

**TALEN MONTANA
CERTIFICATE OF COMPLIANCE
AMENDMENT**

**DRAFT
ENVIRONMENTAL ASSESSMENT**

**Montana Department of Environmental Quality
Facility Siting Program
1520 East Sixth Avenue
Helena, MT 59620-0901**

April 23, 2019

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1.0 Introduction

Talen Montana, LLC (Talen) operates a four-unit coal fired electricity generating facility in Colstrip, Montana. The Colstrip Steam Electric Station (CSES) is located in Section 34, Township 2 North, Range 41 East, Rosebud County, Montana and consists of four sub-bituminous coal-fired units. CSES Units 3 and 4 were sited, constructed and are operated under its Certificate of Environmental Compatibility and Public Need (Certificate) for Units 3 and 4 issued under Montana's Major Facility Siting Act (MFSA). The Certificate governs Units 3 and 4 and their associated facilities. Units 3 and 4 are currently permitted to consume coal from Areas A through G at the nearby Rosebud Mine. Talen seeks approval from the Department of Environmental Quality (DEQ) for an amendment to the Certificate for future coal supply from Non-Rosebud (NR) mines. Talen seeks the flexibility to utilize coal for Units 3 and 4 from mines other than the nearby Rosebud Mine and to modify a larger coal handling facility to enable the Units to receive and utilize these new coal sources.

After DEQ receives a notice of an amendment to a Certificate, including notice to all active parties to the original proceeding, it has 30 days to determine whether the proposed change in the facility would result in a material increase in any environmental impact of the facility or a substantial change in the location of all or a portion of the facility as set forth in the Certificate. In those cases, in which DEQ determines that the proposed change in the facility would not result in a material increase in any environmental impact or would not be a substantial change in the location of all or a portion of the facility, DEQ shall automatically grant the amendment either as applied for or upon terms or conditions that DEQ considers appropriate. DEQ has determined the use of the NR coal to be combusted in Units 3 and 4 would not result in a material increase in any environmental impact or substantial change in the location of the facility. This portion of the application is not being analyzed in this EA.

If DEQ determines that the proposed change would result in a material increase in any environmental impact of the facility or a substantial change in the location of all or a portion of the facility, DEQ would grant, deny, or modify the amendment with conditions it considers appropriate. If DEQ were to modify the amendment it is required to consult with the Certificate holder.

The proposed project was submitted by Talen to DEQ on March 15, 2019 and was revised on March 29, 2019. The proposed project could involve seven different scenarios of the delivery of NR coal via rail and/or truck not to exceed 7 million tons per year. DEQ has determined the additional coal handling facilities as proposed by Talen would result in a material increase in a portion of the facility with a disturbance of about 116 up to 165 acres. The Environmental Assessment (EA) only discloses the impacts for the additional coal handling facilities proposed by Talen. Specifically, Talen's Proposed Action (Certificate Amendment) is the following:

Utilize rail and or truck delivery facilities for the non-Rosebud mine coal as authorized by Montana Air Quality Permit 0513-11, March 13, 2019.

This draft environmental assessment provides supplemental analysis of impacts examined in the draft and final environmental impact statement for the Colstrip Units 3&4 (DNRC 1974 and 1975). The EA also examines a No Action Alternative which would be no changes to the current Certificate and no disturbance associated with the new coal handling facilities. The EA contains the information to support DEQ's determination to grant, deny, or modify the proposed amendment.

1.1 Purpose and Need

Talen's purpose for the proposed project is designed to allow the Colstrip Power Plant the flexibility to adapt to future changes in coal availability with the use of NR coal supply. The new coal handling area would ensure that the Colstrip Power Plant is able to dynamically adapt to constrained or changing coal markets to help ensure its long-term economic viability and operational stability.

DEQ's purpose and need in conducting this environmental review is to act upon Talen's application to amend its Certificate to authorize a new coal handling facility at the Colstrip Plant Site. DEQ's action on the amendment application is governed by the Major Facility Siting Act, Section 75-20-101, *et seq.*, Montana Code Annotated (MCA).

1.2 Proposed Action Description

Talen has proposed a new coal handling facility to accept up to 7 million tons per year of NR coal via truck and/or rail as shown on Figure 1. Under the proposal, there could be seven different scenarios depending on the amount of coal delivered and method of delivery. The new coal handling facility would be located southeast of the existing plant site which would require new disturbances associated for a new rail loop off the existing railroad and access road off Highway 39. The Proposed Action would involve the disturbance of previously mined and reclaimed areas of the Rosebud Mine Area E, and past areas where historical mining occurred prior to 1969 which has been part of the Plant Site. Table 1 illustrates the different scenarios including the disturbance acreage and transportation increases from the Proposed Action.

The proposed project includes any of the logistical scenarios required to transport, unload and utilize non-Rosebud seam coal. The project is designed to include scenarios that range from bringing one million tons per year (15% of Units 3&4 capacity) to 7 million tons per year (100% of Units 3&4 capacity) of coal onsite via truck on paved access road and/or new rail loop to be combusted in any of the plant's units. In general, coal will be brought in via truck and/or rail, unloaded, and transferred via new conveyor(s) or front-end loader (FEL) to a new coal storage pile and/or directly to the existing plant conveyor and coal storage system. Only a portion of the new storage pile will be active at any given time, and the remainder will be inactive. The coal pile(s) height will range from a minimum of 80 feet to a maximum of 120 feet. The 23-acre coal pile would be unlined. A FEL will be used to move the coal around the new storage pile. Coal will be transported via FEL to conveyors from the new storage pile into the existing plant conveyor and storage system. Construction is expected to occur in 2019 and take 6-12 months. Non-Rosebud coal supply could occur as soon as 2019 but no later than January 1, 2020.

Talen has proposed to manage the new NR coal handling area with designs for a zero-discharge features, consistent with existing practices at the plant site. These features include directing all liquid runoff to be captured and conveyed to a sealed lined pond. The design of the lined pond would be designed according to the appropriate constructions standards for sizing such capture devices in relation to storm water event.

2.1 Decisions to Be Made

Based on the information submitted by Talen in its notice to amend the Certificate and additional information presented in this EA, DEQ will determine, pursuant to Section 75-20-219, MCA, whether the proposed amendment:

- would result in a material increase in any environmental impact of the facility, or
- would result in a substantial change in the location of all or a portion of the facility.

In order for DEQ to determine that an amendment to a certificate should be granted or modified, DEQ must find that the amendment would not materially alter the findings that were the basis for granting the certificate. DEQ's determination is limited to consideration of effects that the proposed change or addition to the facility may produce.

These determinations must be made within 30 days following notice by Talen of an application to amend a Certificate. Talen filed its notice with DEQ on March 15, 2019 and revised the application on March 29, 2019.

A person aggrieved by a final decision by DEQ on an application for amendment to a certificate may within 15 days appeal the decision to the Board of Environmental Review.

2.2 Other Agencies with Jurisdiction

A decision to amend the Certificate may require other additional permits for the project. Below is a list of those agencies and their regulatory responsibilities.

- DEQ: Montana Air Quality Permit #0513-11
- DEQ: General Permit for Stormwater Discharges Associated with Construction Activity
- DEQ: Major revision to the Rosebud Mine's postmining land use for Permit C1981003E
- Montana Department of Transportation: Right-of-Way Encroachment Permit

2.3 Public Involvement

This EA was posted on April 23, 2019 to DEQ's website, mailed to the active parties to original proceeding and released for public comment. It may be revised based on public comment. Comments may be mailed to:

Craig Jones
Montana Department of Environmental Quality
Facility Siting Program
PO Box 200901
Helena, MT 59602-0901
or emailed to crajones@mt.gov

Comments will be accepted no later than April 25, 2019. Due to statutory timelines this deadline cannot be extended.

3.0 Alternatives Considered

This section describes the alternatives that DEQ has considered during its review of the proposed amendment. Talen's proposed action and a No Action Alternative are considered.

3.1 Proposed Action

The amendment proposed by Talen described in Section 1.2 would be granted.

3.2 No Action

The No Action Alternative would mean that the Certificate would remain unchanged and no disturbance related to a new coal handling area would occur southeast of Units 3 and 4 Plant Site.

5.0 EA

Resource	No Action	Proposed Action
<p>1. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: Are soils present which are fragile, erosive, susceptible to compaction, or unstable? Are there unusual or unstable geologic features? Are there special reclamation considerations?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>The proposed coal handling area would be impacting about 12% of Rosebud Mine Area E in the northern sector. Area E was mined from 1976 to 1987 and the Plant Site property which has been only minimally reclaimed from historic mining or plant disturbance which was previously described in the original MFSA Certificate application. The area has been previously impacted by past mining, reclamation activities and Plant Site construction which has made the area void of unusual or unstable geologic features. Talen has proposed to strip and stockpile topsoil for the rail and within the rail loop. The stockpiling of the topsoil would accommodate the future reclamation of this area at the end of operations.</p>
<p>2. WATER QUALITY, QUANTITY AND DISTRIBUTION: Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>There are no surface water features impacted by the Proposed Action alternative as the disturbance would be on lands that have been previously mined. During construction of the Proposed Action, Talen would obtain a General Permit for Stormwater Discharges Associated with Construction Activity. The General Permit for Stormwater Discharges would require best management practices to reduce the potential discharge of pollutants, such as sedimentation, from the construction disturbances to surface waters. The operation phase of the alternative is designed to be a zero-discharge</p>

Resource	No Action	Proposed Action
		<p>facility. All stormwater and all water drainage would be routed to an approximately 29-acre lined pond capable of holding a 100-year, 24-hour storm event with sufficient storage to contain the storm event with 1.04 feet of freeboard. These measures would minimize adverse impacts to the groundwater or surface water from the proposed project.</p>
<p>3. AIR QUALITY: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I air shed)?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>DEQ's Air Quality Bureau completed a modification to Talen's Montana Air Quality Permit #0513-11 on March 13, 2019 which disclosed the air quality impacts of this Proposed Action. This EA is referencing the Air Quality Permit Modification and associated EA completed by DEQ on March 13, 2019 for only the air quality impacts on the Proposed Action Alternative. The modification to Talen's air quality permit included measures to reduce adverse impacts to this resource.</p>
<p>4. VEGETATION COVER, QUANTITY AND QUALITY: Will vegetative communities be significantly impacted? Are any rare plants or cover types present?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>Table 1 shows how much vegetation disturbance would occur for the Proposed Action. A large portion of the proposed area to be disturbed has been reclaimed mine lands identified as Area E under the requirements of the Montana Strip and Underground Mine Reclamation Act (MSUMRA) (82-4-201, et seq, MCA). DEQ has conducted multiple field inspections of Area E's revegetation status and on April 5, 2019 determined different levels of bond release. The entire Area E is 1395 acres and the Proposed Action will only disturb 12% of this</p>

Resource	No Action	Proposed Action
		<p>revegetation. There are no rare plant species in this reclamation. The paved access road would disturb an area immediately adjacent to Highway 39, directly south of Pond C, which is part of a mine runoff collection pond. This collection pond is a man-made storm water settling facility that supports trees and scrubs.</p>
<p>5. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>The same common game species are found in the Proposed Action Alternative areas as the currently approved for Plants Units 3 and 4 and impacts would be similar to those described in the Final EIS (DNRC/FEIS 1975). Due to past and current industrial activities this area is not an important habitat for wildlife.</p> <p>The Proposed Action Alternative is in General Habitat but is exempt from consultation with the Montana Sage Grouse Oversight Team. MSGOT approved an exception from consultation requirements for activities within an area defined by an Administrative Order on Consent (AOC). This exception was approved based on previous impacts from construction/operation of the Colstrip Units throughout the defined area. No new areas outside the boundary of the AOC-defined area would be disturbed, no leks are present within the AOC-defined area.</p>
<p>6. UNIQUE, ENDANGERED,</p>	<p>Under the No Action Alternative, the</p>	<p>The proximity of the Proposed Action to an industrial facility, a</p>

Resource	No Action	Proposed Action
<p>FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern?</p>	<p>amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>town and past mining activities; the area does not provide suitable habitat for species with the designation of state species of concern or federally listed threatened or endangered species. There are no wetlands features as identified in the National Wetland Inventory in the rail loop area or extension of the railroad. The paved access road would cross three wetland features. One is a riparian area that supports woody vegetation greater than 6 meters in height, the other feature is a palustrine system that seasonally floods which was created by a man-made barrier. The last wetland is completely within the reclaimed mine lands of Area E, which may have been present prior to mining and has been altered due to mining and reclamation activities.</p>
<p>7. HISTORICAL AND ARCHAEOLOGICAL SITES: Are any historical, archaeological or paleontological resources present?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.</p>	<p>The historical and archaeological site impacts would be similar to impacts to those described in the Final EIS from the original proceeds for siting Units 3 and 4. (DNRC/FEIS 1975). In addition to the entire Proposed Action Alternative been previously mined out and reclaimed or repurposed for the Units 3 and 4, impacts would be negligible.</p>
<p>8. AESTHETICS: Is the project on a prominent topographic feature? Will it be visible from populated or scenic areas? Will there be excessive noise or light?</p>	<p>Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there</p>	<p>The Proposed Action Alternative's most prominent feature would be the coal pile. The pile would be about 23 acres and range in height of 80 to 120 feet. The coal pile would be within a quarter mile of the Units</p>

Resource	No Action	Proposed Action
	would be no impact to this resource.	3 and 4's existing coal pile. Most viewers would be along Highway 39 and some occasional views from the town of Colstrip. The coal pile color of a darker black would contrast with surrounding reclaimed vegetation and the light tan color of Units 3 and 4 to the north. Also, the conveyor equipment could be observed by viewers. These features would add to the industrial views of the area like the existing Units 1 through 4. A negligible amount of light would be added to the landscape compared to what is already existing at the Units. Noise would be expected to be minor compared to the existing noise already produced at the Units.
9. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: Will the project use resources that are limited in the area?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The Proposed Action Alternative would slightly increase demand for water due to mitigations for pollution control and the additional energy to operate this equipment. Impacts on land, water, air, and energy would be minor and would be consistent to what is currently taking place at the site.
10. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: Are there other activities nearby that will affect the project?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The impacts to other environmental resources would be similar to the No Action Alternative.
11. HUMAN HEALTH AND SAFETY: Will this project add to health and safety risks in the area?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not	The impacts would increase transportation and rail track near the Proposed Action Alternative. There could be a minor health

Resource	No Action	Proposed Action
	occur; therefore, there would be no impact to this resource.	and safety risk due to the added traffic from the proposed traffic.
12. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: Will the project add to or alter these activities?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The impacts would slightly add more industrial features to the area of the Units 3 and 4. The Proposed would require 12% of the reclaimed Mine Area E to be returned to industrial activity instead of grazing land. The increase of rail and/or truck traffic to the existing infrastructure near the project would increase.
13. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: Will the project create, move or eliminate jobs? If so, estimated number.	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The additional transportation needed to bring in coal from other areas could increase employment in this sector. If Units 3 and 4 were to bring in NR coal, it could have a negative impact to Western Energy Company Rosebud Mine's employment if they were unable to secure a comparable customer as Colstrip for their coal.
14. LOCAL AND STATE TAX BASE AND TAX REVENUES: Will the project create or eliminate tax revenue?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The Proposed Action Alternative could increase tax revenue due to the additional features of the transportation area to the Units 3 and 4 Plant Site. If NR coal was used and Western Energy Company's Rosebud Mine was unable to secure a customer equivalent to the Colstrip Units, they might have to curtail mining at their current rate. This could reduce tax revenue to the state and local community.
15. DEMAND FOR GOVERNMENT SERVICES: Will substantial traffic be added to existing roads? Will other services (fire	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there	As shown in Table 1, truck and/or rail would increase near the Proposed Action. There could be more need for government services related to monitoring the transportation sector such as police, legal load limits and rail.

Resource	No Action	Proposed Action
protection, police, schools, etc.) be needed?	would be no impact to this resource.	
16. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The portion of the Proposed Action Alternative in Mine Area E would need to complete a major revision to the Rosebud Mine's postmining land use for Permit C1981003E for the post mine land use.
17. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?	None are present.	None are present.
18. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: Will the project add to the population and require additional housing?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The impacts would be the same as the No Action Alternative.
19. SOCIAL STRUCTURES AND MORES: Is some disruption of native or traditional lifestyles or communities possible?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	The impacts would be the same as the No Action Alternative.

Resource	No Action	Proposed Action
20. CULTURAL UNIQUENESS AND DIVERSITY: Will the action cause a shift in some unique quality of the area?	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	Due to the area being previously mined and its proximity to the existing Plant Site, the Proposed Action Alternative would not cause a shift in the quality of the area.
21. PRIVATE PROPERTY IMPACTS: Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category.) If not, no further analysis is required.	Under the No Action Alternative, the amendment would not be approved. Additional disturbance would not occur; therefore, there would be no impact to this resource.	DEQ's issuance of a decision on an amendment would affect the applicant's real property. DEQ has determined, however, that the amendment application is reasonably necessary to ensure compliance with applicable requirements under the Major Facility Siting Act and to demonstrate compliance with those requirements. Therefore, DEQ's issuance of the amendment would not have private property taking or damaging implications.

6.0 Cumulative and Secondary Impacts

The cumulative impacts analysis area is the largest disturbance of acreage of the Proposed Action plus about 2.25 miles north and 0.75 mile from the proposed new access along Highway 39 and the two miles north along the existing railroad. The cumulative area is either right-of-way owned by the state or rail owned by BNSF Railway and Talen Energy and a private landowner. A majority of this area is within the Administrative Order on Consent (AOC) identified as the Plant Site. The AOC is an enforcement action DEQ has taken against Talen over groundwater contamination caused by leaking ash ponds. The steps Talen must take to address these groundwater issues are outline in the AOC. There are several remedial groundwater activities at the Plant Site which the Proposed Action Alternative activities are unlikely to impact each other. The reclamation of Western Energy Rosebud Mine's Area E would be disturbed, and reclamation would not be completed for this small portion until after the use of NR coal has concluded.

A secondary impact from the Proposed Action would be the increased traffic on Highway 39 and rail traffic on the existing BNSF rail line. The truck traffic would be a substantial increase compared to the existing traffic. The new traffic compared to 2018 going north bound on Highway 39 from the new access road could be an increase of about 8% up to 59%. If the truck traffic were to go south bound from the new access road on Highway 39, the traffic compared to 2018 could increase by about 10% up to 70%. The rail traffic

would increase but would be controlled by scheduling by BNSF Railway to accommodate this additional rail traffic. Secondary impacts and cumulative impacts to soils could be the potential loss of topsoil due to erosion. Water quality impacts would be reduced by the best management practices required under a construction storm water permit and the proposed approach of being a zero-discharge facility during all phases of the project. Air quality secondary and cumulative impacts are disclosed and referenced in the associated EA completed by DEQ on March 13, 2019 for the air quality modification. Due to the disturbance of soils and existing vegetation cover could increase the potential for noxious weed into this area. Talen would continue to manage noxious weeds under their existing plan to minimize the spread of these weeds.

7.0 Further Environmental Review

The DEQ is using the environmental assessment format because the short timeframe required by statute for the determination does not allow sufficient time for preparation of a full or supplemental environmental impact statement and an EA is an appropriate level of environmental review for the proposed amendment. This approach is provided for in ARM 17.4.607(2)(e). The EA considers only the effects that the proposed change or addition to the facility contained in the notice for the certificate amendment may produce.

8.0 List of Preparer(s)

Craig Jones – MEPA/MFSA Coordinator

Reviewers:

Kristi Ponozzo – Public Policy Director

9.0 References

- Montana Department of Environmental Quality. 2019. "Pending Applications & Environmental Assessments." *Western Energy: Area E Bond Release SL16*. April 5. Accessed April 21, 2019.
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Table 1

Scenario	Delivery Method	Coal (Tons Per Yr)	Coal Pile and Balance of Rail Loop Acreage	Disturbance for new access road and/or new rail, unloading structures, conveyor, etc (Acres)	Grand Total Disturbance (Acres)	Trucks Per Hr	Trucks Per Day	Trucks Per Year
1	Truck	1 million	None - coal to existing pile	115.47	115.5	4	103	37,736
2	Truck	3.5 million	117.3	9.97	127.3	15	362	132,075
3	Truck	7 million	129.0	9.97	139.0	30	724	264,151
4	Rail	1 million	108.9	25.8	134.7	none	none	none
5	Rail	3.5 million	117.3	25.8	143.1	none	none	none
6	Rail	7 million	129.0	25.8	154.8	none	none	none
7*	Truck+Rail Maximum	3.5 million via truck + 3.5 million via rail	129.0	35.77	164.8	15	362	132,075

*There is actually 7 scenarios as the amendment language says "Utilize rail and or truck delivery...". Scenario 7 is the largest footprint of rail and truck. The MAQP only allows delivery of 7 million tpy in a 12 month period.