DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air and Waste Management Bureau
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DRAFT ENVIRONMENTAL ASSESSMENT (EA)

Issued To: NorthWestern Generation I, LLC
125 S. Dakota Avenue
Sioux Falls, SD 57104-6403

Air Quality Permit Number: #3154-04

Preliminary Determination Issued: 8/22/06
Department Decision Issued:
Permit Final:

1. *Legal Description of Site*: NorthWestern proposes to construct MMI, a natural gas-fired power plant to be located approximately 2 miles north of Great Falls. The legal description of the site is Section 30, Township 21 North, Range 4 East, in Cascade County, Montana. NorthWestern owns approximately 140 acres of property in the area and would use approximately 30 acres for the proposed facility.

2. *Description of Project*: The Department proposes to issue MAQP #3154-04 to NorthWestern for the construction and operation of a nominal 262-MW combined cycle natural gas-fired power plant. A full permit application, including BACT review, was submitted, since facility construction had not commenced within the three (3) years allowed by the 2002 permit.

   The facility would originally operate in simple cycle mode, and would consist of two General Electric Model PG7121EA gas turbines. Within two years, the facility would operate in combined cycle mode, and each of the above turbines would be supplemented with a HRSG and other ancillary equipment that would support operation of the turbines. The combined cycle turbines use the exhaust heat from the simple cycle turbines and additional heat from the duct burning (natural gas burners) to produce steam, which, in turn, drives a steam turbine. The turbines would be contained in a large building.

3. *Objectives of Project*: The objective of the project would be for NorthWestern to establish a nominal 262-MW natural gas-fired power plant to generate marketable electricity within their field of expertise (natural gas compression and transmission).

4. *Alternatives Considered*: In addition to the proposed action, the Department also considered the "no action" alternative. The "no action" alternative would deny the issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the "no action" alternative to be appropriate because NorthWestern demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no action" alternative was eliminated from further consideration.

5. *A Listing of Mitigation, Stipulations, and Other Controls*: A list of enforceable conditions, including a BACT analysis, would be included in Permit #3154-04.

6. *Regulatory Effects on Private Property*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and would not unduly restrict private property rights.

7. The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The "no action" alternative was discussed previously.

Potential Physical and Biological Effects							
		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats			X			yes
B.	Water Quality, Quantity, and Distribution			X			yes
C.	Geology and Soil Quality, Stability, and Moisture			X			yes
D.	Vegetation Cover, Quantity, and Quality			X			yes
E.	Aesthetics			X			yes
F.	Air Quality			X			yes
G.	Unique Endangered, Fragile, or Limited Environmental Resource			X			yes
H.	Demands on Environmental Resource of Water, Air, and Energy			X			yes
I.	Historical and Archaeological Sites			X			yes
J.	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Overall, the impacts from this project to terrestrial and aquatic life and habitats would be minor because of the relatively small portion of land, approximately 30 of the 140 acres owned by NorthWestern, that would be disturbed and the minor impact to the surrounding area from the air emissions (considering air dispersion characteristics).

Terrestrials (such as deer, antelope, rodents) use the general area of the facility. However, the surrounding area is currently a mix of predominantly agriculture with some industrial facilities. Other industrial facilities include the International Malting Company located on adjacent property, and Montana Refining Company, Malmstrom Air Force Base, and the proposed Montana Ethanol Project (formerly Agri-Technology Corporation or American Agri-Technology Operating, LLC), which are located within a few miles of the property boundary.

Aquatic life and habitats would realize little impact from the proposed facility because NorthWestern is not proposing to directly discharge any material to the surface or ground water in the area, other than a minor amount of stormwater.

The resulting deposition of air emissions to any water body would be minor. The permitted air emissions consume less than 75% of the PM10 Class II increment and less than 50% of the NOx increment. The relatively small amount of air impact would correspond to an equally small amount of deposition.

NorthWestern would use municipal water and sewer, which would result in very little impact on the terrestrial and aquatic life and habitats because the activities would result in minimal disturbance to land/water and the disturbances would be temporary in those areas that are not already disturbed. The sewer and water system upgrade may require a minor disruption of the area, but the impacts would be minor and of a short time duration. Overall, the impacts from this project to terrestrial and aquatic life and habitats would be minor.

B. Water Quality, Quantity, and Distribution

The proposed facility would result in minor impacts to water quality, quantity, and distribution in the area. All water for the facility would be obtained from the Great Falls municipal water supply, and all spent water would be discharged to the Great Falls city sewer, other than stormwater discharges. Construction stormwater will be permitted before construction, and a stormwater discharge permit will be permitted once construction is complete.

In a combined cycle power plant, fuel is combusted and the resulting heat is then used to create steam to turn a steam generator. Outlet steam from the generator is cooled in a cooling tower. Although a substantial amount of water would be used in the cooling tower, the water would be recirculated through the system for approximately 8 concentration cycles, minimizing the demand for water or sewer use. The cooling tower system would require 1,300 gallons per minute (gpm) make-up water, which is evaporated or blown-down to the sewer. Other water necessary for plant operation would be potable water and sanitary sewer service for approximately 15 people, and the water necessary for general plant cleaning.

As described in Section 7.F of this EA, the maximum impacts from the air emissions from this facility would be relatively minor, and therefore the corresponding deposition of the air pollutants in the area would also be very minor. Furthermore, based on the dispersion characteristics (wind speed, wind direction, atmospheric stability, stack temperature, etc.) of the area, the highest impacts would not be at or near the river or other surface water.

The impacts from the water demands for this facility would be minor, due to the make-up water required for the cooling tower. However, there would only be minor water quality impacts from discharges since all spent water is discharged to the municipal sewer system and there will be insignificant stormwater discharge.

C. Geology and Soil Quality, Stability, and Moisture

The impacts to the geology and soil quality, stability, and moisture from this facility would be minor because the project would impact a relatively small portion of land and the amount of resulting deposition of the air emissions would be small. Approximately 30 acres or less would be disturbed for the physical construction of the power plant. Soil stability in the immediate vicinity of the proposed facility would likely be impacted by the new footings and foundations required for the facility. The major construction required for the facility would be the building that would house the turbines. The building dimensions would be approximately 100-feet wide, 315-feet long, and 30-feet high.

The facility would not be discharging any material directly to the soil of the immediate area other than stormwater discharge. Some of the air emissions from the facility may deposit on local soils, but that deposition would result in only a minor impact to local areas because of the air dispersion characteristics of the area (see Section 7.F of this EA).

Any water/sewer/site upgrades during construction would result in very little impact on the geology and soil quality, stability, and moisture because the activities would result in minimal disturbance to land/water and the disturbances would be temporary.

D. Vegetation Cover, Quantity, and Quality

The proposed project would result in minor impacts on the vegetative cover, quantity, and quality in the immediate area because only a small amount of property would be disturbed and the resulting deposition from air emissions would be relatively small. Approximately 30 acres of land would be impacted by the construction and operation of the facility. In comparison to the surrounding agricultural and industrial properties, the disturbance of this acreage would be a very small percentage of the vegetative cover in the area. See Section 8.D of this EA. In addition, as described in Section 7.F of this EA, the impacts from the air emission from this facility are minor. As a result, the corresponding deposition of the air pollutants on the surrounding vegetation would also be minor.

Any water/sewer/site improvements would have little, if any impact on the vegetation in the area because the disturbances would occur on previously disturbed land, such as agricultural or sites already disturbed, and other relatively small portions of land. Those disturbances would be of short duration and the area would eventually return to their current status. Therefore, the proposed project would result in minor impacts on the vegetative cover, quantity, and quality.

E. Aesthetics

The impacts to the aesthetics of the area from this project would be minor because the size of the structures required for this facility would be relatively small, other industrial and commercial facilities/structures are located in the nearby area, the facility would barely (if at all) be visible from gathering places along the river, and the noise from the facility would be low. The facility would consist of one large building approximately 30 feet tall, and other ancillary equipment that would support the operation of the facility. The simple cycle stacks will be 92 feet tall; the combined cycle stacks will be 120 feet tall. For reference, silos and other structures for the nearby IMC are approximately 108 feet tall.

MMI would be visible from Highway 87 (approximately ½ mile away) and may be partially visible from the Lewis and Clark Interpretive Center (approximately 1.8 miles away) and Giant Springs Heritage State Park (approximately 1.9 miles away). Based on other structures visible from the Lewis and Clark Interpretive Center, such as the radio/television towers, the water tank, houses, and electrical substations, it appears that a small portion of the two 120 foot stacks at MMI may be visible. In addition to the partially visible stacks, steam plumes would be visible from the facility on those days with temperatures low enough to cause steam plumes to form.

The MMI facility would not affect the Upper Missouri River Breaks National Monument.

The land at the proposed site is currently used for agricultural purposes; however, other industry currently operates in the surrounding area. IMC is located in the same industrialized area, and a bus "yard" is adjacent to the facility. In addition, Montana Refining Company is located approximately 2 miles away, Montana Ethanol Project (formerly Agri-Technology Corporation or American Agri-Technology Operating, LLC) is proposed to locate at a site approximately 3.8 miles away, Malmstrom Air Force Base is located approximately 4 miles away, and numerous radio/television towers are nearby.

MMI would result in additional noise for the area. The noise impacts from this facility on the surrounding area would be minor because the noise from the facility is relatively quiet when compared to other common sources and the distance to the nearest residence is approximately ½ mile away. The near field sound pressure level (SPL) contribution from the GE-supplied equipment is guaranteed not to exceed 96 decibels (dBA) when measured 3 feet in the horizontal plane and at an elevation of 5 feet above machine baselines or personnel platforms with the equipment operating at base load. The far field SPL contribution is guaranteed not to exceed 67 dBA when measured at a distance of 400 feet from the nearest equipment and operated at the rated load. For reference, normal street noise is estimated to be approximately 70 dBA, and normal close-up conversation is estimated to be approximately 60 dBA. In addition, since noise impacts are minimized by distance, the fact that the nearest resident is approximately ½ mile (2640 feet) from the facility location would further minimize the impacts from this facility.

The area would also receive increased vehicle use as a result of the proposed project; however, the Department does not believe that the amount of vehicle trips in the area would increase substantially over the existing traffic in the area. The vehicles would likely use the existing roads in the area en route to the roads established as part of the actual facility.

Visible emissions would be limited to 20% opacity. There would not be an increase in odors with the addition of this facility to the area because odors from the combustion of natural gas exist in negligible amounts and are only slightly perceptible, if at all. Currently, odors from the existing refinery are noticeable throughout the Great Falls area and would overwhelm any odors from the proposed facility.

Overall, the impacts to the aesthetics of the area from this project would be minor.

F. Air Quality

The proposed MMI facility would result in minor air quality impacts.

MMI's potential emissions of regulated pollutants in the simple cycle phase are: 99.3 tpy of NO_x, 3.0 tpy of sulfur dioxide SO_2, 25.0 tpy of PM_{10}, 20.3 tpy of VOCs and 86.9 tpy of CO. MMI's potential emissions of regulated pollutants in the combined cycle phase are: 79.2 tpy of NO_x, 11.9 tpy of SO_2, 99.1 tpy of PM_{10}, 21.9 tpy of VOCs and 95.3 tpy of CO.

The air quality classification for the MMI project area is "Unclassifiable or Better than National Standards" (40 CFR 81.327) for the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The closest Class I area is the Gates of the Mountains wilderness area located approximately 75 kilometers (km) southeast of the site.

Emissions of NO_x, SO_2, CO, PM_{10} and VOC were modeled to demonstrate compliance with the Montana and National Ambient Air Quality Standards (MAAQS). PSD increment compliance demonstration was also provided NO_2 and PM_{10} because the project has significant NO_2 and PM_{10} impact and the minor source baseline date for NO_2 and PM_{10} has been established in the area. Modeling results are included in the permit analysis.

In addition to the modeling analyses, a BACT analysis was performed as part of the permit action. MMI proposed to install low NOx burners, selective catalytic reduction units and a catalytic oxidizer to substantially reduce NO_x and CO respectively. The results of the BACT analysis were factored into the modeling analysis.

Furthermore, MMI requested limits within the permit to stay below the New Source Review permit thresholds. The permit would contain an annual emission limit of less than 100 tons per year (tpy) each for NO_x, CO, and PM/PM_{10}.

NorthWestern would also emit HAPs. A major facility for HAPs is defined as a stationary source that has the potential to emit more than 10 tons per year of any individual HAP or 25 tpy of all HAPs combined. The highest individual emission rate of an individual HAP would be approximately 2 tpy, and the combined emission rate of all HAPs would be about 7 tpy. Not only is this source not considered a major source for HAPs, but any impact from HAPs would be minor because the emissions of the HAPs would be dispersed by the wind speed, wind direction, atmospheric stability, stack temperature, and other dispersion parameters in the area.

NorthWestern would emit carbon dioxide (CO_2), which is not a regulated pollutant under either the Federal or Montana Clean Air Acts. Any impact from CO_2 would also be minor when compared to the CO_2 emissions from other industrial sources in the state and other natural sources of CO_2. Power in Montana is generally created using either one of two fuels—natural gas or coal. Coal-fired power plants generate 1.8 times more CO_2 than a similar sized natural gas fired power plant.

Upgrading the water /sewer/utilities for MMI would result in very little air quality impact because no major air emission activities would be required. The sewer and water system upgrade may require the use of motor vehicles, but the impacts would be minor and of a short time duration. Similarly, minor fugitive dust emissions would result from the sewer and water system upgrade as well, but the emissions would be temporary.

The modeling results for renewal of NorthWestern's natural gas-fired power plant project have demonstrated compliance with the NAAQS/MAAQS and PSD increments. Overall, the air impacts from MMI are expected to be minor.

G. Unique, Endangered, Fragile, or Limited Environmental Resources

To identify any species of special concern in the immediate area of the proposed project, the Department contacted the Montana Natural Heritage Program of the Natural Resource Information System (NRIS). The Natural Heritage Program files identified two species of special concern in the 1-mile buffer area surrounding the section, township, and range of the proposed facility. The two plant species identified were the *entosthodon rubiginosus* and the *funaria americana*. Both of these species are found on or near the Missouri River. The search results indicated that both of these plant species were previously recorded within a 5-mile radius (approximately 2 miles). The 5-mile radius includes a small portion of the Missouri River.

Based on the modeled air quality impacts from NorthWestern, the proposal would have little, if any chance of impacting the unique, endangered, fragile, or limited environmental resources in the area. Due to the plume characteristics from the proposed facility, the emissions would predominantly be carried to the north and east of the facility, away from the location of the plant species of special concern.

The proposed project would have minor impacts on limited, non-renewable resources because the amount of natural gas consumed by the facility would be relatively small in comparison to the natural gas consumption in Montana and the nation. See the discussion of Energy in Section 7.H of this EA.

H. Demands on Environmental Resource of Water, Air, and Energy

As described in Section 7.B of this EA, impacts to the water resource would be minor because, although the cooling tower would require approximately 1,300 gpm make-up water, the water would either evaporate or be discharged back to the city through the sewer system. The facility will not directly discharge any material to the surface or ground water in the area other than a minor amount of stormwater runoff.

As described in Section 7.F of this EA, the impact on the air resource in the area of the facility would be minor. Ambient air modeling for NO_X, CO, VOC, PM, PM_{10}, and SO_2 was conducted for the facility at "worst case" conditions that demonstrates that the emissions from the proposed facility would not exceed any ambient air quality standard. As a result of the ambient air quality analysis presented in Section 7.F of the EA, Permit #3154-04 would contain conditions limiting the emissions from the facility.

The impacts to the energy resource from this facility would be minor. The facility would consume approximately 17,500 MMscf/year of natural gas. In comparison to the natural gas consumed nationally and many other facilities in the area, this is minor.

I. Historical and Archaeological Sites

The impacts on historical and archaeological sites would be minor because the site location contained no visible standing structures, the facility would physically impact a small amount of property (approximately 30 acres), the facility would locate within an area that has been plowed for agricultural purposes, and the site location is in an area that would likely not have been used for any significant historical or archaeological activity. The lack of standing structures indicates lack of historical activity within the proposed site location. Since the topsoil in the area is 4-6 inches thick and covers glacial gravel, any possibility of historical or archaeological material being present was destroyed by the agricultural activities (plowing) in the area.

The physical location of the site also indicates that it was not likely a location for significant historical or archaeological activity. The site location is located in rolling terrain on the bench above the Missouri River. The nearest portion of the Missouri River to the site location is approximately 1.5 miles away, and the bluff is approximately 1.25 miles away from the site location.

The Department contacted the Montana Historical Society – State Historic Preservation Office (SHPO) in an effort to identify any historical, archaeological, or paleontological sites or findings near the proposed project. SHPO's records indicate that there are currently no previously recorded cultural properties within the project site. Because of the fact that severe agricultural activities have occurred in the area, the likelihood of finding undiscovered or unrecorded historical properties is practically nil.

In an effort to expand the cultural resource inventories available in the state, SHPO recommended that a cultural resource inventory be conducted prior to the construction. However, neither the Department nor SHPO has the authority to require NorthWestern to conduct a cultural resource inventory. SHPO did not identify that they had concern that historical, archaeological, or paleontological sites were present on the site. In fact, numerous other structures have been constructed in the immediate area of the facility with no identification of historical or archaeological artifacts to SHPO.

J. Cumulative and Secondary Impacts

Overall, the cumulative and secondary impacts from this project on the physical and biological aspects of the human environment would be minor. In addition, the highest impacts from industrial sources, other than IMC, are not expected to occur the same receptors as the MMI impacts. The modeling analysis indicates that the cumulative emissions from MMI and other industrial facilities will not violate the MAAQS, NAAQS or Class II PSD increments.

8. The following table summarizes the potential social and economic effects of the proposed project on the human environment. The "no action" alternative was discussed previously.

Potential Social and Economic Effects							
		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Social Structures and Mores				X		yes
B.	Cultural Uniqueness and Diversity				X		yes
C.	Local and State Tax Base and Tax Revenue			X			yes
D.	Agricultural or Industrial Production			X			yes
E.	Human Health			X			yes
F.	Access to and Quality of Recreational and Wilderness Activities				X		yes
G.	Quantity and Distribution of Employment			X			yes
H.	Distribution of Population				X		yes
I.	Demands for Government Services			X			yes
J.	Industrial and Commercial Activity			X			yes
K.	Locally Adopted Environmental Plans and Goals				X		yes
L.	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL SOCIAL AND ECONOMIC EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores
B. Cultural Uniqueness and Diversity

The proposed facility would not cause a disruption to any native or traditional lifestyles or communities (social structures or mores, or cultural uniqueness and diversity) in the area because the land use proposal would not be out of place given the industrial land use of the larger area surrounding the proposed site and the fact that the immediate surrounding area would remain agricultural.

C. Local and State Tax Base and Tax Revenue

The facility would have a minor effect on the local and state tax base and tax revenue because it would generate approximately $2.5 million dollars per year in state and local taxes, would generate taxes for approximately 25 years (including the 5-year tax holiday), and would employ numerous people (taxpayers) during construction and approximately 15 people after completion. MMI would be privately funded.

Cascade County officials submitted information during the public comment period for Permit #3154-00 that indicated an additional $2.5 million dollars in new state and local property taxes would result from the facility. The collection of the $2.5 million dollars in property taxes would begin after a statutory 5-year tax holiday. Of the $2.5 million dollars, the local tax benefits would include $422,000 per year for Cascade County, $425,000 per year for the City of Great Falls, and $800,000 per year for Great Falls Public Schools. Also noted in the correspondence from Cascade County was the fact that the power plant would pay high taxes while requiring fewer than average services.

Comments were received during the public draft stage for Permit #3154-00 questioning why the citizens of Great Falls and Montana should have to subsidize the taxes forfeited during the 5-year tax holiday. In response to this comment, the Department contacted the Department of Revenue and found out that the citizens of Montana would not be subsidizing the taxes forfeited during this period. Furthermore, the tax benefit from the proposed facility outweighs the forfeited taxes during the tax holiday by a substantial margin. According to NorthWestern officials, the business plan for this facility is based on operating 25-30 years.

Comments were also received during the public draft stage for Permit #3154-00 that questioned the impact this facility would have on property values in the area. The proposed plant would be located approximately ½ mile (2640 feet) from the nearest residence and should not be aesthetically obtrusive. Other factors that are traditionally associated with a decrease in property values such as odors, fumes, or significant increases in traffic, dust, vibration, or noise would not be present at this location. In addition, an appraisal of individual tracts is beyond the scope of environmental analysis required by the Montana Environmental Policy Act.

D. Agricultural or Industrial Production

The impacts to agricultural and industrial production in the area from this facility would be minor because the facility would physically impact such a small amount of land, the impact from the air emissions on the land would be small, and the amount of electricity produced to assist other industrial activities within the state is relatively small. The facility would be located on 30 acres of the 140 acres owned by NorthWestern.

As described in Section 7.F of the EA, the air quality impacts from this facility are minor, and the resulting deposition of the pollutants from the NorthWestern project is consequently also minor. In addition, as described in Section 7.F, the fact that the facility would comply with the NAAQS (protect public health and promote public welfare) indicates that the impacts from the facility would be minor.

The NorthWestern facility may assist other industrial production because information submitted as part of the original application indicated that two-thirds of the power (175 MW) would be available to Montana sources to potentially assist with industrial production. In comparison to the power demands of industrial sources within Montana, the amount of power available to the industrial sources is relatively small.

E. Human Health

As described in Section 7.F of the EA, the impacts from this facility on human health would be minor because the impact from the air emissions would be greatly dispersed before reaching an elevation where humans were exposed. Also, as described in Section 7.F, the modeled impacts from this facility, taking into account other dispersion characteristics (wind speed, wind direction, atmospheric stability, stack height, stack temperature, etc.), are well below the MAAQS, NAAQS, and PSD Increments. The air quality permit for this facility

incorporates conditions to ensure that the facility would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

Besides the criteria pollutants, the impacts from HAPs would also be greatly minimized by the dispersion characteristics of the facility and the area (wind speed, wind direction, atmospheric stability, stack temperature, facility emissions, etc.). Impacts from other common activities (such as fueling your vehicle for example) would have a greater impact on human health for HAPs because of the concentrations at the point of exposure.

F. Access to and Quality of Recreational and Wilderness Activities

The facility would not have an impact on recreational or wilderness areas. The recreational activities in the area are approximately 1½ to 2 miles away, and most of the nearby recreational activities are upwind of the predominant wind pattern. No significant recreational or wilderness activities exist within the NorthWestern property boundaries. Based on the modeling analysis (see Section 7.F of the EA) and the distance between and direction from the recreational sites and the MMI site, there should not be noticeable impacts to recreational opportunities in the area.

Furthermore, the project would not affect the Upper Missouri River Breaks National Monument since it is approximately 36 miles from the site location of the proposed MMI power plant.

G. Quantity and Distribution of Employment

There would be a minor effect on the employment of the area from this project because it would result in numerous construction-related employment opportunities and approximately 15 full-time positions. NorthWestern estimates that approximately 100 employees would be needed for the construction of the facility. Upon completion, the normal operation of the power plant would employ approximately 15 people, full-time.

When feasible and economical, NorthWestern plans on using local contractors and workers for construction and operation. The feasibility would be dependent on availability and qualifications. As far as economical, NorthWestern contends that the lowest cost contractors would have the best chance of being utilized.

The sewer and water system upgrades would require some construction and corresponding man-hours. However, the impacts on quantity and distribution of employment would be minor because the required work would be temporary and would likely be handled by current employees of the City of Great Falls.

H. Distribution of Population

The entire project would not affect the normal population distribution in the area because, excluding the 15 full-time positions that would result from the power plant, the remainder of the jobs created from this project would be temporary. Neither the 15 full-time positions nor the numerous temporary construction-related positions would likely affect the distribution of population in the area.

Most employees required for the construction and operation of the power plant would likely be from Great Falls or temporarily locate within Great Falls since housing would be easier to locate. For the other construction related activities with this project, the employees would likely be existing staff in the area and would likely not be moving to Great Falls.

I. Demands of Government Services

Demands on government services from this facility would be minor because, as described in the letter from Cascade County, the facility would pay relatively high taxes and require fewer than average government services. Minor increases may be seen in traffic on existing roads in the area while the facility is operating. All water for the facility would be obtained from the Great Falls municipal water supply, and all spent water would be discharged to the Great Falls city sewer.

The acquisition of the appropriate permits by the facility, the permits for the associated activities of the project, and compliance verification with those permits would also require minor services from the government.

J. Industrial and Commercial Activity

The MMI facility would represent a minor increase in industrial activity in the area. The facility would operate 24 hours a day and 7 days per week generating electricity.

K. Locally Adopted Environmental Plans and Goals

The City of Great Falls contains an area that was previously classified as nonattainment area for CO along 10th Avenue South. However, the area has been redesignated as attainment. Furthermore, the proposed facility is outside of the nonattainment area and would result in only minor impacts because the CO emissions from the facility have been modeled to demonstrate that the facility would not have a significant impact on CO. The modeling inputs were based on the "worst case" CO emissions from the facility. Not only would the facility seldom operate at "worst case" conditions, but the prevailing wind pattern in the area would carry the emissions from the facility to the north and east of the plant, away from the nonattainment area.

The Department is unaware of any other locally adopted environmental plans and goals that would be affected by the facility or the other portions of the project as identified at the beginning of this EA.

L. Cumulative and Secondary Impacts

Overall, the cumulative and secondary impacts from this project on the social and economic aspects of the human environment would be minor because several new full-time employment opportunities would result, many construction related employment opportunities would be available, and the facility would sell reasonably priced power to other residents and industries in Montana.

The MMI project would result in additional jobs for the Great Falls area. As described in Section 8.G of this EA, the facility would employ approximately 15 full-time people and approximately 100 people during the construction phase. The "day-to-day" normal operation positions and the construction-related positions created by the NorthWestern project would bring additional money into the Great Falls economy.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: All potential effects resulting from construction and operation of the proposed facility are minor, therefore, an EIS is not required. In addition, the source would be applying the Best Available Control Technology and the analysis indicates compliance with all applicable air quality rules and regulations.

Other groups or agencies contacted or which may have overlapping jurisdiction: Department of Environmental Quality – Permitting and Compliance Division (Air and Waste Management Bureau); Montana Natural Heritage Program; and State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Department of Environmental Quality (Air and Waste Management Bureau and Water Quality Bureau) Montana Natural Heritage Program, and State Historic Preservation Office (Montana Historical Society).

EA Prepared By: Christine Weaver
Date: 08/14/06