AGENDA

Montana Sage Grouse Oversight Team (MSGOT)

February 24, 2021: 2:00p.m. – 4:00p.m.

Zoom Webinar / Video Conference Meeting

2:00 – 2:20: Call to Order and Administrative Matters, Michael Freeman, MSGOT Chair

- Introductions
- Zoom Webinar logistics

2:20 – 3:50: Clearwater Wind Project Proposed Mitigation

- Introduction
- Presentation of the proposed Clearwater Wind Facility
- MSGOT Discussion
- Public Comment
- Any additional MSGOT Discussion and Executive Action

3:50 – 4:00: Public Comment on Other Matters

4:00: Adjourn

NOTE: Agenda item times are approximate. Actual times may vary by up to one hour. Attendees who may need services or special accommodations should contact Carolyn Sime (406-444-0554 or csime2@mt.gov) at least 5 working days before the meeting.

MONTANA SAGE GROUSE OVERSIGHT TEAM AGENDA ITEM BRIEF SHEET

FEBRUARY 24, 2021

AGENDA ITEM: CLEARWATER WIND PROJECT PROPOSED CORPORATE GUARANTY TO ADDRESS MITIGATION

ACTION NEEDED: EXECUTIVE ACTION TO APPROVE AND ACCEPT THE PROPOSED CORPORATE GUARANTY OFFERED BY CLEARWATER ENERGY RESOURCES LLC FOR MITIGATION ASSOCIATED WITH THE CLEARWATER WIND PROJECT

SUMMARY:

This agenda item addresses a request from Clearwater Energy Resources LLC (Clearwater) that MSGOT approve and accept a mitigation plan that provides a combination of cash and a corporate guaranty for the proposed Clearwater Wind Project (Project).

Clearwater is a wholly owned, indirect subsidiary of NextEra Energy Resources, LLC (NextEra). NextEra acquired Clearwater in November 2019 from Orion Renewable Energy Group, which had begun development in 2013. No state permits were issued by state agencies prior to the 2015 effective date of Executive Order 12-2015.

Clearwater has proposed a wind facility to produce approximately 750 megawatts of energy at full build-out, along with an approximately 100 mile-long transmission line that would interconnect to the electrical grid through an existing substation near Colstrip, Montana. Additional infrastructure associated with the project includes roads, underground electrical collection and communication systems, three substations, an operations and maintenance building, four meteorological towers, temporary workspaces for construction laydown areas, and a concrete batch plant.

The Project is in Rosebud, Custer, and Garfield counties and would be sited on private and State Trust Lands. Approximately half of the Project's direct footprint would be in the Rosebud Core Area and General Habitat to the north, east, and south. The remainder is sited outside of designated habitat.

Clearwater's coordination with the Sage Grouse Habitat Conservation Program (Program) has been ongoing since February 2020. Clearwater provided the Program a near-final Project layout in November 2020 with minor, final revisions in January 2021. In February 2021, the Program issued their analysis and Clearwater submitted a mitigation plan, which includes an initial cash contribution and a corporate guaranty component addressing Program and Clearwater differences in interpretation on how policy multipliers should be applied.

Clearwater seeks to initiate construction in summer 2021 (outside of Core Area habitat) and is requesting approval of the mitigation plan from the Montana Sage Grouse Oversight Team to secure necessary state permits while the parties determine Clearwater's final mitigation obligation. Clearwater will offset impacts of the project through a contribution to the Stewardship Account in lieu of undertaking permittee responsible mitigation.

Clearwater has voluntarily offered and requests MSGOT approve and accept an initial cash contribution with corporate guaranty now to enable the permitting process to move forward. Clearwater would make an initial Account contribution of $2,634,843.13 prior to initiating construction activities that is equivalent to the cost of credits that would be required to offset the number of functional acres lost over the life of the Project. A corporate guaranty in favor of the state for $3,802,595.50 would then be provided by Clearwater. The maximum amount represents the outer limit of any remaining mitigation attributable to policy multipliers that could reasonably be anticipated under the Program's analysis. This ensures that sufficient funds would be available for a future contribution once the final mitigation outcomes are determined in the coming weeks.

[continued]

PROGRAM RECOMMENDATION:
The Program Manager recommends MSGOT approve and accept Clearwater's mitigation plan including an initial cash contribution with corporate guaranty for differences over policy multipliers associated with the Project.

Clearwater Wind Project
Sage-Grouse Mitigation Plan
Project 3288
February 22, 2021

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1.0 Background

The Clearwater Wind Project (Project) has been in development for over eight years. Project development began in 2013, at a time when Montana was still in the process of establishing its sage-grouse conservation strategy. Over the next six years, the Project was studied, planned, and sited as Montana developed its conservation strategy through executive order, statute, regulation, and finally guidance manuals. The Project entered into lease agreements with local landowners based on existing law and guidance in force at the time, which generally consisted of Montana Executive Order (EO) 12-2015 and the Montana Greater Sage-Grouse Stewardship Act of 2015, Montana Code Annotated (MCA) 76-22-101, *et seq*.

Clearwater Energy Resources LLC (Clearwater), a wholly owned, indirect subsidiary of NextEra Energy Resources, LLC, was acquired from Orion Renewable Energy Group, the original project developer, in the fall of 2019. Shortly thereafter, Clearwater began discussing the Project with the Montana Sage Grouse Habitat Conservation Program (Program), including, but not limited to, the following

- March-April 2020: Initial consultation and Program evaluation of proposed, preliminary disturbances (transmission line right-of-way and turbine locations).
- October 2020: Following field micrositing that occurred during spring, summer, and fall 2020, Clearwater submitted near-final Project disturbances for further consultation and review by the Program.
- November-December 2020: The Program issued its Habitat Quantification Tool (HQT) results in November, inclusive of policy multipliers (Appendix A). Clearwater met with the Program on multiple occasions to discuss the Program's review of the Project and its application of policy multipliers. Unable to reach consensus on the Program's review and application of applicable law and guidance documents, Clearwater submitted an objection letter in December 2020, providing a formal response to the Program's review, and asserting its legal arguments with respect to the Program's application of policy multipliers associated with the Project.
- January-February 2021: Clearwater resubmitted the Project in January through the Program's online tool for consultation with minor updates to the layout including the removal of alternate locations associated with various disturbance types. The Program provided draft HQT results in February (Appendices B and C).

The purpose of this mitigation plan is to summarize Clearwater's adherence to the mitigation sequence, which is to avoid, minimize, reclaim, and mitigate impacts of the Project to sage-grouse. It includes a statement of the compensatory mitigation obligation under Clearwater's interpretation of various policy multipliers while also referencing the Program's differing interpretation and application of policy multipliers in its review. Clearwater intends to fulfill its mitigation obligation by means of direct payment to the Sage-Grouse Stewardship Account and is prepared to make payment upon Montana Sage Grouse Oversight Team's (MSGOT) adoption of Clearwater's estimated debit total of $4,059,431. If MSGOT does not adopt Clearwater's proposed debit total, this plan includes an alternative means for Clearwater to satisfy its mitigation obligation, which includes making an initial contribution to the Stewardship Account in the amount of $2,634,843 and securing payment for remaining contribution by means of a corporate guaranty (Appendix D). This alternative would allow for Project permitting and initial construction to occur while the parties determine the final contribution amount, as approved by MSGOT.

2.0 Introduction

Clearwater's proposed Project consists of an approximately 750-megawatt (MW) wind farm (Wind Farm) and an approximately 100-mile transmission line (Transmission Line) in Rosebud, Custer, and Garfield counties, Montana (Appendix E–Figure E1). Over the first 30 years, the Project will bring many benefits to the region, such as:

- Millions in annual property tax revenue for local schools and services.
- Millions in annual payments to private landowners to help farmers/ranchers balance high input costs, low commodity prices, and drought conditions.
- State land lease payments that will further support the State of Montana.
- Up to 350 construction and 20 full-time jobs.
- Contributions totaling over $150,000 (per year of Project operation) to the Southeastern Montana Development Corporation for youth activities, student scholarships, matching grants, medical retention, and water infrastructure studies.
- Clean, home-grown electricity with no air or water pollution.

Since beginning development in 2013, the Project has conducted various desktop and wildlife studies for an area that was larger than the current Project's extent. The wildlife studies were conducted in accordance with the recommendations of the U.S. Fish and Wildlife Service (USFWS) *Land-Based Wind Energy Guidelines* (USFWS 2012) and USFWS *Eagle Conservation Plan Guidance* (USFWS 2013), and in consultation with the USFWS and Montana Fish, Wildlife, and Parks (MFWP). Based on these studies and consultations, the Wind Farm was modified to avoid nesting golden eagles (*Aquila chrysaetos*) and active greater sage-grouse (sage-grouse; *Centrocercus urophasianus*) leks, and the Transmission Line was co-located with existing disturbances and designed to minimize impacts where feasible. The Project location balances many factors impacting siting of infrastructure, such as available wind resource relative to electrical interconnections (e.g., existing substations), landowner participation, avoidance of federal lands, existing infrastructure and accessibility (e.g., roads), and consideration of impacts not only to sage-grouse, but also to aquatic, biological, and cultural resources.

This mitigation plan was developed based on consultation with the Program and select members of the MSGOT, the Program's evaluation of the Project and application of policy multipliers, Clearwater's objections to the Program's application of certain site-specific policy multipliers, EO 12-2015, the *Montana Mitigation System Policy Guidance Document for Greater Sage-Grouse* V.1 2018 (Policy Guidance; Montana Mitigation Stakeholders Team 2018a), and the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* V.1 2018 (HQT Manual; Montana Mitigation Stakeholders Team 2018b). This plan also considers that the Project will:

- minimize impacts by co-locating with existing disturbances to the extent possible,
- not require ongoing construction disturbance once completed, and
- provide considerable economic benefit to the local community.

2.1 Project Description

The Wind Farm encompasses approximately 147,000 acres in Rosebud, Custer, and Garfield counties, Montana (Appendix E–Figure E1) and will consist of approximately 269 turbines, access roads, underground electrical collection and communication systems, three collection substations, an operations and maintenance building, four permanent meteorological (Met) towers, and temporary workspaces for a construction laydown areas and a concrete batch plant. The Wind Farm's nameplate generating capacity of approximately 750 MW will come from a mix of 2.82-MW and 2.5-MW General Electric wind turbines. The generated power will interconnect to the electrical grid through the Transmission Line to an existing substation within the city limits of Colstrip (Appendix E–Figure E1). Table 1 describes Project-related infrastructure occurring in sage-grouse habitat and evaluated in the Program's HQT.

The Project occupies multiple habitat types and ecoregions. The Wind Farm lies in the Montana Central Grasslands Level IV Ecoregion (U.S. Environmental Protection Agency [USEPA} 2017). All Wind Farm turbines are intentionally sited outside of the sage-grouse Core Area. Of the 269 turbines, 147 are in areas mapped as sage-grouse General Habitat (see Section 4.2 for additional detail), and the remainder are outside of habitat. Within the Wind Farm, large sections of the eastern portion consist of grasslands, scattered shrub/scrub, and cropland, while the western and central portions are more heavily fragmented by cropland (National Land Cover Database 2016; Appendix E–Figure E2).

The Transmission Line spans the Montana Central Grasslands Level IV Ecoregion and the Pine Scoria Hills Level IV Ecoregion (USEPA 2017). The Transmission Line spans approximately 16.5 miles of an area outside of sage-grouse habitat, 42.1 miles of General Habitat, and 43.1 miles of Core Area (Appendix E–Figure E1). The area outside of sage-grouse habitat is characteristic of cultivated cropland. The General Habitat is grassland, cropland, and scattered sagebrush (*Artemisia* spp.). The Core Area is predominantly sagebrush, with small grassland breaks and minimal disturbance before transitioning into General Habitat and ponderosa pine (*Pinus ponderosa*; evergreen) forest breaks to the south (Appendix E–Figure E2). However, the Transmission Line in Core Area is largely co-located with the existing Little Porcupine Creek Road (see Sections 3.0 and 4.0 for more detail on co-location).

Project construction is expected to start by summer of 2021 and will occur through calendar year 2022 with commercial operation expected by the end of 2022. Spatially, construction will occur outside of seasonal timing restrictions (March 15 to July 15) in Core Area habitat. Construction in Core Area will occur from July 16, 2021, through March 14, 2022. The commercial life of the Wind Farm is expected to occur over a 30-year period (2022 –2052) and the commercial life of the Transmission Line is expected to occur over a 50-year period (2022-2072).

Table 1: Project-related infrastructure located in in sage-grouse habitat for the Clearwater Wind Project and Habitat Quantification Tool (HQT) Inputs.				
	Habitat		**HQT Inputs**	
Infrastructure Type	**General**	**Core**	**Permanent**	**Temporary**
Wind Turbines	147*	None	40-foot radius	394-foot radius
Underground Collection Lines	94 miles	0.51 miles	None	10 feet
Meteorological Towers	4	None	5-foot radius	0
Access Roads	79.4 miles	0.9 mile	16 feet	30 feet
Substation	1	None	1 acre	15 acres
Laydown Yards	5	None	0	104 acres
Transmission Line Right-of-Way	42.1 miles	43.1 miles	150 feet	0

*122 turbines are in habitat not considered Core Area, General Habitat, or Connectivity Area.

2.2 Greater Sage-Grouse Populations Affected

No Wind Farm infrastructure is located within four miles of confirmed active leks located in General Habitat (Appendix E–Figure E1 and Figure E2). One confirmed active lek (RO-181) located in the Core Area is located 3.43 miles from the nearest Wind Farm infrastructure (turbine) (Appendix E–Figure E3). The maximum count of males in 2020 at lek RO-181 was 14.

Where the Transmission Line spans General Habitat, no confirmed active leks within the General Habitat are located within four miles. Where the Transmission Line spans the Core Area, it is within two miles of seven confirmed active leks and within four miles of 13 confirmed active leks located in the Core Area. The maximum count of males in 2020 at the seven closest leks ranged from zero to 16, with an average of nine. The maximum count of males in 2020 at the 13 leks ranged from zero to 22, with an average of 11.

3.0 Montana Executive Order 12-2015 Consistency Review

Based on Clearwater's interpretation of EO 12-2015, the Policy Guidance, and the HQT Manual, the following outlines the stipulations applicable to the Project with descriptions on how the Project is consistent with the stipulations or where deviations may occur. The Program's interpretation (Appendix B) of the Project's consistency with EO 12-2015 differs from Clearwater's interpretation (Appendix C). Additionally, a detailed review of Clearwater's objections to the Program's review of the Project and application of certain policy multipliers was provided to the Program on December 15, 2020. As demonstrated below and in Section 4.0, Clearwater has minimized Project impacts by prioritizing co-location with existing disturbances, siting in low-quality habitats, and planning construction impacts to occur outside critical seasonal periods.

- **Surface Disturbance (Core Area):** Surface disturbance will be limited to 5% of suitable sage-grouse habitat averaged across the area affected by the Project.
    - *Consistent* — The Density Disturbance Calculation Tool for the Project is 3.79%; this does not exceed the disturbance threshold allowed.
- **Surface Occupancy (Core Area):** There will be no surface occupancy (NSO) for new activities within 0.6 mile of the perimeter of active sage-grouse leks.

- *Consistent* — In February 2020, shortly after Clearwater acquired the Project, consultation with the Program continued, and in March 2020, when the Program conducted a preliminary HQT evaluation, the Transmission Line was consistent with the NSO stipulation. However, a previously unconfirmed lek became confirmed active following the 2020 spring lekking period (RO-152), and this lek lies 0.37 mi from the Transmission Line (Appendix E–Figure E4). This lek is also approximately 0.22 mi from Little Porcupine Creek Road (Appendix E–Figure E4), for which the Transmission Line was intentionally co-located during the planning stages of the Project. The road lies between the lek and the Transmission Line; thus, impacts from the existing road to the sage-grouse population have already been realized. At this point in the late-stage development of the comparatively large, complex Project, when final design, permitting, and material procurement is underway, rerouting the Transmission Line becomes infeasible. Rerouting outside the NSO would also increase habitat fragmentation, impact higher quality habitat, and have a greater impact on the local sage-grouse population than siting within the NSO and co-locating with the existing road. Additionally, the landowner requested the Transmission Line be as near the road as possible, and this landowner's lease states that Clearwater must make every attempt to co-locate with existing infrastructure where feasible. Thus, this multiplier would unintentionally disincentivize co-location (Policy Guidance, page 55, footnote 59) and landowner input.

- **Seasonal Use (General Habitat)**: Activities (production and maintenance activity exempted) will be prohibited from March 15 through July 15 within two miles of an active lek where breeding, nesting, and early brood-rearing habitat is present.
    - *Consistent* — Project infrastructure in General Habitat is greater than two miles from active leks.
- **Seasonal Use (Core Area)**: As authorized by permitting agency or agencies, activities (production, maintenance, and emergency activity exempted) will be prohibited from March 15 through July 15 outside of the NSO perimeter of an active lek in Core Areas where breeding, nesting, and early brood-rearing habitat is present.
    - Policy Guidance provides that seasonal restrictions within two miles of active leks is particularly critical. Within Core Area, there are seven confirmed active leks within two miles of the Transmission Line.
        - *Consistent for three leks* —Clearwater did not apply a deviation for three confirmed active leks (RO-101, RO-103, RO-152) as this would disincentivize co-location (Policy Guidance, page 55, footnote 59; Appendix E—Figure E5). The Transmission Line near these leks is 100% co-located (within 500 meters) with Little Porcupine Creek Road (Appendix E–Figure E5), a moderate-traffic road (HQT Manual, Table F.1).
        - *Deviates for four leks* (Transmission Line operations phase only) — The Program classifies a transmission line that is in an operations and maintenance phase as an activity that deviates from the seasonal use stipulation. In Core Area, there are four confirmed active leks within two miles of the Transmission Line that, due to siting limitations, are not 100% co-located with existing disturbance. The percentage of Transmission Line co-located with existing disturbance within two miles of these four leks was 0, 58, 90, and 93.

- **Vegetation Removal (General Habitat)**: Limited to the minimum disturbance required by the project.
    - *Consistent* — Clearwater endeavors to limit vegetation removal as it not only reduces habitat impacts, but also reduces construction and reclamation costs.
- **Vegetation Removal (Core Area)**: Limited to the minimum disturbance required by the Project. All soil stripping and vegetation removal in suitable habitat will occur between July 16 and March 14 in areas within four miles of an active lek.
    - *Consistent* — Clearwater will avoid all vegetation removal in suitable Core Area habitat between the prescribed stipulation dates.

4.0 Adherence to the Mitigation Hierarchy

4.1 Avoidance

Almost half of the disturbance associated with the Wind Farm is outside of sage-grouse habitat with the remainder in General Habitat. Portions of the Transmission Line span the General Habitat and Core Area (Appendix E–Figure E1). Many factors impact siting of infrastructure, such as available wind resource relative to electrical interconnections, landowner participation and requests, avoiding federal lands, existing infrastructure and accessibility, and consideration of impacts to aquatic, biological, and cultural resources. Because of these factors, the Project was unable to completely avoid impacts to sage-grouse habitat.

4.2 Minimization

Recognizing siting constraints identified above, Clearwater minimized impacts to sage-grouse by siting the Wind Farm outside of the Core Area (Policy Guidance, page 8), co-locating infrastructure with existing disturbances or in low-quality habitat (Policy Guidance, page 9), and locating Wind Farm infrastructure as far as economically feasible from active leks.

The Wind Farm has 122 turbines located outside of sage-grouse habitat and 147 in General Habitat; no turbines occur in the Core Area. Of the wind turbines located in General Habitat, 92 are in previously disturbed habitat (e.g., cultivated lands [Habitat Function = 0]) and 20 are in areas of low-habitat quality (e.g., Habitat Function = 1). Overall, 234 turbines (87% of all turbines) are co-located with existing disturbances or in habitat that is already considered low quality (Habitat Function = 0 and 1). Two of these turbines are located more than 3.43 miles from a confirmed active Core Area lek (RO-181; Appendix E–Figure E3), but these turbines are in cultivated cropland and impacts to sage-grouse populations are not expected due to the co-location of impacts and existing levels of habitat disturbance.

To the extent possible, existing roads will be used for turbine access. Overall, 73% of all turbine access roads in General Habitat are in existing disturbance areas or in low-quality habitat (e.g., Habitat Function = 1). Using existing roads and co-locating most turbine access roads has minimized potential impacts to the local sage-grouse population.

Other infrastructure associated with the Wind Farm includes laydown yards, Met towers, substations, and underground collection lines. Collection lines will be buried, laydown yards will be temporary, and Met towers and substations are located outside of sage-grouse habitat in existing disturbances (Habitat

Function = 0; n=3) or in low quality habitat (Habitat Function = 1; n=1). This further demonstrates Clearwater's ability to minimize impacts by co-locating infrastructure with existing disturbances or in low-quality habitat.

The Transmission Line spans non-habitat, General Habitat, and Core Area. In General Habitat and Core Area, the Transmission Line is co-located to the extent possible within the zone of influence of existing roads and power lines — 500 meters from moderate-traffic road (HQT Manual, Table F.1) and 1,000 meters from existing transmission/distribution structures (HQT Manual, page 135). Approximately 79 miles (78%) is co-located with existing above-ground disturbances (85% in Core Area and 73% in General Habitat), thus minimizing the potential for new impacts to sage-grouse habitat. Approximately 20.4 miles of Transmission Line is not possible to be co-located with existing above-ground disturbances. These portions are located greater than 0.6 mile of confirmed active leks and as far as possible given siting considerations noted above. A portion of the Transmission Line (0.92 mile) intersects a 0.6-mile buffer of an active lek but is co-located with existing above-ground disturbances (see Section 3.0).

To further minimize impacts, Clearwater designed the Transmission Line to align with the Avian Power Line Interaction Committee's (APLIC) recommendations for siting transmission lines in sage-grouse habitat (Appendix F). Specifically, Clearwater is:

- Incorporating tubular monopoles to minimize sage-grouse avian predator nesting and limiting guyed structures (APLIC 2015).
- Electing to install bird flight diverters (BFD) and perch deterrents (cross-arm and pole caps), recognizing the need to limit potential power line collisions and avian predators from perching (EO 12-2015). These measures will be installed on 12.9 miles of the Transmission Line within two miles of active Core Area leks, as well as 22.1 miles outside of the 2-mile buffer of active leks, resulting in additional protections for sage-grouse. Overall, approximately 35 miles will include an estimated:
    - 6,086 BFDs,
    - 332 Cross-Arm Perch Deterrents, and
    - 181 Pole Cap Perch Deterrents.

All construction activities will adhere to seasonal timing limitations in accordance with EO 12-2015. Therefore, impacts to sage-grouse from the development of the Project are minimized through Project siting and construction timing.

4.3 Reclamation

The EO 12-2015 states, "reclamation should re-establish native grasses, forbs and shrubs during interim and final reclamation to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to benefit sage-grouse and replace or enhance sage-grouse habitat." Clearwater will reclaim areas of native habitat that are temporarily disturbed during Project construction (e.g., temporary access roads, laydown yards) and after Project decommissioning. Noxious weeds will be controlled within the Project for the life of the facility and for one year following construction within temporarily disturbed areas outside of the Project. Clearwater will continue to investigate additional methods to establish or enhance sagebrush communities during reclamation.

4.4 Compensatory Mitigation

The following compensatory mitigation is based on Clearwater's interpretation of policy described in the Program's draft February 2021 HQT results (Appendix C). The final compensatory mitigation number is subject to MSGOT's review and approval.

4.4.1 Habitat Quantification Tool Results

The Raw HQT Score is 390,585.59 (Table 2).

Table 2. Estimated Raw Habitat Quantification Tool (HQT) Score Applied to the Clearwater Wind Project.

Habitat Type	Project Phase	Impact Area	Raw HQT Score
Core Area	Construction	Direct Impact	243.55
		Indirect Impact	5,676.23
	Operations	Direct Impact	9,259.92
		Indirect Impact	227,716.49
	Reclamation	Direct Impact Only	7,871.38
	All Phases	**Direct Impact**	**17,374.85**
		Indirect Impact	**233,392.72**
General Habitat	Construction	Direct Impact	106.15
		Indirect Impact	3,240.41
	Operations	Direct Impact	4,003.07
		Indirect Impact	130,627.80
	Reclamation	Direct Impact Only	1,840.60
	All Phases	**Direct Impact**	**5,949.82**
		Indirect Impact	**133,868.21**
Total Raw HQT Score			**390,585.59**

4.4.2 Application of Policy Multipliers

The Policy Guidance outlines specific multipliers to incentivize consistency with the EO stipulations and to ensure that mitigation is timely and effective throughout the life of the Project. Clearwater and the Program have differing views as to how these multipliers apply to the Project. The Program's interpretation is set forth in Appendix B. Clearwater's interpretation is included in Appendix C. The following represents Clearwater's position with respect to policy multipliers and is presented for MSGOT's review and approval.

Table 3 presents Clearwater's interpretation of the Policy Guidance and EO (see Section 3.0), and application of policy multipliers for all phases of the Project. The Raw HQT Score (Table 2) was multiplied by 20% to calculate Reserve Account debits and multiplied by 10% to calculate the Advancement Payment. The Project is not fully consistent with EO 12-2015 site-specific stipulations for the Core Area operations phase (see Section 3.0); thus, policy multipliers are applied as necessary and added to the HQT score. The four seasonal use multipliers are associated with year-round operations of the Transmission Line that is not 100% co-located with existing disturbances located within two miles of Core Area confirmed active leks.

Table 3. Policy Multipliers Applied to the Clearwater Wind Project.			
Policy Application (conversion from Functional Acres Lost to Debits)			
Multiplier Type[1]	**Specific Multiplier**	**Core**	**Debits**
Programmatic Multipliers (Construction, Operation and Reclamation Phases)	Reserve Account (20%)	1	78,117.12
	Adv. Payment (10%)	1	39,058.56
Federal Portion Only	Net Gain	N/A	N/A
Site-Specific EO Stipulation Deviation Multipliers (10% of the Core Area Operation Phase)	Seasonal Use	4	94,790.57
Total Policy Multiplier Debits		**6**	**211,966.25**

[1] Risk and the Reserve Account Contribution is accounted for through a mandatory Reserve Account multiplier. Twenty percent of the Raw HQT Score is calculated and added to the Raw HQT Score. This accounts for the fact that impacts are estimated. The Reserve Account also functions as a shared insurance pool so that credits may be replaced if credit sites do not produce as many credits as predicted or credits are lost due to an Act of God, such as a wildfire.

An Advance Payment of 10% is applied to the total Raw HQT Score for direct and indirect impacts for the life of the Project where the proponent will not undertake permittee responsible mitigation and would contribute to the Stewardship Account.

A Federal Net Gain of 10% is applied when the Project involves a federal nexus. Calculations are based on only the portion of the Project having a federal nexus.

Site-Specific Impacts are addressed through a multiplier of 10% for a Core Area, or 5% for General Habitat for each aspect of a proposed project that is not consistent with the EO 12-2015 stipulations during either construction or operations phase of a project.

EO = (Montana) Executive Order, HQT = Habitat Quantification Tool, N/A = not applicable

4.4.3 Clearwater's Estimated Mitigation Debit Obligation

Clearwater's estimated mitigation debit obligation is 602,551.84 debits (Table 4) and is based on the total Raw HQT Score (Table 2) plus the total Policy Multiplier debits (Table 3). The Program's estimated mitigation debit obligation for the Project is 958,016.45 (Appendix B). As noted, Clearwater disputes the Program's estimate.

Credits obtained through the Stewardship Account are currently $13 per debit but are discounted by 3% over the life of the Project using a discounting method (Policy Guidance, Appendix 7.4). Clearwater could fulfill their estimated debit obligation by contributing to the Montana Sage Grouse Stewardship Account. *See* MCA 76-22-111(1)(b)(ii). Clearwater's interpretation of the policy multipliers places the total mitigation cost at $4,059,431.

Funds would be deposited after confirmation of approval for permits, but before construction begins. The MSGOT and Program would disburse these funds through the Stewardship Account grant process to conserve habitat and sage-grouse populations through offsite mitigation. Any benefit of onsite mitigation would be negated until such activities were completed and disturbed lands fully reclaimed. The Project is in the Central Service Area. MSGOT will be encouraged to apply these funds to mitigation within the Project's same Service Area so that greater conservation benefits to sage-grouse can be secured offsite.

Table 4. Estimated Mitigation Debit Obligation for the Clearwater Wind Project.	
Raw Habitat Quantification Tool Score	390,585.59
Policy Multiplier Debits	211,966.25
Total Debit Obligation	**602,551.84**
Total Mitigation Cost	**$4,059,431**

5.0 Proposal to Fulfill the Compensatory Mitigation Obligation

Due to disagreements over the application of policy multipliers, Clearwater proposes a phased mechanism to fulfill its compensatory mitigation obligation, which would include an initial contribution to the Stewardship Account and a corporate guaranty securing payment for any remaining contribution as determined by MSGOT. Included as Appendix D is a white paper summarizing the proposal. Approval of this plan under this proposal would allow for permitting and initial Project construction to commence while MSGOT determines Clearwater's final Stewardship Account contribution.

Under this proposal, Clearwater would make an initial contribution to the Stewardship Account in the amount of $2,634,843.13, which represents full payment for debits associated with the Project's raw HQT score (390,585.59 debits). Because the initial contribution covers the Project's entire raw HQT score, it provides funding to secure mitigation credits covering the direct and indirect impacts for the life of the Project, including construction, operation, and reclamation.

In addition to this contribution, Clearwater, and its indirect parent, NextEra Energy Resources, LLC, would issue a corporate guaranty in favor of the Montana Department of Natural Resources (DNRC) for the full amount of the disputed portion of the Program's HQT results, i.e., the policy multipliers. The corporate guaranty will be issued in the amount of $3,802,595.50. The corporate guaranty would secure payment up to the maximum amount provided under the Program's debit analysis (Appendix B). With this security instrument in place, MSGOT would be afforded the time to evaluate the Program's analysis and Clearwater's objections, in order to arrive at a final Stewardship Account contribution, if any. Upon MSGOT's determination of a final contribution amount to address the disputed policy multipliers, either Clearwater would immediately make payment to the Stewardship Account or DNRC would be authorized to demand payment under the guaranty. As part of this process, Clearwater reserves the right to request MSGOT to reduce or waive all or part of Clearwater's compensatory mitigation obligation pursuant to MCA 76-22-116 and Section 3.6.1.3 of the Policy Guidance. Nothing in this document shall be construed as a waiver of Clearwater's right to request a reduction of its mitigation obligation.

6.0 MSGOT's Discretion to Incorporate Policy Tools to Facilitate Project Advancement

MSGOT has broad authority to review and act upon compensatory mitigation plans submitted by project proponents. In recognition of MSGOT's considerable discretion, the Policy Guidance sets forth a non-exhaustive list of tools which MSGOT may apply to alleviate economic feasibility constraints when mitigation obligations are high. Policy Guidance, Sec. 3.6.1. These tools include various approaches, including phased contributions to the Stewardship Account, adjusting discount percentage rates, credit-matching, and waiver or reduction of mitigation obligations. The tools "stand for the premise that the state has a responsibility to share in efforts to offset impacts of development and create flexible policy approaches that are responsive to economic feasibility constraints." Policy Guidance, 71. MSGOT may employ these tools to ensure that "development projects move forward and mitigation is timely and effective." *Id*. The Policy Guidance outlines various factors for MSGOT to consider in deciding whether to approve the use of such tools, and it may do so "with flexibility commensurate with its considerable discretion." Policy Guidance, 75. As the Policy Guidance recognizes: "Each situation is unique and MSGOT encourages creativity on the part of developers to find innovative ways to mitigate impacts." Policy Guidance, 71.

To the extent this mitigation plan is construed as including a request for MSGOT to incorporate a policy-based tool, Clearwater provides the following information establishing its eligibility for such treatment pursuant to Sec. 3.6.1.4 of the Policy Guidance:

6.1 No Alternative Sites are Practicable or Economically Feasible

Clearwater purchased the Project from its previous developer after all landowner agreements were already in place to qualify for an exemption to the Major Facility Siting Act. Renegotiating lease agreements with landowners or having to breach those agreements and enter into new leases with other landowners to accommodate a new alignment is not practicable under the circumstances given the construction timeframe, redesign, and substantial additional costs that would be incurred. At the time of acquisition and onward, Clearwater accepted the current alignment as being the most reasonable and economically feasible route to intertie with the electrical grid. Electricity is lost as the line gets longer and construction costs increase exponentially if a more circuitous route were to be taken to intertie with the electrical grid. The existing route avoids federal lands and takes advantage of colocation with existing impacts that are not as readily available with other routes.

6.2 There is an Economic Need for Relief from Compensatory Mitigation Obligations

Economic relief in the form of an initial payment and issuance of a corporate guaranty to cover any remaining compensatory mitigation obligation, as set forth in Section 5.2, is needed because the Program's application of policy multipliers has resulted in a compensatory mitigation figure that Clearwater disagrees with. There is a bona fide, nonfrivolous dispute between the Program and Clearwater with respect to the manner in which certain site-specific policy multipliers should apply to the Project. There is no opportunity or mechanism expressed in statute or rule for Clearwater to appeal this dispute for resolution. Accordingly, it has raised the issue as part of this compensatory mitigation plan for review and action by MSGOT.

6.3 The Cost of the Total Mitigation Obligation Poses a Disproportionate Economic Impact

The total mitigation obligation as calculated by the Program by means of the HQT and application of policy multipliers has, to Clearwater’s knowledge, produced the highest compensatory mitigation figure in Program history. Well over half of the proposed mitigation is a result of policy, which does not have proportionality to the actual Project impacts, as calculated through the HQT. The HQT is policy-neutral and is based on best available science. Policy Guidance, 52. As stated in the Policy Guidance: "The HQT results reflect the functional acres lost as a result of the development action and are proportional to that particular project." Policy Guidance, 52. If the HQT results are "proportional to that particular project," then application of site-specific policy multipliers to more than double the raw HQT result produces a final debit score that is no longer in proportion to the actual impacts of the project. As such, the cost of the total mitigation obligation suggested by the Program imposes a disproportionate economic impact on Clearwater and raises other concerns as noted in the December 15, 2020 objection letter.

6.4 All Available Tools in the Policy Guidance have been Exhausted or are Unsuitable

Clearwater has considered and exhausted all available tools under the Policy Guidance and has no recourse but to request relief from MSGOT so that its development project can proceed forward while

simultaneously ensuring that its compensatory mitigation obligation is fully and fairly satisfied. Clearwater has followed the mitigation sequence with respect to design and siting of the Project and it has taken all reasonable, practicable, and available measures to avoid, minimize, and restore impacts to sage grouse and sage grouse habitat as explained in other sections of this document. Phased payments, discount adjustments, credit matching, and waiver/reduction are options for policy tools provided in the Policy Document. However, these tools are all based on the assumption that the initial mitigation requirement is fair and proportionate to the severity of impacts a project will have on sage grouse and sage grouse habitat. None of these options are suitable to the present situation in which Clearwater disputes the Program's interpretation and application of certain site-specific policy multipliers. As such, Clearwater asks MSGOT to exercise its discretion to utilize an unenumerated policy tool which is analogous to the phased contribution tool. This approach is explained in Section 5.2, and would involve Clearwater making an initial cash contribution to the Stewardship Account to cover the full raw HQT score (which equates to direct and indirect impacts for the full scope and duration of the project) and issuance of a corporate guaranty to cover Clearwater's remaining obligation, as will be determined by MSGOT at a later date after MSGOT has had an opportunity to fully consider Clearwater's and the Program's relative positions.

6.5 There is Some Capacity to Fulfill Some Portions of the Mitigation Obligation so that Fulfilling the Entire Mitigation Obligation Becomes a Joint Public-Private Endeavor

Clearwater has the capacity to fulfill the undisputed portion of its mitigation obligation through a $2,634,843.13 financial contribution to the Stewardship Account, which represents payment in full for the raw HQT score provided by the Program on February 22, 2021. Clearwater will satisfy in full the remainder of its obligation as determined by MSGOT at a future date through an additional financial contribution.

6.6 All Relevant Tools in the Policy Guidance have been Considered

All available tools within the Policy Guidance have been considered and Clearwater has utilized the mitigation hierarchy. To avoid redundancy, please refer to response provided in Section 6.4, above.

6.7 Other Steps in the Mitigation Hierarchy have been Observed an Incorporated into the Mitigation Plan, Including Avoidance, Minimization, and Reclamation Measures

As explained in Section 4.0, Clearwater has adhered to the mitigation hierarchy. Please refer to the following sections herein:

- Avoidance - See Section 4.1.
- Minimization - See Section 4.2.
- Reclamation - See Section 4.3.

7.0 Conclusion

Clearwater has demonstrated its ability to minimize sage-grouse impact in the development of a project that will bring economic development to Montana. Specifically, Clearwater:

- Minimizes impacts by co-locating infrastructure with existing disturbances (refer to Section 4.0),
- Will avoid construction inside the Core Area from March 15 – July 15),
- Will not require ongoing construction disturbance once completed, and
- Provide considerable economic benefit to the local community.

8.0 References

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Appendix A.

Montana Sage Grouse Habitat Conservation Program November 2020 Evaluation of the Clearwater Wind Project

Project 3288

Clearwater Wind Project

November 2, 2020

Project data were initially submitted March 3, 2020. Completed, corrected spatial for all project features were provided on October 26, 2020. See below for additional details. See Figures 1 (Clearwater-Wind Project 10-26-2020 Map) and Figure 2 (Clearwater Wind Project- Wind Facility 10/26/2020). Information in this summary is based on the information and data provided to the Program to date and considered preliminary, for discussion purposes. Certain assumptions were made by the Program for this October 26, 2020 review, lacking specific information regarding project design and management plans.

Site Specific Multipliers Deviation Calculations Summary[1, 2]

Project # 3288

November 2, 2020

Project data were initially submitted March 3, 2020. Completed, corrected spatial for all project features were provided on October 26, 2020. See below for additional details. See Figures 1 (Clearwater-Wind Project 10-26-2020 Map) and Figure 2 (Clearwater Wind Project- Wind Facility 10/26/2020). Information in this summary is based on the information and data provided to the Program to date and considered preliminary, for discussion purposes.

The Construction phase of the project for all project features located within General Habitat or Core Areas is proposed to be July 16, 2021 to March 14, 2022. The Operations phase of the project is proposed to vary by feature. See Table 7 below for additional detail.

Presence or Absence of Newly Proposed Features within 2 and 4 Miles of Active Leks

All active leks in Core Areas were buffered by 4 miles. All active leks in General Habitat were buffered by 2 miles. The following tables list active leks within General Habitat or Core Areas having newly proposed project features within 2 or 4 miles, respectively.

GENERAL HABITAT

Project Features located within General Habitat 2-mile lek buffers, included in project evaluation.

No project features are located within 2 miles of an active lek in General Habitat.

Table 1 – General Habitat Leks Affected and Executive Order 12-2015 Seasonal Stipulations That Apply

Lek Name	Surface Occupancy - Activities occurring within 0.25 miles of perimeter of Active Lek	Seasonal Use - Activities occurring between March 1 through July 15 within 2-miles of an active lek	Vegetation Removal within 2 miles of an active lek. Limited to disturbance required by project.
none	0	0	0

CORE AREA

Project features located within a Core Area lek buffer. Number of leks having newly-proposed project features within 4 miles of an active lek in a Core Area = 14

Table 2 - Core Area Leks Affected and Executive Order 12-2015 Seasonal Stipulations That Apply

Lek Name	Surface Occupancy Activities occurring within 0.6 miles of perimeter of Active Lek	Seasonal Use Activities occurring between March 1 through July 15 where breeding, nesting or brood-rearing habitat is present	Vegetation Removal occurring between March 1 through July 15 within 4 miles of an active lek
RO-011		345kV trans. line	345Kv trans. line

[1] Montana Executive Order 12-2015, Attachment D.

[2] Montana Mitigation System Policy Guidance Document for Greater Sage-Grouse, Section 3.3 through 3.3.1.

Lek Name	Surface Occupancy Activities occurring within 0.6 miles of perimeter of Active Lek	Seasonal Use Activities occurring between March 1 through July 15 where breeding, nesting or brood-rearing habitat is present	Vegetation Removal occurring between March 1 through July 15 within 4 miles of an active lek
RO-018		345kV trans. line	345Kv trans. line
RO-052		345kV trans. line	345kV trans. line
RO-071		345kV trans. line	345kV trans. line
RO-101		345kV trans. line	345kV trans. line
RO-103		345kV trans. line	345kV trans. line
RO-107		345kV trans. line	345kV trans. line
RO-126		345kV trans. line	345kV trans. line
RO-127		345kV trans. line	345kV trans. line
RO-152	345kV trans. line	345kV trans. line	345kV trans. line
RO-153		345kV trans. line	345kV trans. line
RO-156		345kV trans. line	345kV trans. line
RO-181		345kV trans. line 2 Wind Turbines, 2 collection line segments, 3 road segments,	345kV trans. line 2 Wind Turbines, 2 collection line segments, 3 road segments
RO-181 NEW		345kV trans. line 14 Wind Turbines,14 collection line segments, 17 road segments	345kV trans. line 14 Wind Turbines, 14 collection line segments, 17 road segments

Deviations from Executive Order 12-2015 Stipulations by Habitat Category and Project Phase[3]

Deviations from Executive Order 12-2015 were determined based on the presence or absence of newly-proposed project features within the 2 or 4 mile lek buffers within General Habitat or Core Area, respectively (i.e. roads, turbines, buried distribution lines, met towers, substations, laydown yards, 345kV transmission line). The following tables present deviations from Executive Order 12-2015 based on information provided by the Proponent.

GENERAL HABITAT - Construction

Features included in project web application entry. located in General Habitat. No project features occurred within 2 miles of active leks in General Habitat during the Construction Phase.

Table 3a General Habitat Project Construction. Number of years for Construction: 1 year for all project features

Feature Type/Name	Surface Occupancy - Activities occurring within 0.25 miles of perimeter of Active Lek	Seasonal Use - Activities occurring between March 1 through July 15 within 2-miles of an active lek	Vegetation Removal within 2 miles of an active lek. Limited to disturbance required by project.
Turbines (148 within designated habitat, 300 total	0	0	0

[3] Montana Executive Order 12-2015, Attachment D

Feature Type/Name	Surface Occupancy - Activities occurring within 0.25 miles of perimeter of Active Lek	Seasonal Use - Activities occurring between March 1 through July 15 within 2-miles of an active lek	Vegetation Removal within 2 miles of an active lek. Limited to disturbance required by project.
Met Towers (7 within designated habitat)	0	0	0
Sub Stations (1 within designated habitat)	0	0	0
Buried collection lines	0	0	0
Access roads -West Side	0	0	0
Laydown Yards (5 within designated habitat)	0	0	0
345 kV Transmission line total approx. 85 miles within designated habitat, 40 within General habitat)	0	0	0

GENERAL HABITAT - Operations

Features included in project web application entry located in General Habitat. No project features occurred within 2 miles of active leks in General Habitat during the Operations Phase.

Table 3b General Habitat Project Operations. Number of years for Operations: Trans. Line = 49 years, Facility = 29 years (with exception of Laydown Yards = 1 year)

Feature Type/Name	Surface Occupancy Activities occurring within 0.25 miles of perimeter of Active Lek	Seasonal Use Activities occurring between March 1 through July 15 within 2-miles of an active lek	Vegetation Removal Limited to disturbance required by project.
none	0	0	0

CORE AREA - Construction

Features included in project web application entry located in a Core Area and how applicable EO stipulations were applied during the Construction Phase:

Table 4a Core Area Project Construction. Number of years for Construction: All features, 1 year

Feature Type/Name	Surface Occupancy - Activities occurring within 0.6 miles of perimeter of Active Lek	Seasonal Use - Activities occurring between March 1 through July 15 where breeding, nesting or brood-rearing habitat is present	**Vegetation Removal** Activities occurring between March 1 through July 15, within 4 miles of an active lek
Turbines	0	0	0
Met Towers	0	0	0
Sub Stations	0	0	0
Buried collection lines	0	0	0
Access roads -West Side	0	0	0
Laydown Yards	0	0	0

Feature Type/Name	Surface Occupancy - Activities occurring within 0.6 miles of perimeter of Active Lek	Seasonal Use - Activities occurring between March 1 through July 15 where breeding, nesting or brood-rearing habitat is present	**Vegetation Removal** Activities occurring between March 1 through July 15, within 4 miles of an active lek
345 kV Transmission line (approx. 45 miles within Core Area habitat	0	0	0

CORE AREA - Operations

Features included in project web application entry located in a Core Area and how applicable EO stipulations were applied during the Operations Phase:

Table 4b Core Area Project Operations. Number of years for Operations: Trans. Line = 49 years, Facility = 29 years (with exception of Laydown Yards = 1 year)

Feature Type/Name	Surface Occupancy - Activities occurring within 0.6 miles of perimeter of Active Lek	Seasonal Use Activities occurring between March 1 through July 15 where breeding, nesting or brood-rearing habitat is present	**Vegetation Removal** Activities occurring between March 1 through July 15, within 4 miles of an active lek
Turbines	0	16 deviations (14 for Lek RO181New, 2 for Lek RO 181; see Map#5)	0
Met Towers	0	0	0
Sub Stations	0	0	0
Buried collection lines	O: Buried	0: Buried	0
Access roads	0	20 deviations (17 for Lek RO181 New, 3 for Lek RO181; see Map #5)	0
Laydown Yards	0	0	0
345 kV Transmission line	1 deviation	13 deviations (see Table 2 above; Map #4)	0

Multipliers to Incentivize Consistency with EO 12-2015 Included in Calculation[4]

Site Specific Multipliers

Site-Specific Impacts are addressed through a multiplier of 10% for a Core Area, or 5% for General Habitat for each aspect of a proposed project that is not consistent with the EO 12-2015 stipulations during either construction or operations phase of a project.

[4]Montana Mitigation System Policy Guidance Document, Section 3.3.1.

Portions of the Clearwater Wind Project are located in a Core Area or General Habitat. Therefore, the following seasonal stipulations apply.

- **Surface Disturbance:** Surface disturbance will be limited to 5% of suitable sage grouse habitat averaged across the area affected by the project
- **Surface Occupancy:** Within 0.6 miles of the perimeter of active sage grouse leks there will be no surface occupancy (NSO) for new activities
- **Seasonal Use**: In General Habitat, as authorized by permitting agency or agencies, activities will be prohibited from March 15 through July 15 within 2.0 miles of an active lek where breeding, nesting, and early brood-rearing habitat is present.
- **Seasonal Use**: In Core Areas, as authorized by permitting agency or agencies, activities will be prohibited from March 15 through July 15 outside of the NSO perimeter of an active lek in Core Areas where breeding, nesting, and early brood-rearing habitat is present.
- **Vegetation Removal**: In General Habitat vegetation removal is limited to the minimum disturbance required by the project. In Core Areas vegetation removal is limited to the minimum disturbance required by the project. All soil stripping and vegetation removal in suitable habitat will occur between July 16 and March 14 in areas within 4 miles of an active lek.
- **Noise**: New project noise levels, either individual or cumulative, should not exceed 10dBA (as measured by L50) above baseline noise at the perimeter of an active lek from 6:00 p.m. to 8:00 a.m. during the breeding season (March 1 through July 15).

Project features located in General Habitat are consistent with the EO and no site-specific multipliers are included for either the Construction or Operations phases of the project. Project features sited in Core Area or within four miles of Core Area leks deviate from Executive Order 12-2015. A total of 14 Core Area leks are affected by these deviations during the Operations phase, as shown in Table 5

Table 5. Number of Site-Specific Policy Multipliers based on the information provided by Proponent. The Construction Phase activities are consistent with Executive Order 12-2015 in General Habitat and Core Area. See Tables 3a and 4a. All deviations apply to the Operations Phase, based on year-round operations.

Site Specific EO Stipulation Deviations	Multiplier(s) Applied	Description
Surface Disturbance >5% DDCT	0	DDCT below 5% (4.22%)
Surface Occupancy	1	Year-round operations for Trans. line within NSOA of 1 active lek
Seasonal Use	49	year-round operations for 16 wind turbines -within 4 miles of Core Area Leks 20 for road segments within 4 miles of Core Area Leks 13 for Transmission line 4 miles of 13 Core Area Leks
Vegetation Removal	0	
Noise	0	Multiplier not included but recommend noise limited to no more than 10 dBA over ambient in letter
Total Site-Specific Multipliers for deviating from Executive Order 12-2015 Stipulations	**50**	

Policy Multipliers

The Mitigation System Policy Guidance v1.0 October 2018 document was applied to the Clearwater Wind Project. The Policy outlines specific multipliers to incentivize consistency with the EO stipulations. Multipliers also ensure that mitigation is timely and effective throughout the life of the project.

Risk and The Reserve Account Contribution is accounted for through the Reserve Account multiplier. It is mandatory. Twenty percent of the Raw HQT Score is calculated and added to the Raw HQT Score. This accounts for the fact that impacts are estimated. The Reserve Account also functions as a shared insurance pool so that credits may be replaced if credit sites do not produce as many credits as predicted or credits are lost due to an Act of God, such as a wildfire.

Advance Payment of 10% is applied to the total Raw HQT Score for direct and indirect impacts for the life of the project where the proponent will not undertake permittee responsible mitigation and would make a contribution to the Stewardship Account.

Federal Net Gain of 10% is applied when the project involves a federal nexus. Calculations are based on only the portion of the project having a federal nexus.
Due to the unresolved nature of potential for nest supporting structures, debits associated with policy multipliers can't be calculated at this time.

Table 6 Policy Multipliers

Policy Multipliers	
Reserve Account	20% Risk and Reserve Contribution
Advance Payment	10% if not undertaking permittee responsible mitigation and would make a contribution to the Stewardship Account
Federal Net Gain	Applied to portion of project involving Federal Nexus

Narrative Description of Multiplier Calculations

Construction Phase for Entire Project

Entire Project, all Features Construction Phase: The Proponent has committed to conducting all construction activities between July 16 and March 14 for the entire project. The 345kV transmission line, turbines, substations, collection lines, met towers and access roads will be constructed between July 16, 2021 and March 14, 2022. Laydown yards are proposed to be constructed between July 16, 2021 and September 1, 2021 and operated between September 2, 2021 and March 16, 2022. Therefore, all construction activity located within General Habitat or Core Areas will not occur during seasonal timing stipulation periods. All construction activities within General Habitat or Core Areas will occur within <1 year. Therefore, zero Site Specific EO Stipulation Deviation Multipliers were applied for the Construction Phase for all project related activities occurring in General Habitat and Core Areas.

Operations Phase

The HQT was calculated using two different timeframes. The 345kV transmission line was calculated using a 49-year Operations Phase while the Wind Facility features (turbines, substations, access roads, met towers) were calculated using a 29-year Operations Phase.

345kV Transmission Line Operations Phase

Transmission Line: The 345kV transmission line was calculated using the Transmission Line >116 kV 6.0-km radius buffer. Nesting vs. Non-Nest Facilitating Structures are described in The Montana Mitigation System HQT Technical Manual on page 135 and Figure D.2. The HQT for the approximately 85-mile-long 345kV transmission line located within designated habitat, was calculated both ways: 1. nest supporting because nest deterrents were proposed for only approximately 16 miles of the route within two miles of an active lek and details regarding the proposed monopole design have not yet been disclosed (some monopole designs may facilitate nests and other designs do not) and management practices have not been offered; and 2. non-nest facilitating in the event that a non-nest facilitating monopole design is selected, management practices are proposed, and perch deterrents are included more universally within the Core Area segment of the line. Additional information is needed from the proponent.

The Proponent provided operations dates of March 15, 2022 to March 15, 2072 for the 345kV transmission line. The 345kV transmission line is proposed to be installed as an overhead line having a 49-year operations timeframe. The transmission line is located within a No Surface Occupancy Area for one active lek and within four miles of 13 active leks. Zero deviations were applied to the Construction Phase. Fourteen Site Specific EO Stipulation Deviation Multipliers are included for the 49-year Operations Phase for the transmission line.

Wind Turbines and Facilities Operations Phase

Nest Supporting or Non-Nest Supporting -- Met Towers and Substations: Presently, it has not been disclosed whether met towers and substations would or would not support nests. A discount can be incorporated into HQT calculations if met towers and substations were non-nest supporting. The HQT results were calculated both ways: 1. nest supporting; and 2. non-nest supporting. For the nest-supporting calculation and draft results, the program assumed that all met towers, all substations, and the entirety of the 345kV line would be nest-supporting. For the non-nest supporting calculation and draft results, the program assumed that all met towers, all substations, and the entirety of the 345 kV line would be non-nest supporting. It would also be possible to calculate HQT scores for to reflect a proponent's decision that some overhead structures would be nest-supporting while others would be non-nest supporting. Additional information is needed from the proponent.

Wind Turbines: The HQT for wind turbines was calculated using the 1.5 km density buffer for Wind Facilities. The Proponent provided operations dates of March 15, 2022 to March 15, 2052 for the wind turbines and associated facilities. Fourteen wind turbines are located within four miles of one active lek. Two wind turbines are within four miles of one Active lek. Zero deviations were applied to the Construction Phase. Sixteen Site Specific EO Stipulation Deviation Multipliers were applied for wind turbines within four miles of two active leks for the 29-year Operations Phase.

Laydown Yards: The HQT for laydown yards was calculated using the Other Variable Type using a 500-m buffer. The Proponent provided operations dates of September 2, 2021 to March 16, 2022 for ten laydown yards. Five of the laydown yards are located outside of designated sage grouse habitat. Five laydown yards are located within General Habitat. One laydown yard is 4.3 miles from the nearest lek in General Habitat. Another laydown yard is 4.9 miles from a Core Area lek. Therefore, zero Site Specific EO Stipulation Deviation Multipliers were applied for laydown yards.

Substations: The HQT for substations was calculated using a 6.0-km buffer for Tall Structures. The Proponent provided operations dates of March 15, 2022 to March 14, 2052 for three substations. Two substations are located outside of designated habitat. One substation is located within General Habitat and is 11.9 miles from the nearest lek. Therefore, zero Site Specific EO Stipulation Deviation Multipliers were applied for substations.

Access Roads: The HQT for access roads was calculated using a 500-m buffer for Minor Roads. The Proponent provided operations dates of March 15, 2022 to March 14, 2052 for access roads located within General and Core Areas. Access roads will be 16 ft wide permanent gravel roads. The HQT was calculated with all access roads as minor roads. New project road segments are located within four miles of two active sage grouse leks. These roads were entered in the Program web application by the Proponent as 35 individual road segments within 4 miles of the RO181 New active lek and 4 road segments within 4 miles of the RO181 active lek. The Program elected to combine some road segments so that one road segment was counted for each road going to a separate turbine, resulting in a total of 20 segments within 4 miles these two active leks. New permanent road segments resulted in 20 Site Specific EO Stipulation Deviation Multipliers applied for the 29-year Operations Phase.

Collection Lines: The HQT for buried collection lines was calculated using a 500-m buffer for Buried Utilities. The Proponent provided operations dates of March 15, 2022 to March 14, 2052 for collection lines. Sixteen collection line segments are located within four miles of an active lek. Construction will occur outside of seasonal timing periods. Zero years were calculated for the Operations timeframe for the collection lines because the lines are buried. Therefore, zero Site Specific EO Stipulation Deviation Multipliers were applied for collection lines.

Met Towers: The HQT for met towers was calculated using a 6.0-km buffer for Tall Structures. The Proponent provided operations dates of March 15, 2022 to March 14, 2052 for eight 374-foot tall met towers. One met tower is located outside of designated sage grouse habitat. Seven met towers are located within General Habitat. All met towers are beyond four miles of an active Core Area lek. Zero Site Specific EO Stipulation Deviation Multipliers were applied to for met towers.

Table 7. Construction and Operations Timeframe included in Project entry.

Feature	Variable Type used for HQT Calculations[5]	Time frame
Project 4148 345kV Transmission line	Transmission Line 6.0 km Nest supporting or non-nest supporting	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March 15, 2072
Project 4163 Turbines	Wind Facilities 1.5 km density	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March 15, 2052
Project 4173 Substations	Substation 6.0 km Nest or non-nest supporting	Construction: July 16, 2021 to March14, 2022 Operations: March 15, 2022 to March 14, 2052
Project 4173 Laydown Yards	Other 500 m	Construction: July 16, 2021 to September 1, 2021 Operations: September 2, 2021 to March 16, 2022
Project 4172 Collection Lines	Buried Utilities 500 m	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March 14, 2052 N/A-Buried
Project 4169 Access Roads	Minor Road 500 m	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March **15**, 2052
Project 4171 Access Roads	Minor Road 500 m	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March 14, 2052
Project 4170 Access Roads	Minor Road 500 m	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March 14, 2052

[5] Montana Mitigation System Technical Manual Appendix A through L.

Feature	Variable Type used for HQT Calculations[5]	Time frame
Project 4183 Met Towers	Tall Structure 3.0km Nest or non-nest supporting	Construction: July 16, 2021 to March 14, 2022 Operations: March 15, 2022 to March 14, 2052

Map Attachments

Fig 1. Clearwater-Wind Project 10-26-2020

Fig 2. Clearwater Wind Project - Wind Facility 10-26-2020

Fig 3. Clearwater Wind Project and Lek NSOA's – Entire Project 10-26-2020

Fig 4. Clearwater Wind Project – Affected Leks 10-26-2020

Fig. 5. Clearwater Wind Project - RO-181 NEW and RO-181 4 Mile Lek Buffers 10-26-2020

Fig. 6. Clearwater Wind Project Transmission Line and West Side Facility Lek Buffers 10-26-2020

Figure 1

Clearwater Wind Project
10/26/2020

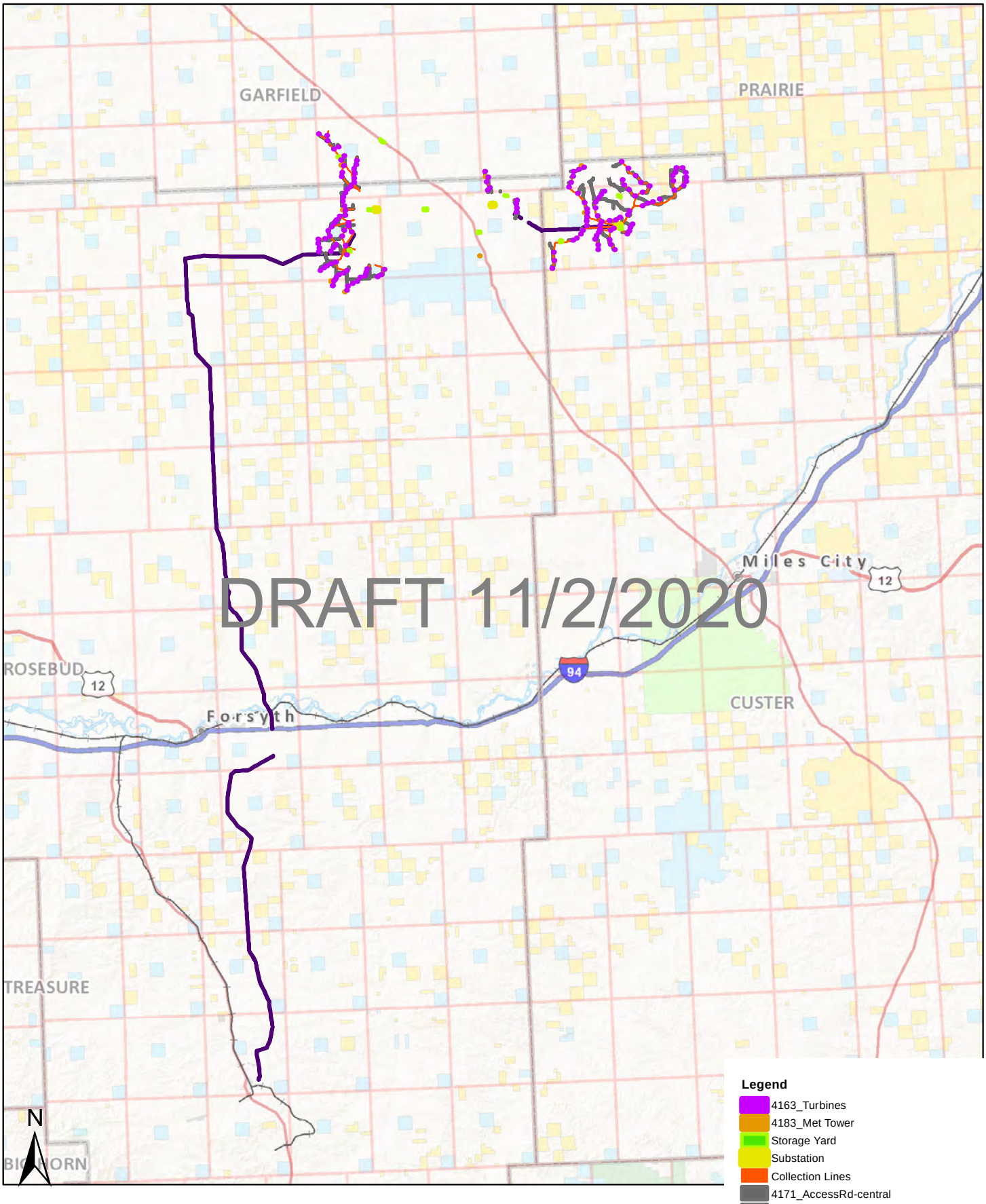
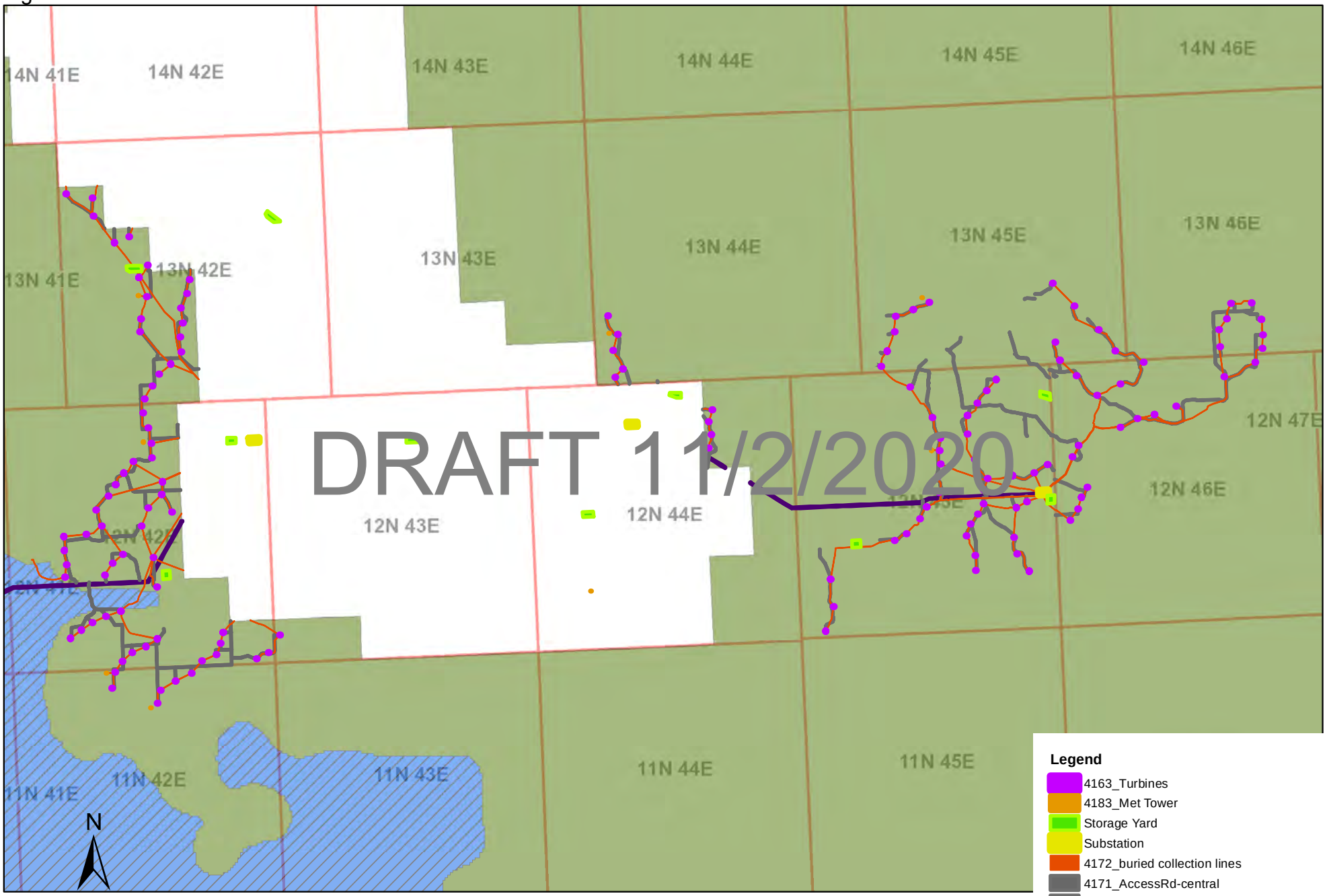


Figure 2

Clearwater Wind Project- Wind Facility 10/26/2020



Clearwater Wind Project and Lek NSOA's- Entire Project 10/26/2020

Figure 3

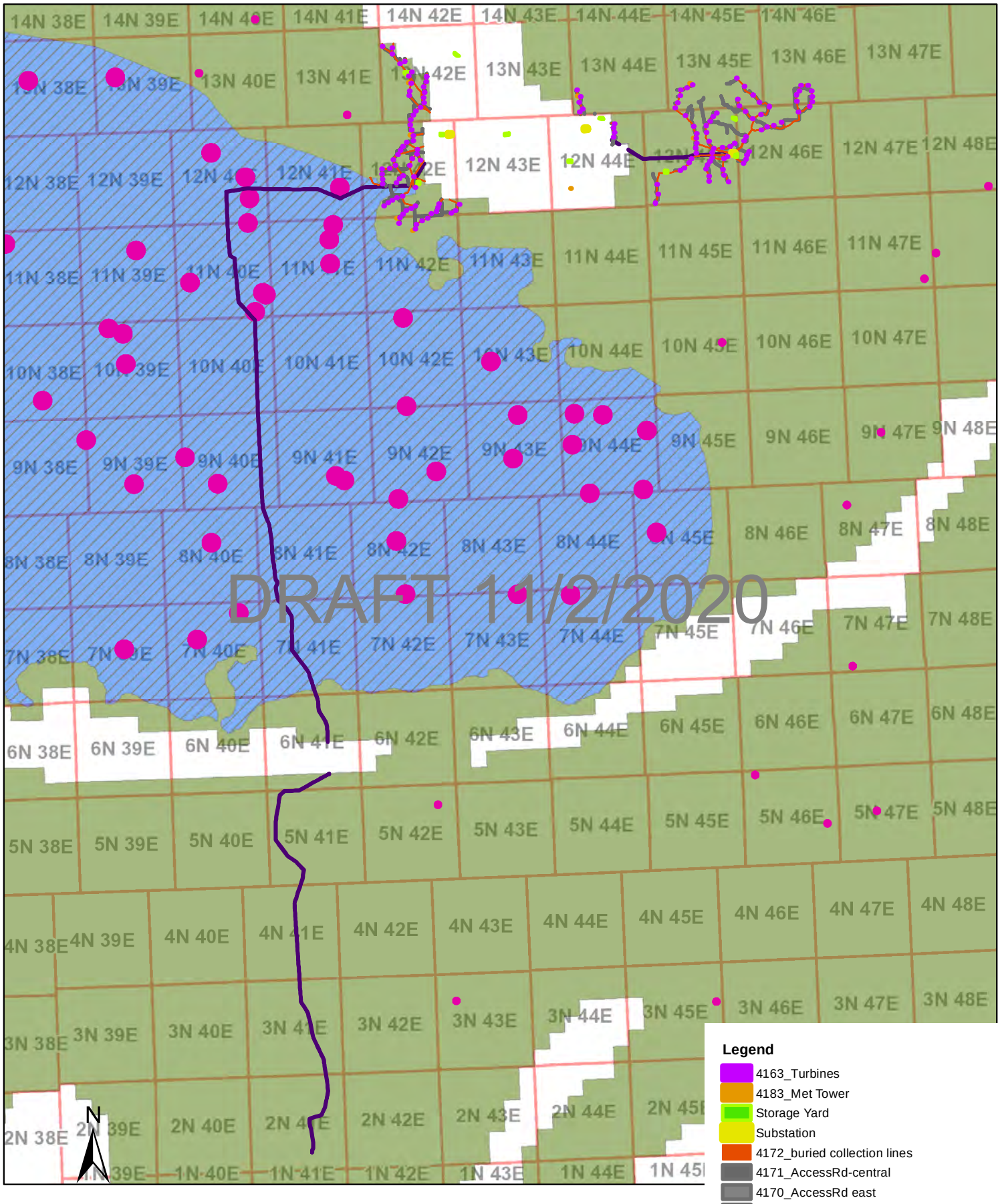


Figure 4

Clearwater Wind Project - Affected Leks 10/26/2020

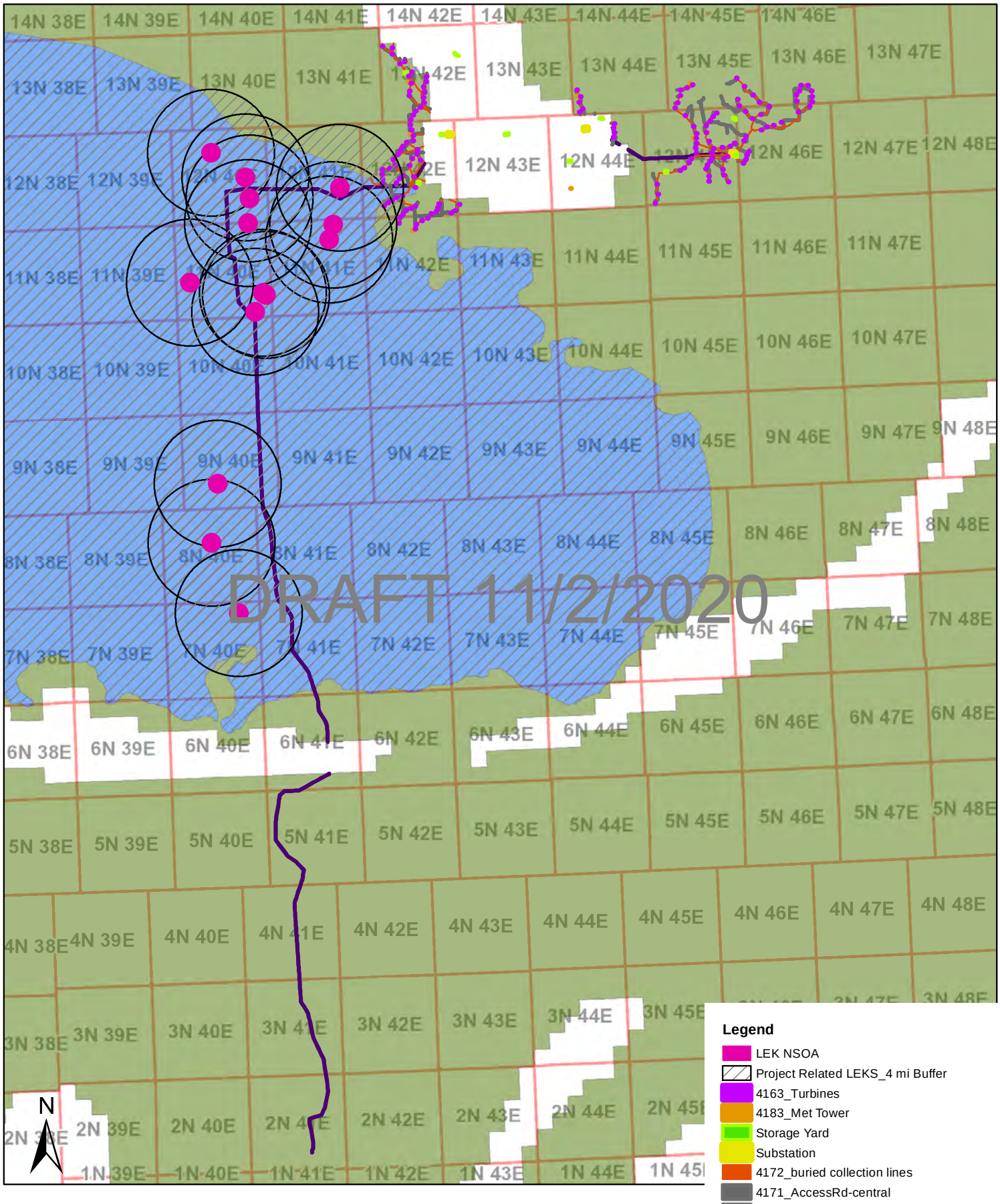


Figure 5

Clearwater Wind Project - RO-181 NEW and RO-181 4 Mile Lek Buffers
10/26/2020

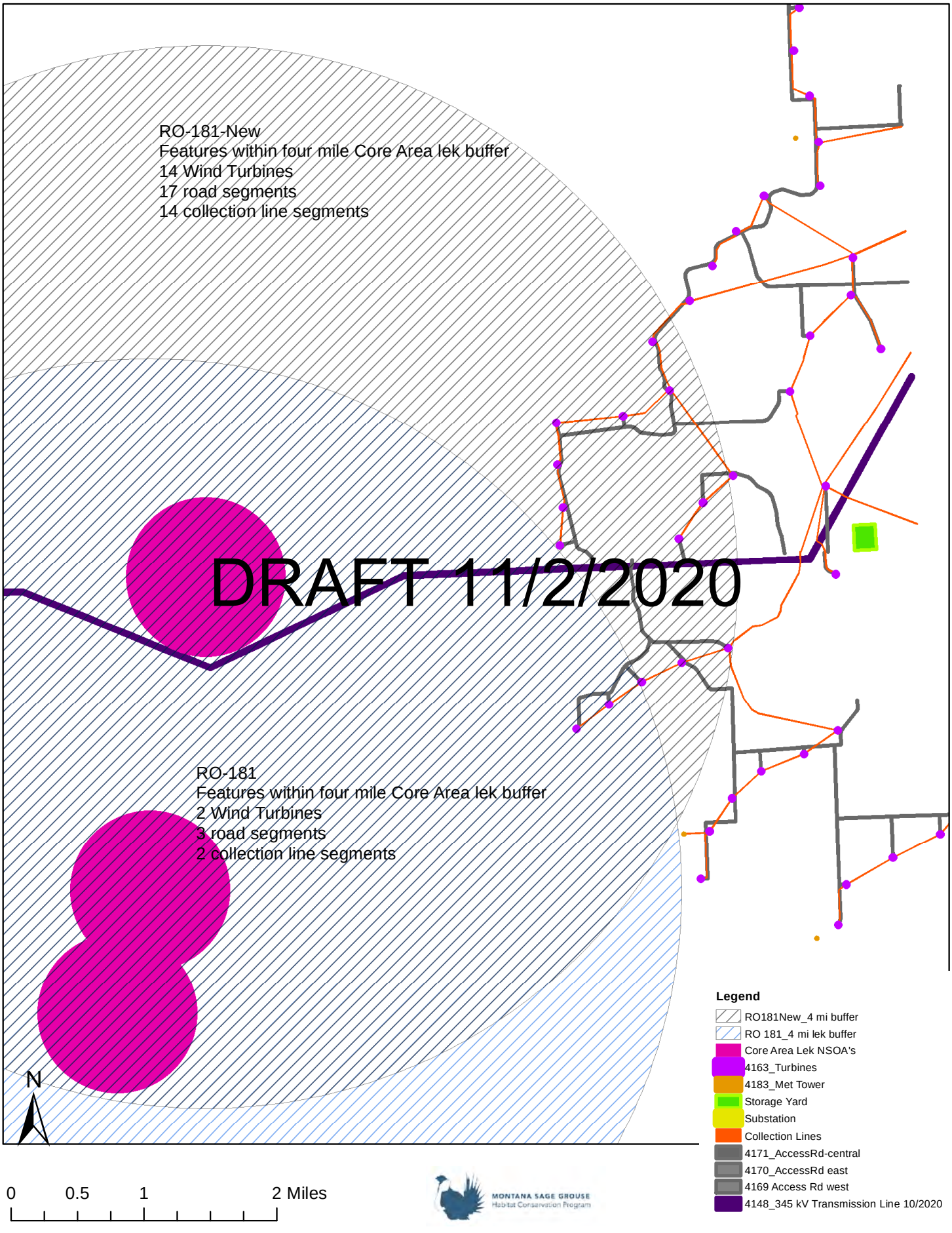
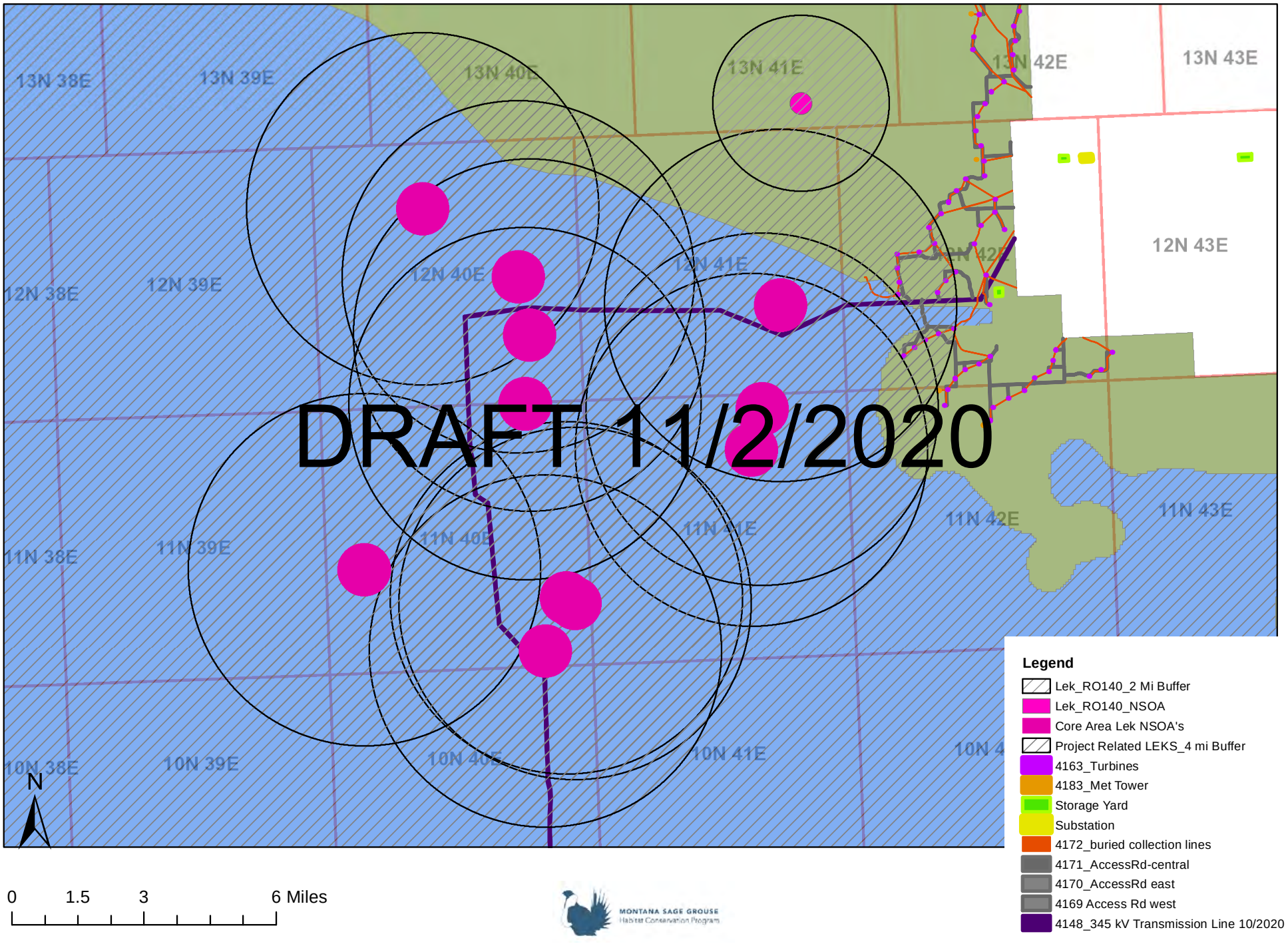


Figure 6

Clearwater Wind Project Transmission Line and West Side Facility Lek Buffers 10/26/2020



PRELIMINARY HQT Results

Project Information						
Project ID	4173, 4172, 4171, 4170, 4169, 4163, 4148					
Project Name	Clearwater Wind Farm					
Service Area(s)	Central, Southeastern					
Project Duration	Project Phases	# of Years Transmission Line			# of Years Wind Facility	
	Construction	1			1	
	Operations	49			29	
	Reclamation	75			75	
Physical Acres	Project Phases	Core Area	General Habitat	Connectivity Area	All Habitat	
	Construction	756.972	1156.578	0.000	1913.550	
	Operations	764.238	1065.860	0.000	1830.098	
	Reclamation	764.238	1156.578	0.000	1920.816	
Versions, etc.	HQT Model	v1.1				
	HQT Tech Manual	Oct 2018 v1.0				
	HQT Basemap	Oct 2018 v1.0				
	Policy Guidance	Oct 2018 v1.0				
	Date of HQT Run	10/27/2020				
List any project-specific HQT parameters	Spatial Resolution	3.75				
	Anthropogenic Variables included in the HQT Analysis & Indirect Impact Area assessed					
	Oil & Gas Facilities	Not Applicable				
	Cedar Creek or Elk Basin?	*Not Applicable*				
	Tall Structures	Applied: 8 Tall Structures: 3.0-km Buffer				
	NON-Nest Facilitating?	*Applied: No*				
	Transmission/Distribution Structures	Applied: 1 Substation, 10 Power Lines: 6-km Buffer				
	NON-Nest Facilitating?	*Applied: No*				
	Substation: buffer size	*Applied: 6.0-km Buffer*				
	Wind Facilities	Applied: 148 Wind Turbines: 1.5-km Density				
	Major Roads & Mainline Railways	Not Applicable				
	Minor Roads & Spur Rails	Applied: 161 Minor Roads: 500-m Buffer				
	Buried Utilities (pipelines, fiber, etc.)	Applied: 73 Power Collection Lines: 500-m Buffer				
	Agriculture & Mines	Not Applicable				
	Noise (compressor stations, etc.)	Not Applicable				
	Other	Applied: 2 Storage Yards, 4 Stock Ponds: 500-m Buffer				

Raw HQT Score - Preliminary Results			
Habitat Type	Project Phase	Impact Area	Raw HQT Score
Core Area	Construction	Direct Impact	242.23
		Indirect Impact	6,022.50
	Operations	Direct Impact	9,025.65
		Indirect Impact	239,980.32
	Reclamation	Direct Impact Only	7,807.39
	ALL Phases	Direct Impact	17,075.26
		Indirect Impact	246,002.82
General Habitat	Construction	Direct Impact	104.99
		Indirect Impact	3,530.21
	Operations	Direct Impact	3,839.63
		Indirect Impact	136,715.22
	Reclamation	Direct Impact Only	1,711.99
	ALL Phases	Direct Impact	5,656.61
		Indirect Impact	140,245.43
Connectivity Area	Construction	Direct Impact	0.00
		Indirect Impact	0.00
	Operations	Direct Impact	0.00
		Indirect Impact	0.00
	Reclamation	Direct Impact Only	0.00
	ALL Phases	Direct Impact	0.00
		Indirect Impact	0.00
ALL Habitat	ALL Construction	Direct Impact	347.22
		Indirect Impact	9,552.71
	ALL Operations	Direct Impact	12,865.28
		Indirect Impact	376,695.54
	ALL Reclamation	Direct Impact Only	9,519.38
	ALL Phases	Direct Impact	22,731.88
		Indirect Impact	386,248.25
TOTAL Raw HQT Score			**408,980.12**

NO **Advanced Payment Multiplier:**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
		Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
Programmatic Multipliers (COR)	Reserve Account (20%)	1			81,796.02		
	~~Adv. Payment (10%)~~	~~0~~			~~0.00~~		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	25,527.07	0.00	0.00
	Seasonal Use	49	0	0	1,220,129.23	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		51			1,327,452.33		

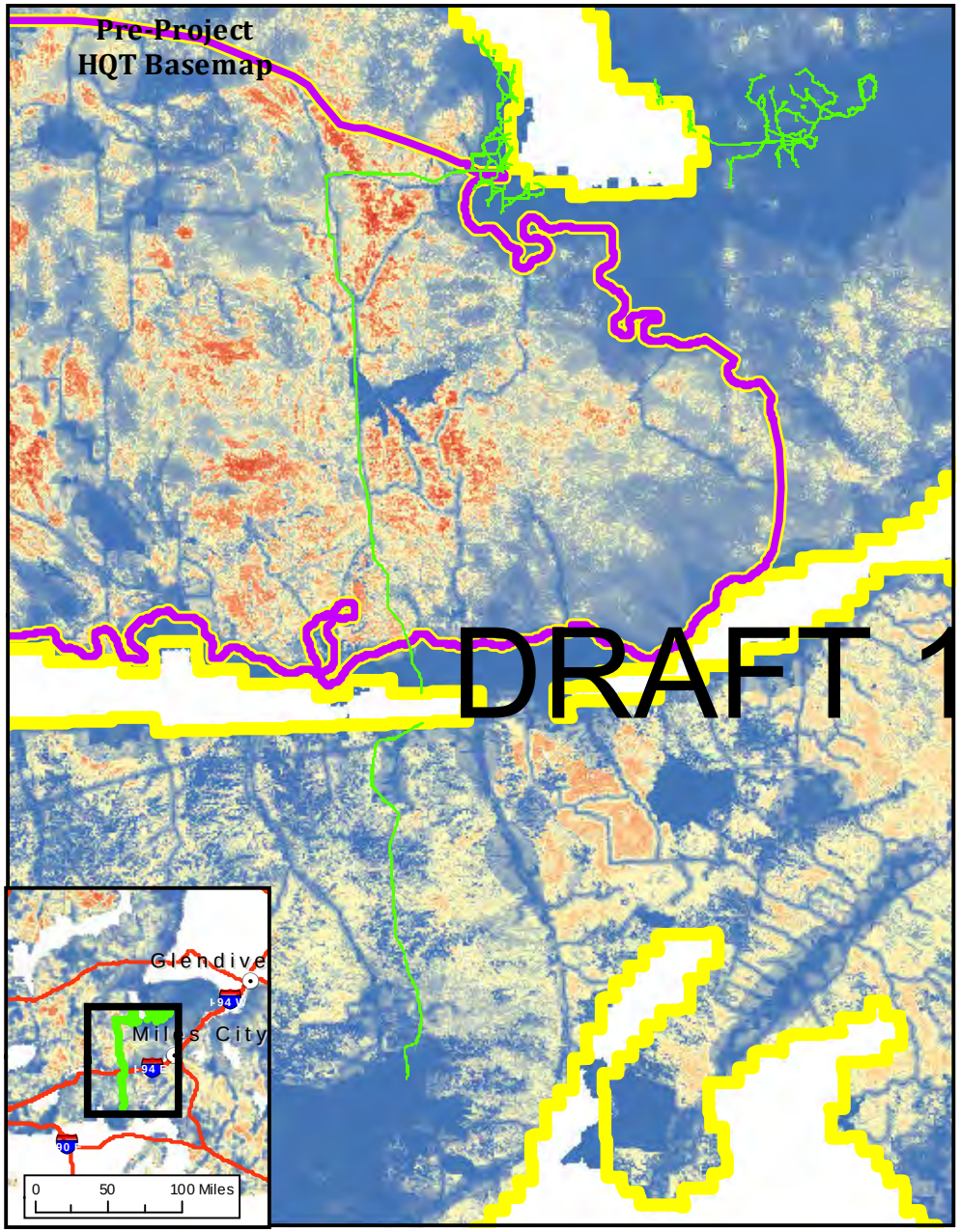
TOTAL Debits (Raw HQT Score + Debits from Policy)	**1,736,432.45**

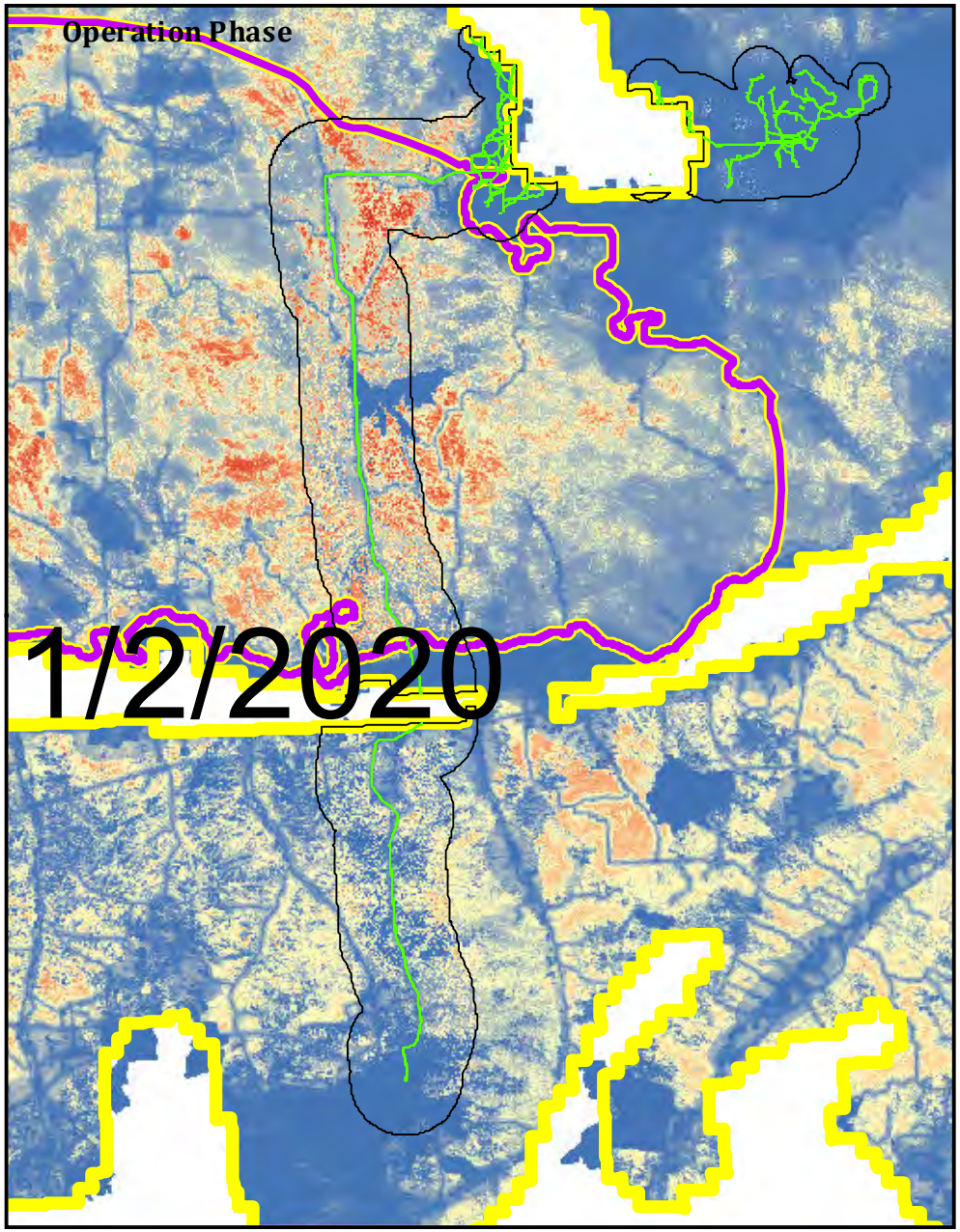
WITH **Advanced Payment Multiplier:** **fullfilling obligation through contribution to Stewardship Account**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			81,796.02		
	Adv. Payment (10%)	1			40,898.01		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	25,527.07	0.00	0.00
	Seasonal Use	49	0	0	1,220,129.23	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		52			1,368,350.34		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**1,777,330.46**

Total Cost		
Discount Rate Method of 3%	Project Phases	All Habitat
	Construction	$ 175,452.93
	Operations	$ 11,883,385.84
	Reclamation	$ 19,721.10
	All Phases	**$ 12,078,559.87**

4173, 4172, 4171, 4170, 4169, 4163, 4148, 4183 - Clearwater: Nest Facilitating





DRAFT 11/2/2020

Project HQT Metadata

HQT Date:27 Oct 2020
Years for Construction: 1 Year
Years for Operations: 49 Years

HQT Habitat Quality

High
Low

Project Direct Impact Footprint

Project Assessment Area

Major Towns

Core Area

General Habitat

Major Roads

0 10 20 Miles

MONTANA SAGE GROUSE
Habitat Conservation Program

N

PRELIMINARY HQT Results

Project Information						
Project ID	4173, 4172, 4171, 4170, 4169, 4163, 4148					
Project Name	Clearwater Wind Farm					
Service Area(s)	Central, Southeastern					
Project Duration	Project Phases	# Years Transmission Line			# of Years Wind Facility	
	Construction	1			1	
	Operations	49			29	
	Reclamation	75			75	
Physical Acres	Project Phases	Core Area	General Habitat	Connectivity Area	All Habitat	
	Construction	756.972	1156.578	0.000	1913.550	
	Operations	764.238	1065.860	0.000	1830.098	
	Reclamation	764.238	1156.578	0.000	1920.816	
Versions, etc.	HQT Model	v1.1				
	HQT Tech Manual	Oct 2018 v1.0				
	HQT Basemap	Oct 2018 v1.0				
	Policy Guidance	Oct 2018 v1.0				
	Date of HQT Run	10/27/2020				
List any project-specific HQT parameters	Spatial Resolution	3.75				
	Anthropogenic Variables included in the HQT Analysis & Indirect Impact Area assessed					
	Oil & Gas Facilities	Not Applicable				
	Cedar Creek or Elk Basin?	*Not Applicable*				
	Tall Structures	Applied: 8 Tall Structures: 3.0-km Buffer				
	NON-Nest Facilitating?	*Applied: Yes*				
	Transmission/Distribution Structures	Applied: 1 Substation, 10 Power Lines: 6-km Buffer				
	NON-Nest Facilitating?	*Applied: Yes*				
	Substation: buffer size	*Applied: 6.0-km Buffer*				
	Wind Facilities	Applied: 148 Wind Turbines: 1.5-km Density				
	Major Roads & Mainline Railways	Not Applicable				
	Minor Roads & Spur Rails	Applied: 161 Minor Roads: 500-m Buffer				
	Buried Utilities (pipelines, fiber, etc.)	Applied: 73 Power Collection Lines: 500-m Buffer				
	Agriculture & Mines	Not Applicable				
	Noise (compressor stations, etc.)	Not Applicable				
	Other	Applied: 5 Storage Yards, 4 Stock Ponds: 500-m Buffer				

Raw HQT Score - Preliminary Results			
Habitat Type	Project Phase	Impact Area	Raw HQT Score
Core Area	Construction	Direct Impact	242.23
		Indirect Impact	5,681.75
	Operations	Direct Impact	9,025.65
		Indirect Impact	223,310.94
	Reclamation	Direct Impact Only	7,807.39
	ALL Phases	Direct Impact	17,075.26
		Indirect Impact	228,992.69
General Habitat	Construction	Direct Impact	104.99
		Indirect Impact	3,451.60
	Operations	Direct Impact	3,839.63
		Indirect Impact	133,614.37
	Reclamation	Direct Impact Only	1,711.99
	ALL Phases	Direct Impact	5,656.61
		Indirect Impact	137,065.97
Connectivity Area	Construction	Direct Impact	0.00
		Indirect Impact	0.00
	Operations	Direct Impact	0.00
		Indirect Impact	0.00
	Reclamation	Direct Impact Only	0.00
	ALL Phases	Direct Impact	0.00
		Indirect Impact	0.00
ALL Habitat	ALL Construction	Direct Impact	347.22
		Indirect Impact	9,133.35
	ALL Operations	Direct Impact	12,865.28
		Indirect Impact	356,925.31
	ALL Reclamation	Direct Impact Only	9,519.38
	ALL Phases	Direct Impact	22,731.88
		Indirect Impact	366,058.66
TOTAL Raw HQT Score			**388,790.53**

NO **Advanced Payment Multiplier:**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
		Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
Programmatic Multipliers (COR)	Reserve Account (20%)	1			77,758.11		
	~~Adv. Payment (10%)~~	~~0~~			~~0.00~~		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	23,826.06	0.00	0.00
	Seasonal Use	49	0	0	1,138,449.25	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		51			1,240,033.41		

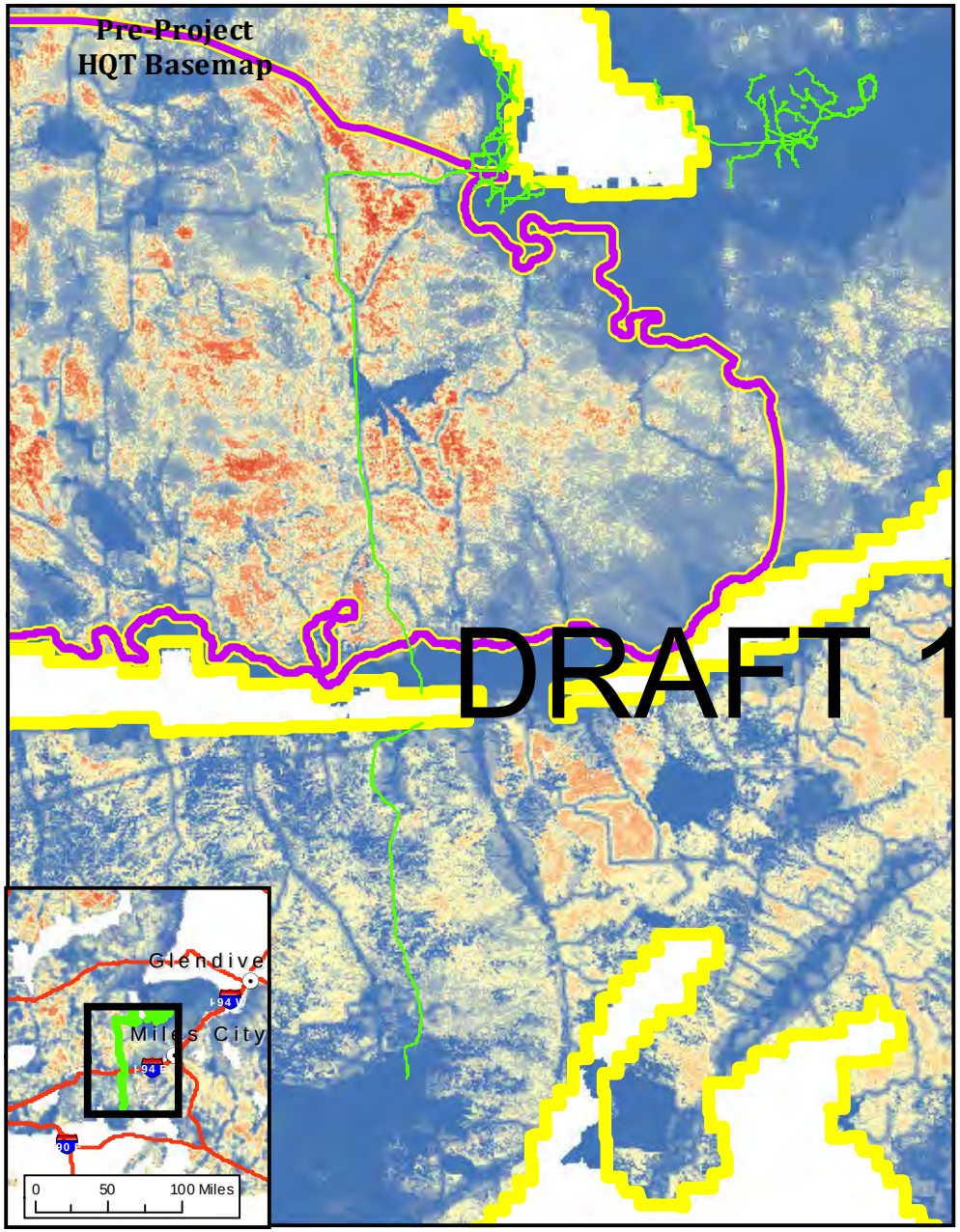
TOTAL Debits (Raw HQT Score + Debits from Policy)	**1,628,823.95**

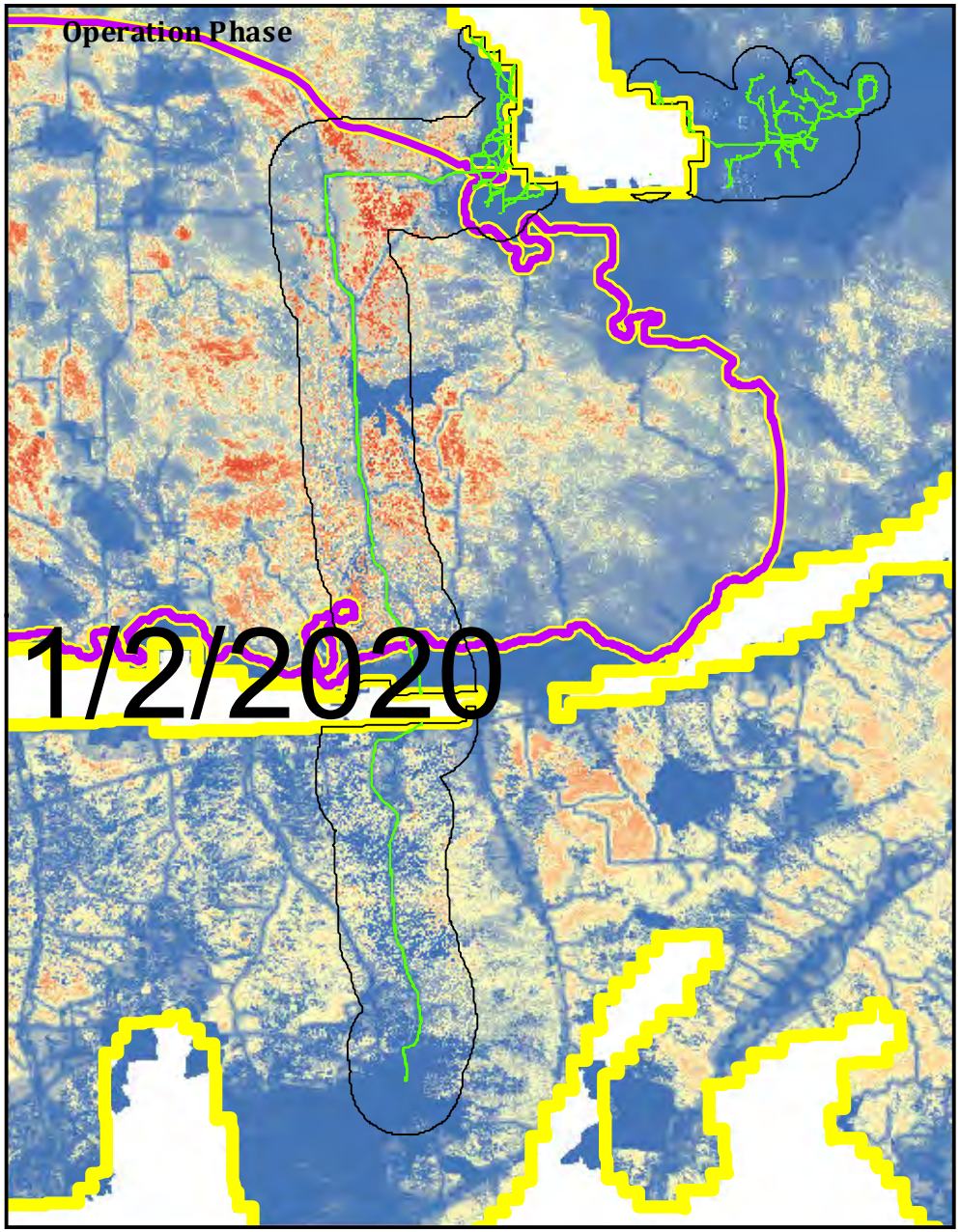
WITH **Advanced Payment Multiplier:** **fullfilling obligation through contribution to Stewardship Account**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			77,758.11		
	Adv. Payment (10%)	1			38,879.05		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	23,826.06	0.00	0.00
	Seasonal Use	49	0	0	1,138,449.25	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		52			1,278,912.47		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**1,667,703.00**

Total Cost		
Discount Rate Method of 3%	Project Phases	All Habitat
	Construction	$ 167,922.77
	Operations	$ 11,143,065.50
	Reclamation	$ 19,146.70
	All Phases	**$ 11,330,134.97**

4173, 4172, 4171, 4170, 4169, 4163, 4148, 4183 - Clearwater: Non-Nest Facilitating





DRAFT 11/2/2020

Project HQT Metadata

HQT Date:27 Oct 2020
Years for Construction: 1 Year
Years for Operations: 49 Years

HQT Habitat Quality

High
Low

Project Direct Impact Footprint

Project Assessment Area

Major Towns

Core Area

General Habitat

Major Roads

0 10 20 Miles

MONTANA SAGE GROUSE
Habitat Conservation Program

N

Appendix B.

Montana Sage Grouse Habitat Conservation Program February 2021 Evaluation of the Clearwater Wind Project — Program's Interpretation

PRELIMINARY HQT Results - Including Reserve Account, Advanced Payment, 18 Seasonal Use Deviations, 1 NSO Deviation

Project Information					
Project ID	4173, 4172, 4170, 4169, 4163, 4148, 4183, 4255, 4223				
Project Name	Clearwater Wind Facility				
Service Area(s)	Central				
Project Duration	Project Phases	# of Years			
		Full Project Footprint (1 year Construction, First 30 Years Operations)			Transmission Line Only (Remaining 20 Years Operations)
	Construction	1			0
	Operations	30			20
	Reclamation	75			
Physical Acres	Project Phases	Core Area	General Habitat	Connectivity Area	All Habitat
	Construction	774.027	1094.045	0.000	1868.072
	Operations	769.103	968.356	0.000	1737.459
	Reclamation	0.000	0.000	0.000	0.000
Versions, etc.	HQT Model	v1.1			
	HQT Tech Manual	Oct 2018 v1.0			
	HQT Basemap	Oct 2018 v1.0			
	Policy Guidance	Oct 2018 v1.0			
	Date of HQT Run	2/4/2021			
List any project-specific HQT parameters	Spatial Resolution	3.75			
	Anthropogenic Variables included in the HQT Analysis & Indirect Impact Area assessed				
	Oil & Gas Facilities	Not Applicable			
	Cedar Creek or Elk Basin?	*Not Applicable*			
	Tall Structures	Applied: 4 Met Towers: 3.0-km Buffer			
	NON-Nest Facilitating?	*Applied: Yes*			
	Transmission/Distribution Structures	Applied: 10 Power Lines, 1 Substation: 6.0-km buffer			Applied: 10 Power Lines: 6.0-km buffer
	NON-Nest Facilitating?	*Applied: Yes*			*Applied: Yes*
	Substation: buffer size	*Applied: 6.0-km Buffer*			
	Wind Facilities	*Applied: 147 Wind Turbines: 1.5-km Density*			
	Major Roads & Mainline Railways	*Not Applicable*			
	Minor Roads & Spur Rails	*Applied: 165 Minor Roads: 500-m Buffer*			
	Buried Utilities (pipelines, fiber, etc.)	*Applied: 256 Collector Lines: 500-m Buffer*			
	Agriculture & Mines	*Not Applicable*			
	Noise (compressor stations, etc.)	*Not Applicable*			
	Other	Applied: 5 Laydown Yards: 500-m Buffer			

Raw HQT Score - Preliminary Results					
			Full Project Footprint (1 year Construction, First 30 Years Operations)		Transmission Line Only (Remaining 20 Years Operations)
Habitat Type	Project Phase	Impact Area	Raw HQT Score		
Core Area	Construction	Direct Impact	243.55		0.00
		Indirect Impact	5,676.23		0.00
	Operations	Direct Impact	5,556.15		3,703.77
		Indirect Impact	136,635.89		91,080.60
	Reclamation	Direct Impact Only	7,871.38		0.00
	ALL Phases	Direct Impact	13,671.08		3,703.77
		Indirect Impact	142,312.12		91,080.60
General Habitat	Construction	Direct Impact	106.15		0.00
		Indirect Impact	3,240.41		0.00
	Operations	Direct Impact	2,440.59		1,562.48
		Indirect Impact	81,315.60		49,312.20
	Reclamation	Direct Impact Only	1,840.60		0.00
	ALL Phases	Direct Impact	4,387.34		1,562.48
		Indirect Impact	84,556.01		49,312.20
Connectivity Area	Construction	Direct Impact	0.00		0.00
		Indirect Impact	0.00		0.00
	Operations	Direct Impact	0.00		0.00
		Indirect Impact	0.00		0.00
	Reclamation	Direct Impact Only	0.00		0.00
	ALL Phases	Direct Impact	0.00		0.00
		Indirect Impact	0.00		0.00
ALL Habitat	ALL Construction	Direct Impact	349.69		0.00
		Indirect Impact	8,916.64		0.00
	ALL Operations	Direct Impact	7,996.74		5,266.25
		Indirect Impact	217,951.49		140,392.80
	ALL Reclamation	Direct Impact Only	9,711.98		0.00
	ALL Phases	Direct Impact	18,058.42		5,266.25
		Indirect Impact	226,868.13		140,392.80
TOTAL Raw HQT Score			244,926.55		145,659.04

NO **Advanced Payment Multiplier: Full Project Footprint** **(1 year Construction, First 30 Years Operations)**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
		Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
Programmatic Multipliers (COR)	Reserve Account (20%)	1			47,042.91		
	~~Adv. Payment (10%)~~	~~0~~			~~0.00~~		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	14,219.20	0.00	0.00
	Seasonal Use	18	0	0	255,945.68*	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		20			317,207.80		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**562,134.35**

* The debits associated with site-specific multipliers can be calculated by multiplying the number of deviations by the percentage of the multiplier and further multiplying that by the raw HQT score for each habitat category (i.e., General or Core). For example, the debits created by the 18 seasonal use deviations in Core habitat are calculated as: Operations Phase Debits (Direct Impact + Indirect Impact) x Number of Deviations x Percentage Multiplier for Core = (5,556.15 + 136,635.89) x 18 x 0.10 = 255,945.61. Site-specific multipliers from the Construction Phase were not included in this case because seasonal use deviations will only occur during the Operations Phase.

NO **Advanced Payment Multiplier: Transmission Line Only** **(Remaining 20 Years Operations)**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
		Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
Programmatic Multipliers (COR)	Reserve Account (20%)	1			31,074.21		
	~~Adv. Payment (10%)~~	~~0~~			~~0.00~~		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	Net Gain (10%)	N/A	N/A	N/A	N/A	N/A	N/A
	DDCT - Core only	N/A	N/A	N/A	N/A	N/A	N/A
	NSOs	1	N/A	N/A	9,478.44	N/A	N/A
	Seasonal Use	18	N/A	N/A	170,611.85	N/A	N/A
	Veg Removal	N/A	N/A	N/A	N/A	N/A	N/A
	Noise	N/A	N/A	N/A	N/A	N/A	N/A
	Transportation	N/A	N/A	N/A	N/A	N/A	N/A
	Pipelines	N/A	N/A	N/A	N/A	N/A	N/A
	Transmission	N/A	N/A	N/A	N/A	N/A	N/A
	Oil/Gas 1:640	N/A	N/A	N/A	N/A	N/A	N/A
	Surface Mining	N/A	N/A	N/A	N/A	N/A	N/A
	Coal Mining	N/A	N/A	N/A	N/A	N/A	N/A
	Wind Energy	N/A	N/A	N/A	N/A	N/A	N/A
Total Debits from Policy Multipliers		20			211,164.49		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**356,823.54**

WITH **Advanced Payment Multiplier: Full Project Footprint** **(1 year Construction, First 30 Years Operations)- fullfilling obligation through contribution to Stewardship Account**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			47,042.91		
	Adv. Payment (10%)	1			23,521.46		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	N/A	N/A	0	Raw HQT Score	N/A	0.00
	DDCT - Core only	N/A	N/A	0	0.00	N/A	0.00
	NSOs	1	N/A	0	14,219.20	N/A	0.00
	Seasonal Use	18	N/A	0	255,945.68	N/A	0.00
	Veg Removal	N/A	N/A	0	0.00	N/A	0.00
	Noise	N/A	N/A	0	0.00	N/A	0.00
	Transportation	N/A	N/A	0	0.00	N/A	0.00
	Pipelines	N/A	N/A	0	0.00	N/A	0.00
	Transmission	N/A	N/A	0	0.00	N/A	0.00
	Oil/Gas 1:640	N/A	N/A	0	0.00	N/A	0.00
	Surface Mining	N/A	N/A	0	0.00	N/A	0.00
	Coal Mining	N/A	N/A	0	0.00	N/A	0.00
	Wind Energy	N/A	N/A	0	0.00	N/A	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		21			340,729.26		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**585,655.81**

Total Cost - Full Project Footprint (1 year Construction, First 30 Years Operations)			
Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	156,601.03
	Operations	$	4,789,478.03
	Reclamation	$	-
	All Phases	**$**	**4,946,079.07**

WITH **Advanced Payment Multiplier: Transmission Line Only (Remaining 20 Years Operations) - fullfilling obligation through contribution to Stewardship Account**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			31,074.21		
	Adv. Payment (10%)	1			15,537.10		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	9,478.44	0.00	0.00
	Seasonal Use	18	0	0	170,611.85	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		21			226,701.60		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**372,360.64**

Total Cost - Transmission Line Only (Remaining 20 Years Operations)			
Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	-
	Operations	$	1,471,899.10
	Reclamation	$	19,460.47
	All Phases	**$**	**1,491,359.56**

Total Cost -
Construction: 1 year;
Operations: 50 years total; years 1-30 (met towers, transmission line, substation, turbines, roads, laydown yards); years 31-50 (transmission line only)
Reclamation: 75 years

Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	156,601.03
	Operations	$	6,261,377.13
	Reclamation	$	19,460.47
	All Phases	**$**	**6,437,438.63**

Appendix C.

Montana Sage Grouse Habitat Conservation Program February 2021 Evaluation of the Clearwater Wind Project — Clearwater's Interpretation

PRELIMINARY HQT Results - Including Reserve Account, Advanced Payment, 4 Seasonal Use Deviations

Project Information					
Project ID	4173, 4172, 4170, 4169, 4163, 4148, 4183, 4255, 4223				
Project Name	Clearwater Wind Facility				
Service Area(s)	Central				
Project Duration	Project Phases	# of Years			
		Full Project Footprint (1 year Construction, First 30 Years Operations)			Transmission Line Only (Remaining 20 Years Operations)
	Construction	1			0
	Operations	30			20
	Reclamation	75			
Physical Acres	Project Phases	Core Area	General Habitat	Connectivity Area	All Habitat
	Construction	774.027	1094.045	0.000	1868.072
	Operations	769.103	968.356	0.000	1737.459
	Reclamation	0.000	0.000	0.000	0.000
Versions, etc.	HQT Model	v1.1			
	HQT Tech Manual	Oct 2018 v1.0			
	HQT Basemap	Oct 2018 v1.0			
	Policy Guidance	Oct 2018 v1.0			
	Date of HQT Run	2/4/2021			
List any project-specific HQT parameters	Spatial Resolution	3.75			
	Anthropogenic Variables included in the HQT Analysis & Indirect Impact Area assessed				
	Oil & Gas Facilities	Not Applicable			
	Cedar Creek or Elk Basin?	*Not Applicable*			
	Tall Structures	Applied: 4 Met Towers: 3.0-km Buffer			
	NON-Nest Facilitating?	*Applied: Yes*			
	Transmission/Distribution Structures	Applied: 10 Power Lines, 1 Substation: 6.0-km buffer			Applied: 10 Power Lines: 6.0-km buffer
	NON-Nest Facilitating?	*Applied: Yes*			*Applied: Yes*
	Substation: buffer size	*Applied: 6.0-km Buffer*			
	Wind Facilities	*Applied: 147 Wind Turbines: 1.5-km Density*			
	Major Roads & Mainline Railways	*Not Applicable*			
	Minor Roads & Spur Rails	*Applied: 165 Minor Roads: 500-m Buffer*			
	Buried Utilities (pipelines, fiber, etc.)	*Applied: 256 Collector Lines: 500-m Buffer*			
	Agriculture & Mines	*Not Applicable*			
	Noise (compressor stations, etc.)	*Not Applicable*			
	Other	Applied: 5 Laydown Yards: 500-m Buffer			

Raw HQT Score - Preliminary Results					
			Full Project Footprint (1 year Construction, First 30 Years Operations)		Transmission Line Only (Remaining 20 Years Operations)
Habitat Type	Project Phase	Impact Area	Raw HQT Score		
Core Area	Construction	Direct Impact	243.55		0.00
		Indirect Impact	5,676.23		0.00
	Operations	Direct Impact	5,556.15		3,703.77
		Indirect Impact	136,635.89		91,080.60
	Reclamation	Direct Impact Only	7,871.38		0.00
	ALL Phases	Direct Impact	13,671.08		3,703.77
		Indirect Impact	142,312.12		91,080.60
General Habitat	Construction	Direct Impact	106.15		0.00
		Indirect Impact	3,240.41		0.00
	Operations	Direct Impact	2,440.59		1,562.48
		Indirect Impact	81,315.60		49,312.20
	Reclamation	Direct Impact Only	1,840.60		0.00
	ALL Phases	Direct Impact	4,387.34		1,562.48
		Indirect Impact	84,556.01		49,312.20
Connectivity Area	Construction	Direct Impact	0.00		0.00
		Indirect Impact	0.00		0.00
	Operations	Direct Impact	0.00		0.00
		Indirect Impact	0.00		0.00
	Reclamation	Direct Impact Only	0.00		0.00
	ALL Phases	Direct Impact	0.00		0.00
		Indirect Impact	0.00		0.00
ALL Habitat	ALL Construction	Direct Impact	349.69		0.00
		Indirect Impact	8,916.64		0.00
	ALL Operations	Direct Impact	7,996.74		5,266.25
		Indirect Impact	217,951.49		140,392.80
	ALL Reclamation	Direct Impact Only	9,711.98		0.00
	ALL Phases	Direct Impact	18,058.42		5,266.25
		Indirect Impact	226,868.13		140,392.80
TOTAL Raw HQT Score			244,926.55		145,659.04

NO **Advanced Payment Multiplier: Full Project Footprint** (1 year Construction, First 30 Years Operations)							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
		Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
Programmatic Multipliers (COR)	Reserve Account (20%)	1			47,042.91		
	~~Adv. Payment (10%)~~	~~0~~			~~0.00~~		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	0	0	0	0.00	0.00	0.00
	Seasonal Use	4	0	0	56,876.82*	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		5			103,919.73		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**348,846.28**

* The debits associated with site-specific multipliers can be calculated by multiplying the number of deviations by the percentage of the multiplier and further multiplying that by the raw HQT score for each habitat category (i.e., General or Core). For example, the debits created by the 4 seasonal use deviations in Core habitat are calculated as: Operations Phase Debits (Direct Impact + Indirect Impact) x Number of Deviations x Percentage Multiplier for Core = (5,556.15 + 136,635.89) x 4 x 0.10 = 56,876.82. Site-specific multipliers from the Construction Phase were not included in this case because seasonal use deviations will only occur during the Operations Phase.

NO **Advanced Payment Multiplier: Transmission Line Only** (Remaining 20 Years Operations)							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
		Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
Programmatic Multipliers (COR)	Reserve Account (20%)	1			31,074.21		
	~~Adv. Payment (10%)~~	~~0~~			~~0.00~~		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	Net Gain (10%)	N/A	N/A	N/A	N/A	N/A	N/A
	DDCT - Core only	N/A	N/A	N/A	N/A	N/A	N/A
	NSOs	0	N/A	N/A	0.00	N/A	N/A
	Seasonal Use	4	N/A	N/A	37,913.75	N/A	N/A
	Veg Removal	N/A	N/A	N/A	N/A	N/A	N/A
	Noise	N/A	N/A	N/A	N/A	N/A	N/A
	Transportation	N/A	N/A	N/A	N/A	N/A	N/A
	Pipelines	N/A	N/A	N/A	N/A	N/A	N/A
	Transmission	N/A	N/A	N/A	N/A	N/A	N/A
	Oil/Gas 1:640	N/A	N/A	N/A	N/A	N/A	N/A
	Surface Mining	N/A	N/A	N/A	N/A	N/A	N/A
	Coal Mining	N/A	N/A	N/A	N/A	N/A	N/A
	Wind Energy	N/A	N/A	N/A	N/A	N/A	N/A
Total Debits from Policy Multipliers		5			68,987.95		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**214,646.99**

WITH **Advanced Payment Multiplier: Full Project Footprint** (1 year Construction, First 30 Years Operations)- fullfilling obligation through contribution to Stewardship Account							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			47,042.91		
	Adv. Payment (10%)	1			23,521.46		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	N/A	N/A	0	Raw HQT Score	N/A	0.00
	DDCT - Core only	N/A	N/A	0	0.00	N/A	0.00
	NSOs	0	N/A	0	0.00	N/A	0.00
	Seasonal Use	4	N/A	0	56,876.82	N/A	0.00
	Veg Removal	N/A	N/A	0	0.00	N/A	0.00
	Noise	N/A	N/A	0	0.00	N/A	0.00
	Transportation	N/A	N/A	0	0.00	N/A	0.00
	Pipelines	N/A	N/A	0	0.00	N/A	0.00
	Transmission	N/A	N/A	0	0.00	N/A	0.00
	Oil/Gas 1:640	N/A	N/A	0	0.00	N/A	0.00
	Surface Mining	N/A	N/A	0	0.00	N/A	0.00
	Coal Mining	N/A	N/A	0	0.00	N/A	0.00
	Wind Energy	N/A	N/A	0	0.00	N/A	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		6			127,441.19		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**372,367.74**

Total Cost - Full Project Footprint (1 year Construction, First 30 Years Operations)			
Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	156,601.03
	Operations	$	2,977,910.59
	Reclamation	$	-
	All Phases	**$**	**3,134,511.62**

WITH **Advanced Payment Multiplier: Transmission Line Only (Remaining 20 Years Operations) - fullfilling obligation through contribution to Stewardship Account**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			31,074.21		
	Adv. Payment (10%)	1			15,537.10		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	0	0	0	0.00	0.00	0.00
	Seasonal Use	4	0	0	37,913.75	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		6			84,525.05		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**230,184.10**

Total Cost - Transmission Line Only (Remaining 20 Years Operations)			
Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	-
	Operations	$	905,459.25
	Reclamation	$	19,460.47
	All Phases	**$**	**924,919.72**

Total Cost -
Construction: 1 year;
Operations: 50 years total; years 1-30 (met towers, transmission line, substation, turbines, roads, laydown yards); years 31-50 (transmission line only)
Reclamation: 75 years

Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	156,601.03
	Operations	$	3,883,369.84
	Reclamation	$	19,460.47
	All Phases	**$**	**4,059,431.34**

Appendix D.

Summary Paper – Clearwater Wind Project Sage Grouse Mitigation Plan with Corporate Guaranty Component

CLEARWATER WIND PROJECT
SAGE GROUSE MITIGATION PLAN WITH CORPORATE GUARANTY COMPONENT

CLEARWATER WIND PROJECT BACKGROUND

The Clearwater Wind Project ("Project") is proposed to encompass 147,000 acres of private and state trust land in Rosebud, Custer, and Garfield Counties and at full build-out, will consist of a wind farm with approximately 750 MWs of nameplate capacity and a 100-mile transmission line that will interconnect to the electrical grid through an existing substation near Colstrip. The Project will inject approximately $1 billion in investment in the state, create hundreds of construction jobs, and generate millions in local tax revenue. The Project is targeting start of construction by summer 2021 and is anticipated to be operational by Q4 2022.

SAGE GROUSE CONSULTATION & MITIGATION EFFORTS

Portions of the Project and transmission line are sited within general and core sage grouse habitat. As such, since February 2020, Clearwater Energy Resources LLC ("Clearwater") has been in consultation with the DNRC Sage Grouse Program ("Program") to work through the mitigation sequence. The physical footprint of the Project impacts approximately 1,460 acres, with roughly half of that being in core area and the other half in general habitat. The Program's most recent HQT results issued on February 22, 2021, with multipliers, assessed a score of 958,016.45 debits, with a total estimated financial contribution of **$6,437,438.63** if utilizing the state's stewardship account. Clearwater disputes the Program's application of certain site-specific policy multipliers as per an objection letter sent to the Program on December 15, 2020. Clearwater remains committed to working with the Program and MSGOT to resolve these issues.

THE ISSUE AND THE PROPOSAL

Given the Project construction timetable, Clearwater acknowledges that it is unlikely the parties will resolve its legal objections and reach agreement on application of policy multipliers in a timely fashion for Clearwater to obtain MSGOT approval, a sage grouse consultation letter, and to secure coverage under the MPDES General Permit for Storm Water Discharges Associated with Construction Activity (MTR100000), and other permits, so that Project construction can begin on schedule. Clearwater, therefore, intends to propose a mitigation plan for MSGOT approval that would allow Project construction to commence while the parties sort out Clearwater's legal objections and settle on a final sum for payment to the Stewardship Account. To alleviate concern that impacts to sage grouse habitat will occur without corresponding offsets, Clearwater proposes to make an initial contribution to the Stewardship Account in an amount covering its raw HQT score **($2,634,843.13**) and, in addition, provide a corporate guaranty (**$3,802,595.50**) in favor of the State that would ensure payment of any remaining compensatory mitigation obligation with respect to the disputed portion of the HQT results, *i.e.*, the policy multipliers. The initial payment will ensure that there are monies available to the Program to fund credit-creating mitigation projects concurrent with Clearwater's construction activity. Upon final resolution of Clearwater's objections and agreement as to its final payment, Clearwater will release additional funds to the Stewardship Account satisfying 100% of its mitigation obligation as approved by MSGOT.

LEGALITY AND CONSISTENCY WITH MONTANA'S SAGE GROUSE CONSERVATION STRATEGY

Clearwater's proposal is consistent with state law and Montana's Sage Grouse Conservation Strategy, which seeks to balance economic development with conservation. The Stewardship Act permits a developer to satisfy its compensatory mitigation obligation through direct payment to the Stewardship Account if sufficient credits are not available for purchase elsewhere and the developer does not intend to undertake permittee-responsible mitigation actions of their own accord. MCA § 76-22-111(b)(ii); ARM 14.6.104(9)(c). MSGOT is responsible for reviewing and acting upon compensatory mitigation plans, including those with financial contributions to the Stewardship Account. MCA § 76-22-105(1)(g). While MSGOT retains considerable discretion with respect to taking action on such plans, the plans must still meet applicable standards provided in the Montana Mitigation System Policy Guidance for Greater Sage-Grouse ("Policy

Guidance"). ARM 14.6.104(10). Here, there is nothing in Montana law or the Program's Policy Guidance that would preclude use of a corporate guaranty or other acceptable form of security as part of a developer's mitigation plan. In fact, the Program's Policy Guidance allows for the phased purchase of credits, which is similar to how Clearwater's corporate guaranty proposal would function here. Policy Guidance at 69. An initial contribution to the Stewardship Account would be synchronized with initial project construction and a future payment—secured by the corporate guaranty—would be deposited at a later date upon resolution of Clearwater's objections to the policy multipliers and final determination of Project debits. To the extent MSGOT construes Clearwater's mitigation plan as a request to incorporate a policy-based tool, Clearwater has included a section in its mitigation plan addressing the various factors MSGOT is to consider as part of that process.

Furthermore, Clearwater's proposal is made in the spirit of the Program's Policy Guidance, which states: "Each situation is unique and MSGOT encourages creativity on the part of developers to find innovative ways to mitigate impacts. MSGOT seeks to provide the greatest degree of flexibility to developers so they can determine the best way of fulfilling mitigation obligations." Policy Guidance at 71. Indeed, one of the expressly stated goals of Montana's compensatory mitigation process is to provide an approach that is flexible, equitable, and science-based, and which allows those engaged to take creative approaches to offsetting impacts to development. Policy Guidance at 10-11. Where questions, conflicts, or uncertainties arise in the application of the Policy Guidance, this goal of flexibility and creativity is to be used to guide case-by-case decisions, in service to Montana's Conservation Strategy. Policy Guidance at 10-11. Clearwater is committed to working with the Program and MSGOT to develop a solution that meets conservation goals while also allowing Project permitting and construction to proceed on schedule.

Appendix E.

Figures

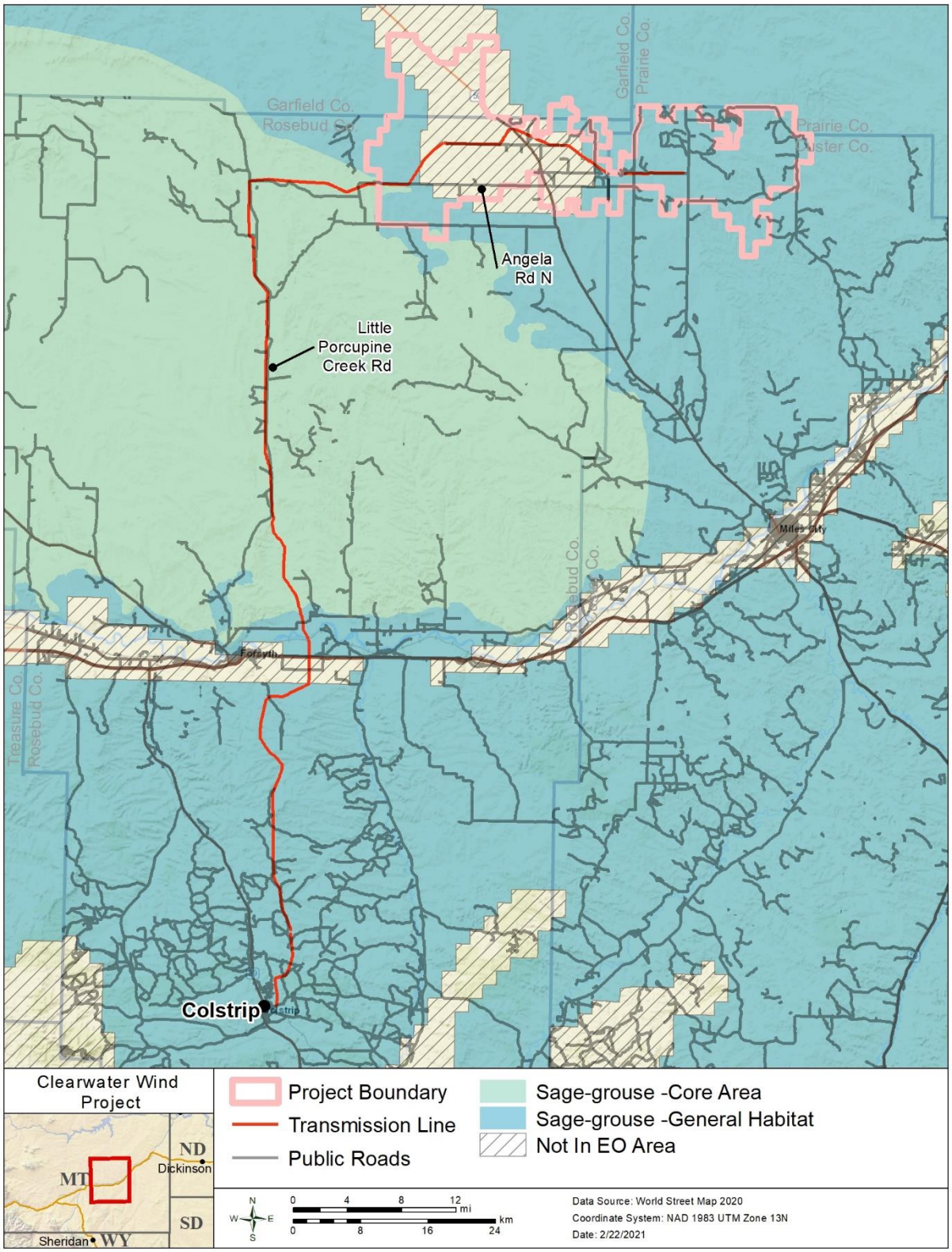


Figure E1. Location of the Clearwater Wind Project, including proposed wind turbines and transmission line located in Custer, Rosebud, and Garfield counties, Montana.

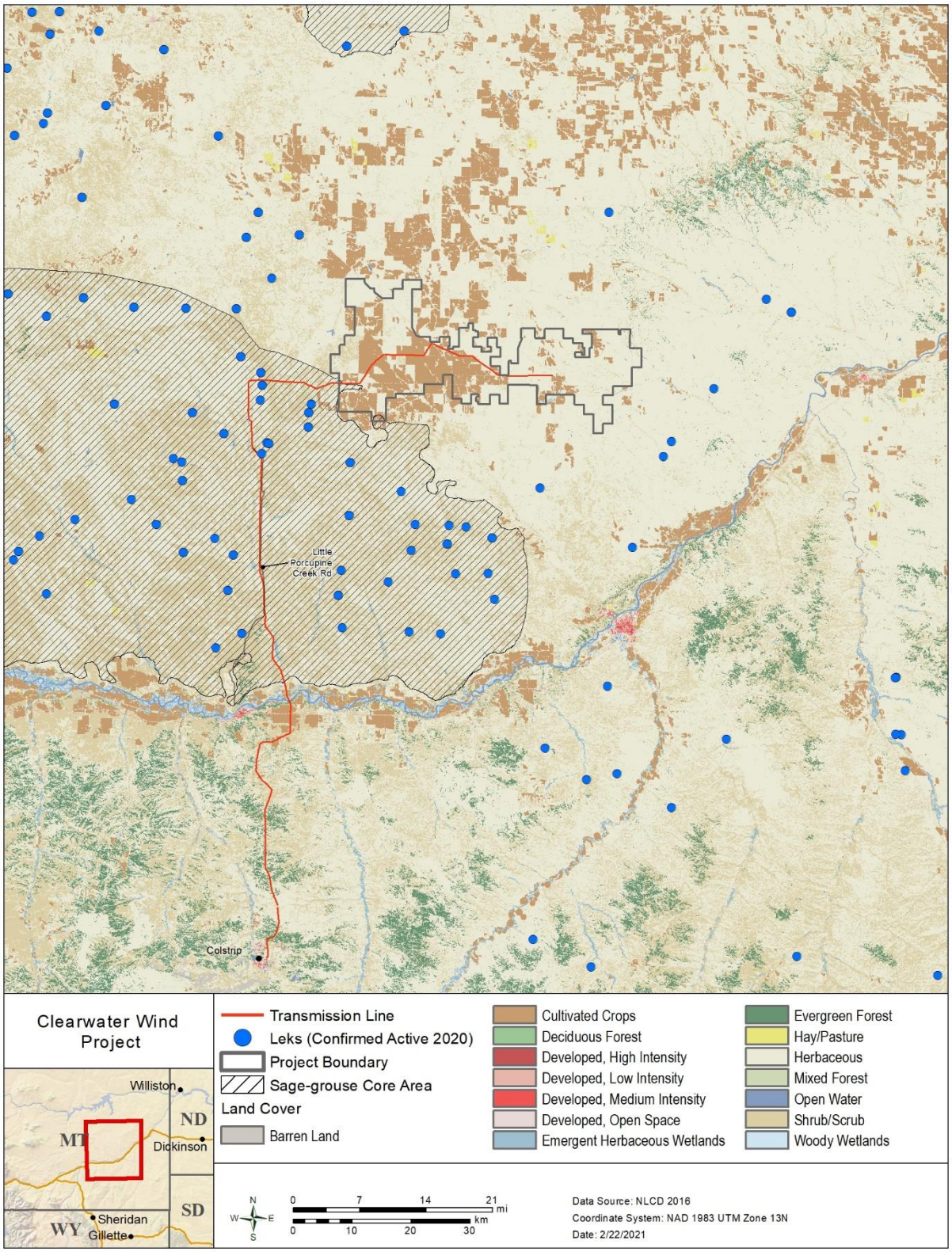


Figure E2. The location and land cover of the Clearwater Wind Project, including proposed wind turbines and transmission line relative to confirmed active greater sage-grouse leks located in Custer, Rosebud, and Garfield counties, Montana.

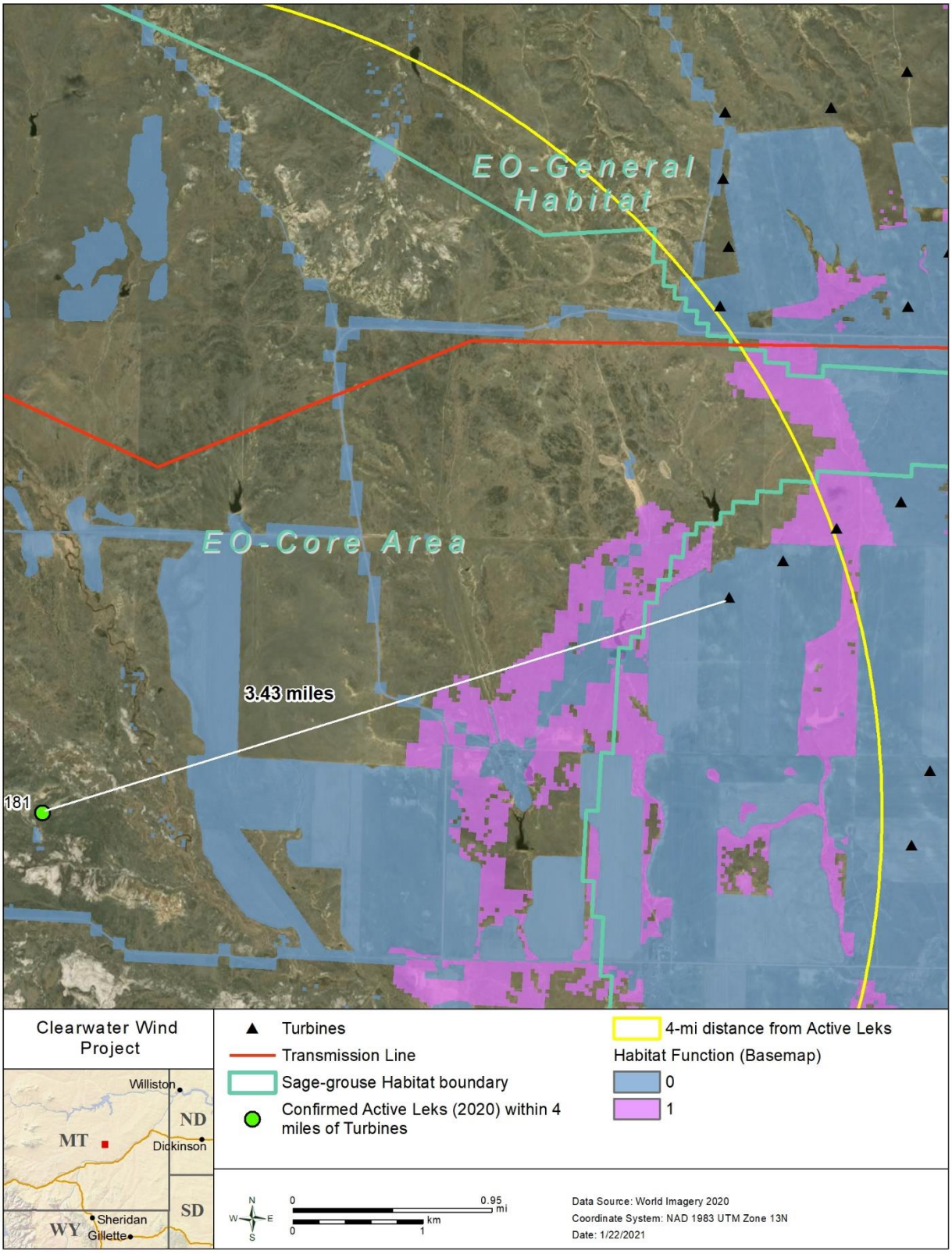


Figure E3. The Clearwater Wind Project's proposed wind turbines within four miles of confirmed active greater sage-grouse leks.

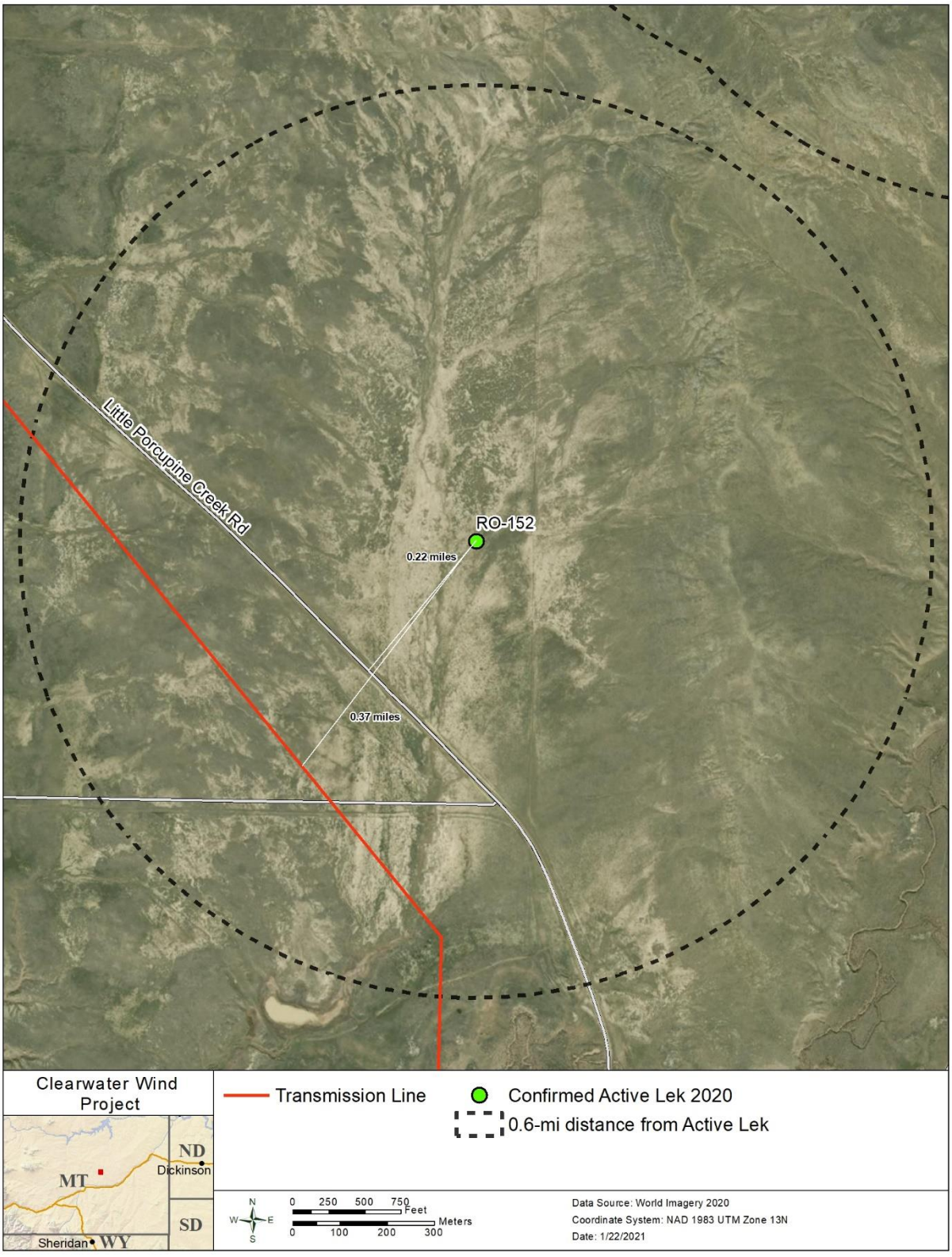


Figure E4. The portion of Clearwater Wind Project's transmission line co-located with Little Porcupine Road and within 0.6 mile of a confirmed active greater sage-grouse lek.

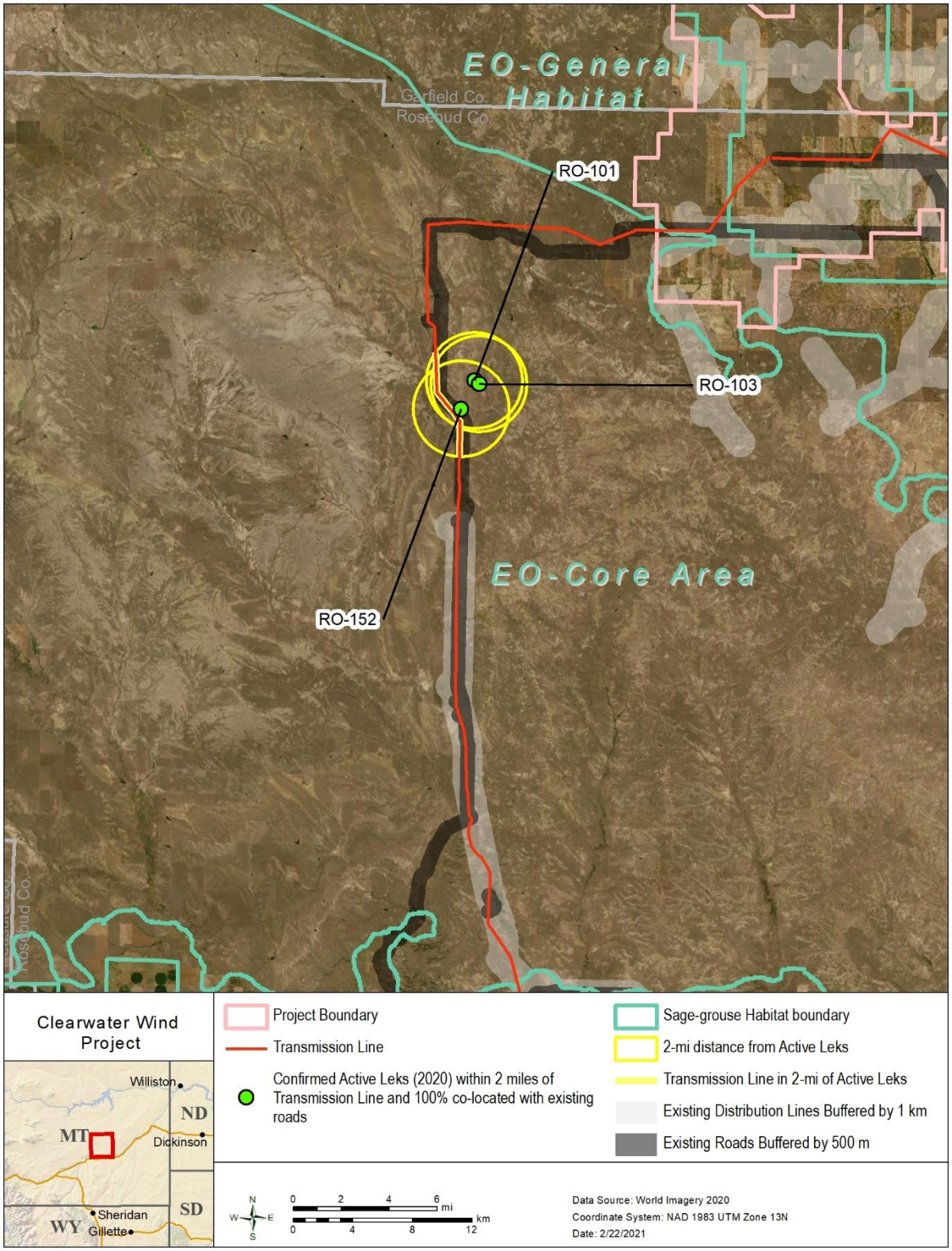


Figure E5. The Clearwater Wind Project's transmission line that is co-located with an existing road within two miles of an active greater sage-grouse lek.

Appendix F.

Clearwater Wind Project Non-Nest Facilitating Supporting Information

Clearwater Wind Project
Non-nest Facilitating Supporting Information
Clearwater Energy Resources LLC
January 2021

Some bird species (e.g., raptors, corvids, etc.) nest on power line structures. The nest type and location on the structure depend on bird species, structure location, line voltage (i.e., size), and structure configuration (Avian Power Line Interaction Committee [APLIC] 2006). Nests are often located on higher voltage structures (e.g., H-frame, steel lattice) and lower voltage double dead-end or dead-end distribution structures. Structures that support raptor and corvid (e.g., raven species) nesting may offer protection from sun, wind, and temperature fluctuations. The height of a power line structure also may be a factor for nest selection, depending on the degree of natural nest substrate available in a breeding territory (APLIC 2006).

Structure design is integral to minimizing nesting by raptors and corvids (i.e., non-nest facilitating). Over 95% of the Clearwater Wind Project 345-kilovolt (kV) single-circuit transmission line will include a single-pole, tubular steel monopole with braced post insulator design (Figure 1). Other designs include a three-pole, tubular steel monopole dead-end and tubular steel H-frame tangent structures (Figures 2 and 3).

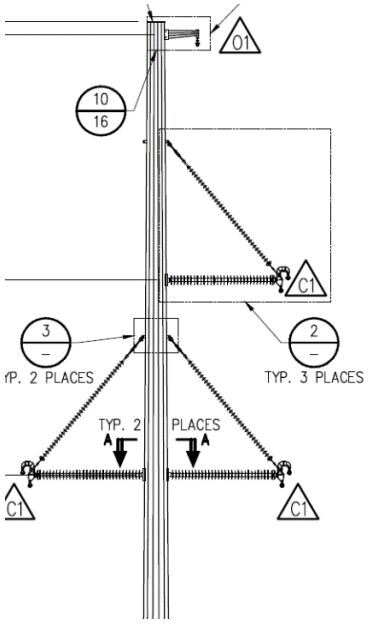


Figure 1. Representative single-circuit 345kV single-pole, tubular steel monopole tangent with braced post insulator structure.

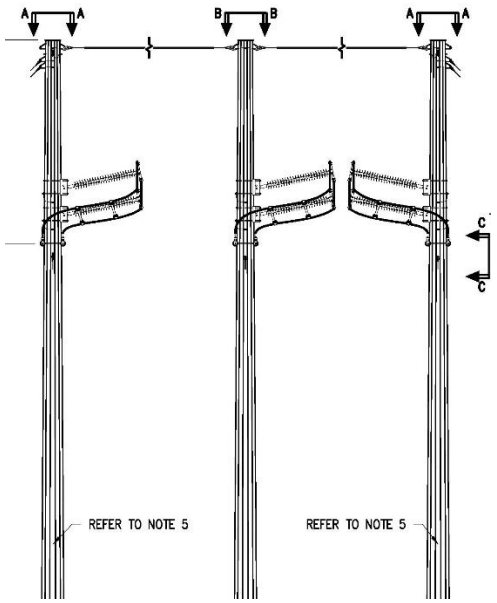


Figure 2. Representative single-circuit 345kV three-pole tubular steel monopole dead-end structure.

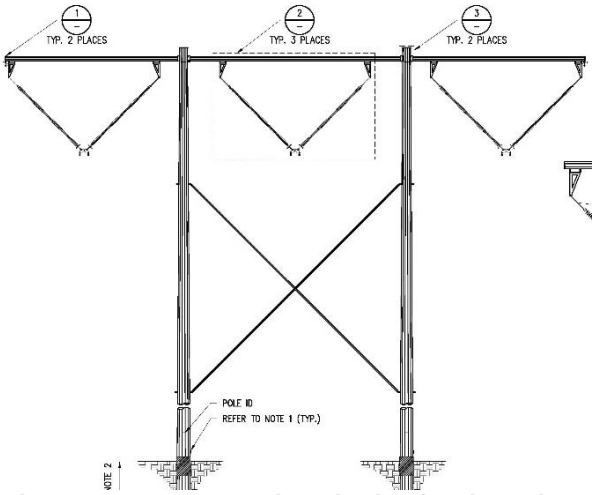


Figure 3. Representative single-circuit 345kV tubular steel H-frame tangent structure.

The monopole and tubular designs (Figures 1 and 2) significantly limit the surface area to attract large nesting birds (e.g., raptors, corvids). To further limit nesting, 67% (*n* = 114) of the 224 structures through Core Area habitat will include cross-arm and pole-top perch deterrents, appropriately designed for the structure size. Combining monopole design with perch deterrents reduces and possibly eliminates raptor and corvid nesting on these structure types.

Of the 548 structures proposed for transmission line, 15(2.7%) would include H-frame structures (Figure 3). The tubular steel crossarm would limit nesting substrate for raptors and corvids (i.e., less surface area for nest structures).

Bird nesting within substations typically involves songbirds attempting to nest within the substation infrastructure. Although ravens and raptors may nest in the larger platforms and portions of substation infrastructure, this nesting is not as common. In the event these nests do occur, management is necessary to prevent any operational issues (i.e., nesting can result in outages). Therefore, nest management to discourage potential future nesting by large birds will rely on proactive measures to remove and dispose of nest materials off site before nest structures are formed and before eggs are laid, per the US Fish and Wildlife Service's (USFWS) 2018 Nest Memorandum (USFWS 2018) allowing inactive nest destruction of non-eagle and non-listed species, as long as no nest possession occurs during or after the destruction.

Citations

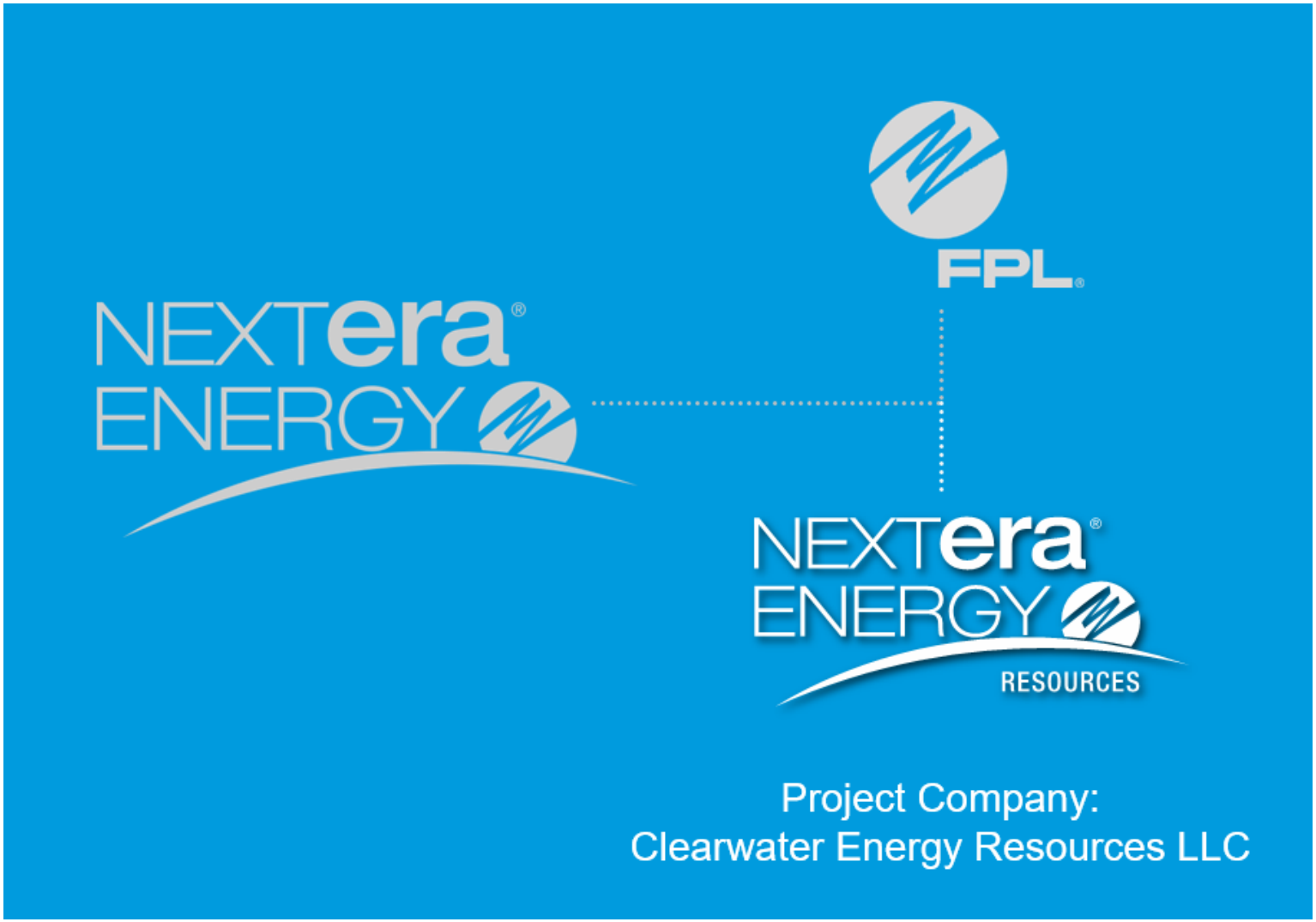
Avian Power Line Interaction Committee (APLIC). 2006. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington D.C. and Sacramento, California.

US Fish and Wildlife Service (USFWS). 2018. Destruction and Relocation of Migratory Bird Nest Contents. FWS/DMBM/AMB/068029. June 14, 2018.

Clearwater Wind
Sage Grouse Mitigation Presentation

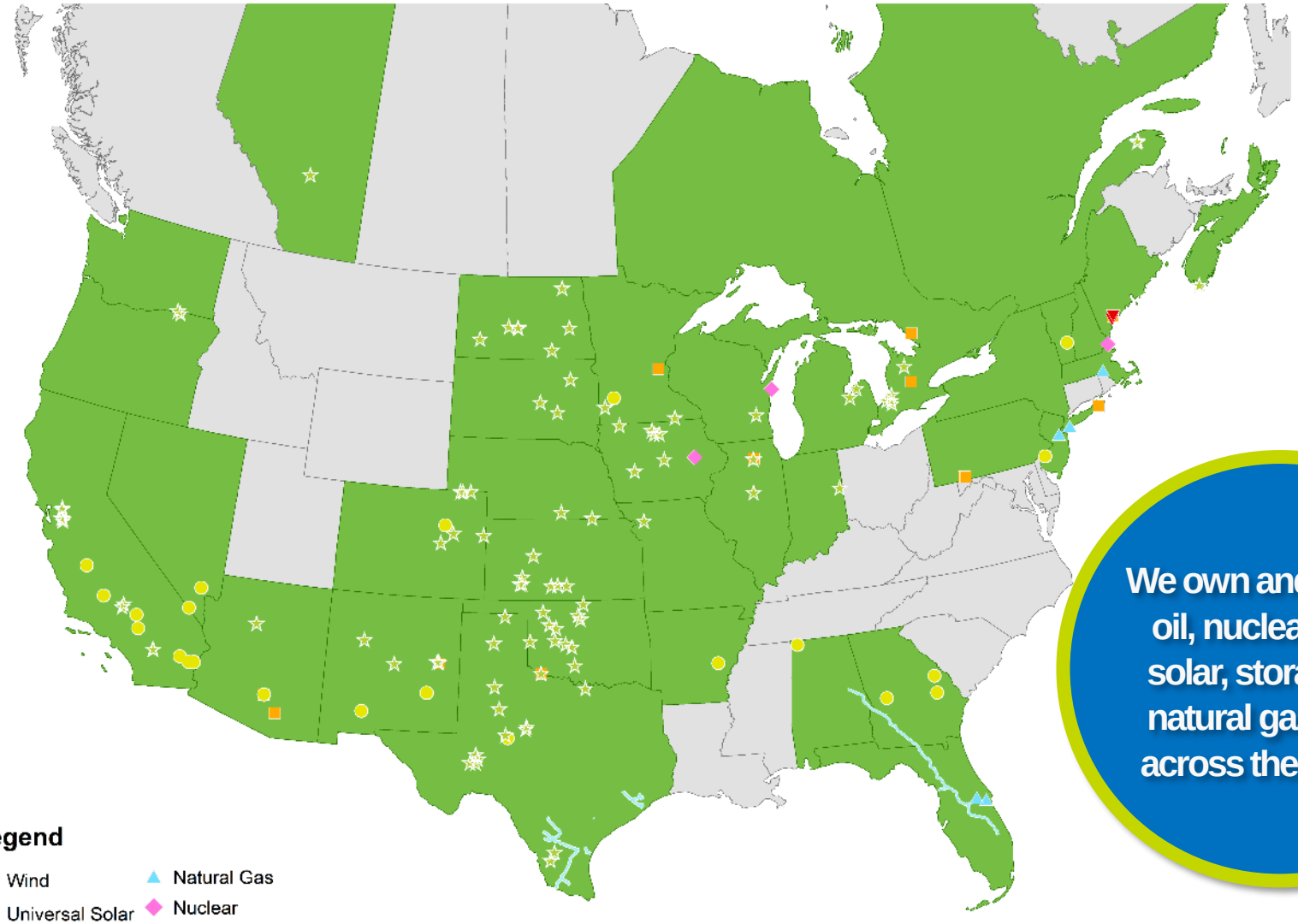
February 24, 2021

Introduction to NextEra Energy Resources



NEXTera ENERGY RESOURCES

Introduction to NextEra Energy Resources (continued)



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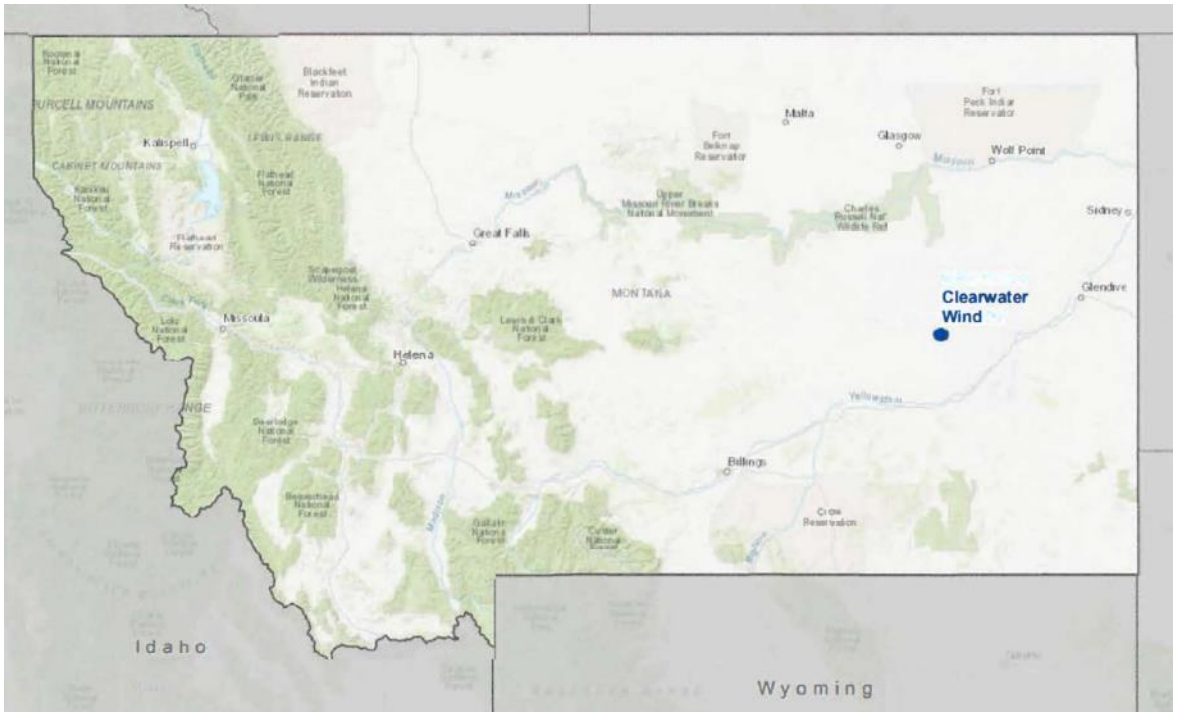
Clearwater Wind Project Overview



- **Large wind project located in Rosebud, Custer, and Garfield Counties in development since 2013**
- **Will provide hundreds of millions of dollars in land payments & tax revenue over the course of the project life to eastern Montana**
- **Provides an estimated 350 construction and 20 operational jobs**
- **Will financially support community development via youth athletics, scholarships, matching grants, medical personnel retention, and water quality studies**

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Montana's Sage Grouse Program: A Quick Overview

Habitat Quantification Tool (HQT)

Scientific method used to evaluate vegetation and environmental conditions related to the quality and quantity of sage grouse habitat and to quantify and calculate the value of credits and debits

Policy Multipliers

Stipulations stemming from Executive Order 12-2015 and applied to the raw HQT scores based on lek buffers, seasonal timing, and other considerations

The Project

The proposed development project that is being assessed for impact to sage grouse habitat

The Program

The Montana Sage Grouse Habitat Conservation Program, housed within Montana's Department of Natural Resources & Conservation

The MSGOT

The 9-member Montana Sage Grouse Oversight Team, consisting of committee and state agency directors, legislators, and a Governor's office representative

Core Habitat

High conservation value and greatest number of displaying males

General Habitat

Provides habitat but not Core or Connectivity Areas

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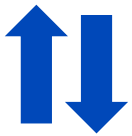
How the Process Works

We are here

1. Developers consult with the Program to discuss Project, process, HQT, siting, design, and more

2. Developers upload HQT inputs for Program analysis and drafts mitigation plan



Iteration occurs

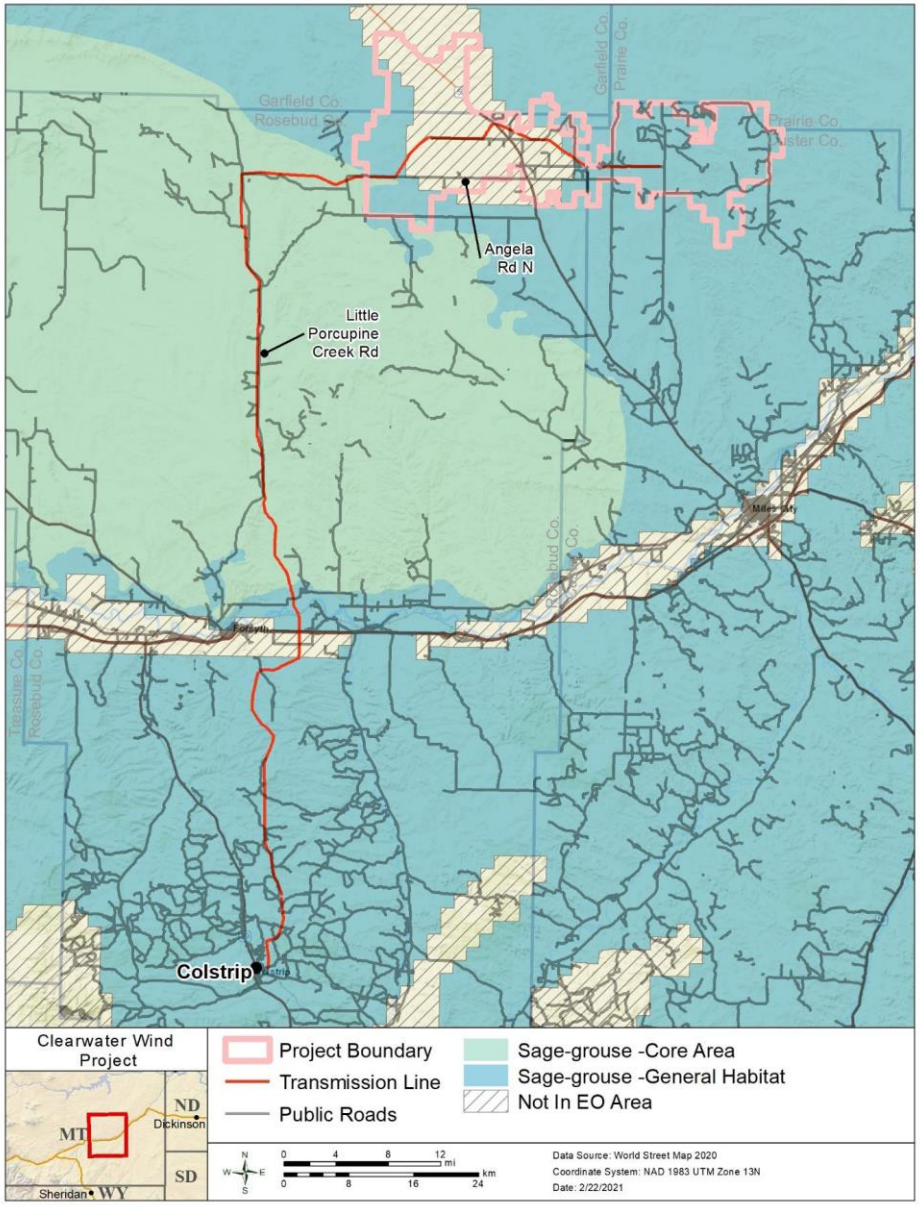
3. Program produces HQT estimates of a Project's impact, including policy-based multipliers, and reviews mitigation plan

4. Mtigation plan presented to MSGOT for approval

5. If approved, Program issues formal Consultation Letter to MT state agencies as part of the permitting process

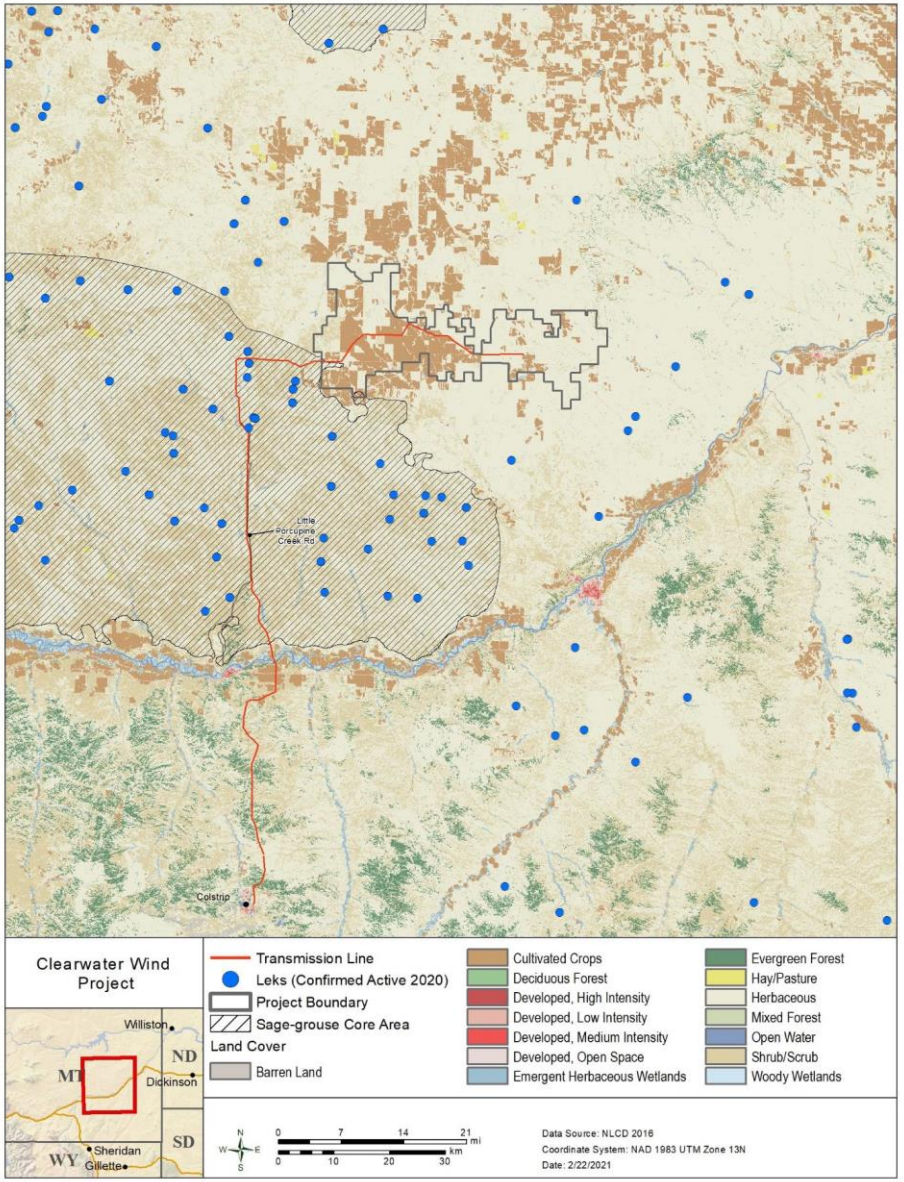
Project Environmental Overview

- **In development since 2013**
- **~750 MW Project with 269 planned turbines**
- **~100-mi transmission line**
- **Coordinating with Program since February 2020**
- **Project is ready to begin construction by late spring or early summer 2021**
  - All key permits are in hand or are in progress and on track
  - Remaining stormwater and wetlands permits are awaiting Program's consultation letter to receive formal approval



Siting Considerations

- **Balances the following considerations in addition to sage-grouse habitat:**
  - ❖ Wind resource
  - ❖ Existing transmission infrastructure
  - ❖ Landowner participation
  - ❖ Avoiding federal lands
  - ❖ Accessibility & roads
  - ❖ Economics & costs
  - ❖ Numerous biological, cultural, and environmental considerations
  - ❖ Co-location with existing infrastructure
- **Wind turbines avoid Core Habitat altogether, while the majority of the transmission line is co-located with existing disturbances (roads and transmission lines)**
- **Project follows framework of avoidance, minimization, reclamation, and mitigation**



Mitigation Plan & Proposal

- **Clearwater agrees with the Program on the value of the quantitative impact of the HQT tool, amounting to an impact of approximately $2.6 MM**

- **The Program and Clearwater disagree on if/how certain site-specific policy multipliers should be applied**
  - Differences in interpretation amount to approximately $2.4 MM
  - Clearwater project submitted objection letter to application of policy multipliers on December 15, 2020

- **To meet construction timing in summer 2021, the Clearwater project proposes a "Cash + Parent Guaranty"**
  - Clearwater would pay $2.6 MM in cash upfront and provide a $3.8 MM parent guaranty to the State of Montana for disputed policy multipliers
  - In service to Montana's Conservation Strategy, MSGOT has broad discretion to approve mitigation plans that incorporate innovative ways to mitigate impacts

The Clearwater project requires a consultation letter to proceed with obtaining permits critical to construction

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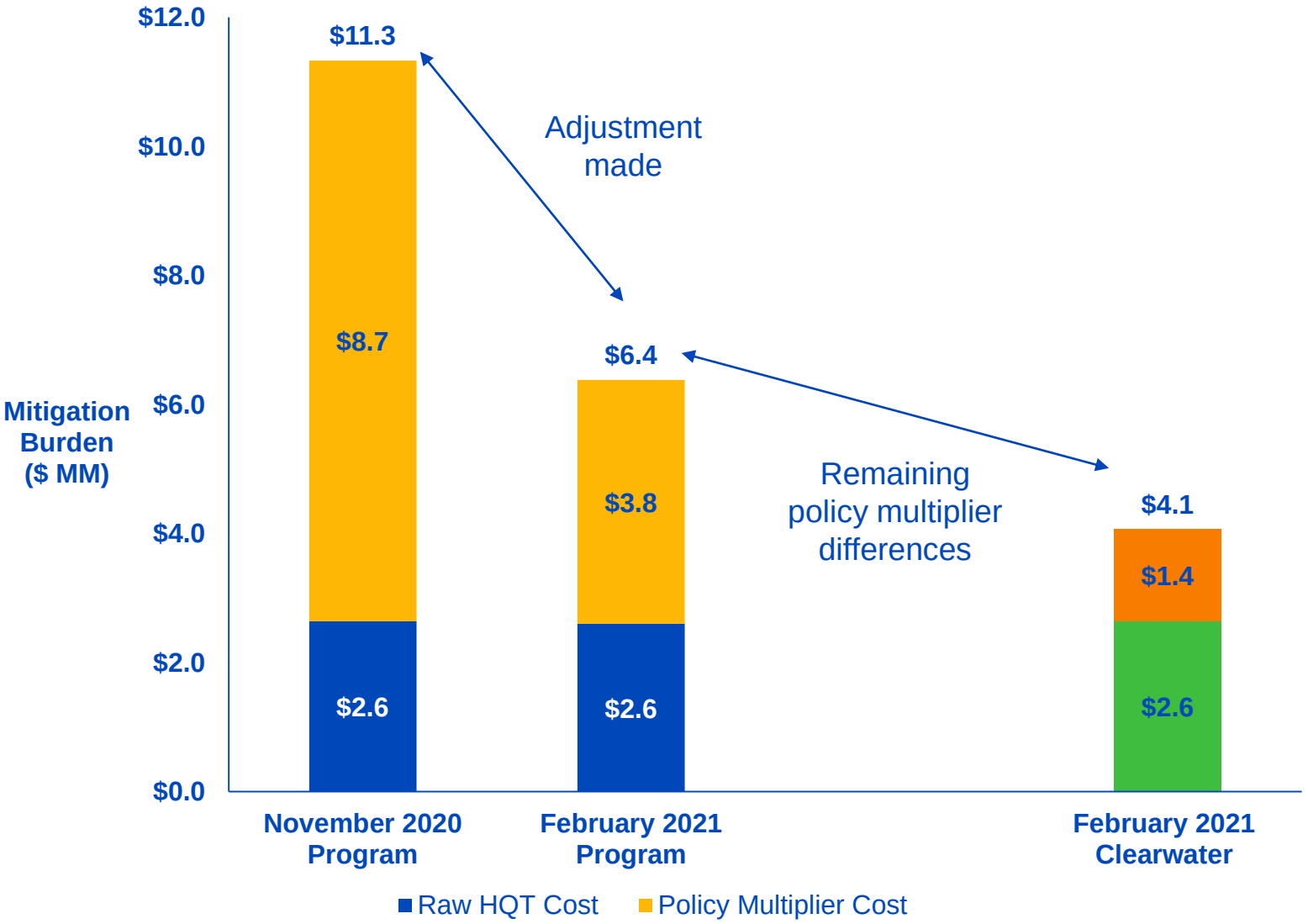
Policy Multiplier History



MSGOT Executive Action Requests

Clearwater formally requests the following from the Montana Sage-Grouse Oversight Team in order to proceed with obtaining permits to start construction on the Clearwater Wind project:

1. **Approval of the February 22, 2021 Mitigation Plan which includes providing cash payment of $2.6 MM and a parent guaranty for $3.8 MM**

2. **A formal consultation letter from the Program issued no later than March 1st, 2021 to relevant state agencies that will allow for the release of multiple permits in progress**

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Questions?

Stay informed at
http://www.clearwaterwind.com

Appendix A: November 2020 HQT Results

WITH **Advanced Payment Multiplier: fullfilling obligation through contribution to Stewardship Account**							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			77,758.11		
	Adv. Payment (10%)	1			38,879.05		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	23,826.06	0.00	0.00
	Seasonal Use	49	0	0	1,138,449.25	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		52			1,278,912.47		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**1,667,703.00**

Total Cost		
Discount Rate Method of 3%	Project Phases	All Habitat
	Construction	$ 167,922.77
	Operations	$ 11,143,065.50
	Reclamation	$ 19,146.70
	All Phases	**$ 11,330,134.97**

Appendix B: February 2021 HQT Results (Program)

WITH **Advanced Payment Multiplier: Full Project Footprint** (1 year Construction, First 30 Years Operations)- fullfilling obligation through contribution to Stewardship Account							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			47,042.91		
	Adv. Payment (10%)	1			23,521.46		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	N/A	N/A	0	Raw HQT Score	N/A	0.00
	DDCT - Core only	N/A	N/A	0	0.00	N/A	0.00
	NSOs	1	N/A	0	14,219.20	N/A	0.00
	Seasonal Use	18	N/A	0	255,945.68	N/A	0.00
	Veg Removal	N/A	N/A	0	0.00	N/A	0.00
	Noise	N/A	N/A	0	0.00	N/A	0.00
	Transportation	N/A	N/A	0	0.00	N/A	0.00
	Pipelines	N/A	N/A	0	0.00	N/A	0.00
	Transmission	N/A	N/A	0	0.00	N/A	0.00
	Oil/Gas 1:640	N/A	N/A	0	0.00	N/A	0.00
	Surface Mining	N/A	N/A	0	0.00	N/A	0.00
	Coal Mining	N/A	N/A	0	0.00	N/A	0.00
	Wind Energy	N/A	N/A	0	0.00	N/A	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		21			340,729.26		

TOTAL Debits (Raw HQT Score + Debits from Policy)	**585,655.81**

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Appendix B: February 2021 HQT Results (Program, continued)

WITH Advanced Payment Multiplier: Transmission Line Only (Remaining 20 Years Operations) - fullfilling obligation through contribution to Stewardship Account							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			31,074.21		
	Adv. Payment (10%)	1			15,537.10		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	1	0	0	9,478.44	0.00	0.00
	Seasonal Use	18	0	0	170,611.85	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		21			226,701.60		

TOTAL Debits (Raw HQT Score + Debits from Policy)	372,360.64

Total Cost - Transmission Line Only (Remaining 20 Years Operations)			
Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	-
	Operations	$	1,471,899.10
	Reclamation	$	19,460.47
	All Phases	$	1,491,359.56

Total Cost -
Construction: 1 year;
Operations: 50 years total; years 1-30 (met towers, transmission line, substation, turbines, roads, laydown yards); years 31-50 (transmission line only)
Reclamation: 75 years

Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	156,601.03
	Operations	$	6,261,377.13
	Reclamation	$	19,460.47

Appendix C: February 2021 HQT Results (Clearwater)

WITH **Advanced Payment Multiplier: Full Project Footprint** (1 year Construction, First 30 Years Operations)- fullfilling obligation through contribution to Stewardship Account							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			47,042.91		
	Adv. Payment (10%)	1			23,521.46		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	N/A	N/A	0	Raw HQT Score	N/A	0.00
	DDCT - Core only	N/A	N/A	0	0.00	N/A	0.00
	NSOs	0	N/A	0	0.00	N/A	0.00
	Seasonal Use	4	N/A	0	56,876.82	N/A	0.00
	Veg Removal	N/A	N/A	0	0.00	N/A	0.00
	Noise	N/A	N/A	0	0.00	N/A	0.00
	Transportation	N/A	N/A	0	0.00	N/A	0.00
	Pipelines	N/A	N/A	0	0.00	N/A	0.00
	Transmission	N/A	N/A	0	0.00	N/A	0.00
	Oil/Gas 1:640	N/A	N/A	0	0.00	N/A	0.00
	Surface Mining	N/A	N/A	0	0.00	N/A	0.00
	Coal Mining	N/A	N/A	0	0.00	N/A	0.00
	Wind Energy	N/A	N/A	0	0.00	N/A	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		6			127,441.19		

TOTAL Debits (Raw HQT Score + Debits from Policy)	372,367.74

Appendix C: February 2021 HQT Results (Clearwater)

WITH Advanced Payment Multiplier: Transmission Line Only (Remaining 20 Years Operations) - fullfilling obligation through contribution to Stewardship Account							
Policy Application (conversion from Functional Acres Lost to Debits)							
Multiplier Type	Specific Multiplier	# of Deviations			Debits		
Programmatic Multipliers (COR)	*Habitat Classification*	*ALL Habitat*			*ALL Habitat*		
	Reserve Account (20%)	1			31,074.21		
	Adv. Payment (10%)	1			15,537.10		
Site-Specific Multipliers (CO only; Core - 10%; General Habitat & Connectivity - 5%)	*Habitat Classification*	Core Area	General Habitat	Connectivity Area	Core Area	General Habitat	Connectivity Area
	Net Gain (10%)	0	0	0	0.00	0.00	0.00
	DDCT - Core only	0	N/A	N/A	0.00	N/A	N/A
	NSOs	0	0	0	0.00	0.00	0.00
	Seasonal Use	4	0	0	37,913.75	0.00	0.00
	Veg Removal	0	0	0	0.00	0.00	0.00
	Noise	0	0	0	0.00	0.00	0.00
	Transportation	0	0	0	0.00	0.00	0.00
	Pipelines	0	0	0	0.00	0.00	0.00
	Transmission	0	0	0	0.00	0.00	0.00
	Oil/Gas 1:640	0	0	0	0.00	0.00	0.00
	Surface Mining	0	0	0	0.00	0.00	0.00
	Coal Mining	0	0	0	0.00	0.00	0.00
	Wind Energy	N/A	0	0	N/A	0.00	0.00
Total Debits from Policy Multipliers		*ALL Habitat*			*ALL Habitat*		
		6			84,525.05		

TOTAL Debits (Raw HQT Score + Debits from Policy)	230,184.10

Total Cost - Transmission Line Only (Remaining 20 Years Operations)			
Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	-
	Operations	$	905,459.25
	Reclamation	$	19,460.47
	All Phases	$	924,919.72

Total Cost -
Construction: 1 year;
Operations: 50 years total; years 1-30 (met towers, transmission line, substation, turbines, roads, laydown yards); years 31-50 (transmission line only)
Reclamation: 75 years

Discount Rate Method of 3%	Project Phases	All Habitat	
	Construction	$	156,601.03
	Operations	$	3,883,369.84
	Reclamation	$	19,460.47
	All Phases	$	4,059,431.34