CONSIDERATION OF ELECTRICAL GENERATION IN NEPA REVIEWS OF ELECTRIC TRANSMISSION PROJECTS OTHER THAN GENERATION INTERCONNECTION LINES (INTERIM GUIDANCE)

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Introduction

When reviewing a proposed new transmission line pursuant to the National Environmental Policy Act (NEPA),¹ the Department of Energy (DOE) often must determine whether to include an analysis of the environmental effects of electric generating facilities (power plant, solar installation, wind farm, etc.). This interim guidance² discusses how to make this determination when preparing an environmental impact statement (EIS) or environmental assessment (EA).³ for electric transmission lines other than generation interconnection, or "gen-tie" lines. Gen-tie lines enable a single dedicated generation facility to interconnect to the electric grid, and some elements of NEPA review of gen-tie lines differ from what is discussed here.

DOE prepares an EIS or an EA when it has developed a proposed action to a stage that it has a goal, is actively preparing to make a decision on one or more alternative means of accomplishing that goal, and can meaningfully evaluate the alternatives' effects. (42 U.S.C. 4336e(12); 40 CFR 1508.1(ff)) The goal is to meet the purpose and need for agency action (i.e., the underlying reason for the proposed agency action, such as to implement an authority granted in law). DOE evaluates a no action alternative,⁴ the proposed action (including connected actions), and reasonable alternatives.⁵ "Reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action." (40 CFR 1508.1(hh)) In a separate guidance document issued today, DOE has also provided guidance with respect to the appropriate range of alternatives to be considered in evaluating a transmission project, *Interim Guidance: Consideration of Non-Transmission Alternatives in NEPA Reviews of Electric Transmission Projects*.

¹ 42 U.S.C. §§ 4331 et seq.

² This interim guidance does not establish new legal requirements. This guidance is intended to facilitate and enhance DOE's compliance with NEPA and existing regulations implementing NEPA (40 CFR Parts 1500–1508 and 10 CFR Part 1021). Even though this is interim guidance, DOE offices are nonetheless encouraged to consider it when preparing NEPA reviews for new transmission lines. This interim guidance should be applied based on fact- and context-specific conditions associated with an individual proposed project.

³ An agency prepares an EIS when the proposed action is likely to have significant effects and an EA when the proposed action is not likely to have significant effects or the significance of effects is unknown. (40 CFR 1501.3(c)) The third type of NEPA review is a categorical exclusion, which refers to a category of actions that normally do not have significant effects. (40 CFR 1501.4) DOE has a categorical exclusion for certain new transmission lines. If that categorical exclusion applies to a proposed action, DOE would not be required to prepare an EIS or EA. (10 CFR Part 1021, Subpt. D, Appx. B, B4.12)

⁴ DOE evaluates a no action alternative, which does not have to be reasonable, to provide a baseline for comparison to the action alternatives in an EIS or an EA. (NEPA section 102(C)(iii); 40 CFR 1502.14(c); 10 CFR 1021.321(c))

⁵ DOE also often evaluates reasonable alternatives in an EA, but CEQ regulations only refer to the evaluation in an EA of alternatives required by NEPA section 102(2)(H). (40 CFR 1501.5(c)(2)(ii)) NEPA section 102(2)(H) requires that federal agencies "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources."

Types of Environmental Effects

A NEPA review analyzes the reasonably foreseeable environmental effects of the proposed action and alternatives. CEQ defines "reasonably foreseeable" as "sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision." (40 CFR 1508.1(ii)). NEPA analyses consider three types of environmental effects:

- Direct effects are reasonably foreseeable and are "caused by the action and occur at the same time and place." (40 CFR 1508.1(i)(1)) The environmental effects of an electric generating facility would be evaluated when such a facility is part of the proposed action or a connected action or when those effects are otherwise caused by the transmission facility, such as when the transmission facility is a gen-tie line. However, this is normally not the case for electric transmission line projects other than gen-tie lines, and so the environmental effects of an electric generating facility normally are not direct effects of those projects.
- Indirect effects "are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." (40 CFR 1508.1(i)(1)) The environmental effects of an electric generating facility would be included in the indirect effects analysis for a proposed transmission line when it is reasonably foreseeable that the proposed transmission line would result in construction or expansion of an electric generating facility or otherwise affect operation of the facility. It may be reasonably foreseeable that a new transmission line would increase the opportunity for an expansion of electric generating capacity in an area. The potential for expansion of electric generating capacity might then be analyzed as an indirect effect. However, it is less common for a particular electric generating facility to be reasonably foreseeable, so the effects of specific generating facilities typically would not be analyzed.
- Cumulative effects "result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." (40 CFR 1508.1(i)(1)) Any existing or reasonably foreseeable electric generation facility in the vicinity of the proposed transmission line would be considered for inclusion in the cumulative effects analysis.

Direct and indirect environmental effects are those that are caused by the action or alternative(s) analyzed in the EIS or EA, and cumulative effects are those from the action when added to other effects in the in the affected area. Thus, the scope of the environmental effects analysis is linked to the description of the analyzed alternatives.

Proposed Action and Connected Actions

The primary alternative analyzed in an EIS or EA is referred to as the proposed action alternative. This is a combination of DOE's proposed action, the proposed action of any other federal agency with a decision to make about the proposal, and any connected actions. This guidance assumes that the proposed action is focused on the development of a transmission line, typically through financial assistance for that transmission line or the permitting of that transmission line. Generally, DOE's proposed action in such context will not involve financial assistance for, or permitting authority over, any electricity generation project.

For example, if Congress appropriates funds for DOE to provide financial assistance for the construction of new transmission lines, DOE's purpose and need would be to implement the program funded by Congress. DOE might solicit applications to fund projects that meet DOE's need, identify eligible applications, prepare a NEPA review of the project proposed in an eligible application, and then decide whether to provide financial assistance to that project. DOE's proposed action would be to provide financial assistance for the applicant's proposed transmission project.

Sometimes the proposed action evaluated in the EIS or EA will be broader to account for other decisions to be made by DOE or by another federal agency. When more than one federal agency has an action for the same proposal, NEPA requires that the proposal be evaluated in a single NEPA document to the extent practicable. (42 U.S.C. 4336a(b)) DOE determines whether it or any other federal agency has an additional action to take that meets the criteria for a connected action. Connected actions are federal decisions or actions, by any federal agency, closely related to DOE's proposed action that should be considered in the same NEPA review because they automatically trigger other actions that may require NEPA review, cannot or will not proceed unless other actions are taken previously or simultaneously, or are interdependent parts of a larger action and depend on the larger action for their justification. (40 CFR 1501.3(b).) For example, a land management agency may need to issue an authorization for the proposed transmission line to cross federal land. That action would be evaluated in the same EIS or EA being prepared by DOE for the proposed transmission line, and DOE and the land management agency would work together to complete the NEPA review.

When to Analyze the Environmental Impacts of an Electric Generating Facility as Direct or Indirect Effects of a Transmission Project

If a federal decision with respect to the generating facility is required and if the electric generation facility itself and its connection to the proposed new transmission line are reasonably foreseeable, then the effects of the generating facility ought to be considered within the EIS for the proposed transmission line.⁶ In certain cases, the environmental impacts of generation resources will be

⁶ In certain cases, NEPA reviews for proposed transmission projects have considered planned electrical generation on non-federal lands as a connected action. However, evaluating generation as a connected action will often be inappropriate because non-federal actions are not "connected actions" as that term is defined in the CEQ updated NEPA implementing regulations 40 CFR 1501.3(b); Council on Environmental Quality, NEPA Implementing Regulations Revisions Phase II ("Phase II Rules"), 89 Fed. Reg. 35,442 (May 1, 2024). CEQ's recent Phase II Rules clarified that "connected actions" only include federal actions: "non-Federal actions have long been excluded from connected actions because the purpose of the doctrine is to prevent the Federal Government from segmenting Federal actions into separate projects and thereby failing to consider the scope and impact of the Federal activity". Phase II Rules, 89 Fed. Reg. at 35,462 (citing *Sierra Club v. U.S. Army Corps of Engineers*, 803 F.3d 31 (D.C. Cir. 2015)). This means that only Federal actions should be considered as potential connected actions. So, an electrical generation facility will only be a "connected action" for the NEPA review of a proposed transmission project if there is a federal nexus that

sufficiently reasonably foreseeable and sufficiently closely related to the transmission facility to warrant evaluation as a direct or indirect effect of the transmission facility.

However, for the reasons discussed below, the environmental impacts of a specific generation facility will not typically be sufficiently likely or causally related to warrant consideration as direct or indirect effects of a transmission facility in an EIS prepared for purposes of informing a decision with respect to that transmission facility.

Generation resources and transmission facilities are typically developed along distinct timelines, by distinct corporate entities, and subject to distinct regulatory regimes. Most generation resources require interconnection to transmission facilities. But due to the connectivity of the electric grid, the evolving mix of national generation production, and the fact that there are often multiple pathways for transmission, it is not always easy to identify which electricity generation sources would be served by a given transmission project (RUS, 2019, p. 516). Electricity markets in large areas of the country operate under a regional transmission organization (RTO) or an independent system operator (ISO), which are organizations that manage the flow of electricity through and between regions of the country independent of the electric utilities and wholesale generators. In these regions, the generation source mix is variable on an hourly basis and the electricity is purchased from the wholesale market based on several factors including price and may not be the closest generation source.

While general categories of generation development may be reasonably foreseeable within areas with known energy generation potential, there is often insufficient information regarding specific facilities to allow for detailed evaluation of their potential environmental effects (for example, the number and type of potential projects, their configuration, funding structure, permitting, completed prior environmental reviews, and how to incorporate appropriate impact mitigation measures). In the absence of information indicating specific planned generation projects, any analysis of the effects of future generation development will necessarily be qualitatively generalized and not include a detailed, quantitative analysis of site-specific impacts associated with generation. For example, in describing potential impacts to land cover and land use, the *Upper Great Plains Wind Energy Programmatic Environmental Impact Statement* states that "there is no way to predict with certainty how much of the future wind energy development within the UGP Region might be connected to Western's Transmission System, because there are about 27.5 million ac (11.1 million ha) of high-suitability land outside of Western's Transmission Area and there are additional utilities in the region that could also provide connection services" (WAPA & FWS, 2015, p. 5-4).

In such cases, NEPA may be satisfied by a generalized analysis of potential effects of reasonably foreseeable future generation development, or an explanation for why the information before the agency does not allow such an analysis. *See, e.g., Oregon-California Trails Assoc. v. Walsh*, 467 F. Supp.3d 1007, 1051-55 (D. Colo. 2020) (accepting agency explanation that analysis of effects of future wind development on avian mortality would be "pure guesswork" without additional information about turbine placement).

could potentially make it a connected action, such as if the project would be located on federal lands, requires interconnection to a federal transmission system, or otherwise requires a federal approval that requires a NEPA analysis.

Identifying whether any specific generation resources are reasonably foreseeable requires consideration of several factors. Indicators of planned generation include existing interconnection requests or signed interconnection agreements, submitted right-of-way (ROW) applications for interconnection, secured financing evidenced by committed funds and contractual agreements, land identified or acquired for siting of generation infrastructure, submitted applications for approvals necessary for construction or issuance of final approvals necessary for construction, power purchase agreements, or detailed public announcements in media such as local newspapers where proposed project locations and site plans are disclosed. While these examples are not exhaustive, differentiating planned generation that is reasonably foreseeable from planned generation that is not sufficiently likely to be considered in reaching a decision requires evidence indicating that a planned generation project is well underway.

When considering interconnection requests as indicators of planned generation, it should be noted that the increasing costs of network upgrades required for interconnections have led to exceedingly high rates of withdrawals from interconnection queues resulting in the cancellation of planned generation projects. Studies conducted by the Lawrence Berkley National Laboratory (LBNL) showed that out of all of the projects that applied to the interconnection queues of the Midcontinent Independent System Operator (MISO) and the PJM Interconnection (PJM) queue between 2000 and 2016, only 24% of projects that applied to the MISO queue and 27% of projects that applied to the PJM queue were in operation by 2021 (J. Seel et al., 2023; J. Seel et al., 2022). As such, in most cases, simply having a submitted interconnection application in the queue alone does not make a project reasonably foreseeable, much less warrant further distinction as a proposal as defined by CEQ in 40 CFR 1508.1(ff). By contrast, a signed and executed interconnection agreement will likely be sufficient to indicate that a specific generation project is reasonably foreseeable and should be considered in the NEPA analysis for a proposed transmission project.⁷

NEPA analysis for proposed transmission projects should also consider the area in which the proposed transmission project will be located, and whether that area has known energy-generating potential, unknown energy generating potential, or is within an area with little to no energy generating potential, typically limited to designated areas (e.g. designated Critical Habitat, Historic Districts, and wilderness areas) which prohibit or restrict generation infrastructure.

Areas incompatible with near-future energy generation are generally well documented, and readily available information exists to identify them. These areas include urban or residential areas which cannot support near-future utility-scale generators, public lands which have been designated as protected areas prohibiting infrastructure development such as National Parks or wilderness areas, biologically and culturally sensitive areas or other environmentally sensitive areas, or other protected lands. Examples of the latter include designated critical habitat for federally listed

⁷ The U.S. Fish and Wildlife Service (FWS) prepared an EIS for the proposed R-Project Transmission Line, which identified the Thunderhead Wind Energy Center as a reasonably foreseeable future wind energy generation facility based on a signed interconnection agreement and analyzed it as a cumulative effect. (FWS, 2018, p. 4-1—4-3; *Oregon-California Trails Ass'n v. Walsh*, 467 F. Supp.3d 1007, 1046-47 (D. Colo. 2020).) The EIS was challenged in litigation and the court determined that the Thunderhead project should have been considered an indirect effect for purposes of preparing a Biological Opinion under the Endangered Species Act, and remanded the Biological Opinion and the corresponding portion of the EIS to FWS. *Walsh*, 467 F.Supp.3d at 1049-55.

species and culturally sensitive areas such as historic districts and other sites listed in the National Register of Historic Places. Some of these areas and others with similar restrictive characteristics are also included and defined as exclusion areas in the BLM's *Final Programmatic Environmental Impact Statement and Proposed Resource Management Plan Amendments for Utility-Scale Solar Energy Development* (BLM, 2024) within the geographic coverage of the document. Although future energy generation may be possible in some areas initially deemed incompatible – for example, if an approved Habitat Conservation Plan allows for development of a generation project within designated critical habitat for a federally-listed species – NEPA analysis for proposed transmission projects should generally conclude that future energy generation in these areas is not reasonably foreseeable.

That a transmission line crosses through areas with known wind- or solar-energy generation potential will rarely be sufficient, without more, to warrant evaluation of effects from wind or solar generation in those areas. Much of the United States' land area may support future energy generation. Even those areas or regions designated as energy development planning areas may be very large, and thus insufficiently particular to allow for meaningful review of potential impacts from electricity generation in such areas.⁸ The future development of energy generation in an area where favorable conditions for development exist may be reasonably foreseeable even if the exact location(s) on which that generation will be built cannot be specifically identified. In such cases, generation may be reasonably foreseeable for purposes of a cumulative effects analysis of a proposed transmission project, even if no specific planned generation projects in that area have reached a point in its planning process where a site-specific effects analysis is possible.

Because transmission infrastructure typically takes considerably longer to design, permit, and construct as compared to generation facilities, particularly land-based wind and solar, generic or high-level descriptions of environmental impacts associated with induced generation may be all that can be included in indirect effects analyses addressing generation in NEPA reviews of proposed transmission projects. In Oregon-California Trails Assoc. v. Walsh, the plaintiffs argued that NEPA and the Endangered Species Act (ESA) required analysis of the effects of wind development as *indirect* effects, not *cumulative* effects, of a proposed transmission line,⁹ and that the Fish and Wildlife Service's analysis should have included a more detailed analysis of the impacts to endangered birds, by forecasting the number of turbines and evaluating wildlife impacts based on per-turbine mortality data. 467 F. Supp. 3d at 1050-55. The court agreed that future wind development was an indirect effect of the line, not a cumulative effect, because one of the project's "explicit purposes" was "providing a way for wind farms to connect to the grid," and so the project made wind power development "more probable,' even if it does not 'directly cause' it." Id. (quoting San-Luis & Delta-Mendota Water Auth. v. Locke, 776 F.3d 971, 1009 (9th Cir. 2014)). However, the court accepted the Service's explanation that the detailed evaluation of effects sought by the plaintiffs was not possible because the impacts to wildlife would vary greatly depending on the number of projects built and the siting of individual wind turbines, and that without additional information on specific developments "any 'generalized evaluation of the increased risks to ESAlisted bird species' ... would be pure guesswork." Id. at 1053. Hence the Service's decision to

⁸ See, e.g., Final Programmatic Environmental Impact Statement and Proposed Resource Management Plan Amendments for Utility-Scale Solar Energy Development (BLM, 2024),

⁹ The court applied the definition of "indirect effects" under the ESA, which is effects "caused by the proposed action and are later in time, but still reasonably certain to occur." 467 F. Supp. 3d at 1050 (quoting 50 C.F.R. § 402.02).

analyze future wind development as a cumulative effect, rather than an indirect effect, was harmless, and the court accepted the Service's justification for providing only a generalized analysis of the effects of reasonably foreseeable wind development. *Id*.

In addition to considering the foreseeability of future generation resources, an EIS must also differentiate between generation resources that are sufficiently closely related to the transmission facility to warrant evaluation as a direct or indirect effect of the transmission facility from generation resources that are not so closely related. Indicators of a sufficiently close relationship to the transmission facility include an interconnection agreement and common ownership.

When the purpose and need for a transmission project includes enabling additional generation, that generation may have a causal relationship with the proposed transmission project and should be included in the indirect effects analysis for the project. (*Oregon-California Trails Assoc. v. Walsh*, 467 F. Supp.3d 1007, 1051-55 (D. Colo. 2020); *Border Power Plant Wkg. Grp.*, 260 F. Supp. 2d at 1017.) However, the circumstances in which a specific transmission project has a causal relationship with a specific generation resource are rare. *See Border Power Plant Wkg. Grp. v. Dep't of Energy*, 260 F. Supp. 2d 997, 1017 (S.D. Cal. 2003) (distinguishing between generation for which a particular transmission facility was a but-for cause and generation for which it was not, and holding that environmental impacts of the latter need not be considered as effects of the transmission facility under NEPA).

Cumulative Effects

Where the effects of specific generation resources are too speculative to be meaningfully considered, an EIS may nevertheless consider the effects of certain categories of generation as cumulative effects.

An existing electric generating facility located in the vicinity of the proposed transmission line normally would be analyzed for cumulative effects, unless it is included as part of the direct or indirect effects analysis. For example, a visual impacts analysis might consider the effects of the proposed transmission line added to the visual impacts of an existing electric generating facility and the overall visual character of the area. As for potential future electric generation facilities, the central question is whether they are reasonably foreseeable. Cumulative effects associated with a potential electric generating facility should be considered in the EIS or EA if the facility is reasonably foreseeable and would be in the vicinity of the proposed transmission line. If the facility is not reasonably foreseeable, analysis is not required.

Objective criteria help distinguish reasonably foreseeable future electric generating facilities from those that may be discussed in public but are speculative at the time of NEPA analysis. For example, to be included in the cumulative effects analysis in the 2015 TransWest Express EIS, BLM required that reasonably foreseeable generation be approved and funded, that a ROW application was filed and actively being pursued, and that the location would impact the same resources as the proposed TransWest Express project (BLM and WAPA, 2015a). Other agencies have limited cumulative analyses to evaluate projects with some configuration of known locations and descriptions, with a permit application filed, and an adequately detailed public announcement made (FS, 2018; BLM, 2016b).

Between Draft and Final EIS, the U.S. Fish and Wildlife Service (FWS) expanded the scope of its cumulative effects analysis for the *R-Project Transmission Line Project* (FWS, 2018). In the Draft EIS, FWS only included proposed wind energy projects with signed interconnection agreements as reasonably foreseeable future actions. Through the public comments process, this approach was revised to remove the interconnection requirement as an indicator of reasonably foreseeable, and FWS determined that wind energy projects were "sufficiently likely to occur over the next 50 years" without an existing interconnection agreement and were subsequently evaluated in the cumulative effects analysis in the Final EIS (FWS, 2018). FWS acknowledged that, except for one proposed wind energy project with a signed interconnection agreement, the locations and details of projects were unknown and therefore specific environmental effects, which would depend on turbine siting, were not reasonably foreseeable. However, because a purpose of the proposed action was to facilitate renewable energy transmission and use in Nebraska, the availability of wind resources in the study area was enough to assess future wind projects as reasonably foreseeable and analyze the effects of future wind development as cumulative effects. This decision was challenged in Oregon-California Trails Assoc. v. Walsh, and the court determined that the effects of wind development should have been analyzed as indirect effects, not cumulative effects. 467 F. Supp.3d 1007, 1051-55 (D. Colo. 2020). However, the Court accepted the FWS's explanation for providing only a generalized analysis of wind development on wildlife and why a more detailed analysis of wildlife effects would be speculative: the impacts to wildlife would vary greatly depending on the number of projects built and the siting of individual wind turbines, so without additional information on specific developments "any generalized evaluation of the increased risks to ESA-listed bird species' ... would be pure guesswork." Id. at 1053.

Conclusion

The scope of any given NEPA process will necessarily be context- and action-specific. However, as discussed herein, there are often good reasons to limit consideration of any potential environmental impacts from generation resources in the NEPA review of a transmission facility. As discussed above, such generation resources are often not likely to be reasonably foreseeable or causally related to the transmission facility. The guidance provided herein may assist the Department in identifying those instances in which environmental impacts from generation resources should be evaluated as direct or indirect effects of a transmission line, and also those instances in which such consideration would not meaningfully inform the Departments' assessment of the proposed action.

References

U.S. Bureau of Land Management (BLM) and U.S. Department of Energy (DOE). July 2012a. Final Programmatic Environmental Impact Statement (PEIS) for Solar Energy Development in Six Southwestern States (DOE/EIS-0403). Accessed 10/3/2024. <u>EIS-0403: Final Programmatic Environmental Impact Statement | Department of Energy</u>

U.S. Bureau of Land Management (BLM). October 2012b. Final Environmental Impact Statement for the Sigurd to Red Butte No. 2 345kV Transmission Project. Accessed 10/3/2024. <u>Environmental Impact Statement (EIS) Database[USEPA</u>

U.S. Bureau of Land Management (BLM). June 2013. Final Environmental Impact Statement and Proposed Resource Management Plan Amendments for the SunZia Southwest Transmission Project. Accessed 10/3/2024. <u>Environmental Impact Statement (EIS) Database|USEPA</u>

U.S. Bureau of Land Management (BLM). March 2014. San Juan Basin Energy Connect Project Draft Environmental Impact Statement. Accessed 10/3/2024. <u>Environmental Impact Statement (EIS)</u> <u>Database|USEPA</u>

U.S. Bureau of Land Management (BLM) and Western Area Power Administration (WAPA). April 2015a. TransWest Express Transmission Project Final Environmental Impact Statement. Accessed 10/3/2024. Environmental Impact Statement (EIS) Database USEPA

U.S. Bureau of Land Management (BLM) and Western Area Power Administration (WAPA). October 2015b. Southline Transmission Line Project Final Environmental Impact Statement. Accessed 10/3/2024. Environmental Impact Statement (EIS) Database[USEPA

U.S. Bureau of Land Management (BLM). May 2016a. Final Environmental Impact Statement and Proposed Land-use Plan Amendments for the Energy Gateway South Transmission Project. Accessed 10/3/2024. Environmental Impact Statement (EIS) Database|USEPA

U.S. Bureau of Land Management (BLM). October 2016b. Final Supplemental Environmental Impact Statement and Proposed Land Use Plan Amendments for Segments 8 and 9 of the Gateway West 500-kV Transmission Line Project, Idaho. Accessed 10/3/2024. <u>Environmental Impact Statement</u> (<u>EIS</u>) Database|USEPA

U.S. Bureau of Land Management (BLM). November 2016c. Final Environmental Impact Statement and Proposed Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project. Accessed 10/3/2024. Environmental Impact Statement (EIS) Database[USEPA

U.S. Bureau of Land Management (BLM). October 2016d. Final Environmental Impact Statement for the Vantage to Pomona Heights 230 kV Transmission Line Project. Accessed 10/3/2024. Environmental Impact Statement (EIS) Database/USEPA U.S. Bureau of Land Management (BLM). August 2024. Final Programmatic Environmental Impact Statement and Proposed Resource Management Plan Amendments for Utility-Scale Solar Energy Development (DOE/EIS-0557). Accessed 10/3/2024. <u>Environmental Impact Statement (EIS)</u> <u>Database[USEPA</u>

U.S. Department of Energy (DOE) and State of Montana Department of Environmental Quality (DEQ). September 2008. Final Environmental Impact Statement for the Montana Alberta Tie Ltd. (MATL) 230-kV Transmission Line. Accessed 10/3/2024. <u>EIS-0399: Final Environmental Impact Statement | Department of Energy</u>

U.S. Department of Energy (DOE). October 2015. Plains & Eastern Clean Line Transmission Project Environmental Impact Statement (DOE/EIS-0486). Accessed 10/3/2024. <u>Environmental Impact</u> <u>Statement (EIS) Database|USEPA</u>

U.S. Department of Energy (DOE). August 2017. Final Northern Pass Transmission Line Project Environmental Impact Statement. Accessed 10/3/2024. <u>Environmental Impact Statement (EIS)</u> <u>Database|USEPA</u>

U.S. Forest Service (FS). March 2013. Final Environmental Impact Statement, Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line Upgrade. Accessed 10/3/2024. <u>Environmental Impact</u> <u>Statement (EIS) Database|USEPA</u>

U.S. Forest Service (FS). June 2016. Kake to Petersburg Transmission Line Intertie Project, Tongass National Forest Final Environmental Impact Statement. Accessed 10/3/2024. <u>Environmental Impact Statement (EIS) Database|USEPA</u>

U.S. Forest Service (FS). March 2018. Final Environmental Impact Statement, Bordertown to California 120kV Transmission Line Project. Accessed 10/3/2024. <u>Environmental Impact Statement</u> (EIS) Database|USEPA

U.S. Fish and Wildlife Service (FWS). November 2018. Final Environmental Impact Statement on Issuance of an Incidental Take Permit and Implementation of a Habitat Conservation Plan for the R-Project Transmission Line. Accessed 10/3/2024. Environmental Impact Statement (EIS) Database [USEPA]

Rural Utilities Service (RUS). April 2014. McClellanville 115 kV Transmission Project Draft Environmental Impact Statement. Accessed 10/3/2024. <u>Environmental Impact Statement (EIS)</u> <u>Database|USEPA</u>

Rural Utilities Service (RUS). October 2019. Cardinal-Hickory Creek 345-kV Transmission Line Project Final Environmental Impact Statement. Accessed 10/3/2024. <u>Environmental Impact</u> <u>Statement (EIS) Database|USEPA</u> Seel, Joachim, Joseph Rand, Will Gorman, Dev Millstein, Ryan H. Wiser, Will Cotton, Nicholas DiSanti, and Kevin Porter. 2022. Generator Interconnection Cost Analysis in the Midcontinent Independent System Operator (MISO) Territory. Accessed 10/3/2024. <u>Generator Interconnection</u> Cost Analysis in the Midcontinent Independent System Operator (MISO) territory.

Seel, Joachim, Joseph Rand, Will Gorman, Dev Millstein, Ryan H. Wiser, Will Cotton, Katherine Fisher, Olivia Kuykendall, Ari Weissfeld, and Kevin Porter. 2023. Interconnection Cost Analysis in the PJM Territory. Accessed 10/3/2024. Interconnection Cost Analysis in the PJM Territory.

Western Area Power Administration (WAPA) and U.S. Fish and Wildlife Service (FWS). April 2015. Upper Great Plains Wind Energy Programmatic Environmental Impact Statement, Final (DOE/EIS-0405). Accessed 10/3/2024. DOE/EIS-0408: Final Programmatic Environmental Impact Statement | Department of Energy