else either for or against the proposed Big Stone II Power Plant and accompanying Big Stone Transmission Project, please listen to the arguments about mercury. Mercury is an incredibly toxic substance. Unlike nuclear waste, mercury is a stable element, it does not have a half-life. It will not break-down in an environment. It will be there forever! The Big Stone II Power Plant has been estimated to release between 100 and 200 lbs of mercury into environment of western Minnesota every year. This is in addition to the 189 pound average annual mercury that is released by Big Stone I.

Initially, a few hundred pounds of Mercury here or there does not do much to raise concern. That is until a person realizes how dangerous and toxic mercury is. One teaspoon of mercury will make all of the fish in a 50-acre lake inedible. Most of the Minnesota River and many of the lakes western Minnesota are currently listed as "mercury impaired waters" by the Minnesota Pollution Control Agency. The construction of the Big Stone II Power Plant will only further make Minnesota's waters and tourism industry less accessible and less desirable.

The Environmental Protection Agency currently states that one in six pregnant women have an unsafe level of mercury in their body. This directly impacts 630,000 children born each and every year. Unsafe levels of

mercury in pregnant women have been directly linked to mental retardation and a permanent decrease in IQ. Mercury has also been proven to cause developmental problems in children. These problems include: autism, dyslexia, blindness, and uncontrolled aggression. In addition, mercury has a negative impact on any person who comes into contact or ingests it. Permanent neurological damage, kidney damage, liver failure, and fatal heart disease all have a direct correlation to mercury exposure. It is a known fact that mercury exposure harms the human body in all instances of contact

I'm asking you to look inside yourself. Please realize that you have the power to directly impact the health and well-being of people's lives. **I'm asking you to not allow the Big Stone Transmission Project to be approved. Without the transmission project, the Big Stone II Power Plant will not be built!** You have the chance to be a hero to the people who will be most affected. Please take solace in the fact that you are responsible for the amount of mercury that will be deposited in our (Minnesota's) lakes, rivers, and environment as a whole. You have the opportunity to drastically reduce the potential amount of Mercury released into western Minnesota.

Once again, I am asking you to thoroughly evaluate what is being discussed here. **By not allowing the Big Stone Transmission Project to be built, Big Stone II Power Plant will not be built!** Please put yourself in the shoes of the residents who reside in this area. Would you be willing to raise your children, your family in that environment. I know that you will make the right decision and do everything in your power to prevent the Big Stone II Power Plant and Big Stone Transmission Project from being approved and built.

Sincerely,

Andrew J. Falk
Private Wind Energy Developer and west-central Minnesota resident



EIS SCOPE

E017/TR-05-1275

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(Use the back of this page for additional comments.)

Dear Mr. Birkholz,

I am writing to you as a concerned student learning about Mercury emissions and the damage they cause. After hearing that a second Big Stone power plant is under consideration, I felt it was my duty to take a stand against such a pollutant. Why should we as Minnesotans (or anyone for that matter) suffer from the effects of Mercury pollution in our water now and for future generations? It makes absolutely no sense to me. Mercury pollution is completely avoidable! There is no reason in building a power plant run off of coal that will harm people, animals, and the

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85 7th Place East, Suite 500
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Fax: 651.297.7891

Email: david.birkholz@state.mn.us

environment which we have open space and the technology to build wind generators to do the same job without the harmful effects.

As a woman who hopes someday to have a family that is happy and healthy, I am requesting your help in relaying my concerns and helping to make our environment and future safer.

Thank you for your help,
Cattlin Strand

Andrew Spaeth

Student

2040 60th Ave SW

Montevideo, MN 56265

320-269-6612

E017/TR-05-1275

EIS SCOPE

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Dear Mr. Birkholz,

I am writing to urge you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. It is my contention that the transmission requested is not needed because the new Big Stone II power plant is not needed.

I am a concerned citizen from Montevideo. I have been involved with the outdoors for as long as I can remember and I enjoy fishing and hunting in the Upper Minnesota Watershed. The Minnesota River as well as the Chippewa River and Lac Qui Parle Lake have provided me with a place to enjoy nature close to home. According to the MPCA all of these bodies of water considered impaired waters due to pollution by humans. This information worries me because someday I would like my children and their children to be able to enjoy catching a walleye on Lac Qui Parle Lake and not have to

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Email: david.birkholz@state.mn.us

worry about mercury in the fish. If we allow Otter Tail Power to build the proposed power lines from Big Stone, SD to Morris I believe my children and future generations may never have the chance to enjoy clean waters on the Upper Minnesota River Watershed. The current Big Stone Power Plant produces somewhere around 189 pounds of mercury that are released into the atmosphere every year. This is a scary amount because only a cupful of mercury can infect a 50-acre lake to make it unsafe to eat any of the fish. Mercury in our fish may have bigger effects than we could possibly conceive. People that eat fish from impaired waters may face neurological damage, kidney damage, liver failure and heart disease. If pregnant women consume fish containing mercury their children may have mental retardation or permanent IQ loss. These illnesses seem very similar to the results of exposure to lead. As we know lead based paint and other lead containing products have been banned and these problems no longer exist. The difference between lead and mercury is the ecological effects that mercury is having around the world. Mercury released into the atmosphere accumulates and is brought back to the surface of the earth in our rain water and snow. This means that mercury released from the plants may infect some of the worlds cleanest waters left in the Boundary Waters and Canada. I am urging you to think about alternatives for power instead of burning coal. Wind energy is the cheapest new power available and produces no waste. I am urging you on my own behalf as well as future generations who may not have the chance to enjoy Minnesota if we continue our current binge on fossil fuels. As Minnesotans we need to expand our views on energy and protect our 10,000 Lakes.

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Dear Mr. Birkholz,

I am 18 years old and I think your Bigstone II power plant is a very bad idea. Not only will it affect the fish and wildlife around the river, from the mass amounts of mercury being released into the air, but it will also affect many of the surrounding people. The power plant will pollute the air and water with so much mercury we (the people) will want nothing to do with the local rivers and lakes. I myself like to hunt and fish on and near the river if this power plant is approved, I see myself and many others not using the river anymore and I don't want that to happen and I don't think you want to see that happen either.

Another great opportunity is to build wind mills for wind power. The wind power will have no resulting pollution and is very efficient. The Bigstone II power plant will increase the mercury pollution and will add to the amount of global warming in our near future. The mercury pollution can cause birth defects or severe learning problems in children. I know in the future I do not want my kids exposed to mercury pollution and if you have kids I don't think you want severe learning problems or birth defects in your kids.

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Email: david.birkholz@state.mn.us

This plant is wrong and should not be permitted at all. Nobody wants their kids to have severe learning problems or to have higher percentages of birth defects. Please do not allow this power plant to be permitted look for a new and better alternative for all people and all animals. We need a better way.

Sincerely,



Tyler Jacobs

EIS SCOPE



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Dear Mr. Birkholz:

How long did it take to take the lead out of gasoline? Children had levels of lead in their blood higher than their grandparents! Let's get the mercury out before our children suffer the price for cheap polluting energy production! It is obvious why they are building the plant in S.D! Pollution trading is bad for the people who live by the plant! I teach high school biology and environmental science and my students feel this is a no-brainer! We should sacrifice turning on

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lights before we sacrifice
Mercury accumulation ~~is~~ and is ~~also~~
concentrated as it passes through an
food chain. DDT was persistent

Mercury is FOREVER! Look at
the data from Minamata Bay in
Japan! They're ^{children} still paying 40 years
later! Please our air and water should
be free of toxics!

Richard Hatten

Biology instructor

Montevideo High School

Montevideo MN. 56265

David Birkholz
Energy Facility Permitting
85 7th Place east, Suite 500
Saint Paul, MN 55101-2198

February 10, 2006

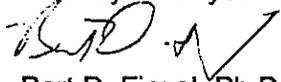
Dear Sir:

I am writing to express my concern regarding the Big Stone II coal fired power plant and the transmission lines required to transport the additional power. Please share my concerns with the Public Utilities Commission.

I find it ironic that the proposed expansion of Big Stone occurs at a time of tremendous growth in alternative energy technologies and clear, proven economic benefits of decentralized power sources to local communities and local landowners. Rural economies, including Stevens County where I reside, are already realizing the benefits of alternative fuels and wind energy. Growth in these power sources will only accelerate in future years. For example, in addition to wind and ethanol, Stevens County is exploring the possibility of using methane and bio-fuels derived from agricultural by products to decrease our dependence on large scale, centralized power sources that benefit utility stockholders in other areas, rather than keep energy dollars and employment at home. Beyond this, recent information suggests that the wind resource in the West Central Region of Minnesota is greater than previously thought. This region needs more time to exploit these emerging energy sources.

Expansion of the Big Stone facility at this time will surely set back these initiatives: power-lines will have less capacity for Minnesotan produced wind energy and other alternatives; power companies and power purchase cooperatives will have less incentive to invest in local energy development. Moreover, if the project is approved, power prices will continue to understate the real, true cost of imported power from coal by failing to account for the costs to our health, to our environment, to the self-sufficiency of our rural communities. This is not a path this region in Minnesota need travel. We have proven alternatives.

Thank you for your attention.



Bart D. Finzel, Ph.D
Associate Professor and Discipline Coordinator
Economics and Management
University of Minnesota, Morris

EIS SCOPE



- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Dear Mr. Birkholz,

I am writing to you about my concerns about the Big Stone Transmission Project. I believe that the new power plant is not needed. The mercury pollution from these coal-burning plants is going into our rivers and lakes. I don't want my future children to have problems and deformities because I ate fish out of mercury-polluted water caused by these plants!

There are many other sources of power available to us, wind being one choice. Wind generated electricity has no air emissions, water pollutions and no wastes.

If new power plants keep being built, the mercury problems will just keep getting worse.

Complete and turn in today, or mail or fax by February 13, 2006 to:

(over)

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Do we want humans to be exposed to terrible illnesses caused by mercury? Do we want pregnant women to have deformed children because of mercury? I suspect the answer to these questions is no. The future of our state depends on a healthy population. The building of the Big Stone plant won't give us that. This plan should be seriously reconsidered.

Sincerely,

Deborah Dipp
Student - age 17



EIS SCOPE

FEB 13 2006

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Dear Mr. David Birkholz,

I am writing you because of my concerns about the Big Stone Transmission Project. As a young woman, it concerns me not to mention offends me that you would consider approving a power plant that could harm pregnant women and children for many generations to come. According to the EPA, one in every six American women of childbearing age already have unsafe mercury levels in their bodies. This puts unborn children at risk for mental retardation and IQ loss. Would you like to live with the fact that you not only have harmed children, but mothers as well? Do you have a daughter? Do you want your daughter to have unhealthy children due to a poor decision made by a group of politicians? It seems a bit silly to allow a power company to put up a plant that will harm a countless number of women and children. We do not allow tobacco companies to spew carbon dioxide and nicotine into the air. Why should a power company be able to dispense mercury into our rivers? (over)

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 Energy Facility Permitting
 85 7th Place East, Suite 500
 Saint Paul, MN 55101-2198

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 Fax: 651.297.7891

Email: david.birkholz@state.mn.us

I want my children to grow up in an environmentally safe Minnesota. I would also like to feel as if Minnesota is a healthy place to live. Mercury pollution could ruin the rivers that make Minnesota a unique and diverse place to live. Please consider all the negative impacts a power plant in Big Stone could have on countless Minnesotans.

Samantha Lindemann, 17, student
136 Summit Avenue
Montevideo, MN 56265

E017/TR-05-1275



MINNESOTA
DEPARTMENT OF
COMMERCE

EIS SCOPE

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(Use the back of this page for additional comments.)

Dear Mr. Birkholz —

I have been working to help build a recreational trail along the Minnesota River from Mankato to Granite Falls,

Now the MPCA has released findings that show that the Minnesota River and its tributaries are impaired due to mercury and its fish

To allow this plant and its transmission lines to be built would seriously damage the emerging tourism and recreation economy that we have worked so hard to build.

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85 7th Place East, Suite 500
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Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

(over)

The mercury from the plant gets into the fish and when fishermen and recreational users of the river learn about that, they will choose to go elsewhere,

To continue to allow, even to promote the development of more coal fired, mercury polluting power plants is just plain wrong.

More than 80% of Minnertans say that we want more renewable energy. We can get that from wind power, biomass and other renewable sources.

Don't allow these powerlines to go through
Tell Otter Tail power to go back to the
drawing board.

Sincerely,

Patrick J. Moore
Executive Director
Clean Up the River
Environment

115 S. 4th
Montevideo, MN 56265



EIS SCOPE

FEB 13 2006

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(Use the back of this page for additional comments.)

I Live in section 23 in walter township
Lac Qui Parle. I have an irrigation
pivot on the East side of this section
along city rd 3.

Also a single pole is easier to farm
around

Steve Redepenny
320-568-2482

Complete and turn in today, or mail or fax by February 13, 2006 to:

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85 7th Place East, Suite 500
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(Use the back of this page for additional comments.)

We are in Walter, section 34 - your route would go down the middle of our best land. Leaving us with little to farm. Please take the main route on S.D.

Also with this line, it will also pollute our environment.

also concerned about health hazards from the line

Thank you -
Eruen Paul Pederson

Eruen Paul Pederson
Box 108
56212

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Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

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Granite Falls, MN 56241-0080
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FAX: 320-564-3044 or 320-564-4730

February 10, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

E017/TR-05-1275

FEB 13 2006

Dear Mr. Birkholz,

We are writing to state our opposition to the construction of the Big Stone II power plant and its proposed transmission system. We understand that our comments should concern only the power lines and not the power plant, but the two issues are inseparable.

We are writing both as grandparents who owe our grandchildren a clean environment and as residents of Minnesota who need to ask our neighboring state to stop sending pollution our way. To say the Big Stone Project is short-sighted is an understatement. In the short run, the plan may benefit a few, but in the long run, everyone loses.

People in western Minnesota are already losing. The MPCA tells us that mercury—most of it from coal-fired power plants outside Minnesota—has found its way into several lakes and rivers, causing the Department of Health to issue fish consumption restrictions. Unless we stop building coal-burning power plants, our grandchildren will have us to blame for poisoning the lakes and rivers. And who will our grandchildren blame when another coal plant pollutant, CO₂, causes catastrophic climate change (which has already begun)?

One alternative to coal-produced energy is wind. Mathew Painter of the Global Resource Action Center for the Environment writes in the February 8, 2006 issue of The Christian Science Monitor that “Wind farms currently power nearly 3 million US households, and the number is growing. Today’s wind machines offer reliable, pollution-free power at competitive prices.”

Besides eliminating the need for another polluting coal-burning plant, this renewable energy development would be a great boon to economically depressed areas of rural Minnesota. In addition, another form of economic development would flourish. Instead of being driven away by contaminated water and fish, tourists would come to enjoy a beautiful, healthy environment. We need to invest in renewable energy to get rid of the greenhouse gas effect and pollution from mercury. The only transmission line upgrades we would favor would be those used for renewable energy sources such as wind.

Grandchildren have brought a new dimension to our lives and a renewed commitment to protecting the environment. Everything we are giving them such as music lessons and college educations will do nothing to enrich their lives if they live in a world where the natural resources are poisoned and ruined. We have procrastinated long enough and we hope it’s not too late.

Sincerely,
Diane Ladner, True Value business owner &
CURE board member

Bob Ladner, True Value business owner
& Granite Falls EDA charter member

E017/TR-05-1275

MOONSTONE FARM
A Handeen Family Farm since 1872
9060 40th St. SW
Montevideo, MN 56265

FEB 13 2008

David Birkholz
Energy Facility Permitting
Minnesota Department of Commerce
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

As family farmers we are writing to urge you to relay our concerns about the Big Stone Transmission Project to the Public Utilities Commission. It is our understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. **It is our contention that the transmission requested is not needed because the new Big Stone II power plant is not needed.**

We consider ourselves part of the New Agriculture, the less energy-intensive agriculture that will eventually replace our current systems. As energy conservationists and innovators, we recognize **that the potential economic benefits** of meeting our future energy needs through a combination of real conservation and integrated renewable energy development **are available to us now.**

As demonstrated by the University of Minnesota's Research and Outreach Center at Morris, and as documented by countless investigations, our energy needs are **blowing in the wind.** There is no reason, given our community awareness and the state of human and landscape dis-ease that **investment in clean energy makes sense.** Investment in fossil fuel based energy does not.

Renewable energy is the choice of viable and future-oriented economies throughout the world today. Instead of perpetuating outdated choices that continue to deteriorate our resource base, **we need to shape a vision that delivers clean energy within Minnesota's borders, to the benefit of its end users without contaminating us, our water and our food.**

We need your help in protecting Minnesota's citizenry, now and in the longer term, by rejecting the continued poisoning of our air, water and land, as well as curtailing our contributions to climate change. It's time to take a stand for **zero emissions, the integrity of the biological community, protection of the health of future humans and a clean energy economy.**

Sincerely,

Audrey Arner & Richard Handeen

Owners and managers of Moonstone Farm, organic food producers, grandparents, habitat defenders, outdoor sportspeople, tourism hosts, biodiversity enthusiasts.



MINNESOTA
DEPARTMENT OF
COMMERCE

EIS SCOPE

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Mr. Birkholz: I am disagreeing with the plan for the second power plant. It seems that they just want to take the easy way out by building another plant when we can have a win-win situation with the windmill plan. Think about time, eventually the water will get so polluted and will shut the plant down. By going with the windmill plan it will last alot longer, farmers will be able to raise their crops.

By building another ^{plant} you are doubling the money and destroying something that will never be able to get back. You are just putting more money in the youth, pregnant women, families, animals, everything.

I am well aware that this letter might do nothing but just realize, there will be more letters.

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Sincerely
Deven Perisley
age 18



EIS SCOPE

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(Use the back of this page for additional comments.)

Dear Mr. Birkholz,

Why do you insist on building another coal fired power plant? There are other ways to make energy than from coal. Coal puts mercury into the environment when you burn it. Coal will eventually run out because it gets used faster than it is created. The mercury that gets into the environment, water, fish, and humans is not a good thing. Do you want children in future generations to have deformities? Mercury is a toxin to humans. The fish that get contaminated by the water that is poisoned by these coal-burning plants are harmful. It is unhealthy to eat more than one meal of fish from these waters per week; in some places, per month. This mercury problem is only going to get worse. Mercury doesn't go away. There are other ways to get energy than burning coal. Please don't build this plant. It is a health hazard for so many. Energy can come from wind, sunlight, and other renewable resources. Coal is not the goal. You can do better than that. Don't cause more pollution.

Sincerely,

Karla Olson

Complete and turn in today, or mail or fax by February 13, 2006 to:
DDT was persistent, but mercury is FOREVER

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us



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Dear Mr. Birkholz

Mercury is bad I love to fish & thanks to your stupid power plants I can not do that anymore. I hate the idea of another plant going up. It takes money to build it & for what some electricity. It's not worth it because ~~the plants~~ would be putting in so much more mercury in the water than what there really is. How would ~~they~~ like it if we built some & started to pollute the area around ~~here~~. So I think it is a horrible idea to build these stupid power plants. Thank you for for reading my opinion.

Sincerely,
Kevin Harden

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David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Anthony Amato
512 Lincoln Ave
Marshall, MN 56258

E017/TR-05-1275

FEB 13 2006

Mr. David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Dear Mr. Birkholz,

February 9, 2006

I urge to convey my concerns about the Big Stone Transmission project to the Public Utilities Commission. The transmission lines and the Big Stone II plant are unnecessary and detrimental. The lines and plant are both big steps backward in a region that has led our state and nation in the development of sustainable energy. The transmission lines will tie Minnesotans to non-renewable and polluting forms of energy generation precisely at a time when Western Minnesota is developing nonpolluting renewable sources of energy. With growing wind and solar projects, this part of the state is poised to enter an era of energy independence and sustainability. Residents of Western Minnesota have done much to show their deep concern for the land, water, and air of their region and the larger planet. They value their homes and our earth. New transmission line and power production in and around the state could and should meet the highest environmental and economic standards. In a state that wants to lead, anything less is simply unacceptable. A fossil-fuel-based energy-generation operation would release carbon dioxide, sulfur dioxide, nitrogen oxygen compounds, and mercury into the atmosphere, and Western Minnesota is downwind from the proposed plant. The Big Stone Transmission Project is a large step backward and a step toward a future of continued and increased pollution, inefficiency, and uncertainty. I ask you and the commission to refuse allow this project until it meets the highest standards of sustainability. I thank you for your time and attention in this matter.

Sincerely Yours,



Anthony Amato, PhD

Associate Professor of Rural and Regional Studies
Southwest Minnesota State University



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(Use the back of this page for additional comments)

Dear Mr. Birkholz,

I am writing to express my opinion and concerns about the Big Stone Transmission Project to the Public Utilities Commission, as a citizen of Minnesota. I believe that it would be unnecessary to build a new power plant when other, more safe options are available.

Although I am only seventeen years of age, I have ^{and} plan to be a citizen of Minnesota for my entire life. It is unfortunate to know that for my entire life I have been told that it is unsafe to eat the fish from the rivers of Minnesota because of pollution. Although it may take more effort to reverse the effects, the first step is to stop what is already going on and keep it from progressing. The current power plant emits over 190 lbs of mercury pollution per year that contaminates the lake and rivers of not only Minnesota, but also our neighbors. There are other options beyond building a plant that burns coal and gives off mercury pollution.

I believe it is unnecessary to help this new project and benefit it by allowing them to build their power lines through Minnesota. Western Minnesota is a renewable energy marketplace for using wind as an energy source. If we promote this new power plant, it may make it impossible to help wind energy profit in the future and we will be heading in the wrong environmental direction.

Thank You for your time, *Cassandra Ann Olson*

Complete and turn in today, or mail or fax by February 13, 2006 to:

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Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

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Dear Mr. Birkholz

I am writing to you to express my concerns on the Big Stone II Powerplant. The original Power Plant gives off 189 lbs of Mercury a Year and all that mercury is polluting the Minnesota River. This pollution is making the fish in the river & lakes uneatable because the mercury is building up in the fish. People who come in contact with high levels of mercury can face terrible illnesses like neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and aggression. Pregnant women who are exposed to mercury can have children with mental retardation and permanent IQ loss in their children. There is a cheaper and tested method available and that is wind. It is abundant over much of Minnesota. 89% of Minnesotans want to invest in renewable energy and it is available for us to use.

Sincerely,

Mark Wlodarczyk

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

E017/TR-05-1275

February 10, 2005

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

Dear David,

I am writing to express my concerns about the Big Stone Transmission Project to the Public Utilities Commission.

As a dietitian I am extremely concerned about mercury pollution in our rivers and waterways. It is important that we are able to access food in our region that is supportive of health. It is important that we not contaminate our environment so that food we produce can be health supportive but it is not when it is contaminated with mercury. According to the EPA one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for mercury related diseases.

With alternatives for clean energy production available why can't our state require our utility companies to utilize and expand on these resources rather than continuing to produce poisonous emissions.

We already have to face that the popular fishing and public recreational use Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters by the MPCA. The Public Utilities Commission needs to address this public health problem that currently exists. We don't want any more of this poisonous mercury in our region.

I would like to urge that Minnesota become a leader in delivery energy through wind and other renewable resources. A bigger vision is needed to integrate renewable energy in a way that reduces problems that we are currently facing not promoting solutions that exaggerate them.

The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota while compromising the health of people and the environment. I am asking that you make a commitment to Clean Energy.



Lynn Mader, MBA, RD
Food Systems Consultant
121 Summit Ave.
Montevideo, MN 56265
lynnmader@charter.net



EIS SCOPE

E017/TR-05-1275

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Dear Mr. Birkholz,

I could care less about what the power plants do or don't do; it's not my thing. But I think we could all use a reduction in the amount of mercury these coal burning plants emit into the air. This mercury eventually finds its way into air, rivers & streams & fish, then we eat it & I'm sure you've heard all the information as have I. So there's really no need to explain any further. As an alternative to coal we could use the power of the wind. Anyway, I don't want deformed babies, you don't want deformed babies, we all want healthy babies. We say no to drugs, alcohol & what not so why don't we just say no to Mercury too.

Sincerely,

A handwritten signature in black ink that reads 'Jenna Payne'. The signature is written in a cursive style with a large, sweeping 'J' and 'P'.

Jenna Payne

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
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Mr. Birkholz

This is why I am Against the Bigstone II. I want to be able to catch and eat fish with out worrying about being Poisoned, and I want my children to be able to do the same. I also dont want to have to worry about my children coming out with birth defects because you decided you wanted to make a little extra money. So please consider the citizens, the animals, and the future before you consider the extra money you can make. The future should weigh more heavily then Greed.

Thank you, and think with your heart and brain. Not your check book.

- Josh Williams

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Energy Facility Permitting
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Saint Paul, MN 55101-2198

Phone: 651.296.2878
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Dear Mr. Birkholz,

I am writing you to ask you to think twice before you say yes to the Big Stone Transmission Project. Please think about the future. Do you really want this mercury to keep building up in our environment? The more mercury you allow them to produce the more illnesses we will have to face because of it. More and more people are unable to enjoy the water recreation Minnesota river's offer. If you allow them to build a second powerplant soon nobody will be able to enjoy the recreation.

There is another way to produce the same energy, but it is safer to the environment. By creating windfields we will be able to help the environment rather than hurt it. This will also allow rural economics to benefit. Why would you want to send our money out of state and for a bad cause when you can keep it here in Minnesota. The choice seems easy to me, but it is your decision. I hope I don't have to raise my children in a state polluted by mercury. Thankyou for your time,

Sincerely,

Jared Burkholz
(Student Age 17)

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David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.burkholz@state.mn.us



Church of St. Mary

1215 Seventh Ave
Worthington, MN 56187
507-376-6005

E017/IR-05-1275

FEB 13 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
St. Paul, MN 55101-2198

February 10, 2006

Dear Mr. Birkholz,

I am writing to request that the Big Stone II power plant not be sanctioned by your office. With the president's call to seek renewable energy, I think that looking to fossil fuel is not in our best interests. Governor Pawlenty was also declared his support of looking for renewable energy sources here. Minnesota has so many renewable energy possibilities, it seems counter-productive to look to coal, especially from a neighboring state. Why not locate our energy supplies here so that Minnesotans can benefit from the employment possibilities as well as the financial revenue for the state.

I am also aware that coal has a high pollutant consequence, especially mercury. With the prevailing westerly winds, a power plant just across our western border will pollute our Minnesota waters. This harms the human population as well as the livestock and wildlife in our state, not to mention the fish taken from the waters and eaten. Lester R. Brown, in his latest book "*Plan B 2.0*", points out that the carbon emissions of fossil fuels are destabilizing our climate. (cf. Chapter 10) We need to work to cut these emissions rather than add to them.

It's time that people and government stop looking at immediate gains while ignoring the destructive consequences of our decisions. God has asked us to be stewards of the earth, not its exploiters. Therefore, I am asking that you not approve the Big Stone Transmission Project.

Sincerely,

Rev. Hilary R. Brixius



EIS SCOPE

E017/TR-05-1275

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Dear Mr. Birkholz

I am 15 years old and I think that your bigstone 2 power plant idea is bullshit! I don't want to have my children being born exposed to too much mercury and causing them deformities. I want my children to be able to go fishing in the rivers and be able to eat the fish that they catch.

If we build the second power plant then the chance of deformities and polluted waters will increase. Power plants are one of the main sources that cause global warming. I want all of my power to come from wind so that it doesn't pollute anything. I would rather have wind mills put up than big power lines. I hope that you use my letter to help decide what you are going to do. Make the right decision. Thanks!

A handwritten signature in black ink that reads 'Zack Schulte'.

Zack Schulte

Complete and turn in today, or mail or fax by February 13, 2006 to:

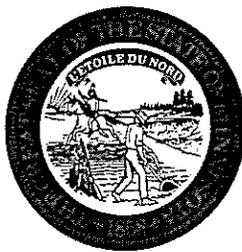
David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Lyle J. Koenen
State Representative

District 20B
Chippewa, Renville and
Yellow Medicine Counties



Minnesota House of Representatives

COMMITTEES: AGRICULTURE AND RURAL DEVELOPMENT
TAXES

February 8, 2006

FEB 8

David Birkholz
Energy Facility Permitting
85 7th Place East Suite 500
Saint Paul, MN 55101-2198

E017/TR-05-1275

Dear Mr. Birkholz,

I am writing to share my comments regarding the Big Stone Transmission Project before the Public Utilities Commission. This is an important issue that requires strategic planning and oversight.

Minnesota has a definite need for new transmission capacity with a good share dedicated to wind power and other renewable energy sources. How we go about that expansion is critical to many essentials. Some of those elements of consideration are economics and renewable energy option expansion, mercury rate reductions in Minnesota waters, address human exposure and its unhealthy impact, shaping of clean energy production, reduction of green house gas emissions as well as others.

Coal emissions are a concern in many ways. As we plan for greater renewable fuels, we need to incorporate strict and safe emission standards. We also need to appropriately increase the emission standards at existing coal facilities. Equalizing our emission standards is a challenging endeavor. We need to be fair with current energy providers and the renewable energy and wind development process. It makes sense to deliberately invest in clean energy for Minnesota and its environs.

Sincerely,

A handwritten signature in cursive script that reads "Lyle Koenen".

Lyle Koenen
State Representative



SALEM LUTHERAN CHURCH
631 North Seventh Street
Montevideo, Minnesota 56265

Phone: 320-269-8507

Rev. Charlie Leonard, Pastor

.....

February 9th, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

I am writing to urge you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need.

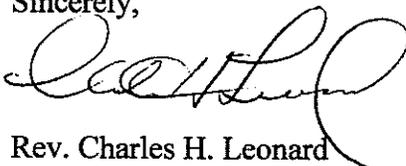
It is my contention that the transmission requested is not needed because the new Big Stone II power plant is not needed.

I observe significant disregard for energy production through the use of renewable resources such as ethanol and wind power. I am also very concerned about the long term environmental and health risks associated with a new coal fired plant in our region.

Human beings exposed to Mercury face a grim inventory of terrible illnesses including neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Tiny exposures of this toxin to pregnant women can cause mental retardation and permanent IQ loss in their children.

According to the Environmental Protection Agency (EPA), one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for these diseases. Minnesota follows this statistical pattern. With alternatives for clean energy production available now, why would our state allow our utility companies to continue to produce poisonous emissions?

Sincerely,



Rev. Charles H. Leonard



*Lac qui Parle – Yellow Bank
Clean Water Partnership
600 6th Street
Madison, MN 56256
(320) 598-3319*

E017/TR-05-1275

February 9, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz:

I am writing to express my concerns about the Big Stone Transmission Project to the Public Utilities Commission. It is my understanding that your request for comment not only includes issues of the transmission routing, but also the underlying Certificate of Need. I have concerns on the need for this expansion and the affect that it will have on water quality in southwest Minnesota lakes and rivers.

I attended the 2006 Impaired Waters meeting in Marshall, MN hosted by the Minnesota Pollution Control Agency and I see that Big Stone Lake is presently on the impaired waters list for Mercury Fish Consumption Advisory. There are several other lakes in the upper portion of the Minnesota River basin that are also on this list. We need to actively pursue the elimination of mercury emissions rather than allowing more mercury in our water bodies.

I believe that we need to be investing in clean energy that will include harvesting wind and researching other renewable energy options on the horizon. It is very disturbing that any extra line space available should not be held open for other renewable forms of energy. That doesn't make any sense to me.

I hope that you will look at *all* of the environmental concerns with the future generations in mind with this expansion before issuing the Certificate of Need. Is it really needed?

Working to Improve Water Quality in Minnesota,

Mary Homan
Lac qui Parle-Yellow Bank
Clean Water Partnership Coordinator

E017/TR-05-1275

Mr. Birkholz,

This letter is in regards to Granite Falls three transmission lines.

FEB 13 2006

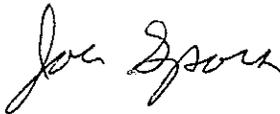
The line will follow a heavily traveled tar road (Lac Qui Parle county road #7) increasing the chances of someone hitting the pole if an accident should happen. Farther down the road the line would run along a farm with an irrigator unit on it.

The route seems to have a lot of dead ends in it. Power line officials said it is best to run the line as straight as possible, otherwise it weakens the line and costs a lot more to build.

The power line would run right over my neighbor's driveway, which is directly across from mine and not much more than 300ft from our home. Would the line interfere with our C/B radios? Would it interfere with our phone or the cell phones of those traveling along the roads where the lines run. Would it interfere with our television reception? If they do build the line along this route and it does cause interference with any of the above how will they be able to fix these problems? They may tell us we have to live with it, which would not be fair.

As for stray voltage, will it affect my family's health? How will it affect my or my neighbor's livestock?

I feel the power line will decrease the value of my farm. The issues of stray voltage, loss of farm land to the line poles, plus the hassle of farming around them every year, and who know what else can't help but bring down the value of my farm.



Joe Spors
3339 121st Avenue
Bellingham, MN 56212

E017/TR-05-1275

Donna Krueger
Community Volunteer
4670 340th Ave
Montevideo MN 56265
320-269-6925

February 8, 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

I am writing to urge you to relay my concerns about the Big Stone Transmission Project to the Public Utilities Commission. I understand that you are looking for comment on transmission routing as well as the Certificate of Need. Based on knowledge of the project, I believe that the transmission requested is not needed because the new Big Stone II power plant is not needed.

My husband and I moved to Montevideo over 2 years ago from Northeast Minneapolis. Deciding that we would truly live the rural experience, we chose a homesite outside of town on 10.5 acres. Not only has our connection to the land deepened but also our dependence on the health of our small town community, such as economical and environmental aspects. We are joining the connections already present in the area. In addition, we witnessed and subsequently participate in many facets of community involvement. **This involvement now translates to concern about our quality of life being compromised by the Big Stone II power plant.**

You will be hearing from people of all different backgrounds and perspectives. Consider that as a graduate student in Ecology at Kansas State University, I and my colleagues searched for topical and relevant research projects. Many of our projects centered around properties of the immediate prairie communities—examples being physical, chemical, biological, terrestrial, and climatological. In that same vein, do we really need to provide the next set of Minnesota and South Dakota graduate students with research projects on the effects of mercury and fossil fuels on their immediate communities and the Minnesota River Valley due to the Big Stone II power plant? The detrimental effects of these pollutants are well documented. For instance, the Minnesota Pollution Control Agency (MPCA) works to test and monitor Minnesota's lakes and rivers. Several western Minnesota lakes and rivers have been recently added to the MPCA's impaired waters list. About two-thirds of the waters on the current list contain enough mercury to warrant Department of Health fish consumption restrictions. **Within the borders of Minnesota, the largest contributor of mercury emissions to**

our environment comes from coal-burning power plants. Wouldn't graduate students find that their time better spent studying the benefits to the environment of communities using renewable energy sources? They could then compare these renewable energy benefits to communities choosing to continue with environmentally destructive traditional power sources. As a potential subject, the study of renewable energy is topical and relevant and well worth the time of graduate students.

To speak to another point mentioned earlier, I am concerned about our quality of life downriver from the Big Stone II power plant. **As an informed citizen, I know that Minnesota could be a forerunner in environmental change if we commit to the fact that half of the greenhouse gases contributing to climate change come from coal-fired power plants.** For decades to come, Big Stone I and II will spew literally millions of tons of CO2 into the atmosphere. By deciding to halt plans to build Big Stone II, we make a conscious decision about changing the forward motion of global warming. And we know there are options to fossil fuels for energy. Minnesota can deliver its energy future on the wind and with other renewable energy options. Wind generated electricity with no air emissions; no fuel to mine, transport, or store; no cooling water; no water pollution; and no wastes. A broader vision for Minnesota integrates a renewable energy plan. The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota.

The bigger plan to ensure quality of life (and keep graduate students away from mercury studies) means that Minnesotans need stronger protection from mercury pollution. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants. The technology exists to reduce these emissions. Our neighboring states to the south and east that receive much of these toxins are demanding us to act also.

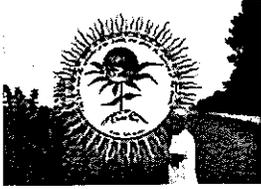
Please take into consideration my position on the matter of the Big Stone II power plant. **We need to find a stopping place to environmental devastation.** I am certainly tired of simply shaking my head whenever I hear of the next project that promotes pollution when renewable options are available. We deserve the best that Minnesota has to offer.

Regards,



Donna Krueger
M.S. in Ecology
Community Volunteer

CURE Board, Fiesta Days Board, Chamber of Commerce Special Events



Earthrise Farm Foundation

2580 250th St.

Madison, MN 56256

320-752-4700

erfarm@hotmail.com

E017/TR-05-1275

FEB 13 2006

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

As a resident of western Minnesota, as a theologian who works on issues of ecology and justice, and as a mother of small children, I am absolutely opposed to the Big Stone Transmission Project. It is my understanding that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. It is my contention that the transmission requested is not needed because the new Big Stone II power plant is not needed—and, indeed, will be harmful to our region in many serious ways.

Renewable Energy and Appropriate Care for the Earth

Here at Earthrise Farm, our primary mission is education. With a deep appreciation for the fact that the Earth is abundant yet ultimately limited and fragile, and that fossil fuels cause widespread and devastating damage to soil, water, air, and the human beings who need all three, we strongly believe that conservation and renewable energy can no longer be neglected. Meeting our future energy needs through a combination of real conservation and integrated renewable energy development is not only possible, but is the only way forward. There are many renewable energy options available, the most obvious being wind.

Wind is tried and tested. It may be the cheapest new power available and wind is abundant over much of Minnesota. Pursuing wind power is not only smart ecologically; it is also smart economically—and western Minnesota needs the jobs and investment. According to data from the Environmental Law and Policy Center, wind power alone would create 22 direct and indirect construction and manufacturing jobs for each megawatt of installed capacity. Your own Department of Commerce statistics will attest to the fact that there

2

is no greater need for sustainable economic development than in the counties of Western Minnesota, and for that matter, in the entire wind belt of Minnesota.

Devastating Environmental Impacts of the Big Stone Plant

Western Minnesota is a lovely place—yet it is under siege. In Western Minnesota we can stand on the eastern shore of Big Stone Lake and watch the existing Big Stone Plant in action, burning a train load of lignite every other day, sending a plume of pollution on the northwest wind right into the Minnesota River Valley. In the summer, southwesterly winds deliver that brown plume to the central lakes of Minnesota. After Big Stone II is built, a train load of lignite per day will be burned at an appallingly low efficiency (33% -36% converted to power, only one train car in three becoming electricity) and the pollutants delivered to our state will be enormous and unacceptable.

Both President Bush and Governor Pawlenty agree that we as a nation are addicted to fossil fuels, and that this must change. *We cannot go on like this anymore.* Speaking at the University of Minnesota Initiative for Renewable Energy and the Environment (IREE), Governor Pawlenty stated that “our country is not giving its best with respect to energy policy, and we haven’t for some time.” The governor also warned that “if we continue to use fossil fuel at the rate and pace and scope that we are with the level of technology and emissions, it’s a major environmental problem.”

Minnesotans need stronger protection from mercury pollution. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants. The technology exists to reduce these emissions. The Minnesota Environmental Partnership is asking our policy makers to reduce mercury from coal-burning power plants by 90% in the next five years. Our neighboring states to the south and east that receive much of these toxins are demanding that we act also. If we accomplished this goal, the expected output of mercury from the Big Stone I and II Plants would exceed the total mercury emissions produced from coal over the entire state. The people of Western Minnesota watch this mercury conveyor delivering this poison into Minnesota every day. *We don’t want any more.*

At Earthrise Farm, we recognize that we are not only citizens of our great state and nation, but of the world—and indeed, of the universe. As citizens of the world, Minnesotans must take steps now to reduce Greenhouse Gas emissions in order to slow and (with luck) reverse catastrophic climate change. Most of the industrialized world sees the wolf at the door in the form of global warming, but many Americans still refuse to acknowledge the danger. *At Earthrise Farm, we recognize that climate change is real; it is*

happening now; and we need to work to slow it as much as we can. Minnesota needs to buck the current national trend and own up to the fact that half of the greenhouse gases contributing to climate change come from coal-fired power plants. For decades to come, Big Stone I and II will spew literally millions of tons of CO2 into the atmosphere. How can we, in good conscience, knowing what we know about global warming alone, proceed with plans to build this plant?

Minnesota can deliver its energy future on the wind and with other renewable energy options. Research projects to demonstrate how this is possible are currently being conducted at the University of Minnesota Morris. A broader vision for Minnesota integrates a renewable energy plan in a way that mitigates other problems that face us at the same time. The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota while compromising the health of our people and environment.

Putting My Children at Risk

Coal-burning power plants spew roughly 50 tons of mercury into our environment each year, according to the Waterkeeper Alliance. This research group also notes that just one teaspoon of mercury is enough to poison a fifty acre lake so that the fish cannot be safely eaten. **As the mother of two small boys, the fact that this kind of poison continues to contaminate my home horrifies me.** We know that the current Big Stone I Plant is emitting at least 189 pounds of mercury per year. The popular fishing destinations of Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters by the MPCA. I don't want to tell my boys that they can't fish, that our waters are too poisoned for them to enjoy fishing. What is the Public Utilities Commission going to do to address this public health problem if not to deny the Certificate of Need to Big Stone II?

Human beings exposed to Mercury face a grim inventory of terrible illnesses, including neurological damage, kidney damage, liver failure and fatal heart disease. Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Tiny exposures of this toxin to pregnant women can cause mental retardation and permanent IQ loss in their children.

According to the Environmental Protection Agency (EPA), one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for these diseases. Minnesota follows this statistical pattern. *Am I at risk? Will living downwind from this horrible plant injure any future children I might have? The idea that I am being poisoned every day—and that it could affect my children—is terrifying.* With alternatives for clean energy production available now, why would our state allow our utility companies to continue to

produce poisonous emissions?

The real future of our state and the sustainability of our communities depend on a healthy population. In President Bush's State of the Union address this year, he not only touted the bright future of renewable energy, but he called for more coal-burning power plants to be built with zero emissions. The Big Stone II plant does not meet this criteria. The citizens of Minnesota should settle for nothing less. The mercury, sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health), nitrogen oxides (a powerful lung irritant in the form of smog) and lead emitting from the current configuration of this Power Plant are not acceptable public health risks.

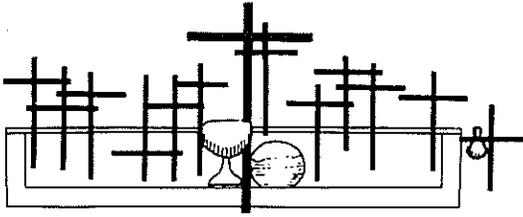
This proposed power plant is unacceptable every level: it is all too inefficient at providing us with energy (especially the kind of energy that will allow us to thrive both now and in the future) and frighteningly efficient at poisoning us, our water, and our air. For our health and our future, I ask that you put a stop to it right now, and pursue alternative strategies for Minnesota's energy future.

Sincerely,



Colleen Carpenter Cullinan, Ph.D.

Community theologian, Earthrise Farm Foundation
Adjunct instructor, Dept. of Theology, College of St. Catherine



The United Methodist Church

731 NORTH 11th STREET •
email: monte.umeth@maxminn.com
Fax: 320-269-5611

MONTEVIDEO, MINNESOTA 56265
Church Office 320-269-9053
Minister's Study 320-269-9054

February 8, 2006

E017/TR-05-1275

FEB 13 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Dear Mr Birkholz,

Please relay my concerns to the Public Utilities Commission about the Big Stone Transmission Project. I have listed below some of my concerns regarding this project. Based on current available information, I am not convinced of the need for the new Big Stone II power plant, at least as it is put forth.

Regarding economics and Renewable Energy -

While I certainly do not profess to be an expert in these matters, I am at least aware that we live in a day when we are indeed able to meet our current and future energy needs through a combination of real conservation and integrated renewable energy development. Additionally, after a bit of research, it would appear that Minnesota is possibly America's largest consumer of energy imported from outside the country, primarily from Manitoba Hydro, and that approximately 75% of our energy already comes from coal costing more than \$6 billion Minnesota dollars - money not kept here to benefit Minnesota, but rather it goes elsewhere. Reality check: renewable energy options are available, the most obvious being wind.

Across the country more and more states, are moving toward a serious transitioning toward the utilization of wind-power. Wind is tried and tested. It may be the cheapest new power available and wind is abundant over much of Minnesota. A recent article in the Star Tribune (February 1, 2006) states that we can rely on data collected from our own Department of Commerce where Mike Bull cites the potential for wind energy to benefit rural economies the way that ethanol plants have. Instead of sending our money out of Minnesota to support our growing electricity appetite (estimated at more than \$13 billion spent on energy here) we should support the public's desire for renewable energy investment (estimated at 89% of Minnesotans) within our own state.

Investment in clean energy makes sense. Again, quoting more data from the Environmental Law and Policy Center, "advancing renewable energy production would create more than 200,000 new jobs in the Midwest region by 2020. In fact, wind power alone would create 22 direct and indirect construction and manufacturing jobs for each megawatt of installed capacity." Your own Department

of Commerce statistics will attest to the fact that there is no greater need for sustainable economic development than in the counties of Western Minnesota, and for that matter, in the entire wind belt of Minnesota.

It is time for Minnesota to lead the nation in reducing Mercury and Harvesting Wind. I don't want to even get into the argument of dramatically rising costs of health care, and the effect a downwind plume of mercury from a 600-megawatt plant would emit would have on environment, ecology, and long term effects for the whole region. I argue that coal is not an option; natural gas (prices have increased four fold in a very short period of time) is not an option; Crude (near \$70 a barrel this week and even coal has increased about 50% in about the last two years) is not an option. Here in Minnesota, we have what all other states might envy: We have wind - lots of it, and we are smart people - with a passion for environment and stewardship of land, water and air. We also, because of our passion toward stewardship of the earth, are very willing to invest in and benefit from the many renewable energy opportunities on the horizon.

Furthermore, hasn't the Southwest Minnesota Foundation claimed/named their region ""the renewable energy marketplace?" Well, are we just going to give lip-service to it, or are we going to live it out? Renewable energy is the answer!

Then there is the whole issue of power lines. We really need to think out of the box, as they say! It would seem that the utilities in Minnesota are entrenched in old thinking, resisting the public desire to rethink energy as a way to sustain our communities and our environment. Citizens and leaders alike must create a long range vision for Minnesota. We need to shape a vision that delivers clean energy within our borders, to the benefit of the consumers being served, without the pollution, from coal or other fossil fuels, being delivered back to us at the same time.

Regarding environmental concerns -

In our beautiful state, filled with lakes and being richly blessed with wonderful ecological systems, one need only take some time standing on the Minnesota side of Big Stone Lake and watch the existing Big Stone Plant in action, to begin to get a sick feeling in your gut about what we are already doing to our environment. The current plant sends a plume of pollution into the northwest wind right into the Minnesota River Valley. In the summer, southwesterly winds deliver that brown plume to the central lakes of Minnesota. Question: if Big Stone II is built, what would change? Wouldn't it still be burning at an appallingly low efficiency (33% -36% converted to power, only one train car in three of raw energy resource becoming electricity), and wouldn't the pollutants continue to be delivered to our state at enormous and unacceptable levels?

And while I am admittedly not a strong fan of our Governor Pawlenty, I think he did recently make the following statement: "The basic fact is we are still as a country horribly addicted to fossil fuel in its various forms" Speaking at the University of Minnesota Initiative for Renewable Energy and the Environment (IREE), Governor Pawlenty stated that "" our country is not giving its best with respect to

energy policy, and we haven't for some time." The governor also warned, ".....if we continue to use fossil fuel at the rate and pace and scope that we are with the level of technology and emissions, it's a major environmental problem."

And then there is the direct effect on the waterways themselves. Minnesota waters are compromised by mercury coming to us from outside our state. The Minnesota Pollution Control Agency (MPCA) works to test and monitor Minnesota's lakes and rivers. Several western Minnesota lakes and rivers have been recently added to the MPCA's impaired waters list. I am told that about two-thirds of the waters on the current list contain enough mercury to warrant Department of Health fish consumption restrictions. Since coal fired power plants deliver much of that mercury to our waters from plants outside our borders, how can we consider adding potentially more mercury to the mix from Big Stone II when we are not adequately addressing the 189 pounds per year that are already being produced by the Big Stone I Plant?

We could also bring in the argument of Greenhouse Gas emissions, which is causing catastrophic climate change. One could go on and on about this. The main point is: When will we wise up and take seriously our responsibility to create energy in ways that live out our partnership with our planet earth as good stewards? To not do so now borders on gross negligence. Especially when we both know better and have the means to do it differently!

Wind is the answer! Minnesota can deliver its energy future on the wind and with other renewable energy options. Wind generated electricity with no air emissions; no fuel to mine, transport, or store; no cooling water; no water pollution; and no wastes. An integrated approach to renewable energy will include bio-fuels, energy from consumer and industrial wastes, gas from manure and field waste, storing wind as compressed air, solar energy, and perhaps the most exciting opportunity; wind to hydrogen for electricity, cars, and fertilizer. Research projects to demonstrate how this is possible are currently being conducted at the University of Minnesota Morris. A broader vision for Minnesota integrates a renewable energy plan in a way that mitigates other problems that face us at the same time. The Big Stone II Plant cannot be a part of this vision because it reduces the market for renewable energy in Minnesota while compromising the health of our people and environment.

Public Health concerns and Children -

Statistics indicate that coal-burning power plants spew roughly 50 tons of mercury into our environment each year (according to the Waterkeeper Alliance), and that just one teaspoon of mercury is enough to poison a fifty acre lake so that the fish cannot be safely eaten. Hmmmm. What's wrong with this picture? We know that the current Big Stone I Plant is emitting at least 189 pounds of mercury per year. The popular fishing destinations of Lac qui Parle Lake and the Chippewa River are listed as mercury impaired waters by the MPCA. What is the Public Utilities Commission going to do to address this public health problem if not to deny the Certificate of Need to Big Stone II?

Again, according to the Waterkeeper Alliance, human beings exposed to Mercury face a grim inventory of terrible illnesses, including neurological damage, kidney damage, liver failure and fatal heart disease.

Mercury has been linked to autism, dyslexia, blindness and uncontrolled aggression. Tiny exposures of this toxin to pregnant women can cause mental retardation and permanent IQ loss in their children.

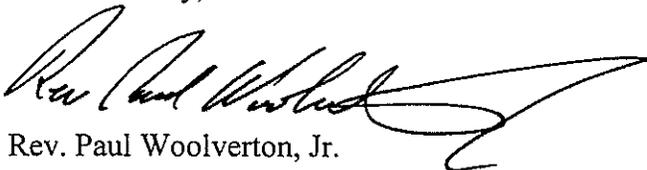
According to the Environmental Protection Agency (EPA), one in every six American women of childbearing age has unsafe mercury levels, putting more than 630,000 American children born each year at high risk for these diseases. Minnesota follows this statistical pattern. With alternatives for clean energy production available now, why would our state allow our utility companies to continue to produce poisonous emissions?

The real future of our state and the sustainability of our communities depend on a healthy population. In President Bush's State of the Union address this year, he not only touted the bright future of renewable energy, but he called for more coal-burning power plants to be built with zero emissions. The Big Stone II plant DOES NOT meet this criteria. The citizens of Minnesota should settle for nothing less. The mercury, sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health), nitrogen oxides (a powerful lung irritant in the form of smog) and lead emitting from the current configuration of this Power Plant are not acceptable public health risks.

Allowing this plant to happen will have huge negative impacts on our recreational and tourism economy as well. Here in rural Minnesota, we really need to maintain a loving partnership with the earth and all her eco-systems. We need each other! The earth needs us to be smart, and to care more about her, and her ability to sustain many future generations, over our own short-sightedness toward easy solutions that benefit us, regardless of consequences to billions of people in generations to follow (if we live that long through our selfish ways of doing things). We have been working hard at trying to improve our approach to our environment - continually discovering how things we have done in the past are indeed harmful to our earth, and have long-lasting consequences. We are doing much to re-approach the ways in which we farm, and ways in which we can celebrate the partnership with our earth through recreation and tourism as well. The earth is really good to us if we are good to her!

So, PLEASE, re-think this whole approach. If we need more energy - let's use renewable approaches. Think wind. Think WIND. Maybe even take a moment to look up the meaning of the Hebrew word, Ruah - which means Wind. It is the word that is used throughout the Old Testament in the bible to describe how God was renewing and recreating and bringing energy to God's people. God's "holy wind" brought about energy and renewal. Hmmmm - could it be that simple? Could it be that for a thousand generations God has been showing us the way to renewable energy? Think wind!

Most sincerely,

A handwritten signature in black ink, appearing to read "Rev. Paul Woolverton, Jr.", with a large, sweeping flourish at the end.

Rev. Paul Woolverton, Jr.

E017/TR-05-1275

Anne Dybsetter

12718 10th Street NE
Spicer, Minnesota 56288

Environmental Education Coordinator,
Prairie Woods Environmental Learning Center

anne.dybsetter@co.kandiyohi.mn.us

8 February 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, Minnesota 55101-2198

FEB 13 2006

Dear Mr. Birkholz:

I am writing in regard to the permitting process for additional power line capacity for the Big Stone II coal-fired power plant. I am gravely concerned about the negative economic, ecological, and health consequences of burning more coal. At the same time, I am hopeful about the positive economic, ecological, and health effects of conservation efforts and renewable energy. I urge you to deny a Certificate of Need in this case. Transmission for additional coal electricity is not needed; in fact, in light of alternatives readily available, it is unnecessary and irresponsible.

I come to this conclusion from several viewpoints. First, as a native of southwestern Minnesota and a resident of west-central Minnesota, I am personally connected to an economy that has and will continue to benefit from renewable energy initiatives. Second, as a woman of child-bearing age, I carry life-changing concerns about mercury and other toxic pollutants. Third, as an educator, I understand how much can be gained through simple, practical conservation.

Southwestern and West Central Minnesota are regions seeking economic activity. I grew up here understanding that my hometown offered no jobs and no futures for me and my classmates. What a change is emerging! Neighbors and family members in my hometown are employed building wind turbines, teaching about wind generation, and promoting local power. Others in nearby communities work in an emerging tourism field focusing on scenic rivers, healthy wildlife, and local foods. I hear over and over again from Southwest Minnesota Foundation and other dynamic organizations that our region is the "Renewable Energy Marketplace" for the future. This is a dramatic opportunity that we can't afford to throw away on coal, a fuel whose glory days are past. Minnesota will thrive by embracing innovative jobs and the clean environment offered by renewable energy—and rejecting disadvantageous alliances with coal investment in South Dakota.

Through the years, citizens of Minnesota have reiterated that a clean environment is essential and outdoor recreation enhances our quality of life. Emissions from burning coal affect our health—and the health of our children—through climate, air, and water. Two thirds of Minnesota's waters are already mercury-impaired. As a result, I and other women I know do not eat fish and will not for the foreseeable future. Mercurial traces will follow our children and grandchildren through ensuing generations, both in their bodies and in their environment. Other emissions, particularly the

greenhouse gas carbon dioxide, which no number of stack scrubbers can remove, present their own problems. There is no reason to authorize coal-driven power lines, which travel along the same route as the prevailing winds that will deliver pollutants to our air and water. We can do better.

Finally, as an educator, I am made aware day after day that there is so much more we can do to conserve electricity. If just a fraction of the money invested in Big Stone II was spent instead on conservation education and incentives, it would pay back thousand-fold. Simple conservation measures using existing technologies in every household and business in the state would allow us to slow down existing coal-burning plants, rather than build more. Just one example that utilities might adopt is the in-home installation of visible electricity meters, allowing consumers to immediately see conservation's savings. Conservation saves money, is perfectly clean, and helps us be responsible stewards of our children's earth.

For Minnesotans, moving away from coal—and our detrimental dependence on fossil fuels—is essential right now. We do not need more coal power or more transmission capacity for coal power—we need cleaner power and smarter conservation. For these reasons, I urge you to deny the Certificate of Need for upgraded power lines and to relay these concerns to the Public Utilities Commission. Minnesotans deserve and demand no less.

Sincerely,



Anne Dybsetter



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
- Information on alternatives to the project
- Mitigating measures for possible adverse impacts

February 8, 2006

Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Dear Mr Birkholz,

I am a 10th grader taking Environmental Biology at Montevideo Senior High School. We have been discussing the pros & cons of mercury in our environment, but the sad realization is there are no viable pros.

Many of my friends & summer maj. ories have been heading the 60 miles to Jordonville whose my family members own multiple lake properties. We used to go fishing all the time but not anymore because of a little thing called mercury. Little did I know that this pollution was coming out of the giant incinerator stacks right across the lake. Learning about mercury I do not see how years left. 12 years the Big Stone plant is allowed to dump hundreds of pounds of mercury in Minnesota's lakes & rivers.

Our lakes and rivers are a huge source of enjoyment for people everywhere. When I lived in Iowa I used to come and visit and think how cool it would be to live by a lake. Now, a resident of Minnesota, I am disgusted to think that the very waters that make this state so wonderful, are being knowingly and forever polluted. Mercury doesn't go away after a year - those hundreds of pounds are going to be around for generations to come. Is it fair that our children won't get the same joys out of our natural resources that there was once.

Periodically I travel back to Iowa and I'm amazed by the number of windmills throughout the countryside. Why is wind not being used to produce electricity? Just as I can think of no prod. of mercury, I can also can think of no cons to wind power. Please do not allow power lines to be built and Minnesota's waters to be polluted.

Sincerely,

Calie Rosgatz

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

**12430 CO RD 1 NW
Pennock, MN 56279
Feb. 9, 2006**

E017/TR-05-1275

**David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198**

Dear Mr. Birkholz,

I am writing to urge you to send my pre-occupations about the Big Stone Transmission Project to the Public Utilities Commission. I understand that your request for comment not only includes issues of transmission routing, but also the underlying Certificate of Need. I contend that the transmission requested is not needed because the new Big Stone II power plant is not needed.

The potential economic benefits of meeting our future energy needs through a combination of real conservation and integrated renewable energy development are available to us now. 75% of our energy already comes from coal paid for with more than \$6 billion Minnesota dollars which leave our state. There are many renewable energy options available, the most obvious being wind. Wind is tried and tested. It may be the cheapest new power available and wind is abundant over much of Minnesota. Investment in clean energy makes sense. According to data from the Environmental Law and Policy Center, advancing renewable energy production would create more than 200,000 new jobs in the Midwest region by 2020.

Minnesota can lead the nation in reducing Mercury and Harvesting Wind. Along with the dramatically rising costs of health care, a future scenario of costly and dirty energy is waiting to smother the next generation of Minnesotans. Unlike the commodities of the fossil fuel world, installed wind delivers a reliable energy product at a fixed price usually over a twenty year contract. It is no accident that the Southwest Minnesota Foundation has branded their region "the renewable energy marketplace." Let us invest in ourselves, our own communities, in our own future. Renewable energy is that opportunity.

In Western Minnesota we can stand on the eastern shore of Big Stone Lake and watch the existing Big Stone Plant in action, burning a train load of lignite every other day, sending a plume of pollution on the northwest wind right into the Minnesota River Valley. In the summer, southwesterly winds deliver that brown plume to the central lakes of Minnesota. After Big Stone II is built, a train load of lignite per day, paid for almost totally with Minnesota consumer dollars, will be burned at an appallingly low efficiency (33% -36% converted to power, only one train car in three becoming electricity) and the pollutants delivered to our state will be enormous and unacceptable.

Each day the mounting evidence comes in that we are on the edge of changing our planet to the detriment of all species. The biggest contributor to global CO₂

emissions is the combustion of coal. It is absolutely asinine to even consider building another coal burning power plant in this country. Furthermore, Minnesota waters are compromised by mercury coming to us from outside our state. Minnesotans need stronger protection from mercury pollution. Within the borders of Minnesota, the largest contributor of mercury emissions to our environment comes from coal-burning power plants. The technology exists to reduce these emissions. The Minnesota Environmental Partnership is asking our policy makers to reduce mercury from coal-burning power plants by 90% in the next five years. Our neighboring states to the south and east that receive much of these toxins are demanding us to act also. If we accomplished this goal, the expected output of mercury from the Big Stone I and II Plants would exceed the total mercury emissions produced from coal over the entire state. The people of Western Minnesota watch this mercury conveyor delivering this poison into Minnesota every day. We don't want any more.

The real future of our state and the sustainability of our communities depend on a healthy population. In President Bush's State of the Union address this year, he not only touted the bright future of renewable energy, but he called for more coal-burning power plants to be built with zero emissions. The Big Stone II plant does not meet these criteria. The citizens of Minnesota should settle for nothing less. The mercury, sulfur dioxide (the primary component of particulate matter adversely affecting respiratory health), nitrogen oxides (a powerful lung irritant in the form of smog) and lead emitting from the current configuration of this Power Plant are not acceptable public health risks.

Lastly, outdoor recreation is a \$9 billion dollar industry in Minnesota. The proposed Big Stone II power plant and other proposed plants in the Dakotas threaten this industry by threatening our rivers and lakes with mercury pollution.

Sincerely,



Joel Schmidt

Member of CURE, Sierra Club, The Nature Conservancy, Natural Resource Defense Council, Land Stewardship Project, Prairie Woods Environmental Learning Center



EIS SCOPE

- Human and environmental impacts of the project due to size, type and timing of project, system configurations and voltage
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Using the above bullets as a guideline, please share your ideas on issues for the Department's Environmental Impact Statement. The EIS will be a part of the Public Utilities Commission's Joint Hearing on the Big Stone Transmission Project Certificate of Need and Route Permit Applications.

(Use the back of this page for additional comments.)

Big Stone Plant is a smokey, mercury and other toxic waste dump. Where is the hook up for wind and Renewable Generation?

Willmar line Route has no easements, we and many others will not permit it.

All power lines easements should compensate at the beginning and annually like pipelines, plus annual land rent.

Cities and towns need the power so put the line on the railroad lands, that's where the towns are.

Put the poles and smoke in your lawn. If Willmar needs the power, they can use the line from Granite Falls to Willmar that's there now. The Ortonville to Willmar needs all new line plus easements.

Complete and turn in today, or mail or fax by February 13, 2006 to:

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Phone: 651.296.2878
Fax: 651.297.7891

Email: david.birkholz@state.mn.us

Greg Kerkowski

Beverly Falk
3715 198th Av NW
New London MN 56273
320-354-4522

E017/TR-05-1275

FEB 13 2006

2/10/06

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

I am saddened to hear that more and more of our lakes are polluted to the point that they are now on the impaired waters list. I live on Norway Lake in Kandiyohi County and it troubles me that we continue to allow any level of mercury pollution when we already know of the detrimental effects to our environment and the known health risks to all of us as citizens of Minnesota. I know there is a growing demand for energy, but I feel we must focus on conservation and renewable energy before we accept any more pollution from burning coal. We as a society must look forward and make better environmental decisions for future generations. Local and regionalized renewable energy projects like wind energy can make a significant difference in the way we look at the need for huge transmission lines. It is my understanding that the proposed transmission lines will offer very little if any space for future renewable projects as the capacity is already spoken for. We need a more sustainable plan for Minnesota that focuses on local and regional renewable energy projects. Please consider my objection to the proposed Big Stone II project and the transmission line that are not need to promote renewable energy.

Thank you,



Beverly Falk



FEB 13 2006

February 9, 2006

E017/TR-05-1275

Mr. David Birkholz
Energy Facility Permitting
85 Seventh Place East, Suite 500
St. Paul, MN 55101-2198

RE: Big Stone Transmission Project

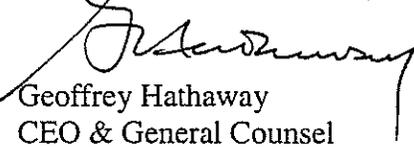
Dear Mr. Birkholz:

Please accept my comments against the new Big Stone II Power Plant that is being contemplated to be built in South Dakota, near our border.

As a business owner, I support progress and economic development. I also understand the role of "cheap energy" in this economic progress. However, as an educated person, I also recognize that coal-fired power plants engender long-term costs to the environment that are not being calculated and passed along to the users of the energy. In a very short-sighted fashion, that simply gains profits for our generation at the expense of future generations, and I do not support it. We can do better, and our economy can afford to bear the costs of moving to alternative, renewable energy production.

Please do not award this Certificate of Need. There is no "need" that cannot be met in other, economically viable ways.

Very Truly Yours,
GOLDFLEAF FINANCIAL, LTD.


Geoffrey Hathaway
CEO & General Counsel



Geoffrey J. Hathaway
General Counsel & CEO

e-mail: geoff@goldleafltd.com
4046 West Highway 7, Montevideo, MN 56265
WATS 888 294-6747 • BUS 320 269-3144 • FAX 320 269-3154

February 10, 2006

Maureen Laughlin, CPA
P O Box 154
Ortonville, MN 56278

E017/TR-05-1275

FEB 13 2006

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

Mornings on my farm are the best time of day. Throughout the year, theater is just outside my front window. Bright winter days are dotted with the color of blue jays and pheasants vibrant against the endless white. Cold mornings melt into deep green summers, filling the landscape with brilliant flowers and singing birds beneath the deep blue Western Minnesota sky.

My window also frames the Big Stone Power Plant dominating the Dakota horizon just miles to the west southwest. More often than not, the northwest wind directs that plume from the stack of the plant directly over the Big Stone National Wildlife Refuge and down the Minnesota River Valley. I can see it as it stretches for fifty miles or more. It's generally the color of dark mustard; dark mustard laden with nitrogen oxide, sulfur dioxide, lead, and mercury blended with literally millions of pounds of CO2.

Those of us who are not natives to Western Minnesota perhaps see our region differently. On the one hand, a place like Big Stone County has open space and some of the last remnants of the prairie world that once thrived here. On the other hand, I have often equated us with the people of West Virginia. Big business and government dictate every move in agriculture out here, polluting our water, eroding our soil, and depleting wildlife habitat. We export our children for lack of local economic opportunity. We were even recently told that the best plan for economic development in Big Stone County might be more open pit mines where the granite is dynamited to build roads for the uncontrolled urban sprawl of Metropolitan Minnesota and beyond.

A bright spot in Big Stone County's economic future has been the wide public support for further developing our outdoor recreation economy and renewable energy potential. I have whole heartedly supported these plans because they represent long range visions of sustainability. But sustainability seems to be a notion that eludes our Minnesota regulators and policy makers. Sustainable development must meet the needs of the present without compromising the ability of future generations to meet their own needs. Development plans must merge our environmental, economic, and social objectives to be fair to everyone.

The Big Stone II Coal Generation Plant does not support a plan for sustainable development for Big Stone County or any part of Minnesota and should not be built. I don't believe the plant would be considered if it were planned for in the heart of Minnesota's wealthy urban communities. But since we lack population, we consequently have a diminished voice in the halls of power. **The abusive habits of big business are blatant in the decision of these Minnesota utilities to build this plant in South Dakota, beyond the reach of Minnesota regulators. Why are Minnesota companies that serve Minnesota consumers investing more than \$1.1 billion in another state, exporting Minnesota dollars for dirty western coal to deliver massive amounts of pollution into an already challenged rural Western Minnesota environment and economy?**

Efforts being made in Western Minnesota on behalf of renewable energy are everywhere. Small wind development companies, Big Stone Wind being one of many, the incredible work at the University of Minnesota Morris, West Central CERTS education, are all part of a worldwide understanding that our planet cannot tolerate the proliferation of projects like Big Stone II. After seeing limited development of coal generation for decades, I understand that there are more than 50 plants planned for the middle of the US. **Why would we support the displacement of the growing market for renewable energy on behalf of a strategy that is itself the recipe for the death of our planet?**

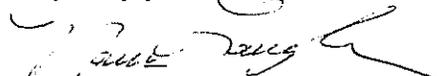
It seems clear that renewable energy needs will not be served by the transmission plan espoused by Otter Tail Power. The regulators of the grossly biased incestuous MISO authority will attest to the fact that transmission access is not available now and will not be in the future as the construction of huge coal facilities proceeds throughout the Midwest.

Please help us sustain our environment and communities by saying no to this plan that is faulty in every way.

NO BIG STONE II

NO BIG STONE II TRANSMISSION

Very truly yours,



Maureen Laughlin

A Letter to the Next Generation.

We have a home for you in Western Minnesota, but take note. Don't eat the fish – contaminated – mercury fills our lakes and streams. Don't breathe the air – particulates and smog are a hazard to healthy lungs. Don't bring your skis – the winters are warm now. Don't bring your families – there are no jobs. My farm is for sale. The well is contaminated but the birds will no longer wake you. The front window provides a smog shrouded view provided by Otter Tail Power and friends – supplying cheap dirty power to dying communities everywhere.

Jim Falk
1170 Hwy 9 NE
Murdock MN 56271
320-875-4341

E017/TR-05-1275

FEB 13 2006

2/8/06

David Birkholz
Energy Facility Permitting
85 7th Place East., Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

I had the opportunity to attend one of the area informational meetings regarding The Big Stone II power plant and the proposed transmission lines into Minnesota. It was obvious to me that information was not free flowing or conclusive to answer legitimate questions regarding the need for the Big Stone II plant or the transmission lines with respect to renewable energy capacity. In fact, during discussion, information surfaced that put into question how the MISO system works and how renewable energy is already being sent to the back of the line in the Queue. Therefore, with the unquestionable negative effect of pollution into Minnesota, particularly MERCURY POLLUTION, from Big Stone II there is no reason for the plant to be built. In regard to transmission lines, minimal upgrades for local and regional renewable energy projects from wind and biomass will be significantly more cost effective for Minnesota communities and Minnesota citizens. Therefore the transmission lines need not be built specifically from the proposed Big Stone II plant. Consequently, I recommend that you consider my concerns and relay them to the Public Utilities Commission.

Economics

Everything has changed in our energy price structure within the last two years. Renewable energy is not only affordable, it is profitable. For the major power providers to continue to ignore the benefits of renewable energy and the sustainability it offers to communities is not in the best interest of the general public or the security of our nation. Minnesota is a leader in wind power and the requests for wind projects exceeds the equipment available today. Why should we accept an antiquated, environmentally polluting, economically impractical system like coal over the community friendly, environmentally proven system of renewable energy? Technology has advanced to the point where we can be self sustaining and even a potential exporter of renewable energy.

Environment

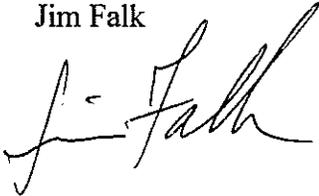
According to Governor Pawlenty: "The basic fact is we are still as a country horribly addicted to fossil fuel in its various forms" Speaking at the University of Minnesota

Initiative for Renewable Energy and the Environment (IREE), Governor Pawlenty stated that “ our country is not giving its best with respect to energy policy, and we haven’t for some time.” The governor also warned, “...if we continue to use fossil fuel at the rate and pace and scope that we are with the level of technology and emissions, it’s a major environmental problem.” It is not only unrealistic but un-American to continue on the path of pollution when society has demanded a better standard for an energy policy and has indicated a willingness to pay for it. As our knowledge and technology has evolved it is unconscionable that we as a society remain trapped in a system that is unresponsive, un-innovative, unconcerned, and unresponsive to the need for self sustainability because of the domination of major energy companies for profit solely. Let’s move forward – not backward.

Community

As a public servant, you should have the interest of the public in mind. The community is much better served when energy is produced and used locally. There is no need for the transmission lines proposed from Big Stone II as communities will be better served by local energy projects.

Jim Falk

A handwritten signature in cursive script, appearing to read "Jim Falk". The signature is written in black ink and is positioned below the printed name.

Wendell Falk
3715 198th Av NW
New London MN 56273
320-354-4522

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David Birkholz
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85 7th Place East., Suite 500
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Dear Mr. Birkholz,

I am deeply concerned about our environment and the obvious lack of concern shown by Minnesota power suppliers who choose to avoid pollution regulations by building coal burning plants outside of our Minnesota border. The fact is there is already too much mercury in our states water and no one can dispute that. Renewable energy produced locally is not the trend for sustainability in Minnesota communities, it is the answer. Therefore, there is no need for the transmission lines from the proposed Big Stone II power plant as the plant is not needed. Upgrades to local and regional transmission lines will be more affordable and provide a more realistic approach to sustaining communities with renewable energy projects that providing a long term solution to our energy needs. Wind energy works and we need to capture every benefit we can as a society to better our environment for future generations. Please relay my concerns to the Public Utilities Commission as there is a better way to serve the energy needs of Minnesota.

Thank you,



Wendell Falk

Karen Falk
1170 Hwy 9 NE
Murdock MN 56271
320-875-4341

E-17/TR-05-1275

FEB 13 2006

2/8/06

David Birkholz
Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101-2198

Dear Mr. Birkholz,

I'm an elementary teacher in Murdock, Minnesota with over 25 years experience working with children. I'm horrified to think that educated, caring adults would even consider dumping any more mercury into our environment. Environmental Protection Agency studies from 2004 report that approximately one in every six women of childbearing age had mercury levels that were high enough to cause adverse neurodevelopmental outcomes in their unborn children. Recent research has shown that infants and children are vulnerable to exposure levels far lower than once believed.

The proposed Big Stone II power plant and the transmission lines will ill-serve the real future of our society, our children. Do not "okay" this project!

Consequently, I recommend that you consider my concerns and relay them to the Public Utilities Commission.



Karen Falk