

BUREAU OF LAND MANAGEMENT: MOUNTAIN STATES TRANSMISSION INTERTIE 500KV PROJECT

Questions asked at the Local Agency Outreach Meeting in Butte, Montana, on May 18, 2011.
Questions are in **bold** font.

Can you provide us with any information on the need to connect to the Mill Creek Substation?

NorthWestern Energy (NWE) proposes to construct a new substation adjacent to the existing Mill Creek Substation. NWE believes siting the MSTI line to the Mill Creek area is important for the future and long term transmission planning and it is a component of NWE's preferred alternative (federal agency "proposed action").

What is NWE's preferred route?

In Zone 1, NWE's preferred route (agency proposed action) is 1-B.

If that is true, does it take the Jefferson Valley area route out of consideration?

The Jefferson Valley area route is included in the range of alternatives (it also includes a No-Action Alternative) being analyzed in detail in the Environmental Impact Statement (EIS). Agencies will make a decision selecting an alternative, once the analysis process is completed.

What is a double circuit?

A double circuit transmission line carries two circuits on a single set of structures (also known as towers). Consequently, double circuits require more robust structures than single-circuit lines. For example, the Bonneville Power Authority (BPA) line that goes from Townsend west out of Montana is a double-circuit line. This is what makes those towers larger than other lines in the area.

If NWE wants to go to Mill Creek, does following Alternative 1-A present concerns?

NWE is required to identify two alternatives in the Major Facilities Siting Act application. Alternative 1-A is one of the two other alternatives. The agencies are analyzing the range of alternatives. If the project is approved, NWE would build on any alternative route selected by agencies.

Where is the 1-A Alternative? It seems to follow an existing utility corridor. What is the difference between the closely located high voltage lines I see in areas of the southwest U.S. and placing MSTI close to the existing transmission line in Montana?

Segments of the 1-A Alternative parallel the existing double-circuit BPA transmission line which was constructed in the early 1980s. Years after the BPA line was constructed, federal agencies designated the 368 energy corridors under the West-Wide Energy Corridor Programmatic Record of Decision (WVEC, decision made based on the EIS analysis). For more information on the 368 energy corridor project, visit <http://corridoreis.anl.gov>. Determining the off-set distance between the MSTI line and the BPA line is a challenge. Currently, the 1-A alternative has an approximately 1,500-foot offset from the BPA line. This is to comply with regional transmission reliability criteria (WECC criteria). NWE must get a path rating from the Western Electricity Coordinating Council (WECC). Part of this process entails

modeling overall grid reliability in case of events that could impact adjacent transmission lines. These studies are currently underway. The results of these studies will determine if Alternative 1-A could be sited in closer proximity to the BPA than the currently planned 1,500-foot offset. Another challenge is the width of the 368 corridor. The established corridor is 1,000 feet wide in the area and the BPA line is located in the middle of the corridor. If the study determines the offset must be at least a span (approximately 1,500-2,000 feet), then alternative 1-A would remain outside of the established utility corridor and would require an amendment to the existing forest plan. Update: the path rating study completed by WECC determined that the MSTI line off-set from the BPA line can be closer (approximately 200 to 300ft [centerline to centerline]) than originally assumed.

Does Alternative 1-A encroach on any towns?

The alternative is located north of the towns of Radersburg and Boulder in Montana and it roughly parallels the existing double-circuit BPA line located in mostly rural areas. The alternative crosses private lands as well as lands managed by the Forest Service and BLM.

Wouldn't Alternative 1-A be an easier route with fewer impacts?

That has not yet been determined. Alternative 1-A as well as the other alternatives are being analyzed in detail in the EIS. The EIS will analyze effects to natural, cultural, and recreational resources, as well as effects to the socioeconomic environment, in detail.

Can you cross under the double circuit BPA line and have you done residential studies along the alternative routes in Zone 1?

NWE considered crossing the BPA line but, because of engineering constraints associated with topography and the need to maintain a certain distance between circuits of the two lines; they did not identify a practical crossing point. MDEQ and NWE have begun to examine specific locations where the MSTI line might be routed underneath the BPA line in order to avoid the residential and subdivided area on Boulder Hill.

Studies on residences and residential areas have incorporated analysis of effects from the following distances: 2 miles from centerline, 300 feet from centerline, 300-1,000 feet from centerline, and 1,000 feet from centerline. Residential information continues to be updated.

When will you hear back on the WECC study?

NWE expects the results of the WECC study will be complete in the summer of 2011. Update: the path rating study completed by WECC determined that the MSTI line off-set from the BPA line can be closer (approximately 200 to 300ft [centerline to centerline]) than originally assumed.

We believe you should study the residential and community impact more. Jefferson County wants the line on the north side of the BPA line, does not want to see monopoles used, and is concerned about eminent domain being used.

The EIS will contain an extensive analysis on land use, including impacts to residences and the communities. As noted above, constraints to crossing the BPA line include terrain and required clearances between the lines. If further investigation determines the BPA line could only be crossed by

going over it, it would require the use of very high structures which would have ramifications for aviation safety. Use of tall structures would require aviation marking and could possibly limit the crossing to the Boulder Hill area. Although monopoles may be used in some areas, the majority of structures would be single-circuit guyed “V” structures or self-supporting lattice steel structures approximately 125 feet tall. If the project is approved, NWE intends to negotiate easements across private lands.

You indicated at the first meeting with Jefferson County that Alternative 1-A wasn’t an option, what has changed?

Nothing has changed yet. As noted above, the final results of the WECC study will determine if that alternative can be moved closer to the BPA line. Update: the path rating study completed by WECC determined that the MSTI line off-set from the BPA line can be closer (approximately 200 to 300ft [centerline to centerline]) than originally assumed.

Why was the Town of Whitehall ignored on early maps and omitted from the invite list for this meeting?

The Town of Whitehall was not and has not been ignored. The first meeting associated with the MSTI project was held in Whitehall. Early maps emphasized alternative route locations and several towns were not labeled on those maps. Maps undergo frequent updates and all towns are now labeled. With regard to the suggestion that the Town of Whitehall was not sent an invite to this meeting, a check of our records shows that invite letters to both Jefferson County and the Town of Whitehall were mailed on April 26, 2011.

Is there a breakdown between private and public land for the EIS?

Yes, the EIS contains tables providing the length of the various alternatives and local routing options by ownership or management by federal or state agencies.

How much does cost play in the agency decision?

Montana Environmental Policy Act (MEPA) regulations require that mitigation costs be disclosed and may factor in cost if other factors affecting the decision are equal. Additionally, the Major Facility Siting Act (MFSA) requires that the facility minimize adverse environmental impacts, considering the state of available technology and the nature and economics of the various alternatives. Federal permitting agencies do not emphasize costs in their decision.

Why can’t you bury the transmission line?

An alternative burying the transmission line was considered but eliminated from detailed analysis due to engineering constraints. Detailed rationale for eliminating this alternative is discussed in the EIS.

How many people involved with this project want it in their backyard?

The question is beyond the purpose of the meeting or the scope of the analysis. NEPA is designed to ensure that federal agencies consider the effects of a proposal in order to reach an informed decision.

Some impacts can be eliminated or minimized. Other impacts must be balanced against the need for the action.

What has BLM been doing with the Draft EIS in the last year? In April 2010, BLM said they were days away from going to the printer. What's the deal? What confidence should we have in the final product?

The lawsuit between Jefferson County and MDEQ delayed release of the analysis but in the meantime, BLM continues to work on route refinements, consultation with Tribes, coordination with local agencies, updating the cultural, visual, and wildlife resource studies, and identifying potential mitigations to impacts. The result will be an updated, more complete analysis.

Would you agree that Zone 1 is the most problematic area in Montana?

Early in the planning process, NWE's northern route was extensively adjusted to move the centerline at least one span length away from BPA's 500 kV line to meet the reliability findings required by MFSA. Beyond this adjustment, Zone 1 had the least amount of change to the alternatives but the highest number of local routing options. Each zone has its own set of issues. For example some of the alignments in Zone 1 come closer to residences (where alignments are located close to Whitehall, Butte, Buxton, Fairmont, and Boulder Hill) than other alignments in other zones. However potential impacts to sage grouse are expected to be lower in Zone 1 compared to zones further south.

Did you look at energy corridors before or after the initial analysis and is one of them the BPA corridor?

Initial analysis pre-dated the 368 corridors established by the WWEC project. However, alternative routes were moved into the corridors where practical. In one case, the established 368 corridor would not be wide enough to accommodate a MSTI line, so the agencies are waiting on the path rating study. Federal agencies consider a range of viable (reasonable) alternatives. Alternative 1-A would cross Forest Service managed lands and would, most likely, require a plan amendment if selected because the line falls outside the WWEC corridor. If the line can parallel the existing BPA line in close proximity then certain impacts would be less than if the MSTI line were placed further away.

Can you widen the BPA utility corridor?

Widening the established 368 corridor would require an amendment to the Deerlodge Forest Plan.

Have you looked at the EIS for the BPA line? Why isn't that route as good now as it was in the 80s?

A portion of Alternative 1-A follows the BPA route and is being analyzed in detail in the EIS. The EIS prepared for the BPA line is 30 years old. Conditions change, so much of the information contained in that EIS is now too outdated to be used in the MSTI EIS.

Do you have subscribers for the MSTI line? If not, will you pursue the Certificate?

Open season has been on-going for a couple of years and there remains strong interest in NWE's interconnection queue in Montana. NWE plans to pursue a Certificate and other permits. One of the findings in the MDEQ decision relates to need for the action; BLM and other federal agencies consider the proposal.

Why is the Townsend Substation located where it is? Is there any financial reason for the Townsend Substation?

The location of the Townsend Substation was determined by engineering and economic factors.

Will Montana Alberta Tie Limited (MATL) line connect to Townsend?

The MATL line is a project from Alberta, Canada to Great Falls, Montana.

Were there other locations considered that would have less impact than locating a substation at Townsend?

NWE considered other locations, but Townsend proved to be the best location. Substations, and consequently their siting, are not regulated by the State of Montana. It is a private business decision.

Have there been discussions with other potential applicants for utility lines?

BLM received an application from a Canadian company in 2005 but the application has subsequently been withdrawn.

Explain WECC better. Why don't they have a more active role and what's the makeup of the Council?

Western Electricity Coordinating Council (WECC) is an organization certified by the Federal Energy Regulatory Commission (FERC, pursuant to Section 215(c) of the Federal Power Act) to establish and enforce reliability standards for the bulk-power system within the Western Grid. More information about the organization can be found on their website at www.wecc.biz. WECC is very active and is made up of participating utilities, government regulators and other parties.

Is the WECC report required for the EIS? Was feedback from WECC over a year ago required for Draft EIS?

It is not required for the EIS but, if completed in time, would provide additional information for the analysis.

What will be the effect of eminent domain?

NWE expects that eminent domain will have little to no impact on permitting the MSTI.

Have there been any letters in support of the MSTI project?

BLM conducts public scoping to identify issues for consideration in the development of alternatives and the analysis of those alternatives. BLM received 353 comment letters during the scoping period and those letters represented a range of views on the proposed project. Another 713 letters and petitions have been received since the close of scoping. The regulations implementing NEPA require federal agencies to consider substantive comments (40 CFR 1503.4).

Is the project a state or regional project? Are federal legislators involved? Is the Governor involved?

In Montana, MSTI is a joint project between federal and state agencies. While the Governor's Office and federal legislators are provided updates on the project, they are not involved in the development of the EIS.

Are routes considered, but eliminated from further consideration early in the process back on the table?

No, those routes considered early in the process were eliminated from further consideration for specific reasons. New routes will be considered only if they solve conflicts, rather than just moving conflicts elsewhere.

BLM should reconsider all alternatives, how far east did the early studies consider?

The regional study area covered approximately 25,000 square miles. The eastern boundary took in the Ringling area, but it was dismissed from further consideration because it would have added unnecessary miles of transmission. The Yellowstone National Park boundary provided the eastern-most boundary of the regional study area in Montana. The purpose of the regional study was to consider the constraints and opportunities of all possible routes. The environmental report further narrowed down potential alternative routes for the application process. BLM reviewed these documents. Other routing options have been identified as part of the NEPA/MEPA process.

When was the Townsend Substation location selected? When was the county notified and who in the county was notified?

The location of the substation at Townsend was identified by NWE during the regional study. Elected officials and the public were notified during the early outreach meeting conducted by NWE in 2007. Public Open house meetings were also held by NWE during this time frame.

In the Administrative Draft EIS (ADEIS) why wasn't the Mill Creek route chosen as the agency-preferred alternative? Isn't that a violation of FACA?

The ADEIS is an internal working document. Federal regulations require agencies to identify an "agency preferred" alternative at the Draft EIS stage if it is known. Based on the information known at the time of the last internal version of the DEIS, the agencies had identified a preliminary agency-preferred route. BLM is reassessing the agency-preferred alternative and before making a decision, BLM will meet with individual counties. FACA does not apply.

Jefferson County, Montana, acknowledges the work done on the EIS but the County needs to know if NWE wants to go to Mill Creek?

NWE has stated they believe it is important for the future and it is a component of NWE's preferred alternative (federal agency "proposed action").

How many of the alternatives are within existing corridors or follow existing transmission or other utilities?

NWE's preferred route (proposed action) follows existing transmission lines. Most, but not all, other alternatives are within established corridors or follow existing transmission lines. Some alternatives were moved away from existing lines in order to maximize use of public land and one alternative in Zone 2 and 3 does not parallel existing transmission.

How will MSTI affect local rates and service?

NWE has indicated that there will be no effect to Montana rate payers but system reliability will be increased. Local service is a separate issue and is dependent upon the service provider.

Will NWE sell the MSTI line once it is approved?

NWE has stated they have no current plans to sell the line.

What is the difference, percentage-wise, between the use of federal energy corridors vs. existing public utility corridors?

Federal energy corridors are land-use decisions. Placement of utilities within these corridors is not mandatory but encouraged where practical. In the case of Forest Service managed lands, selection of Alternative 1-A would require an amendment to the existing land use plan depending on the spacing requirement. In the case of MSTI, the percentage has not been calculated. However, the alternative routes fall within the 368 energy corridor/s where possible. As noted above, many of the alternatives fall within or parallel to other existing utility corridors.

There has been no comment about Sky Park [airport] in Whitehall, what is the distance between the airport and the alternative route/s?

The agencies' consultant has contacted airports near the alternative routes. If the alternative was approved, the MSTI line would be constructed north of the existing transmission line which lies north of the Town of Whitehall area.

Are sage grouse going to be listed?

Sage grouse have been designated as a candidate species by the U.S. Fish and Wildlife Service which is responsible for such designations. For more information, visit their website at www.fws.gov.

Do the alternatives that go from Mill Creek to Apex area follow I-15?

Yes, generally speaking.

Does Alternative 3-A go through a Wilderness Study Area?

No.

What is the route between Mill Creek and Pipestone? Has the double circuit been in the mix from the beginning?

The route follows the existing transmission lines for the most part. There are a number of route alternatives in the South Butte to Mill Creek area that would get to Mill Creek.

Will you be analyzing a 1-mile corridor in the EIS per the new state requirement?

The new state law does not apply to the MSTI project, since it is not retroactive. The area of analysis is resource specific. In some cases, the analysis area extends well beyond a mile from the line