

APPENDIX I. RESPONSE TO PUBLIC COMMENTS

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I.1. DRAFT EIS COMMENT PERIOD

The 45-day comment period on the Draft Environmental Impact Statement (EIS) started January 9, 2026, and ended February 23, 2026. During that time, the Montana Department of Environmental Quality (MTDEQ) and the U.S. Department of Energy (DOE) received comments at the public meetings, by regular mail, and by electronic mail. This appendix presents a compilation of all substantive comments received as described below. Substantive comments pertained to the analysis and contained information or suggestions to be carried forward into the Final EIS. Non-substantive comments were identified by MTDEQ as those (1) outside the scope of the Project analysis, (2) irrelevant to the decisions to be made, (3) conjectural and not supported by scientific or factual evidence; or (4) those that MEPA does not allow for certain analysis. The DOE reviewed each of the comments received on the Draft EIS and concurred with MTDEQ regarding the identification of non-substantive comments.

I.2. DRAFT EIS COMMENTS AND RESPONSES

MTDEQ received comments on the Draft EIS as individual or “unique” comment submissions and as “form letter” submissions. The comments were submitted in hand-written comment forms, letters, and emails. Written responses to *substantive* comments with specific questions or concerns related to the content of the Draft EIS are shown in Table I-1. Many comments resulted in modifications to the EIS as reflected in the Final EIS. Substantive comments are captured in Section I.2.1, Individual (Unique) Comment Submittals.

I.2.1. Individual (Unique) Comment Submittals

The Draft EIS Comment Response Matrix table below presents the substantive comments received on the Draft EIS and responses to them (Table I-1); it lists the name of commenter, organization or affiliation, source of the comments, the substantive comments submitted, and MTDEQ responses to those substantive comments. This table does not include the non-substantive comments submitted (i.e., those that do not state a specific concern or question).

I.2.2. Form Letter Comment Submittals

Table I-2 presents the various form letters received by MTDEQ on the Draft EIS, as well as the names of the individuals who submitted the respective form letters. Some individuals personalized the form letters slightly, but did not significantly alter the content.

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Table I-1
Draft EIS Substantive Comment Response Matrix

Name of Sender	Agency/ Organization	Submittal Method	Comment	Response ^a
Nick Fitzmaurice	MEIC	Comment Letter	As highlighted in our scoping comments, assessment and avoidance of endangered and other special status species’ habitat along the project corridor is critically important. We appreciate Grid United’s intent to avoid major greater sage grouse habitat and develop the project in accordance with the Montana Greater Sage Grouse Mitigation Plan. While Alternative A was originally developed based on BLM’s recommendation to, in part, minimize routing through the Greater Sage Grouse General Habitat Management Area, this route was abandoned for other reasons that rendered it infeasible. It is somewhat unclear how the other alternatives differ (or do not) in their impact on the Greater Sage Grouse General Habitat Management Area. It should be made clearer in the final EIS’s discussion of alternative routes how the proposed alternative avoids major habitat areas such as this one. We encourage Grid United to continue prioritizing mitigation of habitat impacts through the construction and operation of this transmission project.	Chapter 2 of the Final EIS has been updated. The Proposed Alternative crosses the most greater sage-grouse general habitat and leks (within a 2-mile protective buffer), followed by Alternatives B, C, E, and A (Alternative A crosses between 5.0 and 38.6 miles less greater sage-grouse general habitat than the other alternatives). Ultimately, the other alternatives considered contained other substantive constraints (e.g., sensitive species, tribal and cultural concerns, routing along Interstate 94, developed areas, residences, agricultural areas, and energy easements), which resulted in their dismissal. The Proponent worked with the North Dakota Game and Fish Department and the Montana Department of Natural Resources and Conservation, as well as other state, federal, and local authorities responsible for overseeing environmental regulations and land management during routing to avoid, minimize, and mitigate impacts on greater sage-grouse habitat to the greatest extent possible. For additional details on avoidance, minimization, and mitigation measures, see the Montana Greater Sage Grouse Mitigation Plan, which is included in the CMRP (Appendix E of the EIS).
Nick Fitzmaurice	MEIC	Comment Letter	... we would appreciate a more robust analysis of project alternatives in this EIS, even if certain originally contemplated alternatives were deemed infeasible. At a minimum, more clarity is needed on the reasons for dismissing certain alternative routes. Particular clarity is needed around the dismissal of Alternative E, which appears to have been dismissed primarily due to its similarity with Alternative C. Since Alternative C was also dismissed, it is unclear whether Alternative E could have stood on its own for analysis in this Draft EIS.	Alternative E (Tongue River Route Alternative) crosses with Alternative C (Southern Route Alternative) for the majority of the route, differing only where Alternative E turns north to parallel Tongue River Road rather than continuing east to Montana Highway 59 South (Alternative C). The segment of Alternative E between Tongue River Road and where it converges with Alternative C is about 34 miles long, while the segment of Alternative C is about 39 miles long. In comparing the segments of Alternative C and E where the routes split, Alternative E offers the advantage of being shorter, but the following disadvantages: • Crossing the most miles of BLM VRM Class II lands (which aim to retain existing character of the landscape); and • Early (February 2022) coordination with landowners (local irrigators) and agency coordination (Montana State Tribal and Cultural Resources Officer) identified concerns around tribal resources, sensitive species such as raptors and prairie dog colonies along the Tongue River (Grid United 2024a, 2026). To address these concerns, a reroute of Alternative E was developed to follow another path north, such as along Montana Highway 59 south. This resulted in the development of Alternative C. Therefore, Alternative E was dismissed due to public and agency coordination and similarity to Alternative C. Alternative C originally crossed 2.5 miles of the Bice Ranch LLC Conservation Easement, and landowner feedback expressed concerns with ranching and farming operations, as well as the crossing of a subdivided area proposed for residences. The Proponent also identified terrain challenges east of the Powder River crossing (rugged topography with several abrupt elevation changes of up to 800 feet), and a lack of existing access roads. Based on stakeholder engagement between 2022 and 2024, the Proponent revised Alternative C to address landowner concerns and avoid easements and challenging terrain, which resulted in the development of Alternative D (Proposed Alternative). Alternative C was eliminated because it was revised into Alternative D. Chapter 2, Description of Alternatives, has been updated to reflect these clarifications.

Name of Sender	Agency/ Organization	Submittal Method	Comment	Response ^a
Nick Fitzmaurice	MEIC	Comment Letter	MEIC would also like to highlight and continue to stress the importance of the project proponent’s intention to prioritize the use of local, skilled, and unionized labor for project construction and operation to the greatest extent possible. This will maximize the positive impact on Montanans from job creation during the construction and operation of the transmission line.	Noted. Section 3.10.3.2, Proposed Alternative, of the Final EIS reads, "The Proponent has stated that it would endeavor to hire local workers, dependent upon the availability of skilled labor, union agreements, and the hiring methods used by the selected construction contractors" and "The Proponent has engaged with local colleges in Montana and North Dakota to develop workforce development partnerships with their line-worker programs."
Nick Fitzmaurice	MEIC	Comment Letter	Finally, MEIC notes that the Table of Contents for the Draft EIS should be edited to include Chapter 4.	The Final EIS has been updated so that the Table of Contents displays all chapters.
Eric Johnson	Amphibian Refuge	Comment Letter	Amphibian field surveys should be conducted to determine if amphibians are present in proposed disturbance areas within the project area. If amphibians are located, the disturbance area where amphibians are present should be avoided, or the amphibians should be relocated to a protected area.	Table 3.14-3 of the Final EIS shows that one special status amphibian species has potential to occur in the Project area: Great Plains toad (BLM Special Status Species, documented during surveys in Montana). The Proponent also identified the Plains Spadefoot (Level 1 species under the North Dakota Species of Conservation Priority) as potentially having suitable habitat within the Project area, but there were no documented occurrences during surveys. Other general amphibian species are also likely to occur, particularly near wetlands and river systems. Impacts to these areas would be avoided or reduced as much as possible through the use of signs, flagging, and/or construction fencing to identify wetland boundaries and buffer zones for sensitive wildlife species. However, there would be approximately 12.3 acres of wetland impacts (0.7 acre of permanent impacts and 11.6 acres of short- to long-term impacts; see Table 3.6-15 of the Final EIS).
David Dorian	USEPA	Comment Letter	The Final EIS should indicate if there are public wells or muncipal water sources that are near the project impact areas, in addition to the private wells identified in the Draft EIS.	MTDEQ Source Water Protection Viewer and NDDEQ GIS Hub Explorer for Community and Non-community SWP areas were used to review potential public water sources in the area. See Final EIS, Section 3.5.2.3, Public Wells and Wellhead Protection Areas. No public water wells were found within 150 feet of the Project impact areas. However, the HVDC Transmission Line would cross a groundwater SWP area (MT0000307) near Plevna, Montana, which is associated with three public wells (MTDEQ Undated, 2003). The Project also crosses SWP area MT0000180 (designated as a Spill Response Region), which is associated with the City of Colstrip Public Waters Supply (City of Colstrip 2002; MTDEQ Undated_a), near MP 0.0 (in Colstrip, Montana). The Project does not cross any surface waters within or near the groundwater SWP area. The nearest public well is located approximately 0.5 mile north of the Project area. The Project would not affect these SWP areas.
David Dorian	USEPA	Comment Letter	The Draft EIS (p. 3-27) identifies seven impaired waterbodies where Project actions could impact water quality relevant to CWA Section 303(d). The FEIS should identify any impaired waterbodies impacted by the project, list the cause of impairment (i.e., which pollutant), and briefly explain how the Project activities in those areas will or will not impact those impaired waters.	Table 3.6-11 of the Final EIS provides Section 303(d) Impaired Waters crossed by the Project impact areas and the primary pollutant. Table 3.6-10 provides all waterbody impacts (temporary, permanent, or potential riparian buffer clearing adjacent to the waterway) for the Project area and the 303(d) status of the water being impacted, as well as the impact type, which is categorized as "Project Component." Project components include the Project impact areas or access road that crosses the waterbody. Categories related to access roads include Overland Travel; Existing, Needs Improvement; New, Permanent; and New, Temporary. Temporary Impact Area refers to non-access road impacts. Sections 3.6.2.3, [Surface Water Hydrology, Affected Environment] Waterbodies, and Section 3.6.3.2, [Surface Water Hydrology, Environmental Consequences] Proposed Alternative, have been updated to include details on impaired waters.
David Dorian	USEPA	Comment Letter	Where a CWA Total Maximum Daily Load (TMDL) exists for impaired waters, any pollutant load attributed to the project should comply with any applicable TMDL allocations.	Noted. The Proponent would comply with the design specifications required by federal and state agencies for waterbody crossings and acquire all necessary permits from federal, state, and local agencies in compliance with minimization and mitigation measures for permanent waterbody impacts identified in the CMRP (Appendix E of the EIS).

Name of Sender	Agency/ Organization	Submittal Method	Comment	Response ^a
Courtney Hoover	DOI	Comment Letter	During the preparation of the Final Environmental Impact Statement (FEIS) for the project, please consider inclusion of and potential visual impacts to Deer Medicine Rocks NHL...Deer Medicine Rocks is a sandstone rock formation in the Rosebud Valley of Montana that is nationally significant for its associations with the Great Sioux War of 1876–77. Deer Medicine Rocks was designated an NHL in 2012 and appears to be located about 13 miles from the Colstrip project area. NPS requests that the FEIS identify if Deer Medicine Rocks NHL is visually impacted by the project and if a viewshed analysis is warranted.	Deer Medicine Rocks NHL is located approximately 20 miles south/southwest of the existing Colstrip Substation. The viewshed analysis ran in Fall 2025 shows that no structures would be visible from Deer Medicine Rocks NHL (Figure 3.9-2). Additionally, a Programmatic Agreement has been developed for the Project and is included as Appendix J of this EIS. The Programmatic Agreement would be applied to Project construction and operations to facilitate agency determinations of effects on historic or cultural resources, as well as formulation of appropriate mitigation for any adverse effects.
Courtney Hoover	DOI	Comment Letter	To the maximum extent possible, efforts must be made throughout the proposed project to minimize harm to NHLs in accordance with Section 106 of the NHPA...Moreover, as stated in 36 CFR Part 800.10(c), federal agencies are required to notify the Secretary of the Interior (delegated to the National Park Service) an undertaking that may involve an NHL and invite the Secretary to participate in the consultation where there may be an adverse effect. Direct and adverse effects are not limited to physical impacts and may include visual, auditory, and atmospheric effects.	No known NHLs are within the APE, physical, visual, auditory, or atmospheric; and no adverse effects are anticipated on any NHLs. In the unlikely event an NHL is found within the APE, consultation with the DOI will occur in accordance with Section 106 of the NHPA and 36 CFR Part 800.10(c).
William Krutzfeldt	NA	Comment Letter	Today, we present our first formal comments to support a move of the North Plains Connector line to the NORTHERN ROUTE...The NORTHERN ROUTE more closely follows the existing infrastructure of the Rosebud-Yellowstone River and Miles City to Baker throughway. These three (3) comments are specific to DEQ responsibility to environmentally evaluate Grid United's "preferred route" with the NORTHERN ROUTE.	As Alternative A (Northern Route Alternative) extends north out of the City of Colstrip, the route crosses an area of land between the City of Colstrip and Forsyth, Montana, with multiple parcels that are under easements with a different energy company (Clearwater Resources 2016, 2019; Clearwater Wind Land Holdings, LLC 2021). These easements allow the company to use some or all of the parcels for the construction, replacement, relocation, and maintenance of transmission facilities, including structures, wires, cables, foundations, and ingress and egress to these facilities. These existing easement agreements would conflict with the placement of the Project transmission facilities. Acquiring easements that would not conflict with the existing ones would be difficult. The existing energy easements in this area limit the technical feasibility of Alternative A; therefore, it was dismissed from analysis.
William Krutzfeldt	NA	Comment Letter	While transmission lines cause a small percentage of wildfires, the fires they do start in drought-prone ranchlands in Southeastern Montana can be significantly more destructive. • More common high-wind events in Montana can cause “conductor slap,” creating sparks that can lead to megafires. The existing water & highway infrastructure near the NORTHERN ROUTE ensures local fire crews in Custer & Rosebud Counties have quicker access to manage outbreaks before they become catastrophic.	While the FEMA National Risk Index classifies the Project counties as having relatively low to very low overall wildfire risk, we acknowledge that transmission infrastructure can act as an ignition source under specific conditions, particularly during high-wind events in drought-prone rangelands. Although transmission lines account for a relatively small percentage of wildfire ignitions nationally, fires initiated under high-wind conditions can spread rapidly and result in disproportionately large impacts. In southeastern Montana, where drought conditions and open rangelands are present, this risk pathway is relevant. The Project design and routing—including proximity to transportation corridors and water access along portions of the Project—support rapid emergency response, which can significantly limit fire growth potential. Section 3.4, Public Health and Safety, has been updated to include measures from the Proponent’s Reliability and Safety Report (Grid United 2024b) that address this risk, including vegetation management within the ROW, design measures to reduce conductor clashing under high winds, inspection and maintenance protocols, and coordination with local fire response agencies. With these measures, wildfire ignition risk associated with the Project is expected to remain low and impacts would be localized and manageable.

Name of Sender	Agency/ Organization	Submittal Method	Comment	Response ^a
William Krutzfeldt	NA	Comment Letter	The proposed middle route poses a significant threat to the mule deer in Region 7, a population that is already under “generational stress”... • Habitat quality is a primary factor in these declines according to the Fish & Game; and the preferred route cuts through undisturbed ranchland which is fantastic mule deer habitat- privately and publicly owned.	Mule deer occupy diverse habitats and can be found in grassland, sagebrush, forests, and riparian habitats. Construction of the Proposed Alternative would lead to habitat loss/conversion and degradation through grading and vegetation removal as summarized in Section 3.14.3.2, Table 3.13-3, and Table 5-1. Temporary impacts in unbroken grassland would primarily occur within overland travel areas and wire-pulling and tensioning sites, which could result in crushed vegetation but would involve limited ground-disturbing activities (e.g., grading). The majority of Project impact areas are grassland and agricultural lands and would reestablish more quickly than woody vegetation. Permanent impacts on mule deer habitat would be limited to vegetation management within the ROW during operations, where periodic tree and shrub removal would occur using mechanical controls or herbicides. Impact areas would be restored as near as practicable to pre-construction conditions in accordance with Section 6.0 of the CMRP (Appendix E of the EIS). The permanent ROW would be maintained as herbaceous with low-growing shrubs, and seed mixes would be used to revegetate areas disturbed during grading. The Proponent would use revegetation methods and seed mixes appropriate to existing land uses and cover types, and where feasible, root balls of trees and shrubs would be left in place to support restoration.
William Krutzfeldt	NA	Comment Letter	The project's routing can negatively impact the Sage Grouse... • The developer's preferred route more often crosses documented 'leks' (family breeding pods) general habitat than the NORTHERN ROUTE, which is closer to infrastructure where these leks are less commonly documented. • Selecting the NORTHERN ROUTE is a better strategic move by all landowners here to keep the Sage Grouse off the Endangered Species list by utilizing already "disturbed" paths rather than encroaching on sensitive breeding grounds.	Alternative A (Northern Route Alternative) crosses less greater sage-grouse general habitat and leks within a 2-mile buffer than the Proposed Action. However, it would require approximately 20 more miles of centerline and 465 more acres of maintained ROW than the Proposed Action. Additionally, the Yellowstone River Valley (along the Alternative A route) contains sensitive species (e.g., bats, fish, and eagles) and tribal and cultural concerns, and poses challenges with routing along Interstate 94 and the increased developed areas, residences, agricultural areas, and energy easements. For additional details on avoidance, minimization, and mitigation measures, see the Montana Greater Sage Grouse Mitigation Plan, which is included in the CMRP (Appendix E of the EIS).

APE = Area of Potential Effects; BLM = Bureau of Land Management; CFR = Code of Federal Regulations; CMRP = Construction, Mitigation, and Reclamation Plan; DOI = U.S. Department of the Interior; EIS = Environmental Impact Statement; FEMA = Federal Emergency Management Agency; GIS = Geographic Information System; HVDC = high-voltage direct current; MEIC = Montana Environmental Information Center; MTDEQ = Montana Department of Environmental Quality; NA = not applicable; NDDEQ = North Dakota Department of Environmental Quality; NHL = National Historic Landmark; NHPA = National Historic Preservation Act; Proponent = North Plains Connector LLC; ROW = right-of-way; SWP = source water protection; USEPA = U.S. Environmental Protection Agency; VRM = Visual Resource Management

Notes:

^a For all citations included in the responses, a full listing of the source is provided in Section I.3, References, of this appendix.

Table I-2
Form Letter Comments on the Draft EIS

Form Letter ID	Comment Number	Agency/ Organization	Submittal Method	Comment	Individual Names Submitting Form Letter
FL-01	1	NA	Email	I support the North Plains Connector Project. More transmission connectivity through projects means greater electric reliability without having to build more expensive power plants in Montana. Montanans can't afford to pay for more generation, so greater connectivity can help affordably meet our energy needs.	Agustin Garcia Charlene Woodcock Alan Hilden JL Angell Karen McLean Linda Patenaude
FL-02	1	NA	Email	I appreciate how Grid United has taken a community-first approach in planning the North Plains Connector transmission project. Ensuring buy-in from everyone all along the proposed transmission corridor will help the project move forward smoothly without any unexpected speedbumps. I support this project and expanding transmission connectivity in Montana.	Kathy Tonnessen Curtis Kruer
FL-03	1	Rosebud County	Comment Letter	As a Rosebud County Commissioner this project is very beneficial to our county, state and even our nation. I support this project fully! This project would benefit our entire nation, providing dependable energy throughout the energy grid. This is good for not only the citizens, but would provide more dependable energy to help support our national security.	Scott Hein Ed Joiner Robert E. Lee
FL-03	2	Rosebud County	Comment Letter	Our County itself will benefit from the tax revenues, and a certain extent to the impacts additional workers bring to the area. This would benefit our local businesses such as restaurants, motels and other businesses with added business during the construction period. Also, some of our local contractors would benefit as well. There would be electrical, road construction, and fencing opportunities made available.	Scott Hein Ed Joiner Robert E. Lee
FL-03	3	Rosebud County	Comment Letter	As a County Commissioner for Rosebud County, I fully support this necessary project, and hope to see it progress in the near future. It is a very worthwhile project for our entire region!	Scott Hein Ed Joiner Robert E. Lee

NA = not applicable

I.3. REFERENCES

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