#### S.1 Introduction

This document is both a State of Montana Supplemental Draft Environmental Impact Statement (EIS) and a U.S. Department of Energy (DOE) Federal Draft EIS (referred to herein as the Draft EIS for both state and federal purposes) prepared for the United States portion of the proposed Montana Alberta Tie Ltd. (MATL) 230-kilovolt (kV) transmission line.

MATL has proposed to construct an international 230-kV alternating current merchant (private) transmission line that would originate at an existing NorthWestern Energy (NWE) 230-kV switch yard at Great Falls, Montana, and extend north to a new substation to be constructed northeast of Lethbridge, Alberta, crossing the U.S.-Canada international border north of Cut Bank, Montana (proposed Project). Approximately 130 miles of the 203-mile transmission line are proposed to be constructed in the U.S. The line would be constructed and owned by MATL, a private Canadian corporation owned by Tonbridge Power. The proposed line would be part of the Western Interconnection<sup>1</sup> (western grid), and a phase shifting transformer would be installed at the substation near Lethbridge to control the direction of power flows on the line. In order to develop the proposed Project, MATL must obtain Federal and State authorizations.

MATL has submitted an application for a certificate of compliance (certificate) to the Montana Department of Environmental Quality (DEQ) under the Montana Major Facility Siting Act (MFSA), (75-20-101, et seq., Montana Code Annotated [MCA]). MATL has also applied to DOE for a Presidential permit (permit) to construct, operate, maintain, and connect facilities for the transmission of electric energy at the U.S.-Canada international border and to the U.S. Bureau of Land Management (BLM) for a right-of-way (ROW) grant for Transportation and Utility Systems and Facilities on Federal Land. MATL must receive all three authorizations before it can implement the proposed Project. In response to the application for a certificate, DEQ must prepare a report, conduct an environmental review, and issue an approval before construction may begin. These are required by the Montana Environmental Policy Act (MEPA) and MFSA. The DOE and BLM actions also require an environmental review conducted in accordance with the National Environmental Policy Act (NEPA).

-

While the power system in North America is commonly referred to as "the grid," there are actually three distinct power grids or "interconnections." The Eastern Interconnection includes the eastern two-thirds of the continental United States and Canada from Saskatchewan east to the Maritime Provinces. The Western Interconnection includes the western third of the continental United States (excluding Alaska), the Canadian provinces of Alberta and British Columbia, and a portion of Baja California Norte, Mexico. The third interconnection comprises most of the State of Texas. The three interconnections are electrically independent from each other except for a few small direct current transmission lines that link them.

#### S.2 Purpose and Benefit to the State of Montana

The proposed MATL transmission line would connect the Montana electric system with the Alberta electric system, provide access to potential markets for new and existing power generation facilities in the vicinity of the proposed transmission line, and improve transmission access to markets seeking new energy resources. Expected benefits of the proposed Project are summarized below.

#### S.2.1 Benefits to Electricity Generators and Consumers in Montana

The proposed transmission line would have the capacity to carry up to 300 megawatt (MW) of electric power north and 300 MW south for a total capacity of up to 600 MW. However, due to constraints on the current system where the MATL line would tie in at Great Falls, the full capacity of 300 MW to the south may not be realized unless additional upgrades are made to the transmission system south of Great Falls. The added transmission capacity from the proposed MATL transmission line could support a modest increase in new power generation in Montana. While new generation higher than 600 MW would need more transmission capacity than MATL's proposed Project could provide the construction and operation of the proposed Project would provide opportunities for development of smaller energy generation projects of up to 600 MW, such as wind energy, in Montana. Currently, MATL has sold all the "capacity" of the line to potential wind farms. The development of wind farms along the MATL line is considered to be a reasonably foreseeable future action under federal law and is analyzed under the cumulative impacts.

Additional expected benefits to Montana generators and consumers include: additional connection with markets that demand energy; additional wholesale electricity purchasing options for Montana utilities, which could result in lower electricity rates due to an increase in supplier competition; and increased opportunities for western grid optimization during high Montana export and low Alberta-to-British Columbia export scenarios.

#### S.2.2 Benefits to Existing Transmission Systems

A modified transmission system, including a tie line between Montana and Alberta, may also result in benefits to transmission system operators whose service areas include Montana and to utilities that provide transmission service within the state. A modified transmission system could provide more options for power routing within Montana, increase energy transactions between Montana and Alberta, and allow for easier balancing of energy surpluses and shortages within and between balancing authority areas. Because tie lines are able to connect with adjacent electric systems, different generation resources can combine to provide a level of reliability that one jurisdiction

could not otherwise afford to provide if that jurisdiction had to cover the same resources independently. The MATL line could also create another opportunity for Montana's largest privately owned transmission and distribution utility, NWE, to obtain regulating reserves for its transmission system control area. Regulating reserves are likely to become increasingly important as more wind energy is built in NWE's jurisdiction.

#### S.2.3 Benefits as Stated by the Applicant

The MATL transmission line would be a merchant line, the primary purpose of which is to financially benefit the owner/operators. The MATL application for certification described the following benefits to MATL, the U.S., and Canada:

The Project would be the United States' first power transmission interconnection with Alberta and is expected to facilitate development of additional sources of generation (e.g., windfarms both in northern Montana, and southern Alberta), and improve transmission system reliability in Montana, Alberta, and on a regional basis in both the U.S. and Canada. In addition, the Project would promote increased trade in electrical energy across the international border, and provide a transmission route to balance energy surplus/shortage situations in an efficient and economic manner.

In addition, MATL asserts that system stability studies conducted under the direction of the Western Electricity Coordinating Council Peer Review Group indicate that the proposed Project would not adversely affect transmission system stability (Tonbridge Power, Inc. 2007).

The proposed Project is needed to provide transmission capacity between Lethbridge and Great Falls. There is currently no direct high voltage power transmission connection between Alberta and Montana. Although additional capacity is not needed to provide power to Montana customers, additional capacity would allow increased electricity trading between Alberta and Montana and could facilitate development of wind farms or other generation facilities in the vicinity of the northern part of the proposed transmission line.

Because Montana makes more electricity than it consumes, to be economically viable, any new generation resources in Montana must offer competitive pricing and have adequate transmission access to compete in out-of-state markets or replace an existing supplier choosing to take higher profits by selling out of state. Either way, additional transmission capacity is not needed to serve Montana customers, but it is essential for the viability of new generation enterprises (DEQ 2004).

This line could support a modest increase of new electricity generators by connecting them to regional electric systems and thus potentially to electricity markets. The proposed line would be capable of shipping up to 300 MW of power north and 300 MW south at the same time. The amount of new generation that would be able to be shipped south into Montana by MATL is currently unknown due to transmission constraints south of Great Falls, which is the southern terminus of the MATL line. To the extent that southerly electrical flows on the MATL transmission line are constrained, this would reduce MATL's ability to ship power from additional generators. It also may result in more electricity flowing from Montana into Alberta than from Alberta into Montana.

#### S.3 General DOE, MFSA, NEPA/MEPA, and BLM Requirements

MEPA requires that decision makers consider the effects of their actions on the human environment. MFSA requires that need, environmental effects, costs, electric reliability and other factors are considered before making a decision. State agencies must inform the public of the decision making process and seek participation in the process. Similarly, NEPA requires that Federal decision makers be fully informed of the potential environmental consequences of their agency's proposed actions, provide an opportunity for public participation in the environmental review process, and document the reasons for their decisions. The information contained in this Draft EIS will provide a basis for DEQ to make findings required for certification and for federal agencies to determine whether it is in the public interest to grant a Presidential permit, and BLM to grant a ROW. DEQ, DOE, and the BLM will use this information to decide which alternative(s) could be implemented and which mitigation measures, if any, would be appropriate for inclusion as a condition of the certificate, permit, or ROW grant. DEQ, DOE, and BLM will document their decisions in separate Records of Decision.

#### S.3.1 Purpose and Need for DOE Action

DOE has the responsibility for implementing Executive Order (E.O.) 10485 (September 9, 1953), as amended by E.O. 12038 (February 7, 1978), which requires the issuance of a Presidential permit for the construction, operation, maintenance, and connection of electric transmission facilities at the United States international border. DOE may issue the permit if it determines the project to be consistent with the public interest and after obtaining favorable recommendations from the U.S. Departments of State and Defense. In determining if a proposed Project is consistent with the public interest, DOE considers:

1. Potential environmental impacts in accordance with NEPA and Council on Environmental Quality (CEQ) and DOE implementing regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508 and 10 CFR Part 1021, respectively;

- 2. The proposed project's impact on electric reliability, that is whether the proposed Project would adversely affect the operation of the U.S. electric power supply system under normal and contingency conditions; and
- 3. Any other factors that DOE may consider relevant to the public interest.

DOE will consider this EIS in determining whether to grant a Presidential permit to MATL. DOE's action responds to MATL's request for a Presidential permit.

#### S.3.2 DEQ MFSA Requirements

Under MFSA, DEQ requires a certificate of compliance for construction of electric transmission lines defined as facilities. The purposes of MFSA are to: (1) ensure the protection of the state's environmental resources; (2) ensure the consideration of socioeconomic impacts; (3) provide citizens with an opportunity to participate in facility siting decisions; and (4) establish a coordinated and efficient method for the processing of all authorizations required for regulated facilities. DEQ must find that the selected alternative meets the set of criteria listed in 75-20-301, MCA, and applicable administrative rules to be eligible for transmission line certification.

DEQ would approve a transmission line facility as proposed or as modified or an alternative to the proposed facility if it finds and determines:

- the need for the facility;
- the nature of probable environmental impacts;
- that the facility minimizes adverse environmental impact, considering the state of available technology and the nature and economics of the various alternatives;
- what part, if any, would be located underground;
- the facility is consistent with regional plans for expansion of the appropriate grid of the utility systems serving the state and interconnected utility systems;
- the facility would serve the interests of utility system economy and reliability;
- that the location of the proposed facility conforms to applicable state and local laws;
- that the facility would serve the public interest, convenience, and necessity;
- that DEQ has issued all necessary decisions, opinions, orders, certifications, and permits; and,

• that the use of public lands for location of the facility was evaluated, and public lands were selected whenever their use is as economically practicable as the use of private lands (75-20-301[1], MCA).

#### S.3.3 BLM Requirements

BLM has responsibility to issue ROW grants for electric transmission lines on BLM-administered lands in accordance with the Federal Land Policy and Management Act of 1976 and regulations at 43 CFR Part 2800.

A ROW grant provides for the construction, operation, maintenance, and termination of a specific project for a specific period of time. Before issuing a ROW grant, BLM will:

- complete a NEPA analysis or approve a previously completed NEPA analysis;
- determine whether the project complies with Federal and State laws and land use plans;
- consult with other governmental entities;
- hold public meetings if sufficient public interest exists; and
- take any other action necessary to fully evaluate and decide whether to approve or deny the application.

It is BLM's policy to encourage proponents to locate projects within designated or existing ROW corridors to the maximum extent feasible. However, no designated or existing ROW corridor is present on approximately 0.3 mile of BLM land that would be crossed.

#### S.3.4 NEPA/MEPA Process

Initially, the DOE considered an environmental assessment (EA) to be the appropriate level of review under NEPA for the proposed Project while DEQ considered the appropriate level of review for MEPA to be an EIS analysis. DOE issued a "Notice of Intent to Prepare an Environmental Assessment and to Conduct Public Scoping Meetings and Notice of Floodplain and Wetlands Involvement; Montana Alberta Tie, Ltd." in the *Federal Register* on November 18, 2005 (70 FR 69962). In addition, DOE mailed a copy of the notice to each owner of land within and adjacent to the MATL-proposed corridor. Names were obtained from Montana land ownership records.

DEQ and DOE hosted public meetings in December 2005 and DEQ hosted a public meeting in June 2006. At these meetings the public was asked to identify issues and concerns to be addressed during the review. During each meeting, MATL and DEQ representatives presented briefings. Maps and other information were available for review, and representatives from each agency were available to discuss the project, answer questions, and receive public comments.

Meeting dates and locations were:

- Conrad on December 5, 2005
- Great Falls on December 6, 2005
- Cut Bank on December 7, 2005
- Cut Bank on June 26, 2006

In March 2007, the agencies published a document titled *Draft Environmental Impact Statement for the Montana –Alberta Tie Ltd. (MATL) 230-kV Transmission Line* that served as a Draft EIS for DEQ and an EA for DOE (March 2007 document). In order to receive public comments, DEQ and DOE hosted three public hearings after the March 2007 document was issued:

- Conrad on March 27, 2007
- Cut Bank on March 28, 2007
- Great Falls on March 29, 2007

Based on comments received on the March 2007 document relating to land use and potential effects on farming, DOE determined an EIS to be the appropriate NEPA compliance document. Accordingly, on June 7, 2007, DOE published a Notice of Intent to Prepare an EIS and to Conduct Scoping in the *Federal Register* (72 FR 31569) and invited additional comments for a 30-day period. Throughout the scoping processes, stakeholders submitted comments via letters, phone calls, and emails.

DEQ decided to prepare this Supplemental Draft EIS to address issues raised in comments on the March 2007 document. Comments received on that document indicated additional analysis was needed to describe the costs of farming around the proposed structures and to compare these costs to the additional costs associated with alternative locations for the line. In addition, substantial changes to state tax law were enacted during Montana's May 2007 special legislative session which changed the analysis of socioeconomic impacts.

Under MFSA, the Montana Department of Transportation (MDT); Montana Department of Natural Resources and Conservation (DNRC); Montana Fish, Wildlife and Parks (FWP); Montana Department of Revenue; and the Montana Public Service Commission are required to report to DEQ information related to the impact of the proposed project on each agency's area of expertise. The report may include opinions on the advisability of granting, denying, or modifying the certificate (75-20-216[6], MCA). Other agencies having interest or responsibility in the project approval process include the Montana State Historic Preservation Office (SHPO), U.S. Department of Agriculture Farm Service Agency, and the U.S. Fish and Wildlife Service.

Based on comments received from the participating agencies and the public, the following issues and concerns were identified:

- (1) impacts on farming, ranching, and other land uses such as difficulties and hindrances of farming and spraying around the transmission line structures, potential for interference with Differential Global Positioning System (DGPS)-guided farm equipment, potential for noxious weed growth, interference with existing and future pivot or mechanical irrigation systems, and additional fencing needs;
- (2) impacts on protected, threatened, endangered, special status, and sensitive animal and plant species and their critical habitats, such as increased perch opportunities for birds of prey that could result in increased predation on species such as the swift fox and sharp-tailed grouse, disturbance of rare plant species, interference with migratory and feeding flight paths of waterfowl, avian mortality from bird strikes, and potential impacts on critical wildlife habitats;
- (3) impacts on floodplains and wetlands, such as size and degree of impacts on known and delineated floodplains, wetlands, waters of the U.S., and other special aquatic sites;
- (4) impacts on cultural and historic resources including potential disturbance of Native American settlements and religious sites;
- (5) impacts on human health and safety related to minimum ground clearance of the line, corona effects (including audible noise and radio and television interference), and other electromagnetic field effects;
- (6) impacts on air, soil, and water, such as soil erosion and resultant sedimentation to surface water, mass movement of unstable geologic materials and soils, reclamation constraints, and impacts on existing air quality;
- (7) visual impacts to homes, historic homesteads, and tribal landscapes;

- (8) socioeconomic impacts to taxes and disturbance of residential property in Cascade, Teton, Chouteau, Pondera, Toole, and Glacier counties from the construction and operation of the line; and
- (9) impacts from development of wind or other generation projects that could occur as reasonably foreseeable future actions.

On September 6, 2007, DOE invited the BLM to participate as a cooperating agency in the preparation of the EIS. DOE requested BLM's involvement to address BLM's authority to approve MATL's request for a ROW grant and the proposed Project's relationship to relevant BLM land use plans. The BLM accepted the invitation to be a cooperating agency on October 12, 2007.

Following publication of this Draft EIS, the agencies will hold a 45-day comment period during which the public is invited to submit comments. Also during this time, the agencies will hold additional public hearings.

Following the comment period, the agencies will analyze the comments received and will include their responses in the Final EIS. The agencies will use the Final EIS in their respective decision making processes. Federal agency decisions will be issued subsequent to the Final EIS, in the form of a Record of Decision for each agency or as a letter of concurrence, no sooner than 30 days after the Final EIS is available. In the case of DEQ, a decision on whether to issue a certificate of compliance could be timed to coincide with the decisions of the Federal agencies.

### **S.4 Alternatives Description**

This Draft EIS evaluates the proposed Project, three other alternatives, and several local routing options. The No Action alternative, designated Alternative 1, reflects the status quo and serves as a benchmark against which the proposed Project and other alternative actions can be evaluated. The proposed Project is Alternative 2 (**Figure S-1**).<sup>2</sup> Alternative 3 was developed by MATL in response to a single siting criterion under MFSA that gives consideration to paralleling existing utility corridors. Alternative 4 describes an additional alignment (**Figure S-1**) that was developed based on comments and issues raised during the scoping process. In addition, 11 possible local routing options were developed.

Throughout this EIS, many references are made to the Project study area and analysis area. The Project study area is the area that includes the proposed and alternative alignments and areas where roads may be built or improved. The study area was defined by MATL in its MFSA application to DEQ. The analysis area is the area evaluated for each resource. Different resources have different analysis areas. For some resources, the analysis area is the entire study area. For other resources, it may be a smaller area defined by the potential extent of impacts or a larger region defined by the units (for example, counties) for which relevant data are available.

These local routing options, which could apply to Alternative 2 and in some instances to Alternative 4, were based on landowner or MATL input and comments on the March 2007 document. The agencies have not identified a preferred alternative.

#### S.4.1 Details Common to All Action Alternatives

Two types of transmission line support structures would be used: H-frame structures made of laminated or round wood poles and metal monopoles (**Figure S-2**). The typical span between structures of either type (ruling span) would be about 800 feet, but could range from 500 feet to 1,600 feet. Approximately six to seven (average of 6.6) structures per mile would be required for an 800-foot ruling span.

Either type of support structure would incorporate 230-kV design standard synthetic insulators, hardware, and ground wires to provide nearly corona-free operation, as well as reduce audible noise and radio and television interference. Ground clearance under the conductors for either type of support structure would be a minimum of 21.2 feet. MATL would be required to comply with requirements of the National Electric Safety Code. Spacing between the two poles of a typical 65-foot high H-frame structure would be about 23 feet. A typical monopole would be about 90 feet high.

MATL would install bird strike diverters or similar warning devices in high risk areas such as lakes, river crossings, wildlife refuge areas, and high ridge crossings. MATL would comply with appropriate regulations of the Federal Aviation Administration (FAA) and install FAA-recommended colored aerial markers for aviation safety at river crossings. In addition aerial markers would be installed at major pipeline crossings as determined by consultation with pipeline companies.

MATL proposes to construct a new substation on farmland or range/pasture land approximately 10 miles south of Cut Bank at a location next to the site where Naturener USA has proposed to build the McCormick Ranch wind park. The approximate location of the substation would be in the southeast quarter of Sec. 27 T32N R5W. The interconnection at the Great Falls switch yard would require NWE to enlarge the switch yard to accommodate the MATL tie line and other proposed lines. The expanded Great Falls switch yard would be located on farmland or range/pasture land. MATL would submit a copy of an executed interconnection agreement with NWE to the agencies as an addendum to the MFSA application, if such an agreement becomes valid. It is unlikely the line would be built unless a valid interconnection agreement is obtained.

MATL anticipates only minimum development of access roads to construct, operate, and maintain the line because most of the Project ROW would be accessed from public roads, existing two-track roads (unmaintained trails), and farm fields. MATL does not anticipate maintenance of these access points with the exception of certain gate installations.

Construction is anticipated to take 4 to 6 months to complete. A summary of construction tasks is included in **Table S-1**. Additional tasks would include the following:

- Pre-Construction: Environmental permitting, cultural resource clearance, final transmission structure siting, engineering design, land procurement, various utility studies, and major procurement.
- Surveying: survey control, alignment centerline location, and profile surveys.
  Light Detection and Ranging (LIDAR) would be used to provide much of this
  information. LIDAR is an airborne laser mapping technology that directly
  measures the shape of the earth's surface under the aircraft. LIDAR generates
  wide-area elevation information that can be used to make models showing
  details such as buildings, trees, and power lines.
- Geotechnical Survey: Investigations would be completed at selected key locations to establish foundation requirements. The geotechnical information is used to reduce problems during erection of the structures and assist with the cost estimate and bidding process for the project.
- Access Planning and Preparation: Crews would gain access primarily from
  existing public roads and trails as well as within the transmission line ROW.
  Graded surface access roads are planned for a few steep hillsides. Existing roads
  and trails would be left in comparable or better condition than before
  construction or to those conditions specified by landowners during easement
  lease negotiations.

Gates would be installed where fences cross the ROW. Locks would be installed at landowner's request. Gates not in use would be closed but not locked unless requested by the landowner.

• Delivery and Assembly: Structure components, including poles, X-braces, crossarms, insulators, and hardware for structures would be delivered and assembled.

For H-frame structures poles would be set directly in holes and backfilled with compacted native soil or gravel. Any excess soil would be evenly regraded around the structure or hauled off site, depending on the landowner's preference. At heavy angled and dead-end structures, cast-in-place concrete footings would be installed.

For monopoles after the pole is set in the hole, cement would be used, instead of soil, to backfill within approximately 1 foot of the soil surface. The salvaged topsoil material would be replaced on top of the cement. Any excess soil would be evenly regraded around the structure or hauled off site, depending on the landowner's preference.

TABLE S-1							
SUMMARY OF CONSTRUCTION TASKS AND REQUIRED RESOURCES							
	T _	AND EQUIP	MENT				
Task	Crew Size	Typical Wage Level (\$/hour) <sup>a</sup>	Equipment				
Access Fencing/Reclamation	2	\$15 to \$18	¾ -ton post pounder				
Framing	6	\$17 to \$20	Teleking 5-ton crane, Bobcat, 1-ton crewcab pickup				
Setting	8	\$17 to \$20	330 Texoma digger, 35-ton setting crane, gravel truck, concrete truck, air compressor w/ tamper, Bobcat, (2) 1-ton crewcab pickups				
Anchoring	3	\$20 to \$22	radial arm digger or retrofitted trench hoe				
Material Handling	2	\$17 to \$20	(2) trucks				
Pole Hauling	3	\$20 to \$22	pole truck, pickup				
Stringing	31	\$20 to \$26	Tensioner, puller, 30-ton crane and pickup, soft line winder and pickup, cat pulling sock line and pickup, crane and pickup, flat deck and small crane, rider pole crew digger, pole truck				

Notes:

- Conductor Installation: After erecting structures, conductor and ground wires
  would be installed. Large reels of conductor and overhead ground wire would
  be delivered to pre-selected pulling and tensioning sites (about every 2 miles)
  along the transmission line alignment. Adjustments made during tensioning
  would prevent the cable from sagging too much to comply with the applicable
  regulations.
- Reclamation: All disturbed areas would be reclaimed. These efforts typically include gate repair as necessary, regrading and revegetation, and waste material removal.

MATL proposes to commence construction as soon as all property rights are obtained, the interconnection agreement has been finalized, and all necessary state and federal authorizations are issued. MATL may not begin any construction activities unless and until it obtains all required permits.

<sup>&</sup>lt;sup>a</sup>Wage levels extrapolated from "Montana Prevailing Wage Rates – Heavy Construction" Rates Effective March 10, 2006

MATL would design, construct, operate, and maintain the proposed transmission system in accordance with the National Electrical Safety Code (NESC), U.S. Department of Labor Occupational Safety and Health Act (OSHA) Standards, and other requirements and guidance as appropriate.

Construction staging areas would be located in previously disturbed areas whenever possible. In general, construction staging areas would either be located in communities near the ROW where rail and truck service are available or in rural areas where equipment could be unloaded from tractor-trailers. Construction staging areas would be on private land and would be subject to landowner negotiations and agreements. Construction staging areas would likely be located near Cut Bank, Valier, Conrad, Brady, Dutton, or Great Falls. MATL expects that staging areas would be established in three locations, with each staging area occupying about 5 acres. However, a few smaller areas (about 2.5 acres) might be used.

NWE and Alberta Electric System Operator system dispatchers would direct normal line operations, using MATL's facilities to operate circuit breakers, determine the amount of power required to serve the loads and configure the power system accordingly, schedule the proper generation amount, and monitor the power system to ensure reliable service. Circuit breakers would operate automatically to ensure safe transmission line operation. Normal farming and other activities would be permitted on transmission line ROWs if these activities do not interfere with line operation and maintenance or create safety problems.

Maintenance programs would include routine aerial and ground patrols. Aerial patrols would be conducted annually and as needed to check for damage to conductors, insulators, or structures after severe wind, ice, wild fires, or lightning storms. Ground patrols generally would occur every 5 years to detect equipment in need of repair or replacement. Ground patrols and subsequent repair activities would be scheduled to minimize crop and property damage. Noxious weed control plans would help guide herbicide treatments. Vegetation clearing may also be required in certain areas to minimize fire hazards.

For emergencies, crews would respond promptly to repair or replace damaged equipment. MATL would meet with respective landowners to arrange compensation for any damages incurred during emergency repair operations.

In its applications to DEQ and DOE, MATL has committed to project-specific environmental protection measures that may be used to avoid or reduce the intensity and/or duration of the impacts to resources. MATL proposes to implement a worker education program and on-site monitors to ensure that the site-specific environmental protection measures are strictly followed. Other guidance MATL proposes to use includes Western Area Power Administration's (WAPA) Construction Standard 13

(WAPA 2001), and Raptor-Safe Power Line Construction Practices (Edison Electric Institute [EEI] and Avian Power Line Interaction Committee [APLIC] 1996).

#### S.4.2 Alternative 1 — No Action

Under Alternative 1 the proposed Project would not be approved or constructed. Existing electrical transmission service in north-central Montana would be maintained and operated at its current level. In addition, plans to construct new generation facilities in the analysis area would need to consider other transmission alternatives or not be built. Selection of Alternative 1 would likely preclude the construction of the proposed facility in Canada as well.

#### S.4.3 Alternative 2 — MATL's Proposed Project

Alternative 2 is to construct and operate a 129.9 mile long, 230-kV merchant transmission line between Great Falls, Montana, and Lethbridge, Alberta, as described in MATL's application to DEQ, its application to DOE for a Presidential permit and its application to the BLM for a ROW grant. The proposed alignment would have an operational ROW width of 45 feet with an additional 30 feet on either side to create a 105-foot safety zone. The line would extend from the expanded 230-kV Great Falls switch yard north of Great Falls to a proposed new substation south of Cut Bank, and then north to the Montana-Canada border at the western edge of the Red Creek Oil Field. Monopole structures would be used on 53 miles of the line where it would cross cropland and Conservation Reserve Program (CRP) land diagonally. H-frame structures would be used for the remainder of this alternative.

#### S.4.4 Alternative 3 – MATL B

Alternative 3 would be 121.6 miles long and would be similar to Alternative 2 in that the width of the ROW, types of access roads, implementation, conductors, markers, substations, construction, operations, maintenance, and MATL's proposed environmental protection measures would be the same as those described for Alternative 2 and in details common to all alternatives. The Alternative 3 alignment would be different from Alternative 2 in that it would generally parallel an existing 115-kV transmission line along the entire route from the Great Falls switch yard to a substation near Cut Bank and use only H-frame structures. Alternative 3 was developed by MATL in response to a single siting criterion under MFSA that gives consideration to paralleling existing utility corridors (Circular MFSA-2). This alternative alignment was not intended to address potential land use issues or maintenance issues but is the shortest and potentially the least costly alternative under consideration.

#### S.4.5 Alternative 4 - DEQ-Developed

Alternative 4 was developed by the DEQ to address public concerns regarding line interference with farming activities and close proximity to residences. This alternative would be 139.6 miles long and would be similar to Alternative 2 in that width of the ROW, types of access roads, implementation, conductors, markers, substations, construction, operations, maintenance, and MATL's proposed environmental protection measures would be the same as those described for Alternative 2 and in details common to all alternatives. The differences in environmental impacts between Alternatives 2 and 4 are discussed in Section S.6. Alternative 4 would incorporate a higher degree of environmental protection than either Alternative 2 or 3 since it would employ DEQ's draft Environmental Specifications contained in Appendix F.

The Alternative 4 alignment would use portions of the Alternative 2 alignment from north of Conrad to the Montana-Alberta border. In other areas it would maximize the use of range and pasture land, where available. Where cultivated land would be crossed, it would generally be located along field or strip boundaries. Alternative 4 would require the use of monopole structures on all 88.9 miles of cropland and CRP land, not just where cropland and CRP land are crossed on the diagonal as in Alternative 2.

Although Alternative 4 is analyzed as a whole, the agencies could select some or all parts of this alternative or other realignments (i.e., the local routing options described in the following section) whose environmental impacts have been considered in this EIS.

MATL has indicated that because Alternative 4 is longer than the other alternatives this alternative would be more expensive than Alternatives 2 and 3. MATL estimates that Alternative 4 would result in a 12-month delay and a \$7 million increase in direct costs. MATL has stated that if Alternative 4 is selected, the project would be unlikely to be built since it would have difficulties obtaining adequate financing for the project due to additional costs and delays.

Comments received from landowners indicate that Alternative 4 would minimize impacts to farmland. Although MATL has indicated a reluctance to implement this alternative, it is possible that MATL could reconsider this position if this alternative were selected by the agencies.

### S.4.6 Local Routing Options

Based on public comments received on the March 2007 document, the agencies worked with landowners to refine Alternatives 2 and 4 to address landowner concerns related to costs, impacts to farming, impacts to other land uses, and proximity to residences.

They developed eleven local routing options for Alternative 2 (**Figure S-3**), a subset of which could also be included in Alternative 4.

The local routing options would not change environmental impacts for most resource areas. Several of the local routing options would result in fewer impacts on crop production, including lower costs for farming around transmission line structures.

Diamond Valley local routing options. Three local routing options (Diamond Valley South, Diamond Valley Middle, and Diamond Valley North) were identified for the Diamond Valley area. These are alternative alignments for one segment of the line, applicable to both Alternatives 2 and 4. All three options would result in less diagonal crossing of farm fields, but two options (Diamond Valley Middle and Diamond Valley North) could interfere with aerial spraying because they would create acute angles with the existing NWE 115-kV transmission line. Also, the Diamond Valley North option could require relocation of a grain bin to avoid safety problems. Compared with Alternative 2, the Diamond Valley North option would reduce by one the number of residences within 1/2 mile of the alignment; the Diamond Valley Middle option would increase by one the number of residences within this distance; and the Diamond Valley South option would decrease the proximity of the line to one residence.

Teton River Crossing local routing option. The local routing option for the Teton River Crossing Area could apply to Alternatives 2 and 4. It would allow one transmission line structure to be on a slightly more elevated terrace that would avoid an area that is reported to have flooded in 1964. It would also locate structures at the edge of fields to reduce interference with farming. It could, however, result in some clearing of tall growing riparian vegetation.

Southeast of Conrad local routing option. The Southeast of Conrad local routing option for Alternative 2 would reduce the crossing of cropland, but would increase by one the number of residences within 1/2 mile of the alignment and would increase the chance of encountering cultural resource sites.

West of Conrad local routing option. The West of Conrad local routing option for Alternative 2 would decrease the diagonal crossing of cropland and reduce potential interference with aerial crop dusting.

*Northwest of Conrad local routing option.* The Northwest of Conrad local routing option for Alternative 2 would decrease the diagonal crossing of cropland, but increase the chance of encountering cultural resource sites.

Belgian Hill Road area local routing option. The Belgian Hill Road area local routing option for Alternative 2 would increase the distance between the transmission line and nearby residences, slightly reduce the diagonal crossing of cropland, and reduce but not fully avoid the crossing of irrigated fields. Portions of this option also could be used for Alternative 4. Like the local routing option for Alternative 2, the option for Alternative 4 would increase the distance between the transmission line and nearby residences and reduce but not fully avoid the crossing of irrigated fields. The option for Alternative 4 would also decrease by one the number of residences within ½ mile of the alignment and avoid diagonal crossing of farmland.

Bullhead Coulee South local routing option. The Bullhead Coulee South local routing option for Alternatives 2 and 4 would avoid interference with the planned location of a wind turbine unrelated to the proposed MATL transmission line, but would increase the potential for soil erosion.

Bullhead Coulee North local routing option. The Bullhead Coulee North local routing option for Alternatives 2 and 4 would reduce interference with farming.

South of Cut Bank local routing option. The South of Cut Bank local routing option for Alternatives 2 and 4 would move the alignment to follow property boundaries better, is located farther away from one residence, and would result in greater potential for general local acceptance. This routing option would generally parallel Alternative 2.

#### S.4.7 Alternatives Considered But Dismissed

Several alignment and construction-detail alternatives were considered but eliminated from detailed study.

- Many local realignment options
- MATL C alignment
- Building the line underground
- Unguyed, self-supporting angle and dead-end structures
- Requiring the use of helicopters to string the line
- Requiring monopole structures in all areas
- Cut Bank to Shelby alternatives
- NWE 115-kV transmission line rebuild alternative

Numerous local realignment options were considered but eliminated from detailed analysis for one or more of the following reasons: did not address local land use concerns; did not reduce impact to farming; encountered greater geologic and topographic constraints compared to other alternatives being carried forward, would be

more costly than the estimated cost savings to farmers, or would not reduce farming and land use impacts as well as other alternatives being carried forward.

The MATL C Alignment is in the MFSA application. It was dismissed from detailed study because it did not fully address issues raised during scoping. Specifically, although it would cross less cropland diagonally than Alternative 2, it would have crossed more farm land diagonally in the segment beginning south of Brady and continuing to approximately 10 miles north of Conrad. This alternative also would be located very close to several residences, and would not use as much range and pasture land, or parallel existing transmission lines as much as other alignments.

Building the line underground was dismissed because it would cost between two and 15 times more than overhead construction and because digging the trenches required to bury the line would result in greater construction disturbance to the land and require more time to install. The use of unguyed, self supporting angle and dead-end structures would reduce some of the impacts on land uses but this alternative was dismissed because of the substantially higher costs for these structures. Similarly, the use of helicopters to string the line would avoid the construction of some access roads but would increase the cost of construction. Also, helicopters are most commonly used in extremely hilly terrain or in large marshy areas where ground access would be difficult. This alternative was dismissed because most of the study area is accessible from the ground.

The use of monopole support structures instead of H-frame structures for the entire length of the line was dismissed because of added costs with little additional land use benefits on rangeland. However, the use of monopoles is now proposed for 53 miles of cropland and CRP (89 miles) crossed diagonally under Alternative 2 and is also analyzed for all cropland and CRP crossings under Alternative 4.

Two alternatives between Cut Bank and Shelby were identified but dismissed. In one alternative, MATL would build the proposed line from the border to Shelby where it would tie into WAPA's transmission system. Energy producers or other subscribers would then have to pay MATL for the use of its project between the border and Shelby and then pay WAPA for the use of its transmission system from Shelby to Great Falls. This alternative was dismissed because it would result in a substantial increase in transmission costs for those proposing to ship energy into the Great Falls area. In the second alternative, MATL and WAPA would jointly rebuild portions of WAPA's existing Shelby-Great Falls 230-kV line to a double circuit configuration. However, WAPA declined to pursue this alternative because it would reduce the reliability of its system.

MATL also considered an alternative that would combine its proposed transmission line with a rebuilt and updated version of NWE's existing 115-kV line between Cut Bank and Great Falls. This alternative was dismissed because it would create unacceptable operating logistics to maintain electric service while the line was being rebuilt and upgraded and because of the economics associated with the partnership.

#### S.5 Affected Environment

The 1,444,790-acre Project study area contains sparsely populated semi-arid rolling hills, gentle ridges, and plateaus bisected by alluvial corridors of the Marias and Teton rivers and their tributaries. The area has low topographic relief with elevations ranging from 4,372 feet above sea level in the northwest corner of the study area to about 3,016 feet above sea level on the Missouri River in the southeast corner of the area. Winters are extremely cold with desiccating winds and snow. May and June are the wettest months; however, perennial streams and rivers are sustained primarily from moisture derived from mountain snowpack.

The bedrock geologic units are primarily glaciated Cretaceous shales and sandstones. This region includes portions of eight hydrologic subbasins in Montana, all of which contribute to the lower Missouri River Basin. The primary surface water features in the analysis area are Cut Bank Creek, the Marias River and the Dry Fork Marias River, Pondera Coulee, the Teton River, Benton Lake, Hay Lake, and the Missouri River. Isolated prairie potholes, lakes, and stock reservoirs are scattered throughout the analysis area.

The majority of the land (90 percent) is privately owned, with the remainder being owned or managed by state, Federal, and local government agencies. Over 88 percent of the Project study area is considered agricultural lands, including irrigated and non-irrigated cropland and rangeland. Some dry land crops and grazing occur on state and federal lands. Management of agricultural lands can involve the use of Differential Global Positioning System (DGPS)-guided farming equipment and vehicles (e.g., tractors, sprayers, combines) and other equipment used for irrigation, aerial and ground based spraying, plowing, seeding, fertilizing, and harvesting. These activities occur on 73 percent of the Project study area. This agricultural land base gives the landscape its characteristic and dominant patterns of linear strips of dryland cultivation and circular and rectangular shapes associated with irrigated fields. Views are typically expansive throughout the entire Project area, extending across rolling uplands and plains to the Rocky Mountain Front and island ranges such as the Sweet Grass Hills and Highwood Mountains. Portions of Cascade, Chouteau, Glacier, Pondera, Teton, and Toole counties are in the Project study area.

Numerous oil and gas fields are located within the northern portion of the study area. Gathering lines and pipelines between 8 and 20 inches in diameter occur within or traverse the Project study area, including main lines, and transmission/trunk lines. Existing electric and magnetic fields (EMF) levels in the project vicinity are primarily dominated by EMF from common household appliances. Existing transmission and distribution lines also contribute to EMF levels.

#### S.6 Comparison of Alternatives and Impacts

No natural resources would experience a substantial impact from implementation of any action alternative. Potential impacts and cumulative impacts are similar for all three action alternatives.

The no action alternative would forgo the socioeconomic benefits of the proposed Project. Under this alternative there would be no additional employment from construction or operation of the transmission line, no increase in county or state tax revenue, and no additional impacts or compensation to farmers for use of their land. There would be no increased transmission capacity for new or existing power generators.

All of the action alternatives would result in some loss of and interference with crop production. Alternative 3 would have the most impacts to crop production because it would include the most diagonal crossing of crop lands and because H-frame structures would be used on all cropland crossings. Alternative 3 would add to impacts associated with farming around structures because this alternative would closely parallel an existing 115-kV transmission line between Great Falls and Cut Bank. Alternative 4 would have less impact to crop production than the other action alternatives because it would include the least diagonal crossing of cropland and would use monopoles on all cropland crossings.

Construction activities under all of the action alternatives could result in increased soil erosion and release of sediment to streams, lakes, and wetlands, although best management practices would reduce or avoid potential impacts. The 500-foot wide analysis area associated with Alternative 4 would have the highest potential for soil erosion and sediment discharge to surface waters because it would cross the largest area of potentially unstable soils, the most streams, and the largest area of identified wetlands. The analysis area would, however, avoid crossing the edge of Black Horse Lake and its associated wetlands. The analysis area associated with Alternative 2 would cross the smallest area of unstable soils, while the analysis area associated with Alternative 3 would cross the least number of streams and the smallest area of identified wetlands, but the largest number of lakes.

All action alternatives would produce some localized short-term emissions of particulate matter during construction. In addition, all action alternatives would emit very small amounts of greenhouse gasses, principally from vehicle and equipment operations during construction.

Under all action alternatives some bird mortality could result from collisions with transmission lines even after mitigating measures are applied; potential impacts would be somewhat less under Alternative 4 than the other alternatives because Alternative 4 would not be located as close to the Benton Lake National Wildlife Refuge. Under all action alternatives, portions of the transmission line would cross some potential habitat for special status species. Although no adverse effects to special status species are expected from any of the action alternatives, Alternative 2 would cross more potential habitat for special status species than Alternatives 3 and 4.

Under all action alternatives, nearby residents and motorists using travel corridors would be exposed to views of a transmission line; Alternative 3 would expose the largest number of nearby residences and the longest length of travel corridors to nearfield views within  $\frac{1}{2}$  mile of the proposed line. Alternative 4 would have the lowest overall visibility to nearby residences and travel corridors, but Alternatives 2 and 4 would have the smallest number of residences within  $\frac{1}{4}$  mile.

Under any of the alternatives, no disproportionately high and adverse impacts would be expected to minority or low-income populations.

#### S.6.1 Cumulative Impacts

CEQ regulations implementing the procedural provisions of NEPA define cumulative impacts as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR § 1508.7). The regulations further explain that "cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

MEPA defines cumulative impacts as "the collective impacts on the human environment of the proposed action when considered in conjunction with other past, present, and future actions related to the proposed action by location or generic type" (75-1-220(3), MCA). Related future actions may only be considered when these actions are under concurrent consideration by any agency through pre-impact statement studies, separate impact statement evaluations, or permit processing procedures (75-1-208(11), MCA). DEQ considers cumulative impacts when making the findings under MFSA (Administration Rules of Montana (ARM) 17.20.1604 (1)(b) and 1607(1)(a)(vii)).

Pursuant to ARM 17.4.627, whenever a state agency prepares a joint environmental impact statement that must comply with NEPA and MEPA, the joint document must be prepared in compliance with both statutes. The State agency may accede to and follow more stringent federal requirements, such as additional content. NEPA requires reasonably foreseeable future actions to be included in the cumulative impacts analysis, not just those undergoing concurrent review.

Analysis of cumulative environmental impacts of a proposed Project and other actions helps to ensure that agency decisions consider the full range of consequences of the agencies' actions to the extent information is available.

At least 17 pipelines and 8 transmission lines transect the Project study area and vicinity. Other present and past activities in the vicinity of the proposed Project include farming (irrigated and non-irrigated), grazing, weed management, hunting and general recreation; growth of cities and towns, residential areas, and industrial and commercial areas; and development of Federal and state highways and county roads, railroads and railroad rights–of-way, communication facilities, military installations, conservation easements, airports, and national trails. Reasonably foreseeable future actions that could occur in the Project study area include the development of wind farms, rebuilding and relocating a WAPA transmission line, the Southern Montana Electric Highwood Generating Station 250 MW coal-fired power plant proposed to be built outside Great Falls and the transmission line that would connect it to the local electric system, the proposed gas-fired Great Falls Energy Center 275 MW power plant, development of irrigation systems, and the potential for MATL to upgrade the capacity of the line from 300 MW to 400 MW in each direction.

DOE views wind development as a reasonably foreseeable future action. Various developers of wind farms that would be located near the MATL transmission line have purchased all the line capacity. However, wind farm developers that have purchased the capacity on the MATL line might not be the same power suppliers that use the line in the future. MATL has indicated that its transmission service rights contracts do not require the holder to supply any particular form of power generation. In light of the foregoing, DOE believes that MATL's proposed Project is separate from and has an existence and utility independent from the wind farms. While the wind farms would be the first users, it is reasonably foreseeable that other shippers can own the right to ship electricity over the proposed line. As a result, DOE does not view the currently subscribed wind farms as "connected actions" as defined in 40 C.F.R. § 1508.25(a) (1). Therefore, the impacts from potential wind farms are evaluated as cumulative impacts of the proposed Project, consistent with 40 C.F.R. § 1508.7.

**Table S-2** summarizes impacts to natural resources, including cumulative impacts, considerations of environmental justice, and impacts to the existing transmission system (engineering and electric system reliability) among the alternatives analyzed.

	TABLE S-2							
	SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>			
Land Use - General		Facility construction	Same as Alt 2	Same as Alt 2	New projects would			
Impacts		traffic may conflict with			generally have short-			
		movement of farm			term construction			
Comparative impacts		equipment on roads.			impacts and longer			
of action alternatives		Loss of and interference			term changes to land			
depend on overall		with crop production			use depending on the			
length of alignment,		due to structures and			project. Wind			
length on cropland,		roads, increased			development is			
extent of diagonal		potential for weed			generally compatible			
crossing of cropland		introduction and			with a wide variety of			
(diagonal crossings of		spread, potential for			land uses and generally			
cropland result in more		equipment damage			would not preclude			
interference with		from hitting a structure,			recreational, wildlife			
farming), and use of H		increased time to farm			habitat conservation,			
frames vs. monopoles		around poles, and some			military, livestock			
(use of monopoles		DGPS-guided			grazing, oil and gas			
reduces interference		equipment may be			leasing, dry land			
with farming)		affected. Cropland			farming, or other			
		crossings also increase			activities that currently			
		the potential for crop			occur.			
		duster accidents.						
Land Use - Total	There would be	129.9 miles.	121.6 miles. Alt 3	139.6 miles. Alt 4	Impacts would depend			
Amount of Land	no additional		disturbs the least.	disturbs the most.	on the type, location			
Crossed	impacts.				and design of			
Land Use – Total		93.3 miles	95.3 miles. Alt 3	88.9 miles. Alt 4	development.			
Cropland Crossed			crosses the most.	crosses the least.	]			
Land Use - Total		54.9 miles	68.4 miles. Alt 3	28 miles. Alt 4 crosses				
Cropland Crossed			crosses the most	the least cropland				
Diagonally			cropland diagonally.	diagonally.				

	TABLE S-2						
		SUMMARY OF IMPA	CTS BY RESOURCE A	AREA			
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>		
Land Use – Type of structure used on cropland		Monopoles used on 53 miles of diagonal crossings of cropland; H-frames used on cropland not crossed diagonally	H-frames on the entire line, including cropland	Monopoles used for all cropland crossing			
Land Use -Total distance crossing Public Land, Special Management Areas and conservation easements		35.3 miles	24.7 miles. Alt. 3 would cross the least	43.9 miles. Alt 4 would cross the most			
State Land (FWP owned) crossed, Great Falls Shooting Sports Complex		0.7 miles crossed	0.5 miles crossed	Alt 4 would avoid the Great Falls Shooting Sports Complex.			
State Land - Lewis and Clark Heritage Greenway Conservation Easement.		0.1 miles at the edge of the Lewis and Clark Heritage Greenway Conservation Easement.	0.1 miles at the edge of the Lewis and Clark Heritage Greenway Conservation Easement.	0.1 miles at the edge of the Lewis and Clark Heritage Greenway Conservation Easement			
Montana State Trust Lands crossed		10.6 miles crossed	5.9 miles. Alt 3 would cross the least.	11.0 miles. Alt 4 would cross the most.			
Conservation easements crossed		USFWS – 0.0 miles CRP - 23.6 miles	USFWS - 3.8 miles CRP - 14.3 miles	USFWS - 1.7 miles. CRP - 30.8 miles			
BLM Land crossed		0.3 miles	0.1 miles	0.3 miles			

	TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA						
Resource	No Action	Alternative 2	Alternative 3	AREA Alternative 4	Cumulative Impacts		
Geology - Miles on Soil and Geologic Resources Prone to Mass Movement	There would be no additional impacts.	5 miles. Potential impacts would largely be mitigated by pole placement designed to span sensitive slopes and engineering design.	3 miles. Alt 3 has the least potential for mass movement that could result in pole instability. Potential impacts would largely be mitigated by pole placement designed to span sensitive slopes and engineering design.	20 miles. Alt 4 has the most potential for mass movement that could result in pole instability. Potential impacts would largely be mitigated by pole placement designed to span sensitive slopes and engineering design.	Impacts would depend on the type, location and design of development.		
Soils - Miles on Unstable Soils (greater than 20 percent slope)	There would be no additional impacts.	16 miles. Soil erosion impacts would be mitigated by erosion control measures.	12 miles. Alt 3 has the least potential for soil erosion. Soil erosion impacts would be mitigated by erosion control measures.	24 miles. Alt 4 has the most potential for soil erosion. Soil erosion impacts would be mitigated by erosion control measures.	Additional development could cause increased soil erosion. Erosion control and storm water control would mitigate impacts.		
Engineering- The structural reliability of electric transmission facilities in the area.	There would be no additional impacts.	No adverse impact to structural reliability is anticipated. All facilities are proposed to be constructed in compliance with accepted engineering standards.	Same as Alt 2	Same as Alt 2	None expected.		

	TABLE S-2							
	SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts			
Hazardous Materials	There would be no additional impacts.	Wood structures would be treated with pentachlorophenol. Hazardous materials and wastes would be managed in accordance with State and federal requirements	Same as Alt 2.	Same as Alt 2.	Construction, operation, and decommissioning future activities could require the use of some hazardous materials. Wastes would have to be managed as required by state and federal law.			
Electric and Magnetic Fields- Exposure Levels	There would be no additional impacts. Exposure levels in the project vicinity are primarily dominated by EMF from common household appliances.	Exposure levels outside the ROW would be less than 3.8 mG	Same as Alt 2.	Same as Alt 2.	If the line capacity increased to 400 MW in each direction, the electric field and the mean magnetic field would be higher, but electric field strength would remain below the state standard of 1 kV/m at the edge of the ROW in subdivision and residential areas, and the increase in the mean magnetic field would be slight			

	TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>			
Electric and Magnetic Fields- Length of 500- foot-wide Alignment Buffer Zone Within 100 feet of a Pipeline	There would be no additional impacts.	To ensure safety, pipelines near a transmission line would need to be grounded. 7.0 miles of the alignment would be within 100 ft of a pipeline 8" or larger.	9.8 miles of the alignment would be within 100 ft of a pipeline 8" or larger. Alt 3 has the longest distance where pipelines may need to be grounded.	5.7 miles of the alignment would be within 100 ft of a pipeline 8" or larger. Alt 4 has the shortest distance where pipelines may need to be grounded.	Impacts would depend on the type and location of development			
Electric and Magnetic Fields- Radio or TV Interference	There would be no additional impacts.	None anticipated for nearby residents. May be some potential for interference with DGPS guidance systems. MATL would correct DGPS interference.	Same as Alt 2. MATL would correct DGPS interference.	Same as Alt 2. MATL would correct DGPS interference.	There is a potential for wind farm power lines to cause interference, but this impact would depend on the type, location and design of development and might be avoided by proper siting and design.			

TABLE S-2						
		SUMMARY OF IMPAG				
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts	
<b>Water</b> – General	There would be	Minor short-term	Same as Alt 2.	Same as Alt 2.	Future development	
Impacts	no additional	adverse impacts to			activities combined	
	impacts.	surface water quality			with the proposal could	
		could occur by			increase sediment and	
		temporarily increasing			other pollutants to	
		sources of sediment			water resources in the	
		from the time of			analysis area and	
		construction to			potentially affect water	
		reclamation			quantity and quality.	
		completion. This			Construction would	
		impact would be			likely cause increased	
		mitigated by avoiding			stormwater runoff and	
		disturbance of water			soil erosion. Because	
		and riparian areas or by			projects would be	
		implementing			required to reduce the	
		measures to reduce			potential for	
		sediment transport.			sedimentation, require	
		The potential for			proper pesticide	
		impact is related to the			application, and	
		number of stream and			comply with waste	
		lake crossings.			water discharge	
					requirements, and to	
					employ mitigation	
					measures, these	
					impacts are likely to be	
					minor and short term.	
Water - Potential	There would be	10 crossings within the	6 crossings. Alt 3	17 crossings. Alt 4	Impacts would depend	
Number of Perennial	no additional	500-foot wide	poses the lowest	poses the greatest	on the type and	
Stream or River	impacts.	alignment	potential for impact	potential for impact	location of	
Crossings	1		within the 500-foot	within the 500-foot	development.	
			wide alignment.	wide alignment.	1	

	TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA						
Resource	No Action	Alternative 2	Alternative 3	AREA Alternative 4	Cumulative Impacts		
Water - Potential Number of Lake Crossings	There would be no additional impacts.	4 crossings within the alignment.	6 crossings. Alt 3 poses the greatest potential for impact within the alignment.	2 crossings. Alt 4 poses the least potential for impact within the alignment.	Impacts would depend on the type and location of development.		
Wetlands - General	There would be no additional impacts.	Structures would not be placed in wetlands. Construction disturbance could result in a change in wetland plant community if wetland hydrology is altered. This impact would be mitigated if wetlands were undisturbed during construction and maintenance. Potential impact is related to the area of wetlands crossed.	Same as Alt 2.	Same as Alt 2.	Impacts would depend on the type, location and design of development.		
Wetlands – Total Wetlands and Potential Wetlands Crossed	There would be no additional impacts.	67.6 acres crossed within the 500-foot wide alignment, including 64.4 acres of marshland, 0.8 acre lake wetlands, and 2.4 acres of river wetlands.	62.3 acres crossed within the 500-foot wide alignment, including 58 acres of marshland, 0.8 acre lake wetlands, and 3.5 acres of river wetlands. Alt 3 would cross the least total area of wetlands.	76.4 acres crossed within the 500-foot wide alignment, including 74 acres of marshland and 2.4 acres of river wetlands. Alt 4 would cross the largest total area of wetlands, but would avoid crossing wetlands associated with lakes.	Impacts would depend on the type and location of development.		

	TABLE S-2							
	SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts			
Floodplains	There would be no additional impacts.	Line would cross floodplains at the Teton, Dry Fork Marias, and Marias river crossings, but no transmission line structures would be placed in 100-year floodplains. A local routing option for the Teton River crossing would place a structure in a slightly higher location that was not inundated in the 1964 flood.	Same as Alt. 2, except that the local routing option is not applicable.	Same as Alt 2.	There are no reasonably foreseeable future actions that would impact floodplains			
Vegetation – General	There would be no additional impacts.	Temporary loss of vegetation and increased potential for weed emergence and dispersion in disturbed areas until reclaimed. Potential impact is dependent on the number of acres disturbed.	Same as Alt 2.	Same as Alt 2.	Future activities would likely disrupt vegetation in a similar manner. Revegetation would likely make impacts minor and short term.			
Vegetation – Number of non-cropland acres to be disturbed for construction	There would be no additional impacts.	214 acres.	206 acres. Alt 3 would disturb the fewest acres.	240 acres. Alt 4 would disturb the most acres.	Impacts would depend on the type, location and design of development.			

	TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA						
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts		
Vegetation – Native range, forest and riparian vegetation cover crossed	There would be no additional impacts.	32.7 miles of grassland/shrubland and riparian vegetation would be crossed	22.5 miles of grassland/shrubland, riparian vegetation, and forest would be crossed	47.8 miles of grassland/shrubland, riparian vegetation, and forest would be crossed	Impacts would depend on the type, location and design of development.		
Wildlife - General	There would be no additional impacts.	Short-term impacts include loss of individuals during construction or direct disturbance of species during critical periods in their life-cycles. Long-term impacts include habitat alterations, electrocutions, and collisions. Collisions would be reduced by line marking.	Same as Alt 2.	Same as Alt.2.	Activities would result in disturbance and displacement of wildlife during the construction, followed by some permanent loss of habitat. Bird and bat mortalities are expected due to collisions with wind turbines.		
<b>Wildlife</b> – Mule Deer Winter Range	There would be no additional impacts.	19.4 miles of habitat would be crossed. Minor to no impact to mule deer population relative to the size of the existing habitat and individual mobility.	20.5 miles of habitat would be crossed. Minor to no impact to mule deer population relative to the size of the existing habitat and individual mobility.	27.7 miles of habitat would be crossed. Minor to no impact to mule deer population relative to the size of the existing habitat and individual mobility.	Impacts would depend on the type, location and design of development. Herd animals could be affected if developments are placed along migration paths or in fawning areas.		

	TABLE S-2							
	SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts			
Wildlife - Birds	There would be no additional impacts.	Collisions with transmission line could result in bird loss. The potential for bird collisions would be greatest in those portions of the line located near wetlands and the Benton Lake National Wildlife Refuge.	Similar to Alt 2.	Similar to Alt. 2, but line would be farther from the Benton Lake National Wildlife Refuge	Additional development could reduce habitat. Wind farms potentially associated with the proposed line could cause estimated 2 to 3 mortalities per year of raptors (such as eagles and hawks) and 480 to 960 mortalities per year of passerine birds (such as sparrows, larks, warblers, and crows) from collisions with turbines.			
<b>Wildlife</b> – Bats	There would be no additional impacts.	There would be no additional impacts.	There would be no additional impacts.	There would be no additional impacts.	Wind farms associated with the MATL project could cause an estimated 28 to 1,711 bat mortalities per year from collisions with turbines.			

	TABLE S-2						
SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts		
Fish - Expected	There would be	Fish habitat may be	Similar to Alt. 2, – 6	Similar to Alt. 2, – 17	Cumulative impacts		
impacts to habitat due	no additional	slightly affected by	perennial river or	perennial river or	that adversely affect		
to changes in water	impacts.	construction activity	stream crossings in	stream crossings in the	water resources could		
quality		that contributes	the 500-foot wide	500-foot wide	adversely affect fish		
		sediment to streams.	alignment, but no in-	alignment, but no in-	and fish habitats.		
		Potential for impact is	stream activities	stream activities			
		related to potential for	anticipated. Alt 3 has	anticipated. Alt 4 has			
		impact to rivers and	the least potential to	the highest potential to			
		streams - 10 perennial	slightly affect fish	slightly affect fish			
		river or stream	habitat.	habitat.			
		crossings in the 500-					
		foot wide alignment					
		but no in-stream					
		activities anticipated.					
Special Status Species	There would be	All known occurrences	Alt 3 has the least	See Alt 2 and 3.	Construction activities		
- Vegetation	no additional	of special status plant	likelihood of these		could affect threatened,		
	impacts.	species are located	species because the		endangered, and		
		outside the study area.	alignment crosses		sensitive species in the		
		Potential for impact is	less wetland habitat		same manner that		
		based on potential	than Alts 2 and 4.		vegetation could be		
		impact to their habitat			affected.		
		(wetlands).					

TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA									
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>				
- Wildlife Habitat crossed. Although no black-footed ferrets are found in the area, prairie dog towns if crossed by the proposed alignments may be habitat for this federally listed endangered species. Alternatives also would cross actual or potential habitat for 5 bird species listed as sensitive species by Montana and/or BLM and 3 fish species listed as sensitive by Montana.	There would be no additional impacts.	19.9 miles. Alt 2 crosses the most habitats for one or more special status species. The biological assessment concluded that there would be no effect on black-footed ferrets or their critical habitat.	11.3 miles. Alt 3 crosses the least habitat for special status species.	11.7 miles.	Construction activities could affect threatened, endangered, and sensitive species in the same manner that wildlife and aquatic resources could be affected in general.				

TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA							
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>		
Air Quality - General Air quality in the analysis area is designated as attainment for all criteria pollutants.	There would be no additional impacts.	Some localized short-term emissions of particulate matter would occur during construction.	Same as Alt. 2.	Same as Alt 2.	Construction of new facilities such as wind farms and other electrical generating facilities would generally have short-term impacts similar to construction impacts of the transmission line, but because of differences in timing, few impacts would likely be cumulative with air quality impacts of the proposed action. Operation of future facilities could increase other emissions, but few impacts would be cumulative with air quality impacts of the proposed action. Furthermore, construction of new facilities could either help reduce or contribute to emissions of greenhouse gasses; this depends on the type, size, and quantity of any generation built.		

TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA								
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts			
Noise - General	There would be no additional impacts.	Short-term, localized construction noise. Operation of the transmission line would not add substantially to existing background noise levels.	Same as Alt 2.	Same as Alt 2.	Construction of new facilities such as wind farms and other electrical generating facilities would generally have short-term impacts would vary in magnitude and duration based on the size and complexity of the project. Operation of wind turbines would result in noise; noise levels would depend on the observer's location.			
Social Resources	No change to existing conditions and trends.	Increased short-term construction and long-term maintenance employment opportunities. Potential for impact to local schools, community structure and social services from influx of workers is small.	Same as Alt 2.	Same as Alt 2.	Any large development or numerous simultaneous small developments could strain local services.  Smaller projects would have impacts similar to Alt 2. There could be a perception that wind turbines change the local character of a given area. There could be disagreement over wind turbine location.			

TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA					
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts
Economics – Short term	There would be no change in employment opportunities.	There would be short- term construction- related employment opportunities.	Same as Alt 2.	Same as Alt 2.	Depending on the size and number of activities and location, impacts could vary from very minor to large.
Economics – Counties	There would be no opportunities for long-term operation and maintenance employment and no increased county tax revenues.	There would be opportunities for long-term operation and maintenance employment. County tax revenues would increase.	Same as Alt 2.	Same as Alt 2.	Depending on the size and number of activities and location, impacts could vary from very minor to large. Such impacts would include jobs, income, taxes and effects on social services.
Economics – State	There would be no increased opportunity for power import or export, no increased competition that could reduce costs to ratepayers, less opportunity for wind or other power generation facility start up and no increased state tax revenues.	Opportunities to import or export electric power would increase. Increased competition may reduce cost to ratepayers. Creation of opportunities to start up wind generation facilities. State tax revenue would increase.	Same as Alt. 2	Same as Alt 2.	Depending on the size and number of activities, impacts could vary from very minor to large. Such impacts would include jobs, income, and taxes, as well as changes in the local electric system.

TABLE S-2					
SUMMARY OF IMPACTS BY RESOURCE AREA					
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>
Economics – Landowners and Farmers	No change in existing conditions and trends.	Farmers would incur additional costs estimated at \$82,000 to \$86,000 per year. MATL would compensate landowners with one time easement payments, annual perpole payments, and annual flat fees for the additional costs of farming caused by the transmission line. Some agricultural landowners would also receive a state property tax exemption for property within 660 feet of the centerline. Long-term impacts on land values are likely to be small.	Additional cost to farmers is estimated to be \$108,000 to \$109,000 per year. Compensation would be provided as described for Alt 2. Alt. 3 would have the highest cost to farmers before compensation. Some agricultural landowners would also receive a state property tax exemption for property within 660 feet of the centerline. Long-term impacts on land values are likely to be small.	Additional cost to farmers is estimated to be \$57,000 to \$59,000 per year. Compensation would be provided as described for Alt 2. Alt. 4 would have the lowest cost to farmers before compensation. Some agricultural landowners would also receive a state property tax exemption for property within 660 feet of the centerline. Long-term impacts on land values are likely to be small.	Depending on the size and number of activities and location, impacts could vary from very minor to large.  Future activities could
Paleontological Resources - The Two Medicine Formation is the geologic unit with a high probability of containing fossils.	no additional impacts.	Construction activity could disturb fossil sites. Since most of the Two Medicine Formation is covered by 1 to 15 feet of material, little or no impact is anticipated.	Similar to Alt 2.	Similar to Alt 2.	uncover or destroy currently unknown paleontological resources.

TABLE S-2					
SUMMARY OF IMPACTS BY RESOURCE AREA					
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	Cumulative Impacts
Cultural Resources	There would be no new impacts to cultural resources or Traditional Cultural Properties.	Construction could disturb archaeological or historical resources. The 500-foot wide analysis area would encompass 8 known sites eligible for the NRHP and 33 sites of undetermined eligibility. Traditional Cultural Properties or potential locations identified by knowledgeable Tribal members would be avoided.	Similar to Alt. 2. Alt 3 would encompass 7 sites eligible for the NRHP and 9 sites of undetermined eligibility.	Similar to Alt 2. Alt 4 would encompass 4 sites eligible for the NRHP and 19 sites of undetermined eligibility.	Future activities could uncover or destroy currently unknown cultural resources.
Visuals - General	There would be no additional impacts.	Decline in aesthetic quality of view sheds, increase in visual contrast or landscape change due to contrast with natural landscape. Potential impact is primarily dependent on proximity of viewers and residences to the transmission line.	Same as Alt 2.	Same as Alt 2.	Impacts would depend on the type and location of development. Future activities would increase the developed character of the landscape for the long term. In particular, wind farms would be highly visible because
Visuals - Residences	No residences	20 residences.	25 residences. Alt 3	20 residences.	of the introduction of
within ¼ mile	would be		would be visible from		turbines into rural
	exposed to the		the highest number		landscapes with few
	view of a new		of residences within		other comparable
	transmission line.		this distance.		structures.

TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA					
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>
Visuals - Number of Residences 1/4 - 1/2 mile	No residences would be exposed to the view of a new transmission line.	51 residences.	65 residences. Alt 3 would be visible from the highest number of residences within this distance.	45 residences. Alt 4 would be visible from the lowest number of residences within this distance.	
<b>Visuals</b> – Residences within ½ to 1 mile	No residences would be exposed to the view of a new transmission line.	111 residences.	139 residences. Alt 3 would be visible from the highest number of residences within this distance.	111 residences.	
Visuals – Within ½ mile of a travel corridor (I-15 and US Highways 2 and 87)	No travel corridors would be exposed to the view of a new transmission line.	6.1 miles.	7.6 miles. Alt 3 would have the longest near-field visibility from travel corridors.	5.0 miles. Alt 4 would have the shortest near-field visibility from travel corridors.	
Environmental Justice	No change in existing conditions.	No disproportionately high and adverse impacts to minority or low-income populations were identified.	Same as Alt. 2	Same as Alt. 2	Future activities could have an impact on environmental justice depending on location and size of the project, but the proposed project would not contribute to cumulative adverse effects.

TABLE S-2 SUMMARY OF IMPACTS BY RESOURCE AREA					
Resource	No Action	Alternative 2	Alternative 3	Alternative 4	<b>Cumulative Impacts</b>
<b>Electric System Reliability –</b> The ability of the electric system to operate within established criteria under normal and emergency conditions.	No change.	No adverse effect on electric system reliability.	Same as Alt. 2	Same as Alt. 2	Depending on the project, there might be changes in the local electric system.

Notes:

Alt Alternative

BLM Bureau of Land Management CRP Conservation Reserve Program

DGPS Differential Global Positioning System

EMF Electric and Magnetic Field

FWP Montana Dept. of Fish, Wildlife and Parks

kV/m Kilovolt per meter

mG Milligauss MW Megawatt NA Not applicable

NRHP National Register of Historic Places

ROW Right of Way

USFWS U.S. Fish and Wildlife Service

USFS U.S. Forest Service

### S.6.2 Unavoidable Adverse Impacts

Unavoidable short-term adverse impacts from the proposed Project would be expected to occur to wetlands, land use (including transportation), noise, visuals, and native vegetation. Unavoidable long-term adverse impacts would occur to land use, birds, and visuals.

Construction activities could have short-term adverse impacts on land use, transportation, noise, and visuals, due to construction traffic and the establishment of staging areas, tensioning sites, access, and structure assembly areas. Construction activities could also have short-term adverse impacts on wetland resources from the alteration of surface water drainage patterns, disturbances and trampling of vegetation during construction, and from an increase in sedimentation to localized wetland areas from disturbances on adjacent properties. MATL's transmission line structures would not be placed in wetland areas, so no long-term impacts are expected for wetland resources. Native vegetation would be unavoidably disturbed, and weed infestations may occur for the short term during construction and before reclamation.

Long-term impacts to land use include loss of production of farmland, increased risk to aircraft, and interference with farming activities. An increase in avian mortality would be unavoidable and long term. Visual resources would experience unavoidable adverse impacts to the aesthetic quality of the landscape by transmission lines.

#### S.6.3 Irreversible or Irretrievable Commitments of Resources

If concrete footings are used, the concrete would be left in place and irreversibly committed. Fuel used during construction and decommissioning would be irreversibly committed. If wood structures are used, it is probable that these poles would not be available for future transmission projects and would be irreversibly committed. Energy lost during transmission line operation (line losses) would be irretrievably committed.

Paleontological and cultural resources, including traditional cultural properties, are nonrenewable resources. The MATL project would increase access to the areas where these resources may be located. This increased access could lead to intentional damage from looting and vandalism, including unauthorized relic collecting, theft, and defacement, and result in the loss of information and destruction of the resource. Any impacts to these resources would constitute an irreversible commitment of resources.

### S.6.4 Short-Term Use and Long-Term Productivity

Short-term uses are characterized by existing land use as affected by the proposed Project and all activities that such land use facilitates. Long-term productivity involves sustaining the interrelationships of each resource in a condition sufficient to support ecological, social, and economic health.

All action alternatives would manage resources within requisite regulatory standards for air quality, water quality, cultural resource preservation, and wildlife management. Impacts from any of the action alternatives to visual resources and farming activities would not adversely affect long-term productivity of the resource. Beneficial impacts to socioeconomic resources would be realized from all action alternatives. Because Alternative 4 contains additional environmental mitigation measures for avoiding adverse impacts to farming, riparian areas, visual resources, and surface water, this alternative presents the most protective alternative for the maintenance and enhancement of long-term productivity of the environment while benefiting socioeconomic resources.

### S.7 Regulatory Restrictions Analysis

MEPA requires the disclosure of any regulatory impacts on the private property rights of an applicant. These impacts are usually estimated in terms of economic cost. Alternatives and mitigation measures are designed to further protect environmental, cultural, visual, and social resources, although they add to the cost of the Project. Alternatives and mitigation measures that are required by federal or state laws and regulations to meet minimum environmental standards do not need to be evaluated for extra costs to the project proponent. If approved, DEQ would require that the project meet standards for noise and electric field strength in residential and subdivided areas, unless affected landowners waive these requirements. The project would be required to meet minimum standards set forth in the National Electrical Safety Code and Federal Aviation Administration requirements for marking the line.

Project costs and costs of mitigation are presented in **Table S-3**. Monetary values of impacts, except for estimated costs to farmers, cannot reasonably be quantified. Many potential adverse environmental impacts are minimized through measures proposed by the applicant and the application of environmental specifications. A plan for monitoring the facility is described in environmental specifications for the project, as required by administrative rules implementing MFSA and further detailed in ARM 17.20.1901.

TABLE S-3 PROJECT COSTS						
Alternative 2 Alternative 3 Alternative 4						
Length (miles)	129.9	121.6	139.9			
	(53 miles	(all H-frames)	(88.9 miles			
	monopoles, 76.9		monopoles, 51			
	miles H-frames)		miles H-frames)			
Construction cost a	\$39,874,650	\$35,689,600	\$43,994,350			
Total cost with	\$40,619,150	\$36,346,600	\$44,873,350			
mitigating measures	Φ <del>1</del> 0,012,130	ᠳᢧ᠐ᠨᢖᡆ᠐᠐᠐	Ψ <del>11</del> ,07 3,330			

<sup>&</sup>lt;sup>a</sup> H-frame structures \$293,500 per mile; monopole structures \$326,500 per mile (MATL 1/26/07).

Bond requirements and other mitigation measures that might be imposed by DEQ would add from 1.3 to 1.9 percent to the basic construction cost of Alternative 2. Alternative 3 would be less expensive to build than Alternative 2. Alternative 4, including bond, would cost 12.5 percent more than the basic construction cost of Alternative 2 or 11.1 percent more than the cost of Alternative 2 including bond.

Mitigation measures whose costs can be estimated are precision mapping of unstable soils, archaeologist observation of construction, wetlands delineation, bonding for reclamation and revegetation, and the use of conductors with dulled, non-reflective surfaces. Monopole structures in addition to the 53 miles that MATL has committed to use for diagonal crossings of cultivated cropland might also be required in some areas.

The costs of other measures, such as damage payments are not readily quantifiable but would add to the total cost of the Project.

MATL has already negotiated easements across portions of the proposed Project alignment. The cost to MATL of acquiring these easements is unknown. If MATL has already paid for ROW access to lands that may be crossed by the Alternative 2 alignment, and that alignment is not permitted, MATL may lose the money already spent. Alternative 2 with additional mitigation measures and the use of monopoles on selected portions of the transmission line would impose the least regulation on MATL's private property rights while reducing environmental impacts.

### **S.8 Intentional Destructive Acts**

Intentional destructive acts, such as sabotage, terrorism, vandalism, and theft, sometimes occur at electric utility facilities. These acts include shooting at insulators, power lines, transmission towers, or substation equipment; vandalism; and theft of equipment, supplies, tools, or materials. Vandalism and thefts are most common. However, these acts do not generally cause a disruption of electric service to the area.

In general, it is possible that destroying support towers or other equipment may result in disruption of electrical service depending on the size (voltage and capacity) of the transmission line, the particular act, and the configuration of the local transmission system. However, given the characteristics of the proposed MATL transmission line project and its rural location, it is unlikely that intentional destructive acts would occur. Furthermore, even if such an act did occur, it is not likely to have a major impact on the regional transmission system or local electrical service because the electric system is designed to withstand the instantaneous loss (regardless of the cause) of key elements and still provide uninterrupted service to customers.





