Frequently Asked Questions for the Montrose-Nucla-Cahone Transmission Line Improvement Project December 4, 2015

BACKGROUND

What is the Montrose-Nucla-Cahone Transmission Line Improvement Project?

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a wholesale electric power producer/supplier. Tri-State's transmission system in southwestern Colorado relies on a number of 115-kilovolt (kV) circuits including the Montrose-Nucla-Cahone (MNC) transmission line. Tri-State submitted an application to the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) for authorization to rebuild the existing 115-kV transmission line to a 230-kV transmission line, and to operate and maintain the new 230-kV transmission line and optical ground wire.

Tri-State's proposal includes the following elements:

- Using the authorized existing 115-kV 100-foot right-of-way (ROW) and access roads to the greatest extent possible.
- Amend the existing 100 foot-wide ROW width to 150 feet.
- Use of approximately 241 miles of roads, not including state highways, currently used for the existing line. About 67 miles of the existing roads are down line access located under the existing MNC line. 45.7 miles of road are on BLM land, and 79 miles are on Forest System land. Approximately 6 miles of new access/spur roads would be needed.
- 80 miles of transmission line (34.7 on BLM and 22.7 on USFS administered lands).
- Using primarily wooden H-frame structures which would be approximately 25 feet taller and 10 feet wider than the existing poles.
- A new substation (named Maverick) on private lands near Nucla, Colorado.
- Substation upgrades at the Montrose and Cahone substations (both on Tri-State property).
- Double circuit structures between a new Nucla 230-kV Substation and the existing Nucla 115-kV substation.
- Realignments at the Dolores River crossing and near the Cahone substation.
- Installation of a fiber optic cable which provides critical communications for emergency services (911), commercial internet capabilities and transmission system communication.
- Removal of the existing 115-kV towers following construction of the 230-kV line.

Details of the proposed project are presented in Tri-State's draft Plan of Development (Appendix D of the Environmental Assessment). The Final Plan of Development will reflect the terms and condition for mitigation, construction, maintenance, and reclamation stipulated in the agencies' decision documents, should the agencies approve an Action Alternative.

Why is Tri-State proposing this project?

Tri-State has determined the MNC Project is needed to address aging infrastructure and system deficiencies as summarized below.

- The line, constructed in 1958, has exceeded its expected lifespan of 50 years. The aging infrastructure has required frequent and substantial maintenance and repair costs.
- Loads on the existing line are reaching the thermal limit of the line. Under certain conditions, Tri-State is not able to dispatch electricity because the line may become overloaded.

- To address uncertainty with the Nucla Generating Station.
- To address forecasted future power needs in the region.
- To increase load-service capabilities to help mitigate the negative effects of increasing load on the transfer capability of the Colorado-New Mexico regional transmission path (known as TOT 2A).

Why is Tri-State requesting additional right of way?

The additional 25 feet on either side of the centerline is required by the National American Electric Reliability Corporation to provide for electrical clearance and safe operation of the transmission line. The 150-foot ROW would be centered on top of the existing 100-foot easement.

When does Tri-State want to start construction?

If approved, Tri-State plans to construct the Project in two segments and time periods, beginning with construction of the Nucla substation and the Nucla to Cahone segment in 2017, followed by the Nucla to Montrose segment in 2018. Tri-State would continue to maintain the existing transmission line and associated access roads until the new 230-kV line is in operation.

Why is Tri-State proposing to realign the transmission line at the Dolores River crossing?

The existing Dolores River crossing was routed, designed, engineered, and constructed using materials and equipment from 1958. Due to engineering constraints of that time period (specifically the ability to engineer and construct long spans), the line was routed in one of the narrowest areas of the canyon, and the line was diverted below the rim onto steep side slopes in an effort to reduce span length. Accessing the line from the ground on each side of the canyon year-round is necessary for inspection and maintenance, and for emergency repairs. The steep slopes associated with access to the existing crossing on the north rim have created ongoing maintenance access and safety issues for Tri-State's maintenance crews. Localized erosion is also an ongoing concern with the existing crossing.

AGENCY DECISION MAKING

What are the agencies' respective Purpose and Need?

Tri-State holds a valid BLM ROW grant for the entire existing transmission line on both BLM and USFS National Forest System Lands, issued in 2007 under the "Service First" initiative. The BLM's need for the proposed action is to respond to a request from Tri-State, as required under Title 5 of the Federal Land Policy and Management Act (FLPMA) of 1976, as amended, to amend their ROW for this project on public land. The USFS is responding to a request for a new Special Use Authorization (SUA). The USFS has primary responsibility to issue SUAs on National Forest System lands under the FLMPA.

The purpose of the agencies action is to analyze and respond to Tri-State's application in a timely manner, in accordance with law and valid land and resource management plans allowing for such development, and to identify any permit conditions necessary for resource protection and public safety.

What are the agency decisions to be made? Does the BLM/USFS decision affect private land?

The BLM and USFS will decide whether to approve the proposed action, an alternative to the proposed action, or the No Action Alternative. Under Section 7 of the Endangered Species Act, the BLM must insure the proposed action is not likely to jeopardize the continued existence of a threatened or endangered species or result in the destruction or adverse modification of designated critical habitat. As part of the Section 7 process, the BLM is coordinating with the U.S. Fish and Wildlife Service. If the U.S.

Fish and Wildlife Service determines the proposed action may affect threatened or endangered species or designated critical habitat, they will issue a biological opinion. The biological opinion may include actions the BLM or Tri-State may take to avoid the likelihood of jeopardizing a speciesor adversely modifying designated critical habitat.

If an Action Alternative is selected, the BLM and USFS would authorize the selected alternative with a ROW and SUA, respectively, for the construction, operation and maintenance of the line. Decision documents from the agencies would include terms and conditions for the authorizations, as well as stipulations to include in Tri-State's Final Plan of Development. The BLM and USFS decisions affect federal land. Tri-State would also have to seek related permits or approval from state, local, or private landowners. Counties may have to consider if the proposed action is consistent with their land use plans when determining whether to issue a permit(s) for the project. Required permits may include permits for access, construction or changes in land use.

Are other agencies involved?

Council on Environmental Quality regulations allow state agencies, local governments, and other Federal agencies to serve as cooperating agencies during the EA process if they have either jurisdiction by law or special expertise. The BLM invited a number of federal, state, and local agencies, as well as American Indian Tribes, who meet eligibility criteria, to serve as cooperating agencies. Currently, the USFS, Colorado Energy Office, and Montrose, Dolores, and San Miguel Counties are cooperating agencies.

How will the agencies evaluate the effects to the existing environment?

As the designated Lead Federal Agency, the BLM has determined that an EA is required before the agencies (BLM and USFS) can render decisions on the proposed Project. The EA must comply with the National Environmental Policy Act (NEPA) of 1969 as amended, the Environmental Quality Improvement Act of 1970, and all other applicable laws, Executive Orders, regulations, and direction. The EA will be used to evaluate alternatives and to make a determination of the need to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

ENVIRONMENTAL ASSESSMENT

How did the BLM decide what to analyze?

A wide variety of resources were reviewed to identify potential effects from the Action Alternatives. Resources were grouped into three categories, with different levels of analysis depending on the potential for effects and value in comparison of the effects of the Action Alternatives. Based on internal and external scoping the BLM and USFS first identified those resources that could be dismissed from detailed consideration in the EA, because there is no or negligible effects under any of the alternatives. These resources are briefly described in the Chapter 3 (Affected Environment) of the EA and are dismissed from further analysis.

Second, resources that were determined to have measurable effects and value in comparing alternatives were selected for detailed analysis in the EA. These resources are described in Chapter 3 and analyzed in the Chapter 4. Resources that receive this detailed discussion include: access, roads, and transportation; cultural resources; forest and timber resources; geology; lands with wilderness characteristics; soils; threatened, endangered or candidate animal species; and visual/aesthetics resources.

Remaining resources that may be affected by the Action Alternatives, but for which the impact would be minor and similar among all Action Alternatives were also identified. For these resources, a brief

description of the affected environment and summary of effects is provided in Chapter 3 before it is dismissed from further discussion.

What are the alternatives to Tri-State's proposed action?

Two issues influencing the development of alternatives were identified based on information obtained during external and internal scoping conducted in 2014. The issues are concerns about potential effects to Gunnison Sage-grouse (GuSG) habitat in the Dry Creek Basin and effects to visual resources at the Dolores River crossing. These issues led to the development of Alternative C, BLM Routing Options.

The EA analyzes Tri-State's Proposed Action, the No Action Alternative, and three BLM routing options. There are a total of five options, with four combinations of Action Alternatives that are possible for the project.

- Alternative A, Tri-State's Proposed Action: Upgrade-in-place with realignments at the Dolores River crossing and near the Cahone substation.
- Alternative B, No Action: In the No Action Alternative, the existing MNC 115-kV transmission line associated access roads would remain and the transmission line would not be improved.
- Alternative C, BLM Routing Options:
- Dolores River Crossing Routing Option: Alternative A incorporating an upgrade-in-place variation at Dolores River crossing;
- Dry Creek Basin Routing Option: Alternative A incorporating a realignment parallel to State Highway 141 in Dry Creek Basin;
- Both Routing Options: Alternative A incorporating the upgrade-in-place variation at Dolores River crossing and the realignment in Dry Creek Basin.

What is the agency preferred alternative?

After consideration of public comment on the Preliminary EA, the BLM will identify the agency preferred alternative in the Final EA. The identification of a preferred alternative would not constitute a commitment or decision in principle. The BLM's decision on the proposed project would be documented in a Decision Record following publication of the Final EA. The USFS would issue a Decision Notice.

PUBLIC INVOLVEMENT

What is the Preliminary EA Comment Period?

The Preliminary EA was released on November 3, 2015 to inform the public and interested parties of potential effects associated with implementing the proposed action, as well as alternative identified by the agencies. The BLM sought comments on the Preliminary EA from the public and interested parties. The public comment period closed on December 3, 2015. Comments submitted after December 3, will not receive a formal response, but may be considered in the BLM decision-making process.

What happens to my comments?

All substantive comments and information submitted by the end of the comment period will be summarized and addressed in the Final EA. Substantive comments are those that:

- Question, with reasonable basis, the accuracy of, methodology for, or assumptions used in the environmental analysis;
- Present new information relevant to the analysis;

- Present reasonable alternatives other than those analyzed; and/or cause changes or revisions in one or more of the alternatives.

How do I submit my comments?

Written comments may be submitted by mail, email or fax. Comments may be submitted in the following manner:

- By mail: Southwest District Office
  ATTN: Gina Jones
  2465 South Townsend Avenue
  Montrose, Colorado 81401
- By email: blm_co_tristatemnc@blm.gov
- By fax: 970-240-5367

Please note "Tri-State Montrose-Nucla-Cahone" in the subject line for all emails.

Your comments should include: 1) your name and postal address, 2) the project title (Tri-State MNC), and 3) your signature or other verification of identity upon request. Comments received from individual members of an organized group through a clearinghouse or group-generated mail will be considered as the views of the group (pursuant to 36 CFR Subpart B 218.25(a)(3)(v)).

Will my information be kept confidential?

Before including your address, phone number, email address or other personal identifying information in your comment, be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

How can I get a copy of the Preliminary EA?

The Preliminary EA is posted on the BLM's website at http://blm.gov/dvld. You can also request a DVD of the EA by sending a request to any of the contact methods listed above. Paper copies will be available for viewing at BLM Uncompahgre and Tres Rios Offices as well as the USFS offices, and local libraries.

Were there other opportunities to comment?

The BLM and USFS jointly published a legal notice in the newspaper of record (Grand Junction Daily Sentinel and the Durango Herald) on May 5, 2014, notifying the public of the intent to prepare an EA. Public scoping comments were also solicited via a scoping letter dated May 5, 2014, that was mailed to the appropriate agencies, specific interested parties, and to the general public. Letters to interested parties were mailed to approximately 900 addresses. The scoping letter announced the opportunity for public input and initiated the start of the scoping period.

Scoping concluded on June 4, 2014. Various parties provided comments, and a total of 17 individual letters were received. Public comments received were used to help the agencies identify issues and refine the proposed action, develop measures to mitigate potential negative effects, and develop alternatives to the proposed action that meet the agencies' purpose and need and address key issues.

The BLM compiled all comments received during the public scoping period into a report that can be found on the BLM's project website located here: http://blm.gov/dvld.

How do I establish standing for the agency appeals and protest processes?

Each agency will be subject to its respective regulations for BLM appeals (43 CFR Part 4) and USFS pre-decisional objections (36 CFR 218 Subparts A and B). This is the second of two 30-day comment periods during this process that establish standing to appeal or to object. Submitting comments during either of these comment periods will establish standing for BLM appeals and USFS objections.

In order to meet the USFS requirement for objection eligibility on "specific written comments" you must have submitted comments during scoping (held May 5 through June 4, 2014) or during the Preliminary EA comment period (held November 3 through December 3, 2015). Your comments must be 1) within the scope of the proposed action, 2) have a direct relationship to the proposed action, and 3) must include supporting reasons for the responsible official to consider.

NATIONAL ENVIRONMENTAL POLICY ACT

What is NEPA?

The National Environmental Policy Act (NEPA) was passed by Congress in 1969 and signed into law on January 1, 1970. The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment.

What is an Environmental Assessment? What is the purpose of an EA?

The agencies use various types of documents to meet NEPA requirements. Environmental analysis documents, which must be made available to the public, include EISs and EAs (see 40 Code of Federal Regulations [CFR] 1506.6(b)). If a proposed action will have a significant environmental impact, as defined in 40 CFR 1508.27, an agency must prepare an EIS (See 40 CFR 1502.1).

If it is unclear whether the action would have a significant effect, an agency may prepare an EA. The EA will analyze the potential effects of the proposed project on the existing environment including, but not limited to: wildlife, vegetation, cultural resources, existing land uses, recreation, roads/facilities, visual resources, livestock management, and public safety, along with other issues that may be raised by the public. If the agencies determine, based on the analysis, that the proposed Project would result in significant effects, an EIS would be prepared.

If the analysis in an EA shows the action would not have a significant effect, a FONSI documents that there is no need for an EIS (see 40 CFR 1508.13). The BLM's decision will be documented in a Decision Record and the USFS's decision will be documented in a Decision Notice.

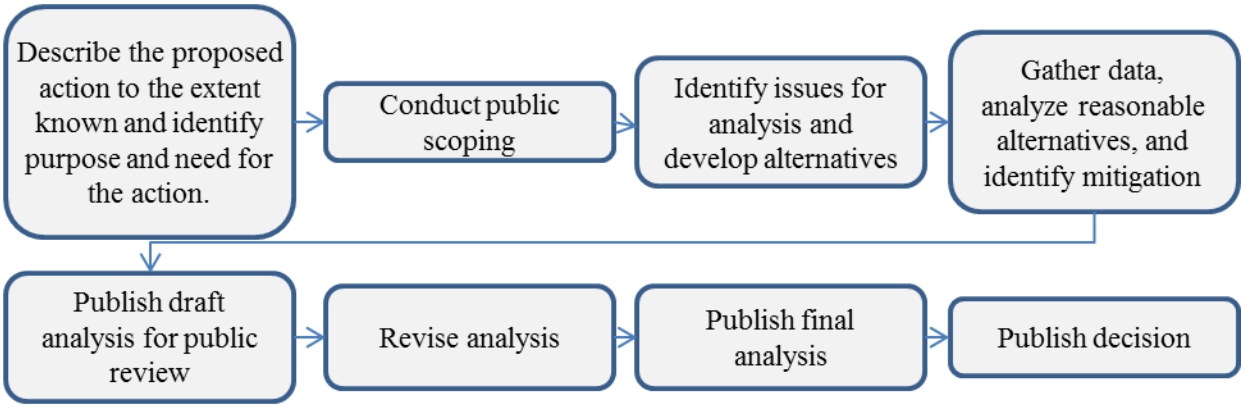
What is the process for preparing an EA?

The NEPA Process chart outlines the general process for NEPA compliance. Public involvement may occur throughout this process. Keep in mind, NEPA is an iterative process and some steps may be revisited.

The Council on Environmental Quality regulations require NEPA documents to be "concise, clear, and to the point" (40 CFR 1500.2(b). Analyses must "focus on significant environmental issues and alternatives" and be useful to the decision-maker and the public (40 CFR 1500.1). Discussions of impacts are to be proportionate to their significance (40 CFR 1502.2(b)). Similarly, the description of the affected environment is to be no longer than is necessary to understand the effects of the alternatives (40 CFR

1502.15). "Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail." (40 CFR 1500.1).

1 NEPA Process Chart



NEXT STEPS & FURTHER INFORMATION

What are the next steps?

At the conclusion of the public comment period, the BLM will review and respond to substantive comments, and collect any additional necessary data, and update the analysis in the EA. A Final EA and draft Decision Notice from the USFS are anticipated in spring, 2016. The BLM's Decision Record and Final EA are anticipated in summer, 2016.

How can I stay informed of project status?

Legal notices will be posted in the newspapers of record (*Grand Junction Daily Sentinel* and the *Durango Herald*) and on the BLM website at http://blm.gov/dvld. The BLM's websitewill be updated as new information is available and the BLM will periodically send out project updates via the U.S. Postal Service. You can request to be added to the project mailing list by sending an email with your name and address to blm_co_tristatemnc@blm.gov.

How can I get more information?

For more information, go to the BLM Tri-State Project website at http://blm.gov/dvld or contact Gina Jones, BLM NEPA Coordinator by phone at (970) 240-5381 or by email to gmjones@blm.gov. Additional information about the USFS objection process can be obtained by contacting Liz Mauch by phone at (970) 240-5405 or by email to lmauch@fs.fed.us.

Where else can I learn about the NEPA process and transmission corridors?

The CEQ's Citizens Guide to NEPA is available at:
http://www.blm.gov/pgdata/etc/medialib/blm/nm/programs/planning/planning_docs.Par.53208.File.dat/A_Citizens_Guide_to_NEPA.pdf.

See also the CEQ's NEPA's 40 Most Asked Questions at:
http://www.blm.gov/wo/st/en/prog/planning/nepa/webguide/40_most_asked_questions.html

You can find out more information about BLM's electric transmission facilities and energy corridors by at: http://www.blm.gov/wo/st/en/prog/energy/transmission.html