



# North Tahoe Citizen Action Alliance

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**RE: Notice of Preparation of a Draft Environmental Impact Statement/Environmental Impact Report for the proposed Tahoe Basin Biomass Energy Facility (Placer County, CA)**

Sirs:

The North Tahoe Citizens Action Alliance (NTCAA) and the Kings Beach Business and Citizens Alliance (KBBCA) appreciate the opportunity to provide comments on the Notice of Preparation (NOP) of an Environmental Impact Study/Environmental Impact Report (EIS/EIR) for the proposed Placer County Biomass Utilization Project.

Our comments pertain to the range of alternatives proposed to meet the stated objectives of the project, the level of environmental documentation to meet National Environmental Policy Act (NEPA) requirements, Land Use, Tahoe Regional Planning Agency (TRPA) threshold impacts on air quality, GHG, water quality, and noise.

We have highlighted technical questions about the methodology of comparing the plant emissions with open burning, and how the fuel specification used by the manufacturer of the combustion and gasification technologies compares to actual locally available feedstock. The risk of fire spreading to the adjacent forest and the odors from various sources is addressed. We include comments on the scope of the Cumulative Impact analysis, the Environmental Justice analysis, and the Economic analysis.

## **Range of Alternatives**

In the NOP (page 10) it states, *“The woody biomass fuel supply is anticipated to originate from within and around the Lake Tahoe Basin, generally within a 30 mile radius from the project site and up to a one hour drive.”* The existing Loyalton Biomass Power Plant (rated at 20 MW currently producing 10MW for lack of fuel) is located just 42 miles north of Cabin Creek. Most of the area of forest waste collection in the 30 mile radius from Kings Beach is outside of the Tahoe Basin and overlaps the collection area of the Loyalton Plant. **How was the 30 mile radius determined?**

Since Placer County's Eastern Regional Landfill (Cabin Creek) has been a consistent supplier of biomass feedstock to the Loyalton Plant, **what are the historical volumes of biomass feedstock shipped from Cabin Creek to Loyalton? Is there capacity at the Loyalton Plant for the 8-24,000 BDT that would be burned at the proposed plant in Kings Beach?**

If the 30 mile line was extended north a few miles it would include the Loyalton Plant. The Tahoe Basin from Emerald Bay north and east to Highway 50 is in the collection area of Loyalton. Biomass collection/processing at Cabin Creek and shipped to the Loyalton Plant is a reasonable alternative to meet the objectives of Placer County's biomass utilization program. **The EIS/EIR should include this alternative in light of the same program objectives that led to the four proposed project alternatives, and then analyzed for its environmental impacts equally with the other alternatives.**

The Cabin Creek processing facility collects and processes all biomass material from fuels reduction activity and other sources in the Tahoe Basin and outside the Basin. This forest material can create green renewable energy outside the Basin accommodating whatever level of fuels reduction occurs in the Tahoe Basin. **The environmental impacts of a proposed plant at Kings Beach or Burton Creek or Cabin Creek should then be compared to no Basin impacts of a Loyalton alternative.** The feedstock at Cabin Creek is a marketable product that enters the biomass fuel waste stream as a sustainable renewable resource.

### **Level of Environmental Documentation under NEPA**

According to the NOP (page 2), *"It is anticipated that the EIR/EIS will be prepared to satisfy the requirements of an Environmental Assessment (EA/FONSI) pursuant to the National Environmental Policy Act (NEPA)."* At this level of environmental review there is no comment or independent analysis by the Environmental Protection Agency (EPA) unless explicitly requested by the TRPA. According to an EPA official in San Francisco it is "administrative discretion" for TRPA to ask for EPA comment under an EA. **Would TRPA and Placer County request the EPA to formally comment on the air quality and water quality analyses in the EIS/EIR?**

A federal EIS under NEPA would require comment by the EPA as an independent authoritative third party. TRPA's EIS (NOP, page 2) is *"prepared in accordance with the TRPA Tahoe Regional Planning Compact, Goals, and Policies, Code of Ordinances, and Rules of Procedure..."* by consultants chosen by the TRPA. It is not an EIS under NEPA. NEPA requires that an EIS be prepared when the proposed project as a whole has the potential to "significantly affect the quality of the human environment."

The determination of significance is based on context and intensity. The context is the Lake Tahoe Basin, a federally designated Outstanding National Resource Water (ONRW), and specifically the community of Kings Beach on the Lake's North shore.

The intensity means the “the degree to which the proposed action would involve one or more of ten factors.”<sup>1</sup>

The project proposed in the NOP involves the following 1) Adverse effects associated with “beneficial projects”, 2) Effects on public health and safety, 3) Unique characteristics of the geographic area (ecologically critical area), 4) Degree of controversy, 5) Degree of highly uncertain effects or unique or unknown risks, 5) Precedent-setting effects, 6) Cumulative effects, 7) Adverse effects on scientific, cultural, or historical resources, and 8) Violations of federal, state, or local environmental law. **Would TRPA and Placer County disclose the analysis of the intensity of these eight factors that determine significance under NEPA, and the rationale to determine whether a federal EIS (under NEPA) is necessary?**

Even though the proposed 1-3MW plant in Kings Beach is small compared to most power plants including Loyalton (20MW), its location is in a very small community of approximately 3000 people in a very limited geographic setting (Kings Beach in the Lake Tahoe Basin) in an ecologically critical Tier 3 ONRW. According to US Census 2000 data, Kings Beach is comprised of 64% low income and Hispanic residents. Numerous residences exist within 300 feet of the proposed plant, and an elementary school is within 1000 feet (see page 3, Exhibit 2 of the NOP).

There is no existing biomass power plant in the Tahoe Basin. A 3MW power plant will consume 24,000 BDT (Bone Dry Tons) feedstock per year, or the heat equivalent of 24,000 cords of Lodgepole Pine (one Bone Dry Ton of biomass feedstock and one cord, 128 cubic feet, of Lodgepole Pine firewood contain 17,000,000 BTUs). Local firewood suppliers estimate Kings Beach consumes less than 1000 cords of firewood per year. The relative impact of introducing new pollutants from combustion at the scale of 1-3MW into Kings Beach is more appropriate for determining significance than comparing the small plant size to industry standards. The EIS/EIR should address the small scale of the community of Kings Beach relative to what a 3MW power plant consumes.

Since the proposal includes combusting biomass material originating outside the Tahoe Basin, to be shipped into the Basin the status of Outstanding National Resource Water for Lake Tahoe is inevitably affected. **The determination of significance under NEPA should account for all eight factors in determining whether an EIS under NEPA is required.**

### **Land Use**

The analysis of land-use according to the Kings Beach Industrial Community Plan the EIS/EIR should include the 1981 zoning of C-1 along Speckled Avenue between Wolf St. and Deer St. (proposed plant site) that has changed to C-4 industrial uses. **When did this light commercial use change to industrial? What was the reason for this change? Is there evidence of public notification and a public hearing on this change?**

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<sup>1</sup> Determining Significance under NEPA, “Environmental Update”, Jones and Stokes, May 2003.

This area has several residences adjacent to it impacted by creeping industrial uses. Effected residents should have meaningful input as the industrial intensity would increase significantly with a 24-hour combustion process. **Was this sort of 24/7 power plant envisioned in the 1996 Community Plan, or was reference to a power plant referring only to the back-up generating plant?**

The back-up generating station was accepted as an advantage for public health and safety during inclement winter weather, but it only runs a few times per year. **What is the record of the number of hours, frequency and duration, of the back-up generating plant? How does that use compare to a full time 24/7 power plant located adjacent to residences?**

A transfer of coverage is referred to in the NOP (page 12), *“The project would increase land coverage and may require banked land coverage to be transferred to the site in accordance with TRPA regulations.”* This banked coverage is a limited public entitlement asset unique to the Lake Tahoe Basin. **The EIS/EIR should specify the quantity of total banked coverage for this watershed, where it came from, its market value, and the justification for conveying it to a private entity operating and receiving revenue from the proposed plant.**

### **Air Quality Impacts**

Air Quality Baseline/Monitoring - The Lake Tahoe Basin is considered one air basin. However, the only instruments in place measure larger particulates (PM10) and Ozone (O3) at South Lake Tahoe. According to a recent air quality study for Kings Beach, pollutants of concern at Lake Tahoe include, “ozone, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide (SO<sub>2</sub>), PM10, particulate matter less than 2.5 microns in diameter (PM2.5).”<sup>2</sup> The proposed Biomass plant in Kings Beach will emit these pollutants, but there is no data to establish an ambient baseline of current conditions. **How does the TRPA and Placer County plan to measure the ambient pollutants in Kings Beach?**

The Loyalton Plant continuously monitors carbon dioxide (CO<sub>2</sub>), carbon monoxide (CO), O<sub>2</sub>, nitrogen oxides (NO<sub>x</sub>), and particulates in lbs/hr. **What pollutants are to be measured at the proposed plant? Where and how will they be measured? How can the power plant’s contribution to ambient conditions be determined with no baseline measurements in Kings Beach?**

According to the Jones and Stokes study, *“Pollutants such as CO, PM12, and PM2.5 are considered local pollutants because they tend to disperse rapidly with distance from the source.”*<sup>3</sup> These pollutants can only be measured locally. But given the cumulative impacts in Kings Beach, ozone precursors (ROG and NO<sub>x</sub>) should also be measured locally. The NOP fails to address the installation and monitoring of air pollutants. **How can the TRPA monitor increased emissions from cumulative impacts of increased conges-**

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<sup>2</sup> Kings Beach Commercial Core Air Quality Technical Study, Jones and Stokes, 2005, p4

<sup>3</sup> Ibid, p4

**tion on SR 267, SR28, and along Speckled Ave (proposed plant location) due to a rerouting of traffic for the Kings Beach Commercial Core Improvement Project?**

Kings Beach is in a Redevelopment Area receiving bonuses for density increases demonstrated by the recent approval of the Domus affordable housing project. Additional Tourist Accommodation Units (TAU's), residential units and commercial floor area under the pending Community Enhancement Projects (CEP) demonstrate the increasing densities proposed in TRPA's Regional Plan Update (RPU). Transect zoning for the RPU will overlay existing zoning regulations. **How will the increase in densities effect air quality in Kings Beach and adjacent areas (Brockway, Kingswood East, Brockway Golf Course residences)?** The shift in traffic patterns, congestion, and the additional vehicle trips due to physical expansion are occurring in a one square mile area of Kings Beach.

**How can the air quality impacts of so many simultaneous changes be ascertained without measurement of all pollutants in Kings Beach? How will Placer County and TRPA quantify air pollution to meet existing regulations at all levels without any hard field data at the specific location of unprecedented growth? What plans are there to establish an empirical baseline? Shouldn't the establishment of an ambient baseline precede any increase in contaminants, especially from the proposed Bio-mass Power Plant?**

The NOP confirms that some biomass feedstock will originate outside the Basin and be trucked into the Basin for drying and burning. This introduces new contaminants into the Lake Tahoe air basin, concentrated in Cabin Creek and Kings Beach, shifting the deposition from an air basin outside Tahoe to inside the Tahoe air Basin. The EIS/EIR should have a thorough analysis of all pollutants in the fuel removed from other air basins and deposited in the Tahoe air basin.

Comparing Emissions from Open Burning vs. Power Plant - The comparison of emissions from a controlled combustion power plant to emissions from open burning is based on fallacies of logic. For example, when comparing emissions from burning firewood in an open fireplace versus a high efficiency woodstove, the duration of measuring emissions must be the same, the actual fuel content and rate of combustion must be the same, and the location is assumed to be the same.

Open burning of forest waste occurs sporadically throughout the entire geographic area of the Tahoe Basin. Like a mobile source of pollution the location moves around impacting different areas, to a varying extent, and at different times. According to the US Forest Service some open burning will continue for ecological purposes and on slopes greater than 30%.<sup>4</sup> **The EIS/EIR should quantify the where prescribed burns (open burning) have occurred from Emerald Bay north and east to Highway 50 in Nevada over the last ten years.** This data should include the purpose of the burn, time of year, duration, and any reported health effects or complaints. Sufficient data would provide evidence of how much open burning will likely continue due to ecology, slope, or inaccessibility. As part of the EIS/EIR the Forest Service could quantify a reasonable estimate of likely future open burning.

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<sup>4</sup> Personal interview with Dave Fournier of the Lake Tahoe Basin Management Unit, US Forest Service.

Open burning is permitted only at certain times of the year, under certain weather conditions, and for a limited duration. A Biomass Power Plant burns continuously, 24 hours a day, emitting pollution from one specific location.

Another failure of logic is the scale of comparison. The instantaneous comparison of pollutants (from open burning versus biomass combustion) assumes the same scale is applicable in the long term. It assumes that open burning and the power plant emissions are generated for the same duration consuming the same quantity of fuel. According to the NOP the proposed plant at 3MW would consume 24,000 BDT of wood fuel per year, with all emissions sourced at the Kings Beach site. **Has Kings Beach ever openly burned the equivalent of 24,000 cords of firewood as forest waste? What is the open burning history in the specific area of the proposed biomass plant location?**

A side by side comparison of emissions from open burning versus a power plant is not comparing “apples to apples.” Therefore, the use of this limited and flawed comparison to justify a power plant is misleading.

**Reduction of Open Burning and Associated Emissions - Given that some open burning will continue how much of a reduction in open burning will occur by burning Cabin Creek’s feedstock in Kings Beach versus the Loyalton plant? Is there some undisclosed reason that supports the assumption in the NOP that a Biomass Plant in Kings Beach will reduce open burning, but burning it in Loyalton will not?**

The major barrier to reducing open burning is the cost. According to Dave Fournier, Forest Service, the cost of open burning is about \$700 per acre, whereas the cost of converting accessible forest material into biomass feedstock is between \$2000 and \$5000 per acre. This is a huge funding gap. Forest fuels reduction programs can temporarily subsidize this cost, just as the Forest Service is doing today. Extraction of the biomass material and processing it into usable fuel requires significant economic subsidies. **How is Placer County, the TRPA, or the Forest Service going to sustain subsidies for the life of the proposed power plant?**

Air curtain technology costs more than open burning but reduces smoke. According to Duane Whitelaw, Chief of the North Tahoe Fire Protection District, it will be a “tool in the toolbox” for certain situations. The NOP describes one of the project alternatives, “a no build alternative that includes the use of air curtain burners to control emissions from burning forest sourced biomass materials at the site of removal”? **If curtain burning is only a tool used as determined by Fire Districts and Best Management Practices, what is the rationale behind this alternative? How does this alternative meet the Biomass utilization program objectives? How does this alternative meet the project objectives stated in the NOP (page 5)?**

At the June 10, 2010 meeting of TRPA’s Advisory Planning Commission, Peter Ludlow spoke on behalf of Basin Fire Districts against mandating air curtain burners instead of open burning. He expressed concern about “adverse environmental impacts” of this

technology, and asked for its use to be determined by local conditions and fire officials, essentially only a “tool in the toolbox.”<sup>5</sup>

Area of Pollutant Deposition - Kings Beach is located on the North Shore of Lake Tahoe and the prevailing winds are from the south southwest. **The EIS/EIR should analyze the area of deposition of pollutants with regard to wind patterns in Kings Beach and temperature inversion conditions. What are the dispersion characteristics especially for local pollutants such as particulates and CO?** Kingswood East is a residential community just north and downwind from the proposed power plant. In calm conditions a circle of anticipated dispersion should be disclosed in the EIS/EIR, with an analysis for each pollutant generated from the plant.

### **Water Quality, Noise, and Odors**

Water quality impacts occur from the deposition of air contaminants directly on Lake Tahoe and on surrounding watersheds, along with the cumulative impacts of increased vehicle emissions. The EIS/EIR analysis of water quality is a function largely of the methodology and determination of air pollutant loads. Any errors or distorted data about how much open burning contaminants will be displaced by a Kings Beach power plant, or how much feedstock originates outside and is imported and burned in the Tahoe Basin will be compounded as this data is then assumed as base data applied to impacts on water quality.

The scope of noise impacts in the NOP refer only to measurable and audible decibels. There is no mention of vibrations from combustion and power generating turbines. When the Kings Beach back-up generators are running there is a perceptible low frequency vibration that is mostly felt not heard. **The EIS/EIR should address this impact due to the close proximity of residences.**

Odors from combustion exhaust, feedstock piles, and the gasification technology must be thoroughly analyzed in the EIS/EIR. Again, the proximity of residences to a 24/7 power generating plant warrants a detailed examination.

### **Fuel Specification and Emission Analysis**

The fuel specification used in the manufacturer’s technical literature about efficiency and emissions is based on an ideal, clean fuel. The general standard is 8500 BTU/lb of fuel. This equates to 17,000,000 BTU/BDT, which is the heat content of a full cord of Lodgepole Pine. The locally available biomass fuel has a high needle and bark content and a high percentage of white fir. The higher pitch content produces a “dirtier burn”. Loyalton plant manager Jim Turner stated that power efficiencies can be reduced by one-third while emissions can noticeably increase with this lower quality fuel.<sup>6</sup> **The EIS/EIR must account for this difference to accurately reflect the quality of locally produced biomass feedstock.**

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<sup>5</sup>CD recording of the APC meeting June 10, 2010.

<sup>6</sup> Interview with Jim Turner, Sierra Pacific Industries, at the Loyalton Plant, April 29, 2010

The standard technical analysis may also need some adjustment for the altitude in Kings Beach at 6250 feet. There is about 23% less oxygen at the elevation of Kings Beach than at sea level. **How does altitude and reduced oxygen affect the performance of combustion or gasification technology compared to the ideal conditions assumed in technical specifications?**

### **Risk of Fire Danger**

There is a balance between tree removal for fire safety and vegetation to buffer noise, air quality, and visual impacts. Given that the Kings Beach proposed site is as close as 50 feet from the nearest residence and within a few feet of heavily forested property, **what standard is being applied for a “fire safe distance” around the power plant?**

Biomass feedstock piles have spontaneously ignited, and sparks can ignite material during high wind conditions (such as the recent fire at the Loyalton plant). **Are there flammable creosote deposits that accumulate inside the exhaust flues?** The EIS/EIR should examine and address all possible sources of fire that could spread to the adjacent forest and residences. **What operational procedures are proposed to ensure no risk of fire?**

### **Environmental Justice Analysis**

The community of Kings Beach is comprised of 64% low income and minority population according to the US Census 2000. An Environmental Justice (EJ) analysis was performed recently in an EIS/EIR for the Kings Beach Commercial Core Improvement Project (KBCCIP). The US Census 2000 data was the data base used, but only certain blocks were selected and the racial composition for the entire community was extrapolated from these few blocks. There was no analysis of the low income characteristics of Kings Beach for the KBCCIP. This resulted in a flawed analysis of the “low income and minority” standard that applies to EJ evaluation.

The EIS/EIR for the proposed power plant must use the census base data in a methodology that withstands critical analysis. It must be accurate, scientifically based, and unbiased.

In the NOP (page 13), *“The EIS/EIR will identify sensitive receptors within 0.5 miles of the site.”* **What is the scientific basis for limiting sensitive receptors to 2640 feet of the plant?** The Health Risk Assessment (HRA) to be prepared for the EIS/EIR “identifies potential impacts to sensitive receptors within 1000 feet of the site boundaries. **What is the scientific basis of limiting the HRA to 1000 feet of the plant site? Does this distance include the Kings Beach Elementary School?**

According to the map in the NOP (page 3) the elementary school could be measured at about 1200 feet depending on where one chooses to draw the line. This school, the adjacent Boy’s and Girls’ Club, the Family Resource Center, and the adjacent Catholic church are all used extensively by children in the Latino community of Kings Beach. **What is the student population by age and racial background at the Kings Beach Elementary School and the Boys and Girls Club?** The EIS/EIR should include these

four community facilities in the HRA with a thorough analysis of numbers, ages, racial composition, and frequency of use by children. Air pollutants do not suddenly stop at 1000 feet.

### **Cumulative Impact Analysis**

The NOP states (page 15), *“the EIS/EIR will identify recently approved and reasonably anticipated projects like to occur in the broader North Tahoe area, as well as growth contemplated in the nearby community plans...”* There are several projects and changes effecting density that should be included in the EIS/EIR.

The Kings Beach Commercial Core Improvement Project was recently approved by Placer County and the TRPA. The traffic model in the EIS/EIR for that project concluded there would be congestion (Level of Service “F”) for only 5-10 days per year under current traffic conditions. This analysis used the SIDRA model which has a built in confidence level of only 50%. However, a study by Roundabout and Traffic Engineering (RTE) using the RODEL software (with an 80% confidence level) concluded the single-lane roundabouts are “under designed” and would fail immediately producing a Level of Service “F” at current conditions of 24,000 vehicles/day through Kings Beach.

This vehicle count is exceeded over 100 days per year according to Caltrans traffic counts. It is during Level of Service “F” conditions on State Route 28 through Kings Beach that triggers traffic cutting through the residential neighborhoods and using Speckled Ave (proposed Biomass Plant site) as a primary cut through route. The EIS/EIR estimates 2400-5400 vehicles per day will avoid congestion on the highway by using streets in the residential grid of Kings Beach. **The Biomass plant EIS/EIR must account for this scientific controversy by analyzing traffic and air quality impacts under the technically more accurate RODEL model.**

The intersection of Speckled Avenue and Highway 267 is a key intersection for analysis because of 1) its lack of a turning lane from Hwy 267 onto Speckled Ave, 2) insufficient turning radius from Speckled Ave turning north onto Hwy 267, and 3) the very narrow portion of Speckled Ave. leading to the intersection with Hwy 267. **The EIS/EIR must address the impacts of additional truck traffic at this intersection and combined with the cut-through traffic anticipated by the KBCCIP.**

The Domus affordable housing project was also recently approved with residential bonus units given for higher densities. This project and its implications for increased densities should be included in the EIS/EIR. Kings Beach is in a Redevelopment Area and is targeted for more affordable housing projects all eligible for more units (bonuses) and higher densities than normally allowed.

The Boulder Bay project in Crystal Bay is one pending Community Enhancement Program at the state line, only 1 mile east of Kings Beach. The traffic study was paid for by the developer and claimed a reduction of vehicle trips; however, California’s Attorney General’s office responded to the Draft EIS/EIR for Boulder Bay questioning the methodology and conclusion. Boulder Bay is increasing densities from about 120 TAU’s to 360 TAU’s with new additional commercial floor space. The EIR/EIR for the proposed

power plant should use standard trip tables in calculating the additional vehicle trips contributed by Boulder Bay.

The other two CEP projects in Kings Beach are the Kings Beach Town Center and the Ferrari motel expansion projects. These two projects also propose to add new and additional TAU's and commercial floor space, and should be included in the cumulative impact analysis.

TRPA is updating the 1986 Regional Plan and intends to overlay current zoning with Transect zoning methodology. This new zoning has been mapped for Kings Beach and includes T-4 areas where there are single family residences today and T-5 along SR28. Transect zoning encourages increased densities closer to the commercial core of Kings Beach. There is evidence from the CEP projects and Domus as to the density levels considered consistent with Transect theory. The EIS/EIR should use this evidence to analyze cumulative impacts on traffic and air quality.

### **Economic Analysis**

In the NOP (page 5) one of the project objectives is, *“Contribute to California’s renewable energy production goals through the operation of a woody biomass power plant that provides long-term renewable electrical supply to the Lake Tahoe Basin...”* The clear intention is to utilize biomass from forest fuels reduction to produce feedstock to sustain long-term operation of a power plant in Tahoe Basin. **How does Placer County propose to sustainably fund the “gap” between lower cost disposal methods (\$700/acre) and collection/processing of forest waste material into power plant feedstock (\$2500-\$5000/acre)?** The Forest Service admits the activity must be heavily subsidized and their funding is available for only another two years.<sup>7</sup>

A sustainable practice cannot depend on the hope of future subsidies. The EIS/EIR must address the economics of this stage of the fuel process and the economics of the power plant itself. **How do renewable energy tax credits and carbon tax credits figure into the economic analysis? How are these credits sustainable?**

With the Loylton and Cabin Creek alternatives the forest material generated by fuels reduction in the Tahoe Basin becomes part of the biomass fuel stream market. Cabin Creek is prominent in the economic analysis since it receives all the biomass material and processes it into useful fuel. The NOP project objectives (page 5) include, *“Reduce transportation costs and related air pollution associated with the current practice of trucking woody biomass out of the Basin to distant utilization facilities and/or disposal sites.”* If the forest material is chipped on site it is mostly green with high-moisture (water) content. A standard chipper trailer hauls a 26 ton load of green chips but produces only about 13.5 Bone Dry Tons. At the Loylton Plant the market rate paid for green chips is about \$22 per ton, whereas for dry chips as much as \$40 per ton depending on quality.

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<sup>7</sup> Interview with Dave Fournier, LTBMU

This would logically lead to a plant at the Cabin Creek site where all processing must occur. **What are the barriers to a clean plant, demonstrating the latest technology that minimizes pollutants, located at Cabin Creek?** The economics would favor this site for a sustainable power plant due to many factors. The EIS/EIR should include an economic analysis for a plant at Cabin Creek. What steps exactly would be required for approvals in that air basin which today is in non-compliance? This economic analysis could be the basis of political support to secure necessary exemptions as a demonstration project and aid the fuels reduction imperative for the Tahoe Basin.

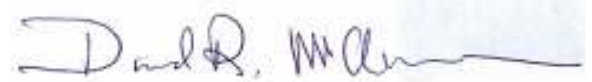
Whatever environmental impacts would occur at Cabin Creek would be incremental and very small in comparison to the total landfill and recycling transfer station. There are plenty of buildings to heat, and no residences and schools nearby.

The NTCAA and the KBBCA appreciates the opportunity to provide comments during this process. We request your prompt attention to the questions posed herein. If you have any questions, please do not hesitate to contact us at PO Box 289, Tahoe Vista, CA 96148 or Email: [jerry@wotel.org](mailto:jerry@wotel.org) and [mccluretahoe@yahoo.com](mailto:mccluretahoe@yahoo.com).

Sincerely,



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North Tahoe Citizens Action Alliance



David McClure, President  
Kings Beach Business and Citizens Alliance

CC: Placer County Board of Supervisors  
TRPA Governing Board  
TRPA Advisory Planning Commission