



FROM

OFFICE OF THE GOVERNOR  
STATE CAPITOL  
CHEYENNE, WYOMING 82002-0010

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TO **Mr. Walt George**  
**Project Manager**  
**Bureau of Land Management**  
**P.O. Box 20879**  
**Cheyenne, WY 82003**

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MATTHEW H. MEAD  
GOVERNOR



STATE CAPITOL  
CHEYENNE, WY 82002

## Office of the Governor

2011 NOV -1 AM 10:00

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DOI-BLM  
CHEYENNE, WYOMING

October 28, 2011

Mr. Walt George  
Project Manager  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, Wyoming 82003

### **Re: State of Wyoming Comments on the Gateway West Transmission Line Project Draft Environmental Impact Statement**

Dear Mr. George:

Thank you for the opportunity to comment on the Gateway West Draft Environmental Impact Statement (DEIS). I want to congratulate you personally on a well-prepared document which provides a comprehensive and impartial assessment of the environmental consequences of constructing and operating this important and complex project in Wyoming.

The Governor's Office, under the prior administration and in the early part of my administration, and the Bureau of Land Management (BLM) has had a history of working closely together to solve many of the challenges associated with this project. I stand ready to provide BLM any assistance necessary to conclude the National Environmental Policy Act (NEPA) process for the Gateway West project. Although the project remains controversial with many of the landowners crossed by some of the applicant's proposed routes and alternatives (i.e., Segments 1E and 4), I am convinced there exists an alignment for this project through our state that has a relatively high level of public acceptance as well as little impact to the natural resources valued by our citizens.

For this letter, I solicited input from all State of Wyoming agencies with regulatory authority and/or expertise on resources potentially affected by the project. Because state agencies were actively involved in initial route evaluation and preparation of the DEIS and reviewed several administrative drafts of the document, most of the agency concerns were adequately addressed in the DEIS and no additional comment was forthcoming. The few remaining state agency comments have been incorporated into this letter.

### **State of Wyoming Preferred Alternatives**

Several of the proposed and alternative alignments for the transmission line are controversial and my office continues to hear concerns from state agencies, local governments and landowners. In

the DEIS at Section 2.9.2, p. 2-204, the state's preferred alternatives are presented. I support these alternatives.

In the comments that follow I will outline the State of Wyoming's position relative to each segment of the Gateway West project.

**Segment 1.** The DEIS accurately states that my preferred alternative for Segment 1W and 1E is to construct both lines directly adjacent (within 0.5 miles) to the existing Dave Johnson – Aeolus segment (1W[c]) of the existing Dave Johnson – Rock Springs 230 kV line using a combination of Alternatives 1W-A and 1W(a) for 1W and Alternative 1E-C for 1E. These routes are consistent with my Executive Order 2011-5 (Greater Sage-Grouse Core Area Protection) and consistent with the comments you received from the Albany County Commissioners and members of the Wyoming Legislature. For reasons stated below, the BLM should adopt these routes in the Record of Decision and reject the applicant's proposed route 1E-B and Alternative 1E-A.

Alternative 1E-A is inconsistent with my Executive Order 2011-5 and could result in adverse impacts to sage-grouse populations. There is no information presented in the DEIS suggesting measures that could be implemented to ensure that Alternative 1E-A is consistent with the Executive Order. In addition, landowner concerns with this alternative are the same as those for the applicant's proposed route, 1E-B, because they share the same alignment through the foothills of the Laramie Range.

Unlike Alternative 1E-A, the applicant's proposed route 1E-B avoids sage-grouse core area outside of existing transmission corridors. However, 1E-B is much longer and would result in significantly higher levels of impacts to natural resources of concern to the State of Wyoming. The applicant's proposed route is 26.7 miles longer than Alternative 1E-C and, according to the DEIS, will result in more than 500 acres of additional surface disturbance. Operations disturbance would increase by 126 acres. Most of this additional disturbance will occur on privately owned lands (approximately 39 miles of additional private lands would be crossed by the applicant's proposed route compared to Alternative 1E-C). As important, while about 25 miles of Alternative 1E-C follows existing transmission corridors, only about 2.5 miles of the applicant's proposed route follows existing corridors (including the West Wide Energy Corridor on public lands).

For all the resource comparisons presented on Table 2.8.1 at pp. 2-174 – 2-175, the impacts to natural resources are significantly reduced for Alternative 1E-C. Of particular concern to landowners crossed by 1E-B is the loss of forest. Alternative 1E-C affects only 39 acres of forest and woodland vegetation whereas the applicant's proposed route affects 290 acres. Given the comparison of impacts presented in Table 2.8-1, it is difficult to justify authorization of the applicant's proposed route 1E-B when an alternative, 1E-C, is available that clearly reduces impacts to both natural resources and private landowners and would be substantially constructed in an existing transmission corridor.

I was concerned to see BLM conclude in the Executive Summary, at p. ES-7, that Alternative 1E-C would not meet the applicant's need to provide 230 kV infrastructure farther east where wind energy resources are planned. This statement is erroneous and is based on information which has changed significantly since the applicant's proposed route was developed. As you are well aware, a large portion of the area north, east and southeast of the Aeolus Substation (the termination of Segment 1E) has been designated core area for sage-grouse. As such it is unlikely that wind development will occur in areas previously considered by the applicant. This conclusion is supported by review of the Open Access Same-Time Information System (OASIS) queue for the project. There are currently no requests for transmission service in the area crossed by the eastern portion of 1E-B. In addition, I asked the Wyoming Infrastructure Authority (WIA) and the Industrial Siting Administration to review our current understanding of potential wind development projects in this part of the state. That review indicates that most of the "likely" wind projects are clustered a relatively short distance from the Aeolus Substation and those entities were unable to identify current or active plans for projects near the eastern portion of 1E-B. My staff also reviewed the current locations of meteorological towers in the state. That review confirms information provided by the Industrial Siting Administration and WIA – for the most part, meteorological towers outside of core area are clustered around the Aeolus Substation.

There appears to be no reasonably foreseeable justification for extending 1E-B as far east as currently proposed by the applicant to collect electricity from wind projects. Further, should a wind project be proposed east of the alignment for Alternative 1E-C in the future, a radial line could be constructed between the wind project and the Aeolus Substation rather than adversely affecting the many landowners along the path of the applicant's proposed route who, based on discussions with my staff, have no interest in either wind development or transmission.

During the public open house in Douglas, my staff discussed these concerns with the applicant. We confirmed our willingness to consider a new alternative that avoids landowner concerns in northern Albany County associated with 1E-B and sage-grouse concerns with Alternative 1E-A. If a new alternative can be developed in cooperation with the state and local cooperators and landowners, I recommend that BLM incorporate the alternative into the Final Environmental Impact Statement (FEIS). If a new alternative is not identified, I request BLM adopt Alternative 1E-C for the Record of Decision.

**Segment 2.** I believe that it is prudent to emphasize my support for the applicant's proposed route for Segment 2 in the vicinity of Fort Steele. Alternative 2A would result in an unacceptable and unnecessary impact to the residents and private property owners of Fort Steele and this alternative should be rejected in the Record of Decision. There is no justification for routing Segment 2 through the small parcels of private lands and in close proximity to existing residences solely for purposes of remaining in the West Wide Energy Corridor. This portion of the West Wide Energy Corridor is inappropriate for high voltage transmission lines.

**Segment 4.** As was stated in the DEIS, my preferred alternative for Segment 4 remains Alternative 4A which follows the three existing 345 kV transmission lines between the Jim Bridger Power Plant and Cokeville. Alternative 4A is the only current common-sense alignment for this segment. Executive Order 2011-5 establishes a 2-mile wide corridor through the Sage

and Seedskadee Core Areas centered on the existing transmission lines to facilitate east to west routing of new transmission lines in this portion of the state. Alternative 4A is consistent with Executive Order 2011-5 – the applicant’s proposed route and all other alternatives for Segment 4 in the DEIS are inconsistent with the Executive Order.

The DEIS states that for all resources, except historic trails, Alternative 4A (which is the shortest route) is preferable. I concur with that conclusion and remain convinced that the incremental impacts to the historic trails from adding a fourth transmission line to that corridor can be mitigated. My staff has begun conversations with the State Historic Preservation Office (SHPO) regarding what mitigation opportunities exist to compensate for the incremental impacts to the trail.

Several meetings have been held with residents of Commissary Ridge north of Kemmerer and adjacent landowners, and public opposition to the applicant’s proposed route remains high. The public clearly prefers Alternative 4A. Similarly, the Lincoln County Commission opposes the applicant’s proposed route and prefers constructing Gateway West in the existing transmission line corridor (Alternative 4A). It appears to me that the only opposition to Alternative 4A is a limited number of staff in the BLM’s Kemmerer Field Office who are concerned about historic trail visual impacts.

I request that BLM adopt Alternative 4A in the Record of Decision and that BLM, SHPO and the applicant begin discussions concerning appropriate mitigation to offset incremental visual impacts to the historic trail.

### **Industrial Siting Permit**

As you state in Chapter 2 of the DEIS, the applicant will be required to secure a permit from the Industrial Siting Council for construction and operation of the Gateway West project. Under the best circumstances, the applicant will be able to incorporate much of the information in the DEIS into the Industrial Siting permit application. Consistent data, collected during the same time period, should facilitate similar conclusions by decision makers in separate federal and state permit processes. However, the form and content of the application to the state are prescribed by regulation and a separate application will be required.

While the socio-economic information contained in the DEIS appears to be sufficient for purposes of NEPA, additional information will be required for the Industrial Siting process. The Industrial Siting process sets the study area at the time of its jurisdictional meeting. Socio-economic statistics are collected and provided in that area. Since such information is generated for political subdivisions, such as counties, the statistical information is on a county-by-county basis. The Industrial Siting process does allow for specialized areas of study for visual effects, sound impacts, wildlife habitat and migration, etc.

The DEIS does not provide a consistent area for study of socio-economic statistics suitable for the Industrial Siting process, rather it chooses different geographic areas to report different statistics. The Industrial Siting process requires a consistent geographic area and data indexes

for different socio-economic features for that consistent geographic area - e.g., student/teacher ratios, crime rates, doctors or hospital beds per capita, water system capacity per capita, etc. The specific geographic area to be used in the Industrial Siting process will be identified with the project proponent during the jurisdictional meeting with the Industrial Siting Division.

### **Fish and Wildlife**

Regarding p. 3.10-26, I concur with the opposition of the Wyoming Game and Fish Department (WGFD) to the applicant's proposed Environmental Protection Measures for wildlife species. Consequently, I request that BLM implement standard state/federal protective stipulations, utilizing existing waiver procedures. These standard procedures have worked well for numerous linear projects constructed on public and private lands in the past.

The Bates Creek Reservoir Lek and the Upper Bates Creek Lek combine to form (along with two other smaller leks) one of the most substantial sage-grouse lek complexes known in the state. For example, on May 7, 2006, a total of 465 males and 9 females were observed attending these two leks. Bisecting the high quality sagebrush/sage-grouse habitat to the east of these leks with two parallel transmission lines separated by 1,500 feet may impact a significant number of sage-grouse within the Natrona Core Area if east-west movements are impeded. I concur with WGFD's recommendation that BLM reduce the separation between all the alternatives and the existing line to the maximum extent possible in this area. It is my understanding that separation of 800 feet between 230 kV lines is acceptable to the Western Electric Coordinating Council.

Portions of Segment 1 fall within the 4-mile buffer of five sage-grouse leks within the BLM Casper Field Office Bates Hole Management Area. The proposed project should comply with the Record of Decision and Approved Casper Resource Management Plan (Dec. 2007), Decision #4051, which provides: "Occupied sage-grouse leks will have a 4-mile buffer. Within this buffer, surface development or wildlife-disturbing activities will be restricted March 15 through July 15 (TLS). Also, within this 4-mile buffer (CSU), surface disturbing activities will avoid sagebrush stands of greater than 10 percent canopy cover. Within this 4-mile buffer, mitigate for power poles and other high profile structures that may provide raptor perches. Avoid placement of these structures if possible, or install devices to preclude raptor perching on the structures."

The applicant should implement measures to control weeds resulting from any new surface disturbance throughout the state. Among all the potential invasive plant species which may occur along Segments 1W and 1E, cheatgrass represents the most significant concern, particularly if it establishes in relatively intact sagebrush communities, such as in upper Bates Hole. Cheatgrass can proliferate rapidly in arid and semi-arid sagebrush grasslands and can pose an eventual fire hazard in sagebrush communities. Avoiding impacts from cheatgrass should be specifically addressed in the FEIS.

Special Use Permits may be required where the transmission line crosses the Wyoming Game and Fish Commission's Red Rim/Daley Wildlife Habitat Management Area. Early coordination should occur to insure that appropriate permissions and mitigation activities are completed prior to construction.

At p. 2-154, Table 2.7-1, Fish-4; the DEIS states: "If an aquatic invasive species is discovered during surveys for wetlands and waters of the U.S. conducted for USACE and state permitting prior to construction, the waterbody will be flagged and noted on the construction drawings. After work is complete in that waterbody, any equipment involved in construction in that waterbody must be washed to remove any propagules of aquatic invasive species and to prevent the spread of those species to other waterbodies in the Analysis Area."

The above provision assumes that surveys conducted by the proponent are going to detect aquatic invasive species (AIS), which is not necessarily the case. Instead of the language quoted above, the measure should be worded as follows:

"All wetlands and waters in the project area are assumed to contain aquatic invasive species and all equipment contacting water will be properly disinfected. After work is complete in a waterbody, any equipment involved in construction in that waterbody must be washed to remove any propagules of aquatic invasive species and to prevent the spread of those species to other waterbodies."

Preventing the spread of AIS is a priority to the State of Wyoming, and in many cases, the intentional or unintentional spread of organisms from one body of water to another would be considered a violation of Wyoming Game and Fish Commission regulations. To prevent the spread of AIS, the following provision should be added and required:

"When work will occur in or near water, all equipment must be decontaminated. Decontamination should first occur before arrival at a project site, so AIS are not transferred from previous work sites. Decontamination should again occur before leaving a work site, so AIS are not transferred to the next work site. Decontamination may consist of either: 1) drain all water from equipment and compartments, clean equipment of all mud, plants, debris, or animals, and dry equipment for five days in summer (June, July and August); 18 days in spring (March, April and May) and Fall (September, October and November); or three days in winter (December, January and February) when temperatures are at or below freezing; or 2) use a high pressure (2500 psi) hot water (140°F) pressure washer to thoroughly wash equipment and flush all compartments that may hold water."

I recommend that AIS stipulations also be required for the disinfection of water trucks between waterbodies. These trucks could easily harbor and move AIS.

Regarding Appendix C, SPC-4, contaminated soils should be stored 500 feet from any wetland or waterbody, consistent with other hazardous materials. And as for Appendix C, C-1, it should address reporting requirements for spills.

Concerning p. 2-163, Table 2.7-1, Midget Faded Rattlesnakes, there is no mitigation measure stated for midget faded rattlesnakes, if they are found. Midget faded rattlesnakes appear to be a relatively rare species and WGFD believes steps are prudent to protect the species and avoid

Mr. Walt George  
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potential listing of the species as federally endangered or threatened. I recommend the BLM incorporate the following in the Record of Decision to address potential impacts to this rare species:

“Prior to the start of construction, the applicant shall conduct surveys for midget faded rattlesnakes and prepare a plan identifying measures to reduce impacts for approval by BLM and the WGFD.”

In closing I want to again offer my thanks to you for the opportunity to comment on the Gateway West Transmission Line Project DEIS and for the commitment you have made to work with my office. If public comment results in additional alternatives for consideration in the FEIS, my office is ready to assist in evaluating those alternatives. If I can provide any assistance as you prepare the FEIS, please do not hesitate to contact me.

Best regards,



Matthew H. Mead  
Governor

cc: Senator Mike Enzi  
Senator John Barrasso  
Representative Cynthia Lummis  
Senator Jim Anderson  
Representative Kermit Brown  
Representative Glenn Moniz  
Converse County Commission  
Albany County Commission  
Natrona County Commission  
Carbon County Commission  
Sweetwater County Commission  
Lincoln County Commission  
Wyoming Public Service Commission  
Wyoming Game and Fish Department  
Wyoming Department of Environmental Quality, Industrial Siting Division  
Office of State Lands and Investments  
Richard Walje – Rocky Mountain Power  
Don Simpson – Bureau of Land Management

**From:** [Kerri Franklin](#)  
**To:** [Gateway BLM;](#)  
**Subject:** 16636 FW: GovGWCommentLetter.pdf  
**Date:** Tuesday, November 01, 2011 7:42:44 AM  
**Attachments:** [GovGWCommentLetter.pdf](#)

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Kerri Franklin | EnviroIssues

101 Stewart Street, Ste 1200 | Seattle 98101  
206.269.5041 | [www.enviroissues.com](http://www.enviroissues.com)

-----Original Message-----

From: George, Walter E [<mailto:wgeorge@blm.gov>]  
Sent: Tuesday, November 01, 2011 7:42 AM  
To: Kerri Franklin  
Subject: FW: GovGWCommentLetter.pdf

Please add these comments to the data base.

-----Original Message-----

From: Aaron Clark [<mailto:aaronclark@wildblue.net>]  
Sent: Friday, October 28, 2011 7:57 PM  
To: George, Walter E  
Subject: GovGWCommentLetter.pdf

GovGWCommentLetter.pdf attached

**MATTHEW H. MEAD**  
GOVERNOR



STATE CAPITOL  
CHEYENNE, WY 82002

## Office of the Governor

October 28, 2011

Mr. Walt George  
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### **Fish and Wildlife**

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"All wetlands and waters in the project area are assumed to contain aquatic invasive species and all equipment contacting water will be properly disinfected. After work is complete in a waterbody, any equipment involved in construction in that waterbody must be washed to remove any propagules of aquatic invasive species and to prevent the spread of those species to other waterbodies."

Preventing the spread of AIS is a priority to the State of Wyoming, and in many cases, the intentional or unintentional spread of organisms from one body of water to another would be considered a violation of Wyoming Game and Fish Commission regulations. To prevent the spread of AIS, the following provision should be added and required:

"When work will occur in or near water, all equipment must be decontaminated. Decontamination should first occur before arrival at a project site, so AIS are not transferred from previous work sites. Decontamination should again occur before leaving a work site, so AIS are not transferred to the next work site. Decontamination may consist of either: 1) drain all water from equipment and compartments, clean equipment of all mud, plants, debris, or animals, and dry equipment for five days in summer (June, July and August); 18 days in spring (March, April and May) and Fall (September, October and November); or three days in winter (December, January and February) when temperatures are at or below freezing; or 2) use a high pressure (2500 psi) hot water (140°F) pressure washer to thoroughly wash equipment and flush all compartments that may hold water."

I recommend that AIS stipulations also be required for the disinfection of water trucks between waterbodies. These trucks could easily harbor and move AIS.

Regarding Appendix C, SPC-4, contaminated soils should be stored 500 feet from any wetland or waterbody, consistent with other hazardous materials. And as for Appendix C, C-1, it should address reporting requirements for spills.

Concerning p. 2-163, Table 2.7-1, Midget Faded Rattlesnakes, there is no mitigation measure stated for midget faded rattlesnakes, if they are found. Midget faded rattlesnakes appear to be a relatively rare species and WGFD believes steps are prudent to protect the species and avoid

Mr. Walt George  
October 28, 2011  
Page 7

potential listing of the species as federally endangered or threatened. I recommend the BLM incorporate the following in the Record of Decision to address potential impacts to this rare species:

“Prior to the start of construction, the applicant shall conduct surveys for midget faded rattlesnakes and prepare a plan identifying measures to reduce impacts for approval by BLM and the WGFD.”

In closing I want to again offer my thanks to you for the opportunity to comment on the Gateway West Transmission Line Project DEIS and for the commitment you have made to work with my office. If public comment results in additional alternatives for consideration in the FEIS, my office is ready to assist in evaluating those alternatives. If I can provide any assistance as you prepare the FEIS, please do not hesitate to contact me.

Best regards,



Matthew H. Mead  
Governor

cc: Senator Mike Enzi  
Senator John Barrasso  
Representative Cynthia Lummis  
Senator Jim Anderson  
Representative Kermit Brown  
Representative Glenn Moniz  
Converse County Commission  
Albany County Commission  
Natrona County Commission  
Carbon County Commission  
Sweetwater County Commission  
Lincoln County Commission  
Wyoming Public Service Commission  
Wyoming Game and Fish Department  
Wyoming Department of Environmental Quality, Industrial Siting Division  
Office of State Lands and Investments  
Richard Walje – Rocky Mountain Power  
Don Simpson – Bureau of Land Management



October 28, 2011

**Representative  
Kermit C. Brown**

**Wyoming House of  
Representatives  
House District 14**

Mr. Walt George  
Project Manager  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, Wyoming 82203

**Subject: Gateway West DEIS Comments**

Dear Mr. George:

Many of my constituents strongly oppose Alternatives 1E-A and 1E-B in northern Albany County. The Albany County Board of County Commissions has raised objections to these alternatives as has Governor Mead.

I want to add my opposition to these alternatives. From a practical standpoint, Alternative 1E-C, which follows Rocky Mountain Power's existing transmission line between Windstar and Aeolus, will result in significantly less impacts to landowners that reside in my district. Furthermore, Alternative 1E-C is the shortest and most economical route resulting in the least disturbance and the greatest benefit to the public. I see no evidence in the DEIS that suggests constructing all three lines between Windstar and Aeolus can not be accommodated in the existing corridor.

I recommend that BLM choose Alternative 1E-C in the Record of Decision for the project.

Sincerely

Kermit C. Brown

cc: Richard Walje – Rocky Mountain Power Company  
Governor Mead

**District Address**

P.O. Box 817

Laramie, WY 82073

W: 307-745-7358

F: 307-745-7385

kermitbrown@wyoming.com

**Committees**

*Judiciary, Chairman*



Duplicate

STATE of WYOMING LEGISLATURE  
REPRESENTATIVE  
KERMIT C. BROWN  
P.O. Box 817  
Laramie, Wyoming 82073



100241

Mr. Walt George  
Project Manager  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, Wyoming 82203

82003\$7018



100241



October 28, 2011

**Representative  
Kermit C. Brown**

**Wyoming House of  
Representatives  
House District 14**

Mr. Walt George  
Project Manager  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, Wyoming 82203

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Sincerely

Kermit C. Brown

cc: Richard Walje – Rocky Mountain Power Company  
Governor Mead

**District Address**

P.O. Box 817  
Laramie, WY 82073  
W: 307-745-7358  
F: 307-745-7385

kermitbrown@wyoming.com

**Committees**

Judiciary, Chairman

2011 OCT 27 AM 10: 00

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CHEYENNE, WYOMING



---

**From:** info@gatewayeis.com  
**Sent:** Friday, October 07, 2011 11:34 AM  
**To:** Gateway BLM  
**Subject:** A comment from gatewayeis.com

**Name:**  
Michael K. Madden

**Organization:**  
Wyoming Legislature

**Mailing Address:**  
63 Langdon Road

**Mailing Address 2:**  
Buffalo

**City:**  
Buffalo

**State:**  
WY

**Zip:**  
82834

**Daytime Phone:**  
307.684.9356

**E-mail:**  
[madden@wyoming.com](mailto:madden@wyoming.com)

**Confidential:**  
No

**DEIS Location:**

**Comment:**

It appears to me that the Route alternative for the transmission line should follow as close as possible the option, 1E-C which is, as much as possible, along the existing transmission line corridor. It appears to be the shortest route and would disrupt the least amount of population and disturb the least amount of our geographical features.

Mike Madden  
Dist. 40 Wyoming Rep.

STATE of WYOMING LEGISLATURE

REPRESENTATIVE

GLENN MONIZ

P.O. Box 784

Laramie, Wyoming 82073



100536

Mr. Walt George - Project Mgr.  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, Wyoming 82203

82003\$7018



100536



November 1, 2011

2011 NOV -4 AM 10:00

RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

Mr. Walt George  
Project Manager  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, Wyoming 82203

**Subject: Gateway West DEIS Comments**

Dear Mr. George:

As you are well aware, many of my constituents continue to strongly oppose Alternatives 1E-A and 1E-B in northern Albany County. The Albany County Commission has raised objections to these alternatives as has the Governor. I want to add my opposition to these alternatives. We would all like to see transmission increased in the state but with as little impact on landowners as possible. I understand the complexity of this issue but from a practical standpoint, Alternative 1E-C, which follows Rocky Mountain Power's existing transmission line between Windstar and Aeolus, will result in significantly less impacts to landowners that reside in that area. I see no evidence in the DEIS that suggests that constructing all three lines between Windstar and Aeolus can not be accommodated in the existing corridor. I recommend that BLM choose Alternative 1E-C in the Record of Decision for the project.

Sincerely,

A handwritten signature in blue ink that reads "Glenn Moniz".

Representative Glenn Moniz  
Wyoming House District 46  
P.O. Box 784  
Laramie, WY 82073  
gmoniz@bresnan.net

cc: Richard Walje – Rocky Mountain Power Company  
Governor Mead

1/1



---

**From:** Kerri Franklin  
**Sent:** Friday, October 28, 2011 12:04 PM  
**To:** Gateway BLM  
**Subject:** FW: Gateway West Transmission Line Project  
**Attachments:** Gateway West Transmission Line Project comments MBCD.pdf

**Kerri Franklin** | EnviroIssues

101 Stewart Street, Ste 1200 | Seattle 98101  
206.269.5041 | [www.enviroissues.com](http://www.enviroissues.com)

---

**From:** George, Walter E [<mailto:wgeorge@blm.gov>]  
**Sent:** Friday, October 28, 2011 7:04 AM  
**To:** Kerri Franklin  
**Subject:** Fw: Gateway West Transmission Line Project

Please add this comment to the data base.

---

**From:** Todd Heward [<mailto:todd@medbowcd.org>]  
**Sent:** Friday, October 28, 2011 07:36 AM  
**To:** [Gateway West WYMail@blm.gov](mailto:Gateway_West_WYMail@blm.gov) <[Gateway West WYMail@blm.gov](mailto:Gateway_West_WYMail@blm.gov)>  
**Cc:** 'Joan McGraw' <[joan@medbowcd.org](mailto:joan@medbowcd.org)>; George, Walter E; 'Ken Besel' <[kbesel@union-tel.com](mailto:kbesel@union-tel.com)>; 'Owen Williams' <[onwilliams@hotmail.com](mailto:onwilliams@hotmail.com)>; 'Ralph Brokaw' <[rbrokaw@carbonpower.net](mailto:rbrokaw@carbonpower.net)>; 'Sarah Babbitt' <[smbmf@hotmail.com](mailto:smbmf@hotmail.com)>; W John Johnson <[wjj\\_jrc@yahoo.com](mailto:wjj_jrc@yahoo.com)>  
**Subject:** Gateway West Transmission Line Project

Dear Project Manager;

Please see attached comments for the Draft EIS of the Gateway West Transmission Line Project.

Thank you

***Todd G. Heward, Manager***

Medicine Bow Conservation District  
PO Box 6  
510 Utah St  
Medicine Bow, WY 82329  
Office 307-379-2221  
Cell 307-703-5050





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Medicine Bow Conservation District  
P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

October 25, 2011

Project Manager  
Gateway West Transmission Line Project EIS  
Bureau of Land Management  
PO Box 20879  
Cheyenne, WY 82003  
Email: Gateway\_West\_WYMail@blm.gov.

**RE: COMMENTS FOR DRAFT EIS- GATEWAY WEST TRANSMISSION LINE PROJECT**

Dear Project Manager:

The Medicine Bow Conservation District (MBCD) operates under and is guided by legislative declarations and policy of the Wyoming State Legislature W.S. 11-16-103 et al. The Board of Supervisors (BOS), held discussion concerning the Gateway West Transmission Line Project (GWT) EIS. The BOS, wishes to convey the following general policies concerning activities within the district's legal boundaries.

- A. The Medicine Bow Conservation District supports the “Multiple Use” concept of management of federal lands within the boundaries of the district. Multiple uses shall include but are not limited to the following:
  - a. Timber harvesting
  - b. Grazing
  - c. Recreation
  - d. Oil and Gas Development
  - e. Mineral Development
  - f. Wind Power Development
  - g. Hydro-Electric Development
  
- B. The Medicine Bow Conservation District board of Supervisors reserves the right to appeal local, state, and federal decisions that adversely affect the Medicine Bow Conservation District Natural Resource and Land Use Plan.

Specific to the Gateway West Transmission Line Project EIS, the BOS would like to submit the following comments. Note: MBCD is commenting primarily on portions of segments 2 and 3 within our jurisdiction.

- A. The Medicine Bow Conservation District recommends that all owners of easements and/or rights-of-ways for power lines, above or below ground transmission lines, road ways, oil and gas exploration, pipeline and development sites, wind farms and mineral exploration and extraction sites



---

Medicine Bow Conservation District  
P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

shall be solely responsible for all control of noxious weeds until full establishment of perennial grass/shrub cover is established meeting the satisfaction of the private landowner, lessee or federal manager.

Specifically, segments 2 and 3 are not in a "high fire danger due to Cheatgrass". Therefore we do not support the following recommendation within segments 2 and 3 for mitigation purposes or any other reclamation practices:

***"Crested wheatgrass (*Agropyron cristatum*) and forage kochia (*Kochia prostrata*) will be used for revegetation. Both of these plant species are fire resistant, will resist noxious weeds, and will also provide habitat for upland birds, small mammals, and reptiles..."***

We ask that all seed mixes be comprised of only local native grass, forb and shrub species. We would ask that all seed mixes be developed in cooperation with MBCD and/or the local private landowners for use on all private lands.

- B. MBCD stipulates that only certified hay or straw to be used as mulch on reclamation projects on any county road, state or federal highway project, or any reclamation project on lands owned or managed by the state of Wyoming or the Federal Government.
- C. MBCD stipulates that within historic Greater Sage-grouse range that a minimum shrub reestablishment standard is met as part of all reclamation sites sufficient to restore/maintain adequate habitat.
- D. MBCD supports local, state and federal agencies in requiring proper construction, maintenance and reclamation of transportation corridors such as, but not limited to, access roads, pipelines, and transmission lines to prevent resource degradation.
- E. MBCD will not support any action that results in a net loss of Animal Unit Months (AUM's) on any allotment, permit or lease on lands owned or managed by the state of Wyoming or the Federal Government.
- F. MBCD asks that proper decommissioning of existing lines be carried out in cooperation with local private landowners.
- G. MBCD asks that appropriate Solid Waste Disposal practices be carried out as part of construction and maintenance.



---

Medicine Bow Conservation District  
P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

- H. MBCD asks that wetlands be avoided to the fullest extent possible and when not possible to avoid that complete mitigation be made when impacting any wetlands including prairie potholes, perennial and ephemeral streams, reservoirs, natural seeps and springs, etc.
- I. One of MBCD's greatest concerns with the GWT project and associated future power lines is the fragmentation of Greater Sage-grouse habitat. Though much of the line is associated with an existing power line corridor, we feel the drastically larger, 1500 foot ROW with two separate lines, is more obstacle than sage-grouse are willing to negotiate. With dissecting several sage-grouse core areas and important habitats we believe the impacts to Sage-grouse will be significant. Mitigation may not be adequate. We would ask that these areas be avoided whenever possible.
- J. MBCD asks that **full** compliance with the Governors Executive Order 2011-5 - Greater Sage-Grouse Core Area Protection. Exceptions should not be made for this project.
- K. MBCD is not in support of route 1E. we ask that it be fully removed as an alternate route. This because of 2 main reasons. First the scenic considerations are much too important in this area to disturb. The proposed changes/amendments to the VRM Classes of the area are not acceptable in our mind. Other routes further to the east would serve the supposed need for security. Second, the area is not suitable to future wind generation projects due to the influences of the Sage-grouse core area. We reiterate, Route 1E should be fully eliminated.
- L. MBCD supports that all mitigation funding go through the Wyoming Wildlife and Natural resource Trust Fund (WWNRTF) this is the most responsible and responsive means of getting mitigation on the ground. If this is not possible we would propose that the funds be distributed through local conservation districts.
- M. MBCD asks that mitigation funds be made available for alterations to Carbon County, Wyoming Road 121 near Medicine Bow, which will serve as the access to the Aeolus Substation, including the bridge across the Medicine Bow River. The cost of these changes should not be exclusively on the backs of local tax payers.
- N. The Medicine Bow Conservation District anticipates a significant Cumulative impact in regards to transmission lines construction in the near future. We do not feel this EIS adequately addresses this in the analysis. We ask that a more



---

Medicine Bow Conservation District  
P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

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- O. MBCD asks that careful consideration be made of the potential negative effects associated with "fast Tracking" the Gateway West Project.
- P. The Medicine Bow Conservation District again is a supportive of multiple uses of the land and natural resources. We believe that proper and responsible construction of appropriate and efficient infrastructure will benefit local economies and landowners as well as provide for future generation and transmission of electrical power. Thus we are generally in support of the Gateway West Transmission Line Project as far as it is constructed responsibly.

On Behalf of the Board of Supervisors,

A handwritten signature in blue ink that reads "Todd G. Heward".

Todd G. Heward  
Manager, MBCD  
PO Box 6, 510 Utah St.  
Medicine Bow, WY 82329  
307-379-2221  
todd@medbowcd.org



"Todd Heward"  
<todd@medbowcd.org>  
10/28/2011 07:36 AM

To <Gateway\_West\_WYMail@blm.gov>  
cc ""Joan McGraw"" <joan@medbowcd.org>, <Walt\_George@blm.gov>, ""Ken Besel"" <kbesel@union-tel.com>, ""Owen Williams""  
bcc  
Subject Gateway West Transmission Line Project

Dear Project Manager;

Please see attached comments for the Draft EIS of the Gateway West Transmission Line Project.

Thank you

**Todd G. Heward, Manager**

Medicine Bow Conservation District  
PO Box 6  
510 Utah St  
Medicine Bow, WY 82329  
Office 307-379-2221  
Cell 307-703-5050



Gateway West Transmission Line Project comments MBCD.pdf

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Medicine Bow Conservation District  
P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

October 25, 2011

Project Manager  
Gateway West Transmission Line Project EIS  
Bureau of Land Management  
PO Box 20879  
Cheyenne, WY 82003  
Email: Gateway\_West\_WYMail@blm.gov.

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Medicine Bow Conservation District  
P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

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P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

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P.O. Box 6 - Medicine Bow, WY 82329 - Phone (307) 379-2221 - Fax (307) 379-2224

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On Behalf of the Board of Supervisors,

A handwritten signature in blue ink that reads "Todd G. Heward".

Todd G. Heward  
Manager, MBCD  
PO Box 6, 510 Utah St.  
Medicine Bow, WY 82329  
307-379-2221  
todd@medbowcd.org

Lincoln Conservation District

P.O. Box 98  
110 Pine Street, Cokeville Town Hall  
Cokeville, Wyoming 83114



WALTER E. GEORGE, NATIONAL PROJECT MANAGER  
BUREAU OF LAND MANAGEMENT  
P.O. BOX 1828  
CHEYENNE, WYOMING 82003-1828

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CHEYENNE, WYOMING

**Lincoln Conservation District**

P.O. Box 98 - 110 Pine Street - Cokeville Town Hall, Room 1 - Cokeville, Wyoming 83014  
Phone (307) 279-3256

September 27, 2011



BLM – Wyoming State Office  
Attention: Walter E. George, National Project Manager  
P.O. Box 1828  
Cheyenne, Wyoming 82003-1828

Dear Mr. George:

Once again, the Lincoln Conservation District (LCD) board members were reviewing the draft EIS for the proposed Gateway West Transmission Line Project. It was noted that the proposed route for the transmission line through southern Lincoln County was miles north of the existing electric transmission lines. Time and time again, we have expressed opposition to this decision during numerous public meetings and in written letters to you and the group writing the EIS.

It is not in the best interest to carve a new corridor through southern Lincoln county through scenic ranch land up Pomeroy Basin and down Pine Creek northeast of Cokeville, Wyoming, when an existing corridor already exists. It will cause problems for existing pivot irrigation systems in the Pine Creek area, in addition to disrupting hay operations. It is also a scenic disruption and possibly health problems for the residents of Cokeville and Pine Creek Ski area.

The idea that it is needed for security reasons is ludicrous. Why then, does it not take an entirely different path throughout the whole stretch of the proposed corridor? It seems something is being misrepresented.

We would like to know the rationale behind this decision, other than for environmental reasons. We would appreciate the proposed route be revisited with input from both sides of the aisle, perhaps a public forum type event. As a LCD board, we feel the proposed route for the transmission line is being considered without local involvement. In the end, we are the ones that live with your decisions.

Please help us understand the rational of this decision. We will be looking forward to your response on this matter.

Sincerely,

Robert Peternal, Secretary/Treasurer  
Lincoln Conservation District

cc: Bonnie Cannon  
Reagan BeBout  
Sandy DaRif

09/11

Office of  
*Albany County Clerk*  
Jackie R. Gonzales  
525 Grand Ave. - Suite 202  
Laramie, WY 82070

Bureau of Land Management  
Gateway West Project  
PO Box 20879  
Cheyenne, WY 82003

82003#7019 B047



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# COUNTY OF ALBANY

525 GRAND AVE ROOM 105 · LARAMIE, WYOMING 82070  
(307) 721-2541 · FAX (307) 721-2544  
COMMISSIONERS@CO.ALBANY.WY.US

October 4, 2011

Bureau of Land Management  
Gateway West Project  
PO BOX 20879  
Cheyenne, WY 82003

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CHEYENNE, WYOMING  
2011 OCT -6 AM 10:00



111

RE: Comments on Gateway West Project

BLM is currently evaluating 3 alternatives for the southern portion of segment 1E. Two of those alternative, 1E-A and 1E-B would be constructed away from the existing 230 kV transmission line corridor between Aeolus and Windstar whereas alternative 1E-C would closely follow the existing 230 kV transmission Line. We are opposed to alternatives 1E-A and 1E-B for the following reasons:

- Both alternatives would require construction along the foothills of the Laramie Range and would result in adverse impacts to the visual quality of the area. Alternative 1E-C would be constructed adjacent to an existing 230 kV transmission line and the visual impacts would be significantly less
- Alternative 1E-A would cross sage grouse core area outside an existing transmission line corridor which is inconsistent with the Governor's executive order. Going around the core area along alternative 1E-B will require significant removal of trees on private lands which can be avoided by adopting alternative 1E-C
- Both 1E-A and 1E-B are significantly longer than alternative 1E-C and will result in many more impacts to all natural resources including wildlife, vegetation, cultural resources, etc.
- Alternative 1E-C uses an existing transmission corridor where impacts would be significantly reduced
- Both alternative 1E-A and 1E-B impact much more private lands than alternative 1E-C. Along 1E-C BLM lands are going to be impacted by 1W and the rebuild, why not concentrate the disturbance in one area rather than spreading it out along the southern edge of the Laramie Range?
- We strongly disagree with Rocky Mountain's conclusion that 1E- C does not meet the project's purpose and need. They have not demonstrate the need to construct transmission east toward Garrett and the offsets proposed for Alternative 1E-C should meet criteria for line spacing established by the Western Electric Coordinating Council. If wind is developed to the east of 1E-C, which we believe is unlikely given the location of sage grouse core area, laterals could be constructed directly between Aeolus and the wind farms without the need of constructing either alternative 1E-B or 1E-A.

Albany County Board of County Commissioners

Tim Sullivan, Chairman

Tim Chesnut, Member

TIM CHESNUT  
COMMISSIONER

TIM SULLIVAN  
COMMISSIONER CHAIRMAN

JERRY M. KENNEDY  
COMMISSIONER



"Jenny Lovell"  
<jlovell@co.blaine.id.us>  
10/27/2011 02:23 PM

To <Gateway\_West\_WYMail@blm.gov>  
cc  
bcc  
Subject Gateway West Comments

Please see attached letter for Blaine County's comments. Thanks!

Jenny Lovell  
Commissioners Assistant  
208.788.5500  
208.788.5569 fax  
206 1st Ave. South, Ste 300  
Hailey, ID 83333

-----Original Message-----

From: mail@co.blaine.id.us [mailto:mail@co.blaine.id.us]  
Sent: Thursday, October 27, 2011 2:22 PM  
To: Jenny Lovell  
Subject: Scanned image from MX-2600N

Reply to: mail@co.blaine.id.us <mail@co.blaine.id.us> Device Name:  
Commissioner MX-2600N Device Model: MX-2600N  
Location: Commissioner Workroom

File Format: PDF (Medium)  
Resolution: 200dpi x 200dpi

Attached file is scanned image in PDF format.  
Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems  
Incorporated to view the document.  
Adobe(R)Reader(R) can be downloaded from the following URL:  
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<http://www.adobe.com/>



mail@co.blaine.id.us\_20111027\_132152.pdf



## THE BOARD OF BLAINE COUNTY COMMISSIONERS

206 FIRST AVENUE SOUTH, SUITE 300

HAILEY, IDAHO 83333

PHONE: (208) 788-5500 FAX: (208) 788-5569

[www.blainecounty.org](http://www.blainecounty.org) [bcc@co.blaine.id.us](mailto:bcc@co.blaine.id.us)

Angenie McCleary, Chairman \* Tom Bowman, Vice Chair \* Lawrence Schoen, Commissioner

October 27, 2011

Bureau of Land Management  
Gateway West Project  
PO Box 20879  
Cheyenne, WY 82003.

Re: Gateway West 500 KV Powerline Draft EIS dated July, 2011.

Dear Sir or Madam,

The Blaine County Board of County Commissioners offers the following comments on two segments of the proposed Gateway West 500KV powerline:

- 1) In the southern tip or "tail" of Blaine County a 345KV powerline currently exists (See Segment 6). Pursuant to Chapter 34 of the Blaine County Code (attached), this is the appropriate location in Blaine County for such a high voltage powerline. The Board has no objection to energizing this line from 345KV to 500 KV on the existing route identified in Segment 6. Given the circumstances, it is appropriate that no Segment 6 alternatives are being offered.
  
- 2) As to Segment 5, it is appropriate that Segments 5(n) and 5(o) were eliminated from detailed study. Among other compelling factors, both are too far removed from the West-Wide (WWE) Corridor. Segment 5(n) that runs north of the Craters of the Moon Nat'l Monument is so far removed geographically and would be so much more expensive, that it does not seem credible to include it as an alternative even if eliminated from detailed study. Given the remote location and multiple other compelling environmental or physical factors associated with Segment 5(n), this Board does not think it merits any, even limited, consideration. For that reason, the Blaine County Board of County Commissioners recommends that Segment 5(n) be eliminated entirely from the final EIS as an alternative even as one "not studied in detail."

Page 2

- 3) On the other hand, it may be reasonable to contemplate Segment 5(o). Blaine County agrees that this segment does not merit further study for the reasons given in the draft EIS, but in light of the suggestions by our neighbors to the south, this board understands identifying it for limited consideration. . The suggestion by “[a] combination of Power County, Bannock County, and Cassia County residents” that a line “be routed directly north from the Populus Substation in order to avoid Power and Cassia Counties altogether” might justify a limited examination of Segment 5(o).

Thank you for the opportunity to comment on the Gateway West 500Kv Powerline Draft EIS, dated July 2011. If you have any questions about these comments or wish to discuss this further, please contact us.

Respectfully submitted,



Angenie McCleary, Chairman

## Relevant Draft EIS Sections:

### 2.0 [ROUTE] ALTERNATIVES

This chapter includes information on how alternatives were developed, describes the alternatives that are evaluated in the EIS, describes alternatives that were **considered but not given detailed study** and preferred alternatives, details system components common to all Action Alternatives, compares the key features and effects of the alternatives studied, and describes conformance with BLM and Forest Service land use plans.

...

### 2.4 ROUTE ACTION ALTERNATIVES

The Proponents state that their overall Project approach was for the Proposed Route to follow the WWE [West-wide Energy] corridor, other designated corridors, or existing utility ROWs where feasible (IPC and RMP 2008, 2009). Therefore, many of the Route Alternatives were developed to consider various ways of following these existing corridors. In addition to alternatives suggested because they more closely follow the WWE corridor or existing utility corridors, several other alternatives were proposed and considered feasible (e.g., routes that would avoid certain sensitive resources), and therefore are also considered in detail in this EIS.

Several alternatives were considered, but upon closer examination, were eliminated from further consideration because it became clear that they provided no environmental benefit over the Proposed Action or one of the other alternatives considered in detail, they were not feasible for environmental, physical, or economic reasons, or they did not meet the Proponents' purpose and need.

...

**§2.4.6 Segment 5 – Populus [Substation, So. Bannock County] to Borah [Substation, Power County]:**

...

#### **§2.4.6.3 Alternatives Eliminated from Detailed Study**

##### **Craters of the Moon North and South Alternatives (5, 5n, 8; 5, 5n, 5o, 8) and Alternative Borah Substation Site (12)**

A combination of Power County, Bannock County, and Cassia County residents asked why the Proposed Route could not be routed directly north from the Populus Substation in order to avoid Power and Cassia Counties altogether. The Proponents reported that any route to the north would have to effectively go through or around Craters of the Moon National Monument and Preserve. Two alternative routes were identified. Alternative 5, 5n, 5o, and 8 through the Monument and Preserve was determined to not be feasible, as it would require Congressional approval, while Alternative 5, 5n, and 8 that went around the Monument and Preserve would be at least 50 miles longer than the Proposed Route. Even if these conditions did not exist, these alternatives do not meet the Proponents' purpose and need of having two geographically diverse, east-west transmission lines north and south of the Snake River for reliability, one of which would interconnect at the Borah Substation.

#### 2.4.6.4 Alternatives Studied in Detail

...

#### 2.4.7 Segment 6 – Borah [Substation] to Midpoint [Substation, northern Jerome County]

...

##### 2.4.7.2 Proposed Route

The line segment between the Borah and Midpoint Substations, Segment 6, is part of the existing 345-kV transmission line that was constructed to 500-kV design standards although currently operated at 345 kV. No new transmission line construction would be required along Segment 6 to operate this line segment at 500 kV, except in the vicinity of the Borah and Midpoint Substations. At the Borah and Midpoint Substations, the line would be rerouted and re-terminated from the existing 345-kV line bays into the new *Gateway West Transmission Line Draft EIS Chapter 2 – Alternatives 2-79* 500-kV line bays at each substation. Several new structures and conductors would be needed adjacent the Midpoint Substation to reroute the existing 345-kV line from its termination on the north side of the existing station to the proposed 500-kV yard expansion on the south side. Several new structures and conductors would also be needed at the Borah Substation to reroute the line from the northeast side of the existing station to the proposed 500-kV yard addition on the south side. A new structure would be needed to route the 345-kV line between Borah and Kinport into the existing 345-kV yard on the east side. The line between Borah and Midpoint would then be energized at 500 kV. No land use plan amendment would be required for the Segment 6 Proposed Route.

**2.4.7.3 Alternatives** No alternatives were considered along this segment because the Proposed Action is an increase in voltage carried by structures and conductors of an existing transmission line.

**COUNTY OF CASSIA**

COURTHOUSE  
1459 Overland Avenue  
BURLEY, IDAHO 83318



**CERTIFIED MAIL™**



7010 1060 0000 3846 1670



Mr. Walt George  
Bureau of Land Management  
Gateway West Project  
P.O. Box 20879  
Cheyenne, WY 82003



8200387018 8047



**COUNTY OF CASSIA**

OFFICE OF THE BOARD OF COUNTY COMMISSIONERS

2011 OCT 28 AM 10:00

RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

**Dennis D. Crane, Chairman**  
**Paul Christensen, Commissioner**  
**Bob Kunau, Commissioner**

**COURTHOUSE**  
1459 Overland Avenue  
BURLEY, IDAHO 83318

Phone: 208-878-7302  
Fax: 208-878-3510  
www.cassiacyoung.org

October 24, 2011

Mr. Walt George  
Bureau of Land Management  
Gateway West Project  
P.O. Box 20879  
Cheyenne, WY 82003

ENTERED  
100475 1/2

Dear Walt:

We appreciate you and your agency representatives' efforts during the recent spate of public meetings concerning the draft EIS for the Gateway West Project. Though there is a great deal of disappointment in the short shrift – perhaps even ignoring – of crucial Cassia County data in compiling the DEIS, we did take a small amount of hope that such deficit in study and consideration can be mitigated in the review and contemplation of an alternative route, which may be palatable to more of the parties involved in the siting of this project.

As you might recall there was discussion at least at the Burley and Almo meetings regarding breaking in a northwest direction off from the Stateline route (7R) to avoid the USFS roadless area, avoid many leks, and yet locate the line predominately on public land. This would bring the line up through the Goose Creek valley, then around the foothills by Oakley and south of Murtaugh to the Cedar Hills site area. We are enclosing a map with some “concept” lines drawn in the general area to provide some talking points in this regard.

We would request the opportunity to sit down with BLM and review this alternative and consider it to be a seriously considered alternative to others as already proposed.

BOARD OF COMMISSIONERS  
FOR CASSIA COUNTY

Dennis D. Crane  
Chairman

Paul Christensen  
Commissioner

Bob Kunau  
Commissioner

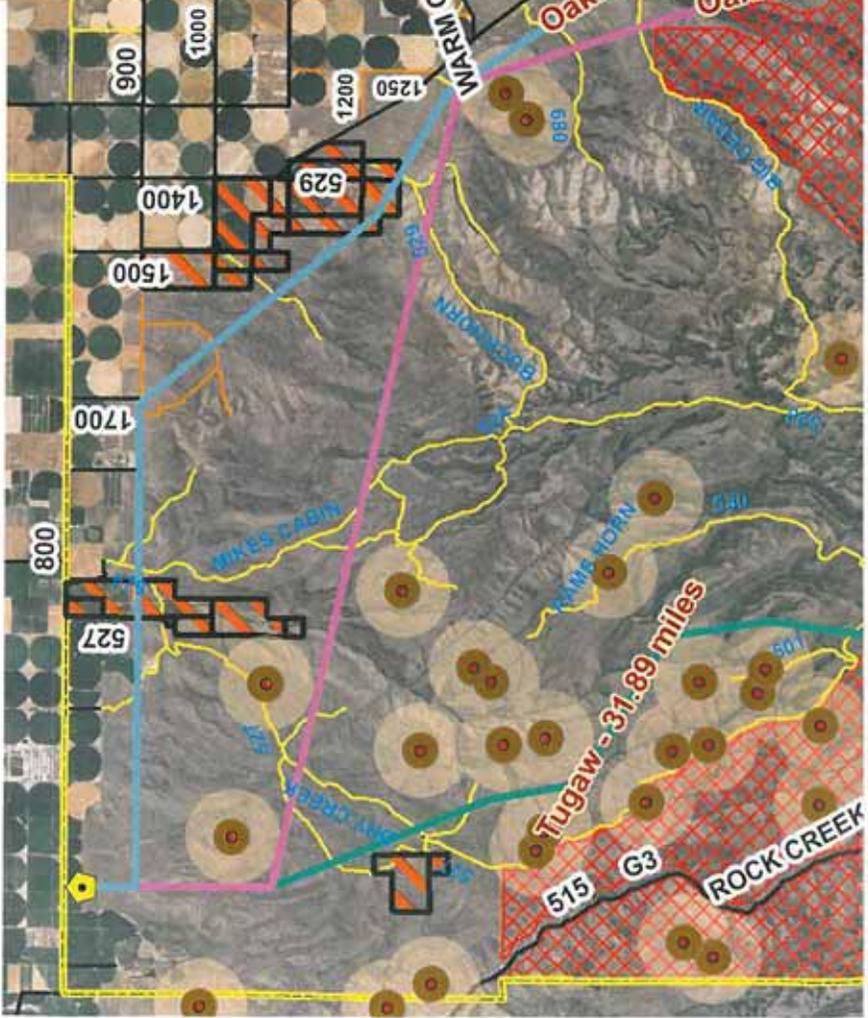
Enclosure: Map



Beginning Point 212

**Legend**

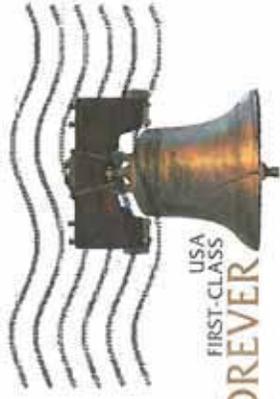
- County Corridor CL
- Leg 1
- Leg 2
- Oakley (East)
- Oakley (West)
- State Line
- Tugaw
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- 



Mike Foxton  
Box 279  
Oakley, Id 83346

BOISE ID 837

27 OCT 2011 PM 3 T



Walt George Pm. Manager  
B.L.M.

Gateway West Project  
P.O. Box 20879  
Cheyenne, WY 82003

100337

9200337018



100337

October 11, 2011

2011 NOV -1 AM 10:00

Walt George, Project Manager  
Bureau of Land Management  
Gateway West Project  
P.O. Box 20879  
Cheyenne, WY 82003

RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

### Comments on Gateway West Project Draft EIS

Dear Mr. George,

We, as members of the Cassia County Federal Lands Advisory Group, represent a broad spectrum of public lands interests ranging from conservation to industry to recreation. Early on in the NEPA process, we were tasked by local elected officials and community members to study the Gateway West Project and to identify specific alternative routes for high voltage transmission to cross public lands in Cassia County in order to assist the County Commission in the development of a high voltage corridor. In your DEIS, it is apparent on page 2-79 that your planners are suggesting to you that the stateline or 7I alternative was driven strictly by local landowner concerns. It is my intent to make you aware of why we support the 7I alternative from a public lands standpoint.

As you know, the natural topography of public and private lands Cassia County provides very few alternatives for a project of this magnitude. The initial information we received outlined two of the three segments studied in your Draft namely segments 7A and 7H. It was our efforts coupled together with the efforts of a local citizen's advisory group (Cassia County Gateway Taskforce) that provided the basis for the 7I route to be included. It is in support of this route that I am writing.

We are aware that one of the most important factors of NEPA planning is the formulation of several viable options (range of alternatives) for the project manager to consider. The lack of development of sufficient alternatives may unnecessarily delay or even thwart the project altogether. For this reason we were immediately drawn to and puzzled by the inclusion of what is known as the 7H alternative. 7H passes through some of the most sensitive public lands resources that exist in our county. It parallels pioneer trails passing through Conner Creek. It dissects the pristine alpine valley of Elba which lies in the shadows of the majestic Cache Peak, the highest peak south of the Snake River in Idaho. It was indicated that Tetra Tech and Idaho Power officials were satisfied that the powerline easement "conveniently" fit in the only area of the Albion Range of Forest Service managed lands that was not designated Roadless. Additionally, the DEIS indicates on page 2-79 that this route was identified by the proponent "in response to the stateline (7I) route". This statement is erroneous. 7H existed before the stateline route—but the proponent would not consider it until talk began to surface of a stateline route. It seems as if this route was arbitrarily drawn to provide an alternative, without any real consideration to the environmental impacts. No one on our committee was satisfied with alternative 7H and we immediately began to look for other areas.

As we considered the proponent's preferred alternative, we were sensitive to the fact that most people who pass through Cassia County come along the Interstate Highway system, namely I-84 and I-86. We feel that Cassia County provides one of the best visual resources for the Interstate Highway traveler anywhere in the state of Idaho. The proponent's preferred alternative would negatively impact this resource for its entire length along I-86 in Cassia County and continuing along I-84 west of the I-84/I-86 junction. When considering visual resources, you need to more carefully consider the number of people whose use of the visual resource will be negatively impacted. Too much consideration may be given to the proponents concerns of mileage, expense, etc.

Continuing west along the proponent's preferred alternative in Segment 7, you cross many of the privately held farm lands in the fertile Goose Creek valley and then reach the public land area near Cottonwood

1/3

Creek, Buckhorn Canyon and Dry Creek. One reason why we preferred the Stateline or 7I alternative to this area was because of the winter wildlife habitat that exists here. You may be aware that there are some seasonal road closures in these areas for wildlife.

Many factors attracted us to the 7I or Stateline alternative. First of all, we felt that although the 7I route crossed more public lands, the nature of these public lands lends itself more to this type of use. For example, from the point where 7H and 7I separate and continuing south and west up the Raft River valley, there already exists a high voltage transmission line belonging to Raft River Rural Electric. It made sense to route additional lines where current lines exist, rather than to impact new areas. The public lands in these areas are somewhat more arid in terms of winter wildlife habitat and are dissected by roads connecting the communities of Bridge, Naf, Yost, and Almo. As we approached the area south of the City of Rocks National Reserve, we consulted with Reserve Manager Wallace Keck, who led some of us on a tour of the area. His main concern was the impact to the Visual Resources from the vantage point of the Reserve. It was on Mr. Keck's recommendation that 7I was routed through an area south of what is locally known as "Spark's Basin." Spark's Basin lies in between the Stateline and Emigrant Canyon, all south of the Reserve. Mr. Keck indicated to us that day that if the line was routed south of Spark's Basin that it would be hidden from view from within the Reserve.

Continuing west, the alternative enters Junction Valley, which is almost entirely privately held land. The single underlying consideration here was Granite Pass—the location where the California Cutoff from the Oregon Trail enters the Goose Creek valley. Again, at the suggestion of Mr. Keck, the route here was located below and to the north of Granite Pass in order to enable visitors to the City of Rocks to have an uninterrupted line of sight from the Twin Sisters lookout point to Granite Pass. From this point the route continues west circumventing Forest Service Roadless areas until it leaves the county.

In summary, please consider that under the proposed alternative, every person who visits our county via the Interstate Highway system will have significant portions of our public lands resources obstructed by the presence of this 500kv powerline. Alternative 7H may represent the most significant impact to our public lands resource in the county—crossing some of the most pristine valleys and vistas.

Alternative 7I, while it may consist of more public land than the proponents preferred route, represents the right balance of public and private land resources and is most ideally suited to this type of use.

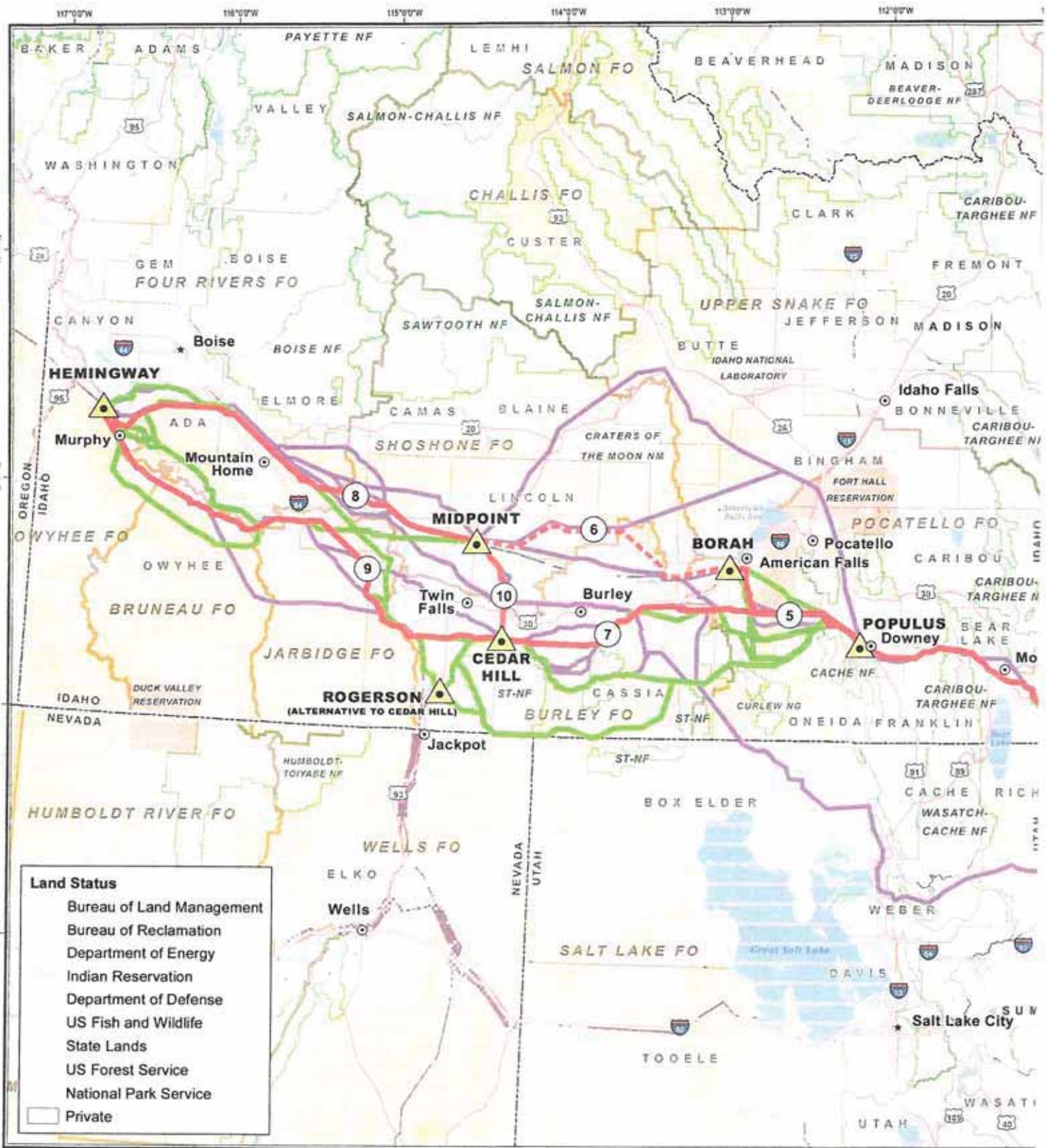
Thank you for your consideration.

Sincerely,



Michael Poulton, Chairman

Cassia County Federal Lands Advisory Group





Brent Stoker  
<bstoker6@gmail.com>  
10/26/2011 08:55 PM

To Gateway\_West\_WYMail@blm.gov  
cc  
bcc  
Subject Draft EIS Comments

## Draft EIS Comments

Gateway West Transmission Line Project

Draft EIS comment period: July 29, 2011- October 28, 2011

Date: October 24, 2011

First Name: Brent Last Name: Stoker

Organization: Cassia County Gateway Task Force Chairman

Mailing Address: 745 East 500 South City: Burley State: ID Zip: 83318

-

### Comment:

1. There is no mention of Cassia County Gateway Task Force or it's submitted information from the last administrative draft environmental impact statement. As private land owners we held 8 recorded public meetings that Idaho Power and Tetra Tech representatives attended in the summer of 2009 and yet none of the documentation is found anywhere in the entire 3200 pages of this EIS.
2. Socioeconomics 3.4-4.2

Quotes a study by (HydroSolutions and Fehringer 2007) addressing the economic impact that is not comparable with the proposed tower structures of Gateway. Single pole and H-frame structures are much smaller than the four legged lattice structures for Gateway. The costs quoted are incorrect and of no use for this EIS. Also the values that Hyrodolutions and Fehringer estimates incorrectly combines non-irrigated and irrigated

average cash rent to comprise an average rent price per acre to be \$132 in Idaho. (USDA 2010b) Averaging two different categories such as irrigated and non-irrigated is not an acceptable method of evaluation or for appraisal.

3. Agriculture 3.18---

Idaho Power reporting that it has not received any complaints regarding the impact of these existing transmission lines and structures discredits all ten subjects that are listed. The problems that were discussed would be on a case by case basis, most likely through negotiated terms between the landowner and proponents. That's Not an overall plan of mitigation for this project. It's discrimination for the individual left to mitigate for him or herself.

4. Cassia County Task Force meeting minutes submitted for BLM and Tetra Tech review for testimony for documentation where not included and all ten subjects in the Agriculture section originated from these meetings.

--



Draft EIS Comments Oct 2011.doc

## Draft EIS Comments

Gateway West Transmission Line Project

Draft EIS comment period: July 29, 2011- October 28, 2011

Date: October 24, 2011

First Name: Brent Last Name: Stoker

Organization: Cassia County Gateway Task Force Chairman

Mailing Address: 745 East 500 South City: Burley State: ID Zip: 83318

### Comment:

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4. Cassia County Task Force meeting minutes submitted for BLM and Tetra Tech review for testimony for documentation where not included and all ten subjects in the Agriculture section originated from these meetings.

ELMORE COUNTY  
GROWTH AND DEVELOPMENT DEPT.  
520 EAST 2nd SOUTH  
MOUNTAIN HOME, ID 83647

Bureau of Land Management  
Wyoming State Office  
Attn: Walter E. George  
PO Box 1828  
Cheyenne, WY 82003-1828



UNITED STATES POSTAGE  
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006557493  
MAILED FROM ZIP 1

100353



# Elmore County Growth and Development Department

520 East 2<sup>nd</sup> South Street  
Mountain Home, ID 83647  
Phone: (208) 587-2142 ext.254  
Fax: (208) 587-2120

160353

Alan Christy  
Director

Bob Winterfeld  
Building Official /  
Code Enforcer

Beth Bresnahan  
Planner I

Kacey Hultenius  
Administrative  
Assistant

August 30, 2011

Bureau of Land Management  
Wyoming State Office  
Attn: Walter E. George  
P.O. Box 1828  
Cheyenne, WY 82003-1828

2011 SEP -6 AM 10:00  
RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

**Re: Comments on the Gateway West Transmission Line Project draft EIS.**

To Whom It May Concern:

The purpose of this letter is to provide some comments and clarification to the draft EIS for the Gateway West Transmission Line Project ("project"). My background with the project has been limited. I have been the Director of the Growth and Development Department ("department") for over two years. I am unsure on when some of the data regarding Elmore County was collected and where the data was collected from. The majority of my comments deal solely with land use within Elmore County, Idaho.

The following items should be revised in the draft EIS:

**Section 3.17 Land Use – Page 7**

***"A CUP would not be necessary in Elmore County for construction of transmission lines. However, other facilities, such as storage yards, would require a CUP."***

A Conditional Use Permit ("CUP") is necessary for the construction of transmission lines. Elmore County adopted a new zoning and development ordinance ("ordinance") on May 13, 2009. Section 6-8-174.E.3 under Public or Quasi-Public uses states:

*"Electric transmission lines and substations shall require conditional use approval."*

**Section 3.17 Land Use – Page 116**

As a point of clarification Elmore County has approved one planned community with another at the Planning and Zoning Commission ("commission") for the public hearing process. I have attached a map that shows the boundaries of the developments.

**Section 3.04 Socioeconomics – Page 23 Table 3.4-15**

It is my understanding that remote portions of Elmore County are served by the Atlanta Power Company. I do not believe any of the proposed transmission locations cross Atlanta Power Company service areas.

**Section 4.0 Cumulative Effects – Page 30 Table 4.2-7**

I have provided some clarification on the existing wind farms within Elmore County. It appears there may have been some confusion as the names have been changed. It is my understanding that Mountain Home, John Deer became Hot Springs and Bennett Springs.

Operational Wind Farms in Elmore County

- Camp Reed Wind Farm, Camp Reed, LLC, 22.5MW+/-
- Hot Springs Wind Farm, Hot Springs LLC, 21MW +/-
- Bennett Springs Wind Farm, Bennett Creek, LLC, 21 MW +/-

**Section 4.0 Cumulative Effects – Page 46 Table 4.2-15**

There have been several new wind farms approved in Elmore County. In addition, the Alkali project by Rick Koebbe is expected to be commissioned on September 23, 2011 and is now known as the Sawtooth Wind Farm, with Proponent Power Works, Rick Koebbe and a total production capability of 22MW+. As it is listed in the table Alkali and Sawtooth are the same project. I have provided a list of the following approved wind farms that are scheduled to start construction within the next year.

Approved pending construction Wind Farms in Elmore County

- Cold Springs Wind Farm, Cold Springs Windfarm LLC, 20MW+/-
- Desert Meadow Wind Farm, Desert Meadow Windfarm LLC, 20MW+/-
- Hammett Hill Wind Farm, Hammett Hill Windfarm LLC, 20MW+/-
- Mainline Wind Farm, Mainline Windfarm LLC, 20MW+/-
- Ryegrass Wind Farm, Ryegrass LLC, 20MW+/-
- Two Ponds Wind Farm, Two Ponds Windfarm LLC, 20MW +/-
- High Mesa Wind Farm, High Mesa LLC, 40MW +/- (Only 16.7 MW in Elmore County remainder is in Twin Fall County)
- Tumbleweed Wind Farm, Tumbleweed LLC, 5-10MW+/- (Part of a joint solar/wind project.)

**Section 4.0 Cumulative Effects**

It may be appropriate to identify potential solar power facilities over 10MW production capability. Elmore County currently has three approved solar facilities awaiting construction. I am unsure of the construction schedule of these facilities. I have provided a list of the approved solar facilities in Elmore County.

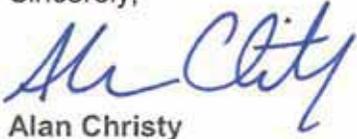
Approved pending construction Solar Farms in Elmore County

- Tumbleweed Solar Farm, Tumbleweed LLC, 5-10MW+/- (Part of a joint solar/wind project.)
- Grand View Solar PV 1, 20 MW solar farm
- Grand View Solar PV 2, 20 MW solar farm

**Summary**

I have attached a map of the wind farm and solar generating facilities locations. If you have any questions regarding this letter please contact me at 280-587-2142 ext. 269. Thank you for providing me the opportunity to provide comments.

Sincerely,

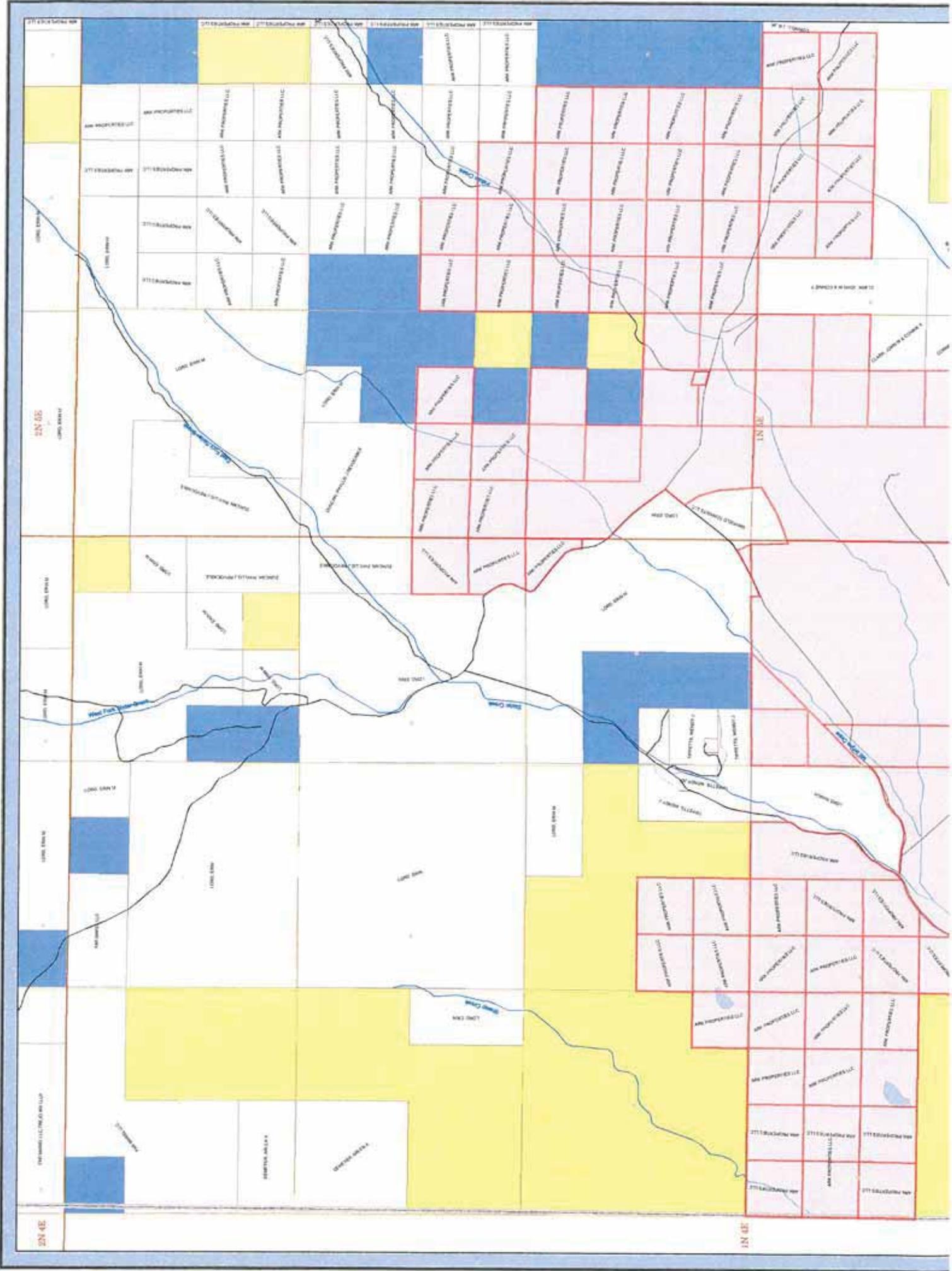
A handwritten signature in blue ink that reads "Alan Christy". The signature is fluid and cursive, with the first name "Alan" and the last name "Christy" clearly distinguishable.

**Alan Christy**  
Director  
Elmore County Growth and Development

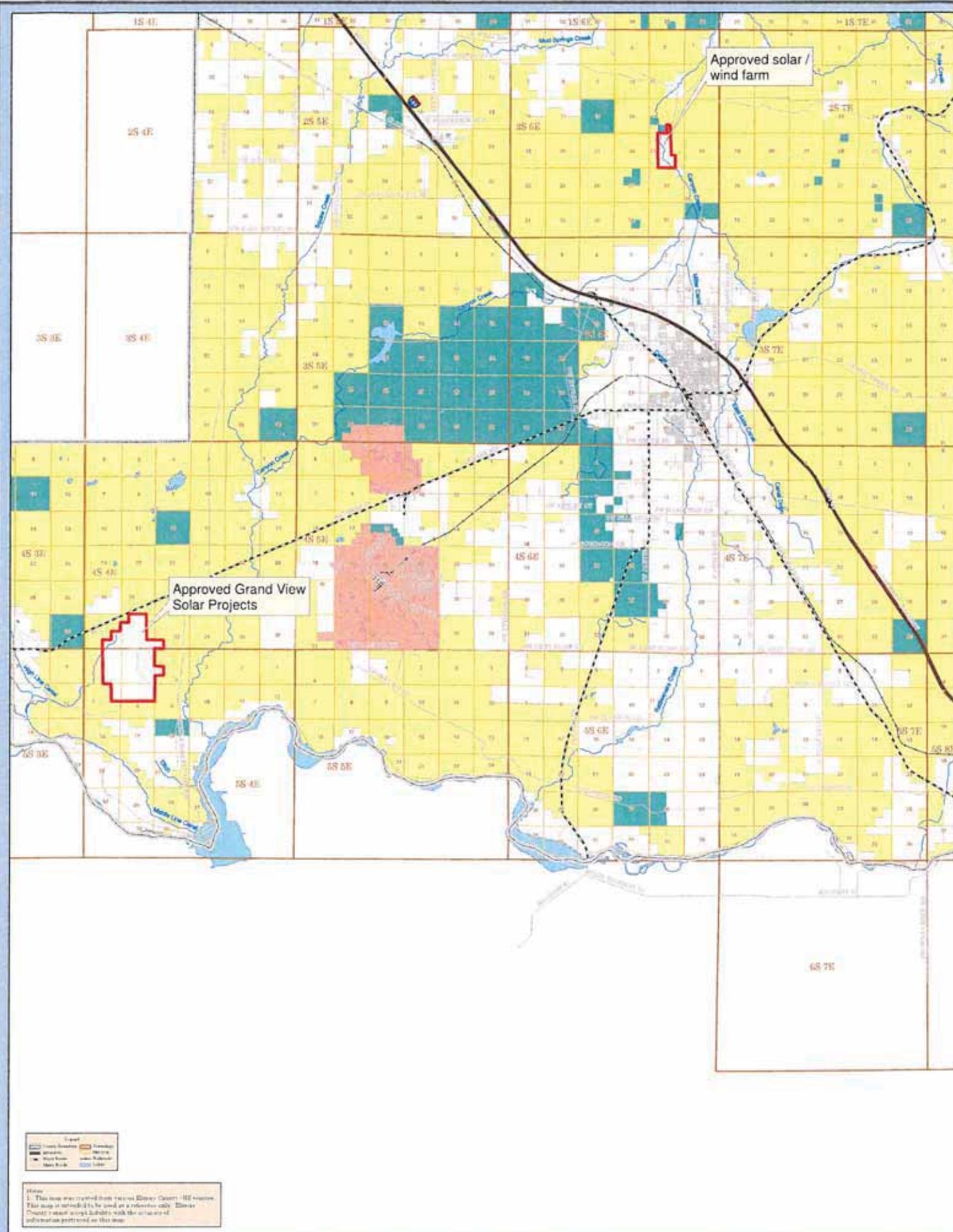
Attachments:

1. Map of approved and proposed planned communities.
2. Map of approved wind farms.

100353



100353



Legend	
	Permitted
	Approved
	Approved Grand View Solar Projects
	Water
	Highway
	County Boundary
	Approved solar / wind farm

Note:  
 1. This map was created from various Elmore County GIS sources.  
 This map is intended to be used as a reference only. Elmore  
 County cannot accept liability with the accuracy of  
 information portrayed on this map.

**Elmore County Permitted Energy Generating Sites**

# Draft EIS Comment Form

100524

Gateway West Transmission Line Project

Draft EIS comment period: July 29, 2011 - October 28, 2011

Date: 9-21-11

First Name: TONY Last Name: MORLEY

Organization or Office Name: MINIDOKA COUNTY BUILDING & ZONING ADMS.

Mailing Address: 13 MT. ASH LANE City: BURLEY State: ID Zip: 83318

Daytime Phone: 208-<sup>436-7083</sup>678-0013 Email: TONY.MORLEY@CO.MINIDOKA.ID.US

Please check here if you wish for your personal information to remain confidential\*

\*If you wish for your contact information to remain confidential, BLM will protect the personal information that you submit to the extent allowed by law. However, the information may be subject to the Freedom of Information Act (U.S.C. etc.). See privacy note on reverse.

Please submit your comments by October 28, 2011. Information submitted on this form is being voluntarily provided solely for the purpose of commenting on the Gateway West Transmission Line Project.

Comment:

~~THE~~ THE SOUTHERN ROUTE THROUGH CASSIA COUNTY MAKES MORE SENSE! LET'S PUT THIS THING AS MUCH AS POSSIBLE ON GOV. LAND THAT WE ALL OWN AND IMPACT TO THE LEAST DEGREE OUR PRIME AG LAND AND COMMUNITIES. THE TRANSMISSION LINE RUNNING THROUGH THE NORTH PART OF MINIDOKA COUNTY IS A GOOD EXAMPLE - ~~THE~~ RESULTING IN A NEGLIGIBLE IMPACT ON WILD LIFE AND A SMALL IMPACT ON AG. - DO NOT GO THROUGH THE HEART OF CASSIA COUNTY!

To mail this comment form please send to:

Bureau of Land Management | Gateway West Project | P.O. Box 20879 | Cheyenne, WY 82003

Comments may also be submitted via email to: Gateway\_West\_WYMail@blm.gov or online at [www.wy.blm.gov/nepa/cfodocs/gateway\\_west](http://www.wy.blm.gov/nepa/cfodocs/gateway_west)

1/1

continued on back

BLM





OCNRC DIR@aol.com

10/27/2011 02:44 PM

To gateway\_west\_wymail@blm.gov

cc shrj@juno.com, jvmerrick@hotmail.com,  
kraberasturi@frontiernet.net, aseidlitz@blm.gov,  
csherburn@co.owyhee.id.us

bcc

Subject Owyhee County Idaho Comment on Gateway West Project  
DEIS

Mr. Walt George  
Project Manager  
Gateway West Transmission Line Project EIS  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, WY 82003

Dear Mr. George:

The attached electronic file contains the Comment on the DEIS submitted by the Owyhee County Board of County Commissioners.

Please note the following in regard to the submitted comment:

1. The comment is submitted as a continuing step in FLPMA coordination between Owyhee County and various BLM Offices in Idaho and with your office. We expect to continue our meetings and involvement in this project under the provisions of FLPMA as the Draft is revised.
2. We will also hand-deliver a hard copy of this comment to Mr. Aden Seidlitz at the Boise District Office.
3. Due to the size of several enclosures provided with the Owyhee County Comment, the electronic version attached to this mail contains only two of five enclosures. Three of the enclosures which will be hand-delivered to Mr. Seidlitz are large format map products which we were unable to digitize. The two enclosures (Encl's 1 and 2) contained within the attached electronic file are scans of portions of two of the large format map products.
4. Following our delivery of the hard copy to Mr. Seidlitz, we will arrange a meeting with Mr. Seidlitz to discuss our comments and to answer questions and/or clarify any points of confusion from the written comments and maps.
5. We would also willingly respond to any questions or clarification requests that you may have.

Sincerely,

Jim Desmond



Staff Coordinator to the County Commissioners Dwyhee County Idaho Gateway West Comment 10-27-11.pdf



OWYHEE COUNTY BOARD OF COMMISSIONERS  
 COURTHOUSE P.O. BOX 128 MURPHY, ID 83650-0128  
 TELEPHONE (208) 495-2421

---

District 1 –Chairman-Jerry Hoagland-P O Box 128, Murphy, ID 83650 318-8308

District 2 –Kelly Aberasturi-P O Box 128, Murphy, ID 83650 249-4405

District 3 –Joe Merrick-P O Box 128, Murphy ID 83650 250-9005

October 27, 2011

Re: 2800 (920George) WYW-174598 IDI-35849, NVN-089270, Owyhee County Comment on Gateway West Transmission Line DEIS

This document will be delivered as an electronic submission to Mr. Walt George via [gateway\\_west\\_wymail@blm.gov](mailto:gateway_west_wymail@blm.gov) and by Hand-Delivery to Boise District BLM Manager Aden Seidlitz. Note: The electronic copy will contain two enclosures (scans of portions of large format maps), the hand-delivered copy will contain 5 enclosures (the two electronic copy enclosures and three large format map products).

Mr. Walt George, Project Manager  
 Gateway West Transmission Line Project EIS  
 Bureau of Land Management  
 P.O. Box 20879  
 Cheyenne, WY 82003

Dear Mr. George:

Owyhee County, Idaho submits the following comment on the Draft Gateway West Transmission Line EIS.

This comment is submitted as part of an ongoing Federal Land Policy and Management Act (FLPMA) Coordination effort as provided for under Sec. 202. [43 U.S.C. 1712] C.(9) of the act.

**I. COORDINATION AND COMMENT BACKGROUND:**

When the potential impact of this project on private property in our county became known, Owyhee County began this coordination as part of our regularly scheduled monthly coordination meetings with elements of the Idaho BLM. During the time that Owyhee County has participated in this coordination effort, we have provided numerous comments during coordination meetings and have submitted several written comments. Owyhee County engaged in this coordination effort and provided comments and documents in an attempt to ensure that BLM met their statutory requirement for its planning and decision actions to be consistent with county plans.

Due to the significant impact that the Gateway West Transmission Line Project potentially imposes on private lands, private enterprise, county economy, and future development of private lands under the provisions of the Owyhee County Comprehensive Plan and its associated Zoning Ordinances, Owyhee County devoted considerable time and effort to this matter.

On September 1, 2009, Owyhee County delivered correspondence, including detailed maps with routes clearly marked, to BLM and Idaho Power containing two proposed alternatives developed by a group of Owyhee County citizens and adopted by Owyhee County as county-proposed alternative routes. In the letter which transmitted the two county-proposed alternatives, the county made clear that the southernmost of the two proposed alternate routes was marginal at best and had been presented as the result of indications by BLM that the county must present more than one alternative.

The southernmost of the county-proposed alternatives was ultimately labeled as alternative 9E in the Draft EIS.

On or about September 8, 2010, Owyhee County forwarded for BLM's and Idaho Power's consideration a review which had been prepared by the Owyhee County Sage Grouse Local Working Group on two of the proposed alternatives. The working group prepared its review comments on alternatives 9D and 9E after careful consideration of the proposed routes and potential impacts on sage grouse populations. Owyhee County adopted the recommendation of the Owyhee County Sage Grouse LWG as its own and submitted it to BLM and Idaho power for consideration during development of alternatives and analysis of impacts.

Upon release of the Draft EIS, Owyhee County immediately realized that the transcription of the county-proposed routes had not been correctly transcribed from the county provided maps to documents used by BLM in the Draft EIS. Maps and other descriptions within the Draft EIS did not accurately reflect the preferred county alternate route, labeled 9D in the Draft EIS. The errors of transcription were significant and the county immediately made them known to BLM during a coordination meeting with BLM Boise District. In addition, the errors were made known to State Director Steve Ellis and BLM Project Manager Walt George by letter dated September 6, 2011.

In the September 6, 2011 Letter to Idaho BLM Director Ellis and BLM Project Manager George, the County also requested a 60 day extension of the comment period due to the errors of transcription and the complexity of the DEIS.

In subsequent meetings with various BLM managers and staff as well as with members of Idaho Power, the County has attempted to resolve the harm done by the errors of transcription. In this comment, we provide a remedy that would be satisfactory to Owyhee County if adopted as the proposed action when the EIS and Decision Record are entered. Such action would also ensure that BLM's planning and decision actions are consistent with county plans and policies.

Since the inception of the county's involvement in coordination over the route development process for the Gateway West Transmission line project, we have maintained that this public benefit project should be located on the public lands.

Owyhee County's primary economic activities are farming, ranching, and use of the federal lands within our county for resource based industries such as logging and mining. Nearly 80 percent of the land within Owyhee County is in federal ownership.

The remaining lands which are in private ownership are primarily used for farm and ranching operations. The owners of those farm and ranch lands have reasonable expectation, under the Idaho

Local Land Use Planning Act as well as the County Comprehensive Land Use Plan and Zoning Ordinances, that they may make full use of the bundle of rights which are associated with the ownership of land. Those rights expectations include the continued use of those lands in their current use, such as farming and ranching operations, or the conversion of use at some future date to some other use which may at that time be a higher and better use of the lands, such commercial or residential development.

Several of the alternative routes proposed in the Draft EIS, which place much of the proposed line on private property in Owyhee County, are unacceptable to the county in that they will adversely impact the current agricultural uses of the lands, diminish current and future land value, and will severely impact future highest and best use of those lands. This potential adverse impact is unacceptable to Owyhee County and unnecessary in achieving the desired intent of electric power delivery as envisioned under the Gateway West Project.

## **II. GENERAL COMMENTS:**

1. The scoping process for both the West Wide Energy Corridors and for this specific project was inadequate and flawed in eliciting early public involvement and meaningful participation.

A. Early public scoping notices and public Hearings related to the development of the West Wide Energy Corridors failed to impart to the public the true nature of the impact of the placement of the proposed corridors.

B. Participants in the Energy Corridor Hearings were predominantly representatives of energy development or transmission concerns whose interests were far different from that of the local landowners who would find their private lands, businesses and other interests significantly impacted by the placement of the corridors.

C. Those private landowners who did attend the Energy Corridor meetings were often told that this stage of the process was simply to lay out general corridors and that before any specific project could take place within the corridor, all requirements of NEPA's public involvement must be satisfied and the project justified prior to any approval.

D. That assurance proved to be worthless in dealing with Gateway West in that Idaho Power and Local BLM Officials all adhered to a position that they were constrained to place the line in the West Wide Energy Corridor.

E. The 2005 Energy Act signed into law by President Bush provided for the development of the West Wide Energy Corridors. Section 368 of that Act required that the corridors were to be incorporated into federal plans.

F. The Birds of Prey NCA was in development during the period when the West Wide Energy Corridor was developed in southwest Idaho. Contrary to the mandates of the 2005 Energy Act, BLM removed the corridor from the NCA plan rather than incorporating it.

G. This defiance of the requirements of the Energy Act occurred late in the development of the plan, and occurred after an earlier draft incorporated the corridor in the vicinity of the existing 138 KW transmission line. That transmission line had been shown to be consistent with the needs of raptors and therefore consistent with the purposes of the NCA.

H. In early notices of scoping on Gateway West, public notices failed to provide sufficient notice to the landowning public in Owyhee County as to the potential impact of the project. Attendance at initial meetings was sparse as the result of the failed notices. When information as to the real impact began to be known, citizens' groups developed in multiple counties to protest the early routes as developed by BLM and Idaho Power.

I. This lack of initial proper notice prevented proper county involvement at the earliest planning stages, as is required by FLPMA.

## 2. Impact to Cultural and Historically significant areas:

A. The draft EIS focuses on specific cultural sites for avoidance and/or protection yet ignores significant areas of significant cultural value.

B. Routes segments proposed under the Draft would interfere with multi-generational ranching operations, some dating to the mid to late 1800's, as well as sites of historical significance in the vicinity of Oreana, Bruneau, Little Valley, and Murphy.

C. Changes made by BLM and/or contractor Tetra Tech changed the routing of a county proposed alternative from an area of little cultural significance to the junction of Sinker Creek and the Snake River--an area of significance for multiple reasons.

## 3. Impacts to Private Property and to Health of Property Owners:

A. Locating this project on private lands will alter the use of those lands for the considerable lifetime of this transmission line.

B. Idaho Power officials meeting with Owyhee County admitted early in the planning process that no structures can be built beneath the span of the transmission lines. Such limitations affect current farming/ranching operations and significantly limit future highest and best use of the lands crossed by this line.

C. Health impacts to adjacent residents are of concern as addressed in the comment submitted by Robyn Thompson of 16990 Short Cut Road, Oreana, Idaho. With her comment Ms. Thompson submitted copies of articles indicating health risks associated with large electrical transmission lines. Owyhee County incorporates "A New View of ELF-EMFs" published in Environmental Health Perspectives, Volume 108, Number 10, October 2000 and "Childhood Leukemia and Magnetic Fields in Japan: A case control study of childhood leukemia and residential power-frequency magnetic fields in Japan" authored by Michineri Kabuto, et al, "Residential Exposure to Electromagnetic Fields and Childhood Leukaemia: a meta-analysis" by I.F. Angelillo and P. Villari, "Magnetic Fields and Cancer: Animal and Cellular Evidence--an Overview" by Bo Holmberg, "Exposure to electromagnetic fields (non-ionizing radiation) and its relationship with childhood leukemia: A systematic review: by M.F. Rernandez ,et al, "Increased exposure to pollutant aerosols under high voltage power lines: by A.P. Fewes, et al, and "Risk of hematological malignancies associated with magnetic fields exposure from power lines: a case control study in two municipalities of northern Italy" by Carlotta Malagoll, et al, into this comment. The articles in their entirety are contained within the Thompson comment.

D. Analysis of impact to homes in Owyhee County has not been correctly addressed in the DEIS.

(1.) If the line is routed as indicated in the variants of Alternate 9 (excepting 9D) there will be significant impact to current land value, future land value, and to current uses including agriculture. Location of the proposed line on private agricultural property will prevent future conversion of irrigation systems, as well as placement of future buildings and structures (both farm and residential).

(2.) The impact analysis found in the DEIS (table 2.2.8 on page 2.202) regarding homes in proximity to the proposed route is grossly incorrect. Enclosure 5 to the hand-delivered copy of this comment contains data provided by the Owyhee County Assessor. The map plots existing homes shown in proximity to the West Wide Energy Corridor.

E. Routing the line as proposed in the Alternative 9D, with modifications addressed later in this document, essentially eliminates these impacts to private property and public health. The proposed modifications to 9D have been discussed with Idaho Power Staff and were determined to be workable options.

4. Placing the line in Owyhee County is largely unnecessary:

A. The proposed routes labeled as variants of Route 9 are justified by Idaho Power and BLM as necessary for separation of parallel routes for redundant power needs. Various Idaho Power officials and staff have stated that the required minimum separation is a span width--1,500 feet.

B. Stated reasons for the required redundancy are to prevent loss of the line during natural events such as fire or weather.

C. The Murphy Complex Fire of 2007, burned more than 650,000 acres--an area that would have made the proposed span-width minimum separation distance moot.

D. Weather events such as ice storms are often cited by Idaho Power as reasons to have the separation and redundancy. In reality, however, even the separation provided by proposed segments 8 and segments 9 would be insufficient to avoid the impacts of such storms in this region.

E. The redundancy argument should be abandoned.

F. The segment 9 line should be located through the NCA to parallel the existing 138KW line, with minimum separation as required to avoid line-to-line interference.

G. In that the proposed transmission line project is not in the Idaho Power Ten Year Plan, there is a valid question as to its necessity.

5. The proposed route through Owyhee County violates the intent of the Environmental Justice legislation passed by the Congress:

A. 17.4% of residents in Owyhee County are below poverty level while only 11.8% of Ada county residents are below poverty level.

B. 25.8% of Owyhee County residents are Hispanic and 4.3% are American Indian. Ada County figures in that regard are 7.1% and .7% respectively.

C. The proposed transmission line project is projected to provide power to the populated areas of Ada, and Canyon counties to a significantly greater degree than to the rural population and small towns of Owyhee County.

D. Impacts to the workforce on the private lands of Owyhee County, which are limited in that approximately 80% of the lands in Owyhee County are federally owned, will be significantly greater than to the workforce of Ada County, which will be the beneficiary of the power provided.

6. Placing the line segment in the Birds of Prey NCA is consistent with the purposes of the NCA:

A. Studies completed by Karen Steenhof and others in the NCA, after construction of the existing 138 KV transmission line in the NCA, have shown benefits to raptor populations.

B. The proposed line should parallel the existing 138 KV line.

C. A major road improvement has been recently completed by BLM in the NCA using American Recovery and Reinvestment Act funds. The road project would provide much of the road access needed for line construction and negates a previous position by NCA management that a transmission line project in the NCA was harmful due to the need for road construction.

7. Adverse Impact to Murphy Airport operations and farming and ranching operations may be possible as the result of the installation of the proposed Gateway West Transmission line.

A. Helicopter activity during construction may have adverse impacts on other general aviation activity in the vicinity of the airport.

B. Helicopter use during construction may have adverse impact on domestic livestock operators.

8. Alternative 9E is unacceptable and 9D is acceptable and consistent with resource issues:

A. As noted above, Owyhee County submitted two routes: one route was eventually designated as 9D and the other as 9E in the DEIS.

B. Even in the letter transmitting the routes, the County noted the inadequacies of the route eventually designated as 9E.

C. The Owyhee County Sage Grouse Local Working Group noted the following in their review of 9E:

*The alternative route for Segment 9 that runs south of Highway 78 will impact important sage-grouse habitat in Owyhee County. This proposed route runs near dozens of known leks that are currently occupied by sage-grouse in the Owyhee Foothills. The Local Working Group feels that this is the least desirable alternative because the transmission line will attract avian predators, especially Common Ravens. Raptors and ravens use transmission lines for nesting, perching and roosting. Studies have shown that ravens are important nest predators of sage-grouse and that ravens move an average of 7 km and as far as 60 km from transmission line roosts each day. In addition, new roads required for this alternative would create extensive shrub loss and habitat fragmentation in previously undisturbed areas.*

D. The Owyhee County Sage Grouse Local Working Group noted the following in their review of Alternative 9D:

*The alternative (9D) that runs through the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) is a much better alternative. It would not affect Greater Sage-grouse because sage-grouse do not occur within the NCA. It would be compatible with maintaining raptor populations and the goals of the NCA. Research has demonstrated that properly designed transmission lines can be compatible with raptors. During the 1980s, a new 500-kV transmission line in the NCA enhanced opportunities for raptor perching, nesting, and roosting. Raptors and ravens were attracted to the towers, and productivity of hawks and eagles nesting on transmission towers was as good as and sometimes better than that of those nesting on canyon cliffs. Electrocutation of raptors is not an issue because wires on transmission lines are spaced too far apart to electrocute raptors. Alternative 9D will follow an existing 138-kV transmission line in habitat that has already been disturbed by fire. This alternative represents an opportunity to avert adverse effects of transmission lines on sage-grouse in Owyhee County.*

E. We concurred with that review, adopted it as a county position, and forwarded it to BLM in our September 8, 2010 letter.

9. Impact of Alternative Route 9D to BLM non-motorized area in the vicinity of Cove Recreation Site:

A. BLM analysis of 9D indicates that the route would not be acceptable due to impacts to a non-motorized area in the vicinity of Cove Recreation area.

B. This non-motorized area was designated in the September 2008 NCA RMP, but mentioned only briefly in the RMP and there is little specific data as to the need and justification for the designation.

C. In the specific comments provided later in this document, to proposed route changes to 9D are submitted as alternatives to minimize impact to the non-motorized area in the vicinity of Cove Recreation area.

10. Subsequent to the county submission of the September 1, 2009 letter and maps containing the two alternative routes proposed by Owyhee County, BLM and contractor made alterations to the northwest end of the County's route 9D.

A. These changes were apparently made as the result of requested changes on route 8 in the vicinity of Kuna, Idaho.

B. The changes moved the county's route 9D crossing of the Snake River from a viable and preferred crossing point to one with greater potential impacts.

C. In addition to the changes made to the river crossing, the transcription of the route maps by either BLM or contractor staff did not accurately transfer the route as proposed by the county in the vicinity of Eagle View subdivision.

D. The transposing also did not show the continuation of the route 9D to the Hemingway substation.

E. Specific comments provided later in the document will address changes to the route 9D as shown in the DEIS in order to correct the above errors or changes.

### **III. SPECIFIC COMMENTS:**

1. Raptor impact analysis cited in the DEIS is flawed by the use of outdated or incorrect data.
2. The Sage Grouse and Raven impact analysis is flawed due to missing critical reference material.
3. Alternative Route 9E is unacceptable for reasons as stated above.
4. Alternative Route 9 is unacceptable due to impacts on private property and other reasons as previously stated.
5. The changes made to Alternative Route 9D by transcription errors and/or by action of BLM Staff and contractor are not acceptable to the county and should not have been referenced in the document as a route supported by Owyhee County.
6. With the exception of the two areas of changes to Alternative Route 9D (vicinity of Cove Rec and Vicinity of Murphy and Snake River Crossing), Owyhee County Supports Alternative Route 9D as the proposed action.
7. Regarding BLM's changes to Route 9D in the vicinity of Murphy and the Snake River Crossing, we propose two alternatives to amend the route. They are shown graphically as marked green lines on Enclosure 1 to this document which is an electronic copy of a portion of a larger map product prepared by Idaho Power (Note: in the copy of this document delivered electronically to the Project Manager, the electronic file attachments will be incorporated as Encl's 1 and 2. In the paper copy delivered to the Boise District Manager, we will include both electronic Encl's 1 and 2, as well as three full sized map products):
  - A. Our preferred option to correct the transcription error or changes made by staff to the Northwest end of Alternate Route 9D is shown on Encl 1 and described as follows:
    - (1.) Use the routing submitted on our maps delivered on September 1, 2009.
    - (2.) For reference on the routes and maps provided in the DEIS, this would be described as "Our original Route 9D to mile point (mp) 18.5, then west on Route 8 to mp 124, then straight west on section line to a point between mp 155 and mp 156 on route 9.
  - B. Our second option for this section of our Route 9D is shown on Encl 1 and described as follows:
 

Route 9D to mp 58, at mp 58 go southwest approximately one mile and then northwest approximately two miles then north to the point at which our preferred correction line joins Route 9 at approximate mp 155.5.
8. Regarding BLM's concerns related to the non-motorized area in the vicinity of Cove Recreation Area, the county provides two alternate routing options which are shown as marked green lines on Encl 2 to the electronic copy sent to the project manager and on both Encl 2 and the full sized map sheet delivered to the Boise District Manager.

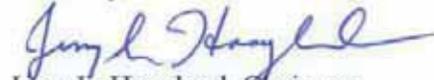
A. Route 9D to a point at approximately mp 11.8 then proceed south to cross the Bruneau Narrows, continue south and then southwest skirting the edge of the Cove NMA until south of State Highway 78. Proceed northwest to Simplot property at Cove then continue on Simplot property to get back on 9D at approximately mp 14.25.

B. Route 9D to mp 12, then proceed northwest north of the Bruneau Narrows until meeting the line of the two-track road which runs southwest through the Cove NMA, follow the line of the two track road to a point south of State Highway 78 then follow the route described above to approximate mp 14.25 on 9D.

#### **IV. CONTINUED COORDINATION ON THIS PROJECT:**

Owyhee County looks forward to continued regular coordination on the development of this project with BLM's Project Manager and with Local BLM Managers and staff.

Sincerely,



Jerry L. Hoagland, Chairman

cc: Boise District BLM Manager Aden Seidlitz

Enclosures to the Electronically-filed version:

- Encl 1: Scan of Murphy Area portion of Idaho Power Map Product.
- Encl 2: Scan of Cove Rec NMA portion of Idaho Power Map Product

Enclosures to the Copy Hand-Delivered to the Boise District Office:

- Encl 1: Scan of Murphy Area portion of Idaho Power Map Product
- Encl 2: Scan of Cove Rec Area Portion of Idaho Power Map Product
- Encl 3: Full size Idaho Power Map Product containing Murphy Area
- Encl 4: Full size Idaho Power Map Product containing Cove Rec NMA
- Encl 5: Full size map product showing locations of homes relative to West Wide Energy Corridor.

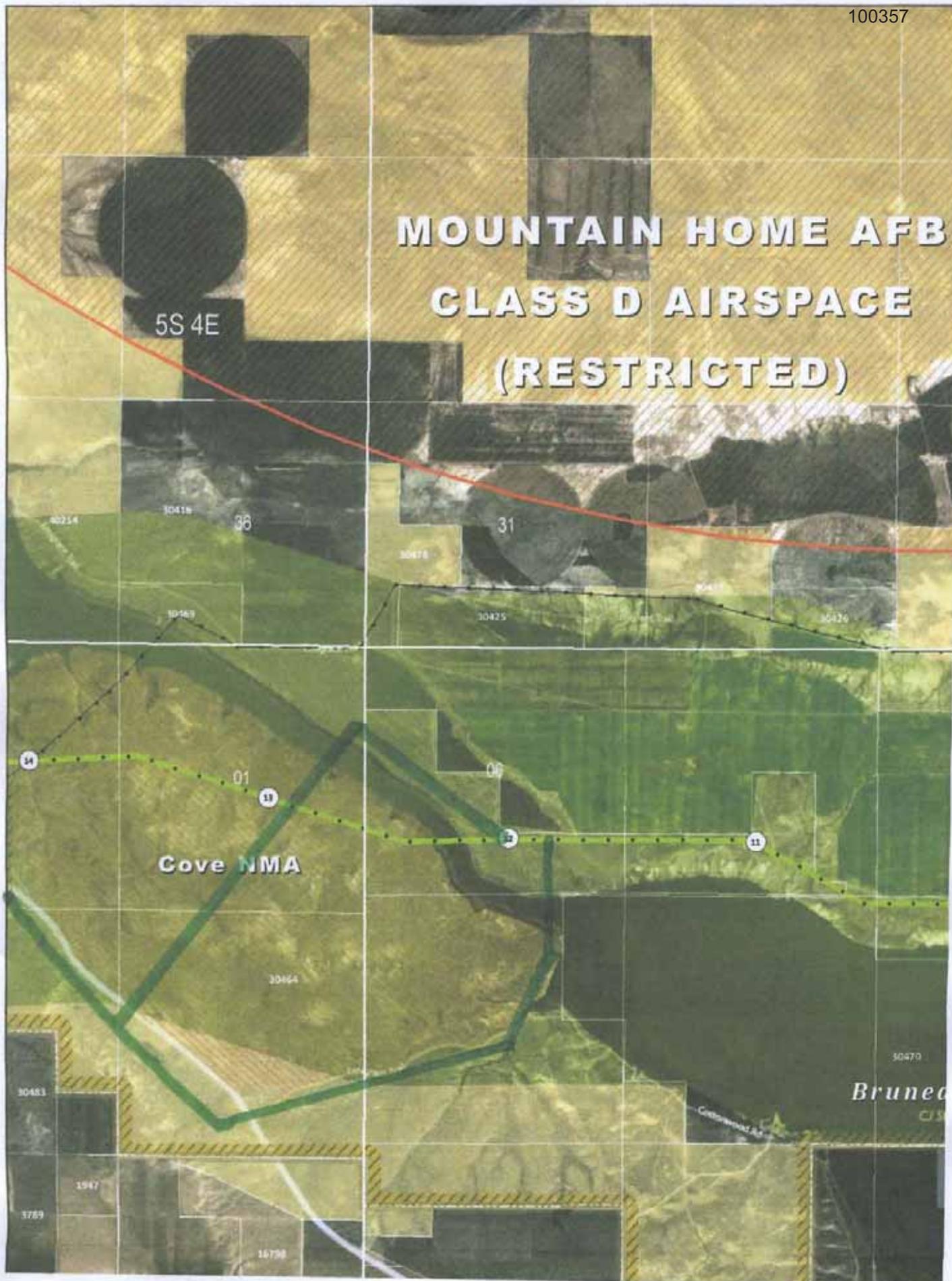
ENCL 4



# MOUNTAIN HOME AFB CLASS D AIRSPACE (RESTRICTED)

5S 4E

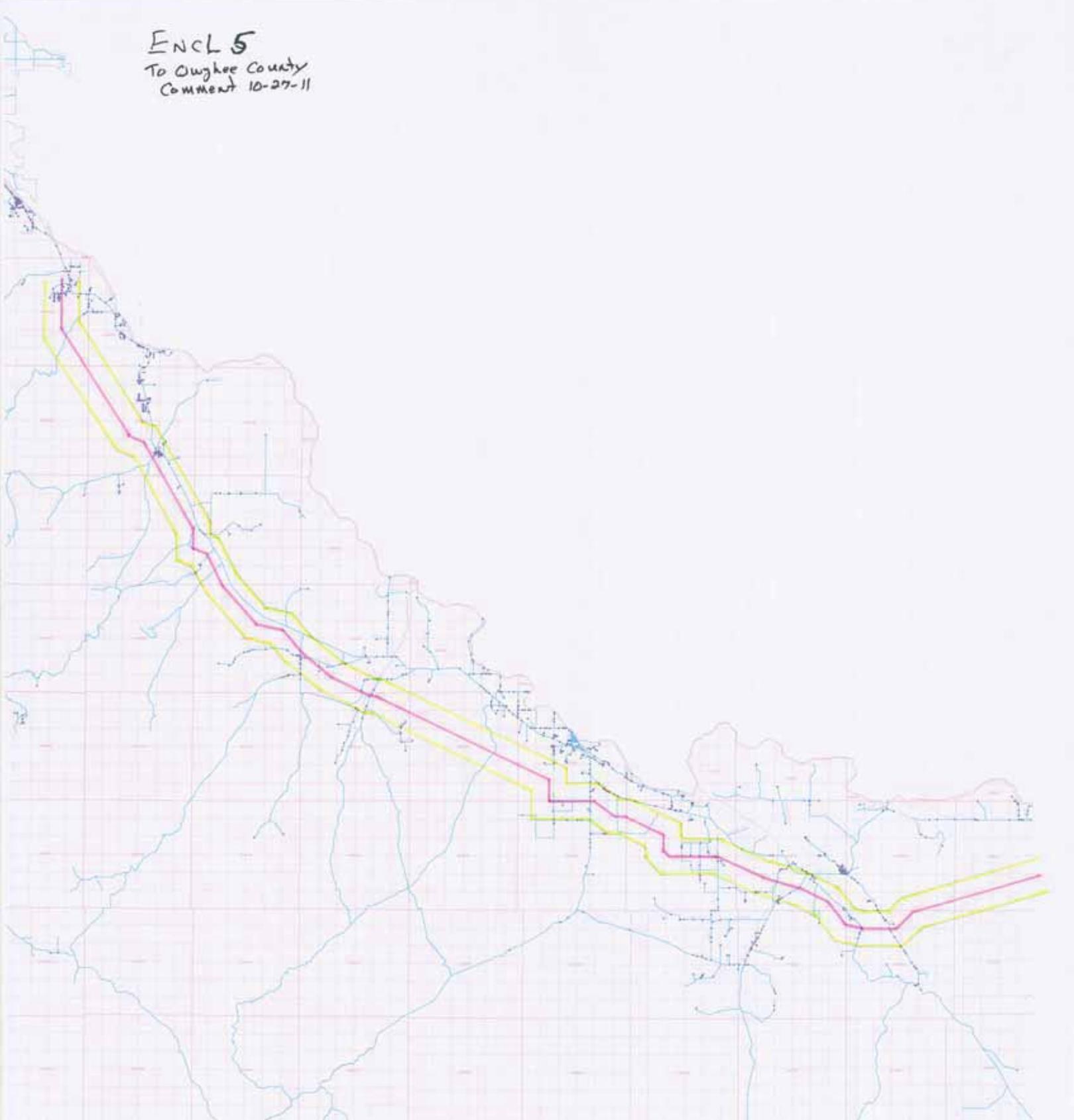
Encl 2







ENCL 5  
To Owyhee County  
Comment 10-27-11



*Owyhee*  
*County Commissioners*

P.O. BOX 128  
MURPHY, IDAHO 83650-0128



**EP** US POSTAGE  
\$00.44<sup>9</sup>  
Mailed From 83650  
09/07/2011  
031A 0005180763

Mr. Walt George  
Gateway West Project Manager for BLM  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, WY. 82003



82003#7018 B047





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100422

1/2

OWYHEE COUNTY BOARD OF COMMISSIONERS  
COURTHOUSE P.O. BOX 128 MURPHY, ID 83650-0128  
TELEPHONE (208) 495-2421

District 1 –Chairman-Jerry Hoagland-P O Box 128, Murphy, ID 83650 318-8308  
District 2 –Kelly Aberasturi-P O Box 128, Murphy, ID 83650 249-4405  
District 3 –Joe Merrick-P O Box 128, Murphy ID 83650 250-9005

September 6, 2011

State Director Steve Ellis  
Bureau of Land Management  
1387 S. Vinnell Way  
Boise, Idaho 83709

2011 SEP 12 AM 10:00  
RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

And

Mr. Walt George  
Gateway West Project Manager for BLM  
Bureau of Land Management  
Gateway West Project  
P.O. Box 20879  
Cheyenne, WY 82003

Re: Request for Extension of Comment Period Due to Errors in Transcription of the Owyhee County Proposed Route for the Gateway West Transmission Line

Dear Director Ellis and Mr. George:

Our initial review of the Draft EIS for the Proposed Gateway West Transmission line revealed significant changes to the route alternative previously supported by Owyhee County.

Route 9D was developed by a citizen group working under our direction. The alternative was carefully considered by the County Commission and submitted to BLM for inclusion in the range of alternative routes for consideration and analysis in the EIS. Maps of the County's Proposed Routes were delivered to BLM and to Idaho Power on September 1, 2009

Upon reviewing the DEIS and comparing it to a copy of the maps provided to BLM and Idaho Power, we discovered that significant changes have been made to our preferred route yet the DEIS still indicates that this is the route preferred by Owyhee County.

We have participated in this process under the consistency and coordination provisions of FLPMA. We submitted alternatives in good faith under the belief that BLM would continue to engage the county with respect to any changes and would continue to engage the county to the degree specified under FLPMA.

This has not been the case.

Though portions of our proposed Route 9D remain unchanged, the sections which were changed will have a serious impact on private property in Owyhee County and may well have introduced fatal flaws into the route which will make it unacceptable.

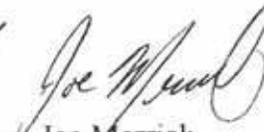
We request a meeting at your earliest convenience to discuss in detail the impacts that resulted from the changes made to Route 9D and to discuss alternatives that will be more acceptable to the County.

In order to provide for sufficient time in which to resolve these issues and in which to prepare effective comments on the DEIS, we also request that the comment period be extended for an additional 60 days.

Sincerely,

  
Jerry L. Hoagland  
Chairman

  
Kelly Aberasturi  
Commissioner

  
Joe Merrick  
Commissioner

cc:

Aden Seidlitz, Boise District Manager  
Senator Mike Crapo  
Senator James Risch  
Congressman Raul Labrador  
Congressman Mike Simpson

---

**From:** Douglas J. Balfour [<mailto:dbal0680@gmail.com>]

**Sent:** Friday, October 21, 2011 11:31 AM

**To:** George, Walter E

**Cc:** Brent Stoker; Brett Leyshon; Brock Driscoll; Clarence Gohl; Eddy Hansen; Gehring, Jordan; Greg Pahl; Henry Hornbacher; Hofmeister, Gilbert; Ivan Perman; Jake Evans; Jerry Evans; Jordan Gehring; Kent Rudeen; Kindra Munk; Lish, R. Scott; Povey, Wade; Stan Schmedt; Turnus, Tom; vicki meadows

**Subject:** DEIS

Hi Walt,

Some important members of our task forces have requested I ask for a 30 day extension to submit comments on the DEIS. The main reason is that harvest has run long, due to some weather problems and the timing for comments could not have been worse for farmers, who are the majority of the task forces, and the majority of the impacted parties in Power and Cassia Counties. We were delayed in receiving the hard copy of the DEIS, almost a month, due to the mailing problems. We have been working diligently, but I simply have not been able to reach many of my important parties, because of potato, beet and grain harvests.

Therefore, on behalf of Power and Cassia Counties, I formally request a 30 day extension on the comment period.

Doug Balfour  
Douglas J. Balfour  
230 W. Lewis/PO Box 490  
Pocatello, ID 83204  
Phone: (208) 233-0680  
Fax: (208) 233-0319

---

**From:** Kerri Franklin  
**Sent:** Wednesday, November 09, 2011 2:54 PM  
**To:** Gateway BLM  
**Cc:** Ara Swanson; Gina Auriemma  
**Subject:** FW: Gateway West Comments, Part II  
**Attachments:** doc20111109162816.pdf; Comments submitted Oct27.docx

Kerri Franklin | EnviroIssues

101 Stewart Street, Ste 1200 | Seattle 98101  
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-----Original Message-----

**From:** Julie Yeates, Secretary [<mailto:ricky@qwestoffice.net>]  
**Sent:** Wednesday, November 09, 2011 2:50 PM  
**To:** George Walt; Kerri Franklin  
**Subject:** Gateway West Comments, Part II

PLEASE SEE ATTACHED.....

Julie Yeates  
Secretary/Paralegal  
Douglas J. Balfour, Chartered  
(208) 233-0680

# Memorandum

To: Walt George, EnviroIssues

cc: Gateway West Task Forces, Power and Cassia Counties

From: Douglas J. Balfour ✓

Date: November 9, 2011

RE: Gateway West

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Attached are some additional comments by Power and Cassia County on the DEIS for Gateway.

We look forward to your responses to your comments. Please contact me with any questions.

**Gateway West Transmission Line**  
**Draft Environmental Impact Statement (July 2011 – October 28, 2011)**  
 Comments from Power County & Cassia County Gateway Task Forces

100544

3/10

<b>Agency/Office: Commenter's (Power County &amp; Cassia County Task Forces through Douglas J. Balfour):</b>			
<b>Section</b>	<b>Page</b>	<b>Para.</b>	<b>Response</b>
Chapter 1 Section 3.3.3	1-10 through 1-13		
		<b>Commenter Initials</b>	<b>Comment</b>
		DJB for Power County Task Force	<p>This Comment is on the role WECC separation criteria plays and should play in the EIS. On numerous occasions throughout the DEIS, the proponents refer to WECC separation criteria, including using it as a negative comment on Power County's proposed Segment 5E. The proponents' use of this criteria is inconsistent. For example the proponents indicate that WECC separation criteria can be waived for the final five towers coming into a substation. In addition, Segment 6, admittedly does not even come close to meeting the WECC separation criteria, and yet the proponents have no concern about that.</p> <p>The factors that go into creating the WECC separation criteria are not absent any more in Segment 6 than they are in Segment 5 or 7, and yet the proponents ignore Segment 6.</p> <p>WECC recently has proposed revising their separation standards. One of the reasons that WECC has proposed this revision is that "these requirements create significant hardship for environmental siting/permitting." WECC report. The WECC comments concerning common corridors noted the hardship. They hinder development of renewable energy resources. In fact, perhaps in response to Gateway, the Drafting Team noted that "project developers for many projects, which are currently in the siting and permitting stage of development, are finding that they cannot place an additional</p>

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			<p>line in an existing transmission corridor due to the more stringent system performance requirements placed on facilities in order to comply with the WECC criteria. However, it is difficult to convince Federal and State land management agencies that independent corridors are needed to achieve maximum transfer capabilities for the projects."</p> <p>The WECC proposal notes that the reason for the span length requirement is the possibility of an airplane dragging a conductor from one circuit to another circuit on a separate tower. WECC notes "The Drafting Team believes that this is an extremely low probability event and practically impossible. Designing a system for this very low probability event by treating the two circuits as if they are on the same tower is not appropriate."</p> <p>Furthermore the draft modification notes that transmission structures are designed to crumple, not topple.</p> <p>The Drafting Team also notes that the concerns about fire are overstated. "The time between common outages as a result of fire varies, depending upon the rate the fire advances. Often transmission operators have time to reduce transfers even though the fire is moving at a rapid rate, because they are notified of the fire in the area. The time delay between outages caused by fire,</p>

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Commenter Initials	Comment	Response	Response
			<p>and the advance preparation that is likely for fire, reduces the severity of the multiple circuit outages when there are separate towers."</p> <p>Although WECC has not officially modified their separation criteria, it is obvious that finally some common sense is being suggested, and that modification is imminent.</p> <p>The same must be true in Gateway West, an absolute rule of WECC separation criteria rejecting a proposed route is not appropriate.</p> <p>As previously noted, it is the duty of the proponents to use common sense in constructing their system and convince WECC that their common sense is far more productive in generating reliability than some hard, fast and inflexible rules.</p> <p>Idaho Power and Rocky Mountain Power are both members of WECC. Power and Cassia County suggest that the process in this case should be the complete analysis of a route or a segment based upon that individual analysis without hiding behind some inflexible rule. If the analysis is that a proposed segment is superior or a reasonably viable alternative, then it should be the job of WECC, through Idaho Power and Rocky Mountain Power, to</p>

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Section	Page	Para.	Response
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Chapter 2	85-86		<p>accept that analysis as the best overall result. WECC separation criteria can be modified, amended or waived based upon specific facts. That should be the rule of the proponents, and not the impacted parties.</p> <p><b>SUGGESTED CHANGE:</b> As previously noted on other comments, any reference to WECC separation criteria should be eliminated from the DEIS, and any decisions or even arguments made on behalf of that criteria should be rejected or reevaluated. As noted, and now realized by WECC, WECC separation criteria is often inapplicable and ridiculously inflexible. The routes in the DEIS must be individually analyzed on their own merits, and not simply rejected by some distant and irrelevant standard. As an example, if Segment 5E were analyzed under a common sense evaluation, the separation criteria would not apply. Therefore Power and Cassia Counties request that any references to WECC separation criteria playing a role in route analysis be eliminated.</p> <p>The DEIS contains the following language on these pages "The question was raised by Power and Cassia Counties about why Segment 7 could not be routed along the existing transmission corridor between Populus and Midpoint and why the substation at Borah could not be relocated for more orderly land use development in Power County."</p>

**Gateway West Transmission Line**  
**Draft Environmental Impact Statement (July 2011 – October 28, 2011)**  
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<b>Agency/Office: Committer's (Power County &amp; Cassia County Task Forces through Douglas J. Balfour):</b>			
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Committer's Initials	Commenter Initials	Comment	Response
			<p>Tetra Tech noted that they removed this alternative from study because "it would not meet the reliability criteria" and that relocation of the substation would be prohibitively expensive.</p> <p>Power and Cassia Counties submit that the same analysis concerning WECC separation criteria would be appropriate here. The proponents have a series of existing transmission lines, in various sizes. They have publicly stated they never want to take transmission lines out of service, or combine the voltages into a larger one, they just build the larger one and add on to the corridor. To then use WECC separation criteria to prevent them from continuing in their own corridor is not proper environmental planning, it is not proper economic planning or proper land use. The fact that WECC is revising their separation criteria, and noting that many of the bases for that criteria really are academic or theoretical only should give the BLM and Tetra Tech a basis to go beyond the simple statement of "it would not meet the reliability criteria" and actually analyze why that request was rejected. Those transmission towers and transmission line will essentially be in place forever, at least for 50 – 80 years. Another 6 months to analyze that alternative is completely appropriate.</p> <p>The same is true concerning the comment that the substation</p>

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Commenter's Initials	Comment	Response	Response
			<p>would be prohibitively expensive. No figures, analysis or data were ever given and no analysis ever completed concerning that statement. As the BLM and Tetra Tech are well aware, the Borah substation is the goal for many proposed transmission line projects, not just Gateway. Idaho Power has told the Power County Planning and Zoning Commission that their recent upgrades to Borah had nothing to do with Gateway, and that if Gateway were to come into Borah, the entire Borah substation would have to be doubled in size with new transformers, capacitors and other equipment. As it is going to have to be built from the ground up in any case, we should be able to analyze those costs. That alone should provide the basis to analyze the expense and other considerations to the location of the substation.</p> <p><b>Suggested remedy:</b> Study the suggestion and answer the question as to why existing transmission corridors could not be used. In addition it is requested that an explanation be provided as to why Tetra Tech rejected the request to move Borah. It is not appropriate for a simple conclusion to reject a suggestion. Shine the public light on the costs of having a substation at a place other than Borah explained so that it can be analyzed and criticized, if appropriate.</p>
Chapter 1	1-13		This Section concerns the purpose of the Gateway West proposed

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<b>Section</b>	<b>Page</b>	<b>Para.</b>	<b>Response</b>
Section 3.4		<p style="text-align: center;"><b>Committer Initials</b></p>	<p style="text-align: center;"><b>Comment</b></p> <p>action. The stated purpose is to provide for the delivery of up to 3000 megawatts of the service area of the proponents, and possibly other markets. The DEIS then states Idaho Power's prediction for peak load growth is based upon their 2009 IRP. The 2011 IRP substantially decreases the forecast load growth from the 2009 IRP and generally negates any reference that there will be a need for power from the Gateway West project to serve Idaho Power customers. In fact at the hearings on the 2011 IRP, Idaho Power states that Gateway West is not needed as a power source in Idaho Power's plan, for at least the next ten years and maybe longer. At those hearings Idaho Power admitted that any planning beyond 10 years is purely an academic exercise and not based upon any reasonable forecast. Therefore the question is obvious, why go through this entire process when there is no way to know if it will be needed, or that the Gateway West line will ever be built?</p> <p>1.2.4 goes on to state that Gateway West would be used to transport electricity from where it is generated in Wyoming to where it is needed, mostly Idaho and Utah. The Idaho Power IRP establishes that it is not needed in Idaho and therefore the Populus to Hemmingway section is unnecessary for Idaho Power's service area. Populus to Ben Lomond has already been completed and Populus East to Jim Bridger is not addressed by the Idaho Power IRP.</p>

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<b>Commenter's Initials</b>	<b>Comment</b>	<b>Response</b>	<b>Response</b>
			<p><b>SUGGESTED CHANGE:</b> The section concerning the stated purpose to provide delivery of power to Idaho Power customers should be eliminated and the need for the Gateway West project by Idaho Power seriously questioned. This entire idea and section needs to be reanalyzed in light of Idaho Power's 2011 plan.</p>

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**From:** Kerri Franklin  
**Sent:** Tuesday, November 01, 2011 1:57 PM  
**To:** Gateway BLM  
**Subject:** FW: Gateway West Comments  
**Attachments:** doc20111101142934.pdf; Comment forms.pdf; Comment forms FINAL.docx

Kerri Franklin | EnviroIssues

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-----Original Message-----

**From:** Julie Yeates, Secretary [<mailto:ricky@qwestoffice.net>]  
**Sent:** Tuesday, November 01, 2011 1:48 PM  
**To:** George Walt; Kerri Franklin  
**Cc:** Behrend Paul; Bethke Larry; Burgess Ken; Cates Rayma; Christiansen Todd; Driscoll Braden; Driscoll Brock; Dustin Allen; Evans Jake; Evans Jerre; Gehring Jordan; Gohl Clarence; Hansen Eddy; Hofmeister Gilbert; Hornbacher Henry; Isaak Lamar; Jensen Kristen; Jensen Reve; Koopin Claren; Leyshon Brett; Lish Scott; McHargue Dan; Meadows Vicki; Munk Kindra; Pahl Greg; Permann Ivan; Petersen Ryan; Povey Wade; Rudeen Kent; Schmidt Stan; Schritter Mike; Stoker Brent; Tilley Shane; Tugaw Joe; Ward Dallas; Gibby Von; Kunau Bob; Pickett Doug; Searle Kent; Tugaw Joe; Wood Fred  
**Subject:** Gateway West Comments

Memorandum

**To:** Walt George, EnviroIssues  
**cc:** Gateway West Task Forces - Power County and Cassia County  
**From:** Douglas J. Balfour  
**Date:** November 1, 2011  
**RE:** Gateway West Comments

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Attached are 21 pages of comments from Power County and Cassia County on the Draft EIS. We are still working on additional comments and will submit those when completed. These comments are put on the official Gateway West form.

Please contact me if you have questions or are unable to use this form.

PLEASE SEE ATTACHED.....

Julie Yeates  
 Secretary/Paralegal  
 Douglas J. Balfour, Chartered



# Gateway West Transmission Line Draft Environmental Impact Statement (July 2011 – October 28, 2011) Comments from Power County Gateway Task Force

Agency/Office: Commenter's (Power County & Cassia County Task Forces through Douglas J. Balfour):			
Section	Page	Para.	Response
1.3	7-9, 13	all	<p style="text-align: center;"><b>Commenter Initials</b></p> <p style="text-align: center;">DJB for Power &amp; Cassia County Task Forces</p> <p>Proponents Purpose and Need For The Project. These comments are with regards to Pages 1-7 through 1-9, and 1-13 of the DEIS. These comments are submitted from Power County Idaho and Cassia County Idaho, Cooperating Agencies on the Gateway West Draft Environmental Impact Analysis.</p> <p>The DEIS provides that Idaho Power has submitted a purpose and need for the project. Much of that Purpose and Need is based upon Idaho Power's 2009 Integrated Resource Plan (IRP) concerning projections for demand for electricity.</p> <p>Idaho Power has submitted documents to the BLM indicating that their purpose and need for this project is largely based upon their analysis of demand for electricity estimated in 2007 through 2009. At the time of submission of this information, Idaho Power was operating under the 2009 IRP. Power and Cassia County believe that many of the assumptions used by Idaho Power to justify this extremely expensive project are faulty, and those assumptions are not likely and have not proven true since the 2009 IRP.</p> <p>The 2011 IRP, issued by Idaho Power in June of 2011 specifically states that their current "average system load forecast is lower than the 2009 IRP average system load forecast in all years of the forecast." There are several reasons for this lower forecast, including assumptions of federal carbon legislation that proved to be faulty, assumptions about the economic and housing recovery which have not occurred and the anticipated commercial demand for power, which has also not occurred. In addition Idaho Power has, on its own, added</p>

# Gateway West Transmission Line

## Draft Environmental Impact Statement (July 2011 – October 28, 2011)

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<b>Section</b>	<b>Page</b>	<b>Para.</b>	<b>Response</b>
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			<p>natural gas peaking plants and is currently building the Langely Gulch Plant, which will provide an on demand peaking capacity of 300 megawatts. Furthermore the cost of wind energy, upon which the Gateway West Project is based, has been very publically criticized by Idaho Power, who basically claim that they do not want to pay for and do not need any wind energy.</p> <p>Idaho Power has announced that with the completion of the Hemingway/Boardman Transmission Line, that Idaho Power will be able to purchase additional peaking power and thus complete their ability to supply anticipated demand, for at least the next ten years.</p> <p>The 2011 IRP discussed the Gateway West Project, and now has placed that project as a possibility long into the future, to be reconsidered again in the year 2021. The near term 10 year plan does not even discuss the Gateway West Project.</p> <p>Thus things have changed greatly, and the Counties submit that the Proponents' Purpose and Need for the project has essentially disappeared.</p> <p>In addition to this questionable background, the fact is that no entity has approved or agreed with the Proponents' "Purpose and Need." Other portions of the DEIS refer to that. For example, Chapter 2, Page 185(2.8.5) has the Proponents objecting to alternative 5E because that alternative ostensibly would not meet the separation criteria "established as part of the Project Purpose and Need."</p>

# Gateway West Transmission Line Draft Environmental Impact Statement (July 2011 – October 28, 2011)

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			<p>Although the WECC separation criteria will be addressed in another comment, for the Proponent to rely upon an established "purpose and need" is misleading and incorrect. Almost the same argument could be made to any alternative proposed, that the proponents' disagree with it because they do not want it, and therefore it does not meet their established "Purpose and Need."</p> <p>The Idaho Public Utilities Commission does not get involved in projects such as this, prior to the project being commenced, without a specific request from the regulated utility. That request has not been made. Thus the only governmental entity reviewing the Purpose and Need is the BLM in this EIS.</p> <p>Much of the electricity supplied for Gateway West will come from coal fired power plants in Eastern Wyoming. Considering that the market for much of this energy will be the Desert Southwest, it is not energy efficient for coal generated electricity to travel thousands of miles to its ultimate destination. Thermal generation is likely a better alternative as it should be available closer to the needed market.</p> <p>The Counties suggest that the entire Purpose and Need Section cited be revised to reflect that there is not a need for additional electrical service to Idaho Power or Rocky Mountain Power customers in Idaho to be served by this project. The section should reflect the possible revisitation of that purpose and need in an additional ten years. The section would also reflect the fact that the questioned need for wind energy, as well as the economics of wind energy</p>

# Gateway West Transmission Line Draft Environmental Impact Statement (July 2011 – October 28, 2011) Comments from Power County Gateway Task Force

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			make it less likely that this project will be needed to serve any customers in Idaho.
18	20		<p>The DEIS reports that Power County expressed concern about GPS interference. The Proponents' response was that they do not track reports of interference, but they have not received any specific reported instances of interference. This is not accurate. Cassia County and Power County both had public hearings at which many representatives of the Proponents were present, when specific instances of GPS Interference with tractor navigation systems and irrigation systems were explained by the persons affected. Representatives of Idaho Power specifically spoke with witnesses at those hearings about the instances of interference both with irrigation systems and with tractor navigation systems. Not only did individual land owners testify, representatives of irrigation companies testified about their reports, and their attempts to correct or repair damage.</p> <p>Cassia County will supply the specific testimony as they recorded their hearing.</p> <p>Either TetraTech or Idaho Power then asserted, in the DEIS, a 2001 and a 2002 study to indicate, essentially, that the reports of interference were incorrect or inaccurate. GPS has evolved greatly since 2001 and 2002, and those studies, on their face, are not relevant to 2011.</p> <p>This is a serious enough problem and potentially of great concern, that it is</p>

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			<p>essential that the EIS just not reflect the line from the Proponents. For example, the fact that the Proponents contend that they have never received any specific instances of interference is indicative of their attitude toward this problem. Further they cannot say that they have not received any specific instances of interference if they, by their own admission, do not track those reports.</p> <p>A study commissioned by the Electric Power Research Institute, by its very structure, will favor the power companies.</p> <p>Power County requests that TetraTech retain an independent expert to specifically conduct studies, and speak with the witnesses, to investigate this problem, and have the EIS based upon real experience.</p> <p>The numerous people who testified to Idaho Power about the very problems they experienced with those systems, under transmission lines, was not falsified or made up. That was actual experience. It is not appropriate just to dismiss this as unknown complaints.</p> <p>The EIS should require remedial steps be required to prevent interference and eliminate it as a problem to those affected.</p>
DEIS, Volume 1-A, Section 2	2-185		<p>This is a comment on and in support of Power County's proposed segment 5C and 5E for the Northern Gateway West line to Boise. This comment addresses the statement on Page 2-185 of the DEIS, Volume 1A. That statement indicates that Power County's proposed 5E would not meet the separation criteria Idaho</p>

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			<p>Power established as part of the Project Purpose and Need. That Purpose and Need is generally discussed in Chapter 1.3.3.3.</p> <p>Power County adopted 5E as the official designated corridor that Power County would allow a transmission line to be located. Power County carefully analyzed the WECC separation criteria given the particular circumstances of Alternative 5E and the connection to the Borah substation. Power County had rejected the WECC separation criteria as being unreasonable and unworkable. Power County firmly believes that Alternative 5E completely complies, through experience and judgment, with the goals of system reliability.</p> <p>Power County accepted the reasoning as to that route and designated it as the official corridor, authorized by the Idaho Land Use Planning Act.</p> <p>Idaho Power has commented that our proposed 5E would not meet WECC separation or reliability criteria. Power County completely rejects the comment that the proponents established WECC separation criteria as part of the project purpose and need. As explained in the comments submitted by Power and Cassia County to section 1.3, the Counties do not accept the project purpose and need, and note that no one has considered that "established." The Idaho Public Utilities Commission has not agreed with Idaho Power's statement of purpose and need. In general, Idaho Power states that WECC would allow close proximity to other transmission lines heading toward a substation, for a maximum of five towers. Power County does not believe that any of the reasons for separation criteria magically disappear for those final five towers,</p>

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			<p>but can suddenly reappear beyond tower 5. Judgment and analysis are needed, not inflexible rules.</p> <p>Power County does not accept the WECC analysis in this instance. Of course, given a perfect world for system reliability, transmission lines will never be close to each other as they are less likely to experience outages due to the same natural disasters, storms, wildfires, tornadoes and the like. However this does not deal with the real world. Separation distance impacts the environment and land use. WECC and Idaho Power cannot logically justify objecting to this separation distance in this instance. In fact the entire Gateway West Transmission line splits between Segment 5 and Segment 7, establishing hundreds of miles of separation distance between 5E and Section 7I, for instance. Idaho Power's objection to the separation distance is that they want to be separate from their own, existing transmission lines, of lesser voltage which also enter the Borah Substation. If Gateway West 5E goes down due to some natural disaster, there is far more than 1500 feet between Segment 5E and Segment 7 and thus the common mode failure theory does not apply. In fact one of the reasons Idaho Power offers for splitting the entire Gateway West line into two segments, from Populus to Cedar Hill, is the theory of separation and common mode failure.</p> <p>By far the cause of power system failure has nothing to do with natural disasters that would require separation distance. In this particular area, wildfires are not an issue. The land on the approach to Borah under 5E is largely irrigated crop land. There has never been, in the history of Power</p>

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			<p>County, a wildfire in that area.</p> <p>Any weather related or common mode outages are regional and need to be analyzed by the exact situation. In this case an analysis will not require the maximum five (5) tower separation. There is no reason for the WECC reliability criteria, which are unworkable, unreasonable and overly stringent.</p> <p>Single line outages are the most common form of outage. By far the most frequent causes are equipment related and have nothing to do with weather or natural disasters. We know from the recent power outage in Southern California and Arizona that one (1) worker in the substation near Yuma caused an equipment outage that resulted in four million (4,000,000) people being without power for a substantial amount of time. WECC Separation Criteria had nothing to do with that. That type of malfunction is far more frequent than any of the very unlikely events that WECC Separation Criteria is supposed to protect against.</p> <p>Similarly the City of Boise regularly undergoes power outages due to squirrels chewing through lines and shorting them. The ICF Resources analysis in 2009 submitted to the Governor of Wyoming pointed out that equipment failures are, by far, the cause of high voltage transmission line outages. There is no comparison.</p> <p>Furthermore, the WECC Reliability Criteria is based upon a natural disaster that could occur once every three hundred (300) years, or longer that the United</p>

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			<p>States has been a Country. Line Separation cannot mitigate terminal equipment failure. Outages due to terminal equipment failure are sustained, where some things such as a lightning strike or other environmental weather factors, or a fire, are temporary.</p> <p>In sum, there is no reasonable reason for Idaho Power to claim that WECC Separation Criteria is an objection to 5E.</p> <p>WECC specifically allows exceptions to the Separation Criteria on a case by case basis including if it can determine that the frequency of the initiating event is less than one (1) in thirty (30) years. In this case we would have testimony that there has not been any of the potential problems within thirty (30) years, such as, aircraft flying into a line and dragging it into another line that was less than fifteen hundred (1500) feet away, ice storms that are so localized that fifteen hundred (1500) feet away they did not exist, wildfires, and towers falling into other towers.</p> <p>As to towers falling, that should be resolved by construction which makes it so that they do not fall. That is totally in the hands of Idaho Power Company.</p> <p>As to the natural disasters, ice storms or fire, they should not be statistically significant for alternative 5E.</p> <p>Similarly the natural disasters in common mode would not disappear at tower 5 entering into Borah, but would be just as prevalent there as at towers 6 through 10 in Segment 5E.</p>

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			<p>The ISC International Analysis for the Governor of Wyoming recommended that any weather related cause needs to be analyzed specifically. That is, the probability of whether other factors such as airplanes causing multiple line outages is very low, then changing the Line Separation requirement might be appropriate.</p> <p>All transmission line projects in Idaho must be designed based on NCSC standards to withstand ice and snow buildup on lines and towers. Wind gusts do not limit themselves to fifteen hundred (1500) feet, and therefore the separation is irrational and not appropriate.</p> <p>Similarly, tornadoes are simply not a prospect in the area of Segment 5E. High winds are, but rather than further impact private property, the towers should just be made to withstand those winds. Those high winds are broad, and do not disappear fifteen hundred (1500) feet away, or between towers 5 and 6.</p> <p>Furthermore, Idaho Power is a member of WECC, and can go back to WECC and explain why the separation criteria are simply not relevant in this case. This is not something that Power County has any ability to influence, but Idaho Power has the ultimate influence. Power County considers that the comment by Idaho Power to simply be an internal problem that they need to resolve through construction or dealing with their industry standards.</p> <p>Suggested remedy: remove the second sentence from paragraph 5 on page 2-185. In addition, remove any reference to WECC separation criteria from the</p>

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Agency/Office: Commenter's (Power County & Cassia County Task Forces through Douglas J. Balfour):									
Section	Page	Para.	Response						
3.18	4, 13, 14, 15 and 24	Commenter Initials	Comment						
			entire Draft EIS, as explained above.						
			<p>In this section on these pages the DEIS deals with the Conservation Reserve Program (CRP). Initially the DEIS groups the Conservation Reserve Program, the Grass Land Reserve Program (GRP) and the Wetland Reserve all into one category, CRP. The termination fees for GRP and Wetland could be much different as those involve long term and perhaps even permanent easements being placed on the land. Thus those programs would require a separate analysis.</p> <p>The authors of the DEIS do not understand the damages suffered by land owners if a CRP contract is found in violation, or terminated. The whole contract can be terminated, with payments to date required to be repaid, plus interest and damages. In the affected area most of these contracts are over 10 years old, so the financial impact to a landowner could be substantial.</p> <p>On page 14 an example of an 18 acre CRP land is misstated. The land involved in that 18 acre contract went into CRP on October 5, 1998 and the calculations used were as if it were taken out of CRP on December 15, 2009. The interest rate calculated was 4.875% and the annual rental rate was \$35.00 per year. The calculations for the damages are as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td>Principal payback</td> <td>= \$7,560.00</td> </tr> <tr> <td>Interest</td> <td>= \$1,706.20</td> </tr> <tr> <td>C/S + Interest</td> <td>= \$ 409.93</td> </tr> </table>	Principal payback	= \$7,560.00	Interest	= \$1,706.20	C/S + Interest	= \$ 409.93
Principal payback	= \$7,560.00								
Interest	= \$1,706.20								
C/S + Interest	= \$ 409.93								

# Gateway West Transmission Line Draft Environmental Impact Statement (July 2011 – October 28, 2011) Comments from Power County Gateway Task Force

Agency/Office: Commenter's (Power County & Cassia County Task Forces through Douglas J. Balfour):			
Section	Page	Para.	Response
Commenter's Initials	Comment	Response	Response
			<p>Liquidated damages = \$ 157.50 Total on 18 acres = \$9,833.63</p> <p>Obviously Tetra Tech contested the Power County Task Forces figures without understanding them, or without a basis of understanding the CRP program.</p> <p>Requested remedy is that the DEIS be revised to reflect the actual calculations, showing their accuracy and emphasizing the potential impact.</p> <p>On pages 14 and 15 of that section, the BLM just states that those damages would be mitigated by the proponents to negotiated terms of easements. That is not the state of the law in Idaho concerning eminent domain. Unless the BLM is ordering Idaho Power to compensate for full economic damages as a condition of the EIS, then the proposed response is meaningless.</p> <p>In addition, the DEIS does not even address the SAFE program, which is a type of CRP oriented toward wildlife. To get in to the SAFE program a piece of land has to be within a certain distance of a sage grouse lek. Because of the emphasis on wildlife, and the conflicts of wildlife with power lines, ground near power lines, may not even be accepted into the SAFE program. That has the potential for economic impact on land owners. Some land owners on the proposed route have already signed SAFE contracts.</p> <p>Suggested remedy: Safe Program be explained and the EIS address potential economic losses, and require appropriate mitigation.</p>

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Section	Page	Para.	Response
3.18-4	Commenter's Initials	Comment	Response
3.18-4		<p>Contrary to what is stated in the draft, only the Conservation Reserve Program (CRP) is administered by the USDS-Farm Services Agency (FSA). The Grassland Reserve Program (GRP) and the Wetland Reserve Program (WRP) are administered by the USDA- Natural Resources Conservation Service (NRCS).</p> <p>The Grassland Reserve Program and the Wetland Reserve Program often involve permanent conservation easements. The location of a transmission structure on this type of land very likely will result in the land owner being removed from the program. In fact the regulations setting up those programs specifically state “the installation or relocation of new public or private utilities, including electric, telephone, or other communication systems over the property, is prohibited, except as provided in this provision.(emphasis added)”</p> <p>The provision goes on to state that existing structures can be repaired and maintained. Thus the task force considers this to be a serious issue which should be dealt with in this EIS, including under socioeconomic section, 3.4.</p> <p>Our recommendation is to change the wording of the draft so GRP and WRP are addressed separately from CRP. We also recommend contacting the affected state and/or county USDA Natural Resources Conservation Service offices to determine ground in the GRP and WRP program and then analyzing any ground in GRP or WRP on a case by case basis.</p>	
Appendix E		<p>This comment concerns labeling photos shown in Appendix E in a way that identifies the valley where the photos were taken.</p> <p>Figure E.2-34a and E.2-34b are both labeled existing landscape of the Rockland and Arbon Valleys. Because the Rockland Valley and Arbon Valley are</p>	

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			<p>separated by the Deep Creek Mountains the photos of them should be labeled so the viewer can identify which valley they are observing. There is currently a transmission line in the Arbon Valley. Figure E. 2-34a and E. 2034b as labeled could give the erroneous impression that there are currently transmission lines in both valleys.</p> <p>This comment concerns clarification of the visual impacts to the Public Campground located on State of Idaho land on the East Fork of Rock Creek. Recommend including recognizable features from the East Fork Campground in the photograph and photographic simulation for KOP 242.</p> <p>A photographic simulation is given from Key Observation Point 242 Segment 5 Figure E.21b. Key Observation Point 242 is very close to the public campground on the East Fork of Rock Creek. However, the general public is not likely to recognize this. It would be more informative if the Key Observation Point and Photographic Simulation showed the visual changes as observed from the East Fork Campground or from the East Fork of Rock Creek. Including the creek in the photo would be helpful in documenting the existing visual resource of the stream.</p> <p>Segment 5 Populous to Borah, Figure A-7 and Figure E. 2-6 have an incorrectly labeled road. The road labeled Cutoff Rd. is known to the locals as Deeg Road. I have checked a topographic map and a Big Sky map of Power County and both label the road as Deeg Road.</p>

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			<p>Visual KOP Locations, Segment 5-IDAHO, Figure E.2-6 shows an enlargement with KOP 241, 242, and 257. It would be much easier to recognize the location of these KOP's if streams in the area were shown. There is plenty of room on this enlargement to show these additional features.</p> <p>Appendix E- Large Format Figures: Difficulty determining Cultural KOP locations from the information given on the KOP Figures.</p> <p>Figures E.3-12 (page 74) to Figure E.3-50 (page 112) show Cultural Key Observation Points. It is very hard to determine the location of these KOP's. These 38 pages do not have a reference to the route segment they are associated with. They are also not in numerical order according to their Key Observation Point. The small map on each page does not usually include any information that would give the general population an idea of the KOP location, There are 10 maps on page 63 (Figure E.3-1) to 73 (Figure E. 3-11) with very fine print that would have to be closely examined to determine the location of the Cultural KOP's.</p> <p>Solution: More precisely label each Cultural KOP photo.</p>
3.18	24		<p>This section discusses aerial application of agricultural chemicals (crop spraying). On page 24 Idaho Power reports that it has never received any complaints regarding the impact of existing transmission lines and structures on crop spraying. That is not true. Idaho Power was present at many hearings conducted by Cassia County Task Force and Power County Task Force where</p>

# Gateway West Transmission Line Draft Environmental Impact Statement (July 2011 – October 28, 2011)

## Comments from Power County Gateway Task Force

<b>Agency/Office: Commenter's (Power County &amp; Cassia County Task Forces through Douglas J. Balfour):</b>			
<b>Section</b>	<b>Page</b>	<b>Para.</b>	<b>Response</b>
<b>Commenter's Initials</b>	<b>Comment</b>	<b>Response</b>	<b>Response</b>
			<p>individual farmers explained the problems, and made complaints regarding the impact of existing transmission lines. Many farmers testified that in their fields where there are existing transmission lines, crop dusting services simply will not apply. A member of the Power County Task Force specifically testified that he personally witnessed 6 people die in 3 different accidents as a result of striking transmission lines. One of the crop dusters was a helicopter, in fact. Idaho Power certainly knew about it, as they had to come repair the transmission line. This is a huge problem for the Cooperating Agencies, and for Idaho Power to pretend that it does not exist is disingenuous.</p> <p>The impact will be addressed in Section 3.4, but this section of the DEIS should be corrected to show that Idaho Power has received those complaints, in this process.</p>
Chapter 3.4	39-43		<p>This section of the DEIS addresses socioeconomic impacts and particularly impacts to land owners for economic losses from their land. The DEIS notes that Power County submitted substantial estimates of the potential economic impact of the project on agricultural operations in Power and Cassia Counties. These comments will address Tetra Tech's responses to those analysis. It is initially noted that once those analysis were given from Power and Cassia County to Tetra Tech, Tetra Tech did not contact Power County, did not ask for any explanation or assistance, and did not consult with Power County concerning their figures or analysis.</p> <p>The DEIS lists 5 ways that the project could affect net earnings from crop land. The cooperating counties believe that this list does not come close to</p>
	40		

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Section	Page	Para.	Response
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			<p>summarizing the potential economic damage.</p> <p>Power County noted that many additional potential problems would affect net earnings as well. Substantial information was given to the BLM that the presence of transmission structures in or near irrigated crop land could result in serious problems with attempted aerial application of agricultural chemicals. Aviation companies would or could refuse to aerially apply agricultural chemicals, thus requiring those chemicals to be applied by ground equipment. Such application destroys 9-11% of the crop field, because of the presence of farming equipment in the field all the crops are growing, thus ruining those crops. In addition those methods are less effective. The cost and slowness of ground application also reduces net earnings.</p> <p>There are instances when the crop fields are too wet for ground application and aerial application is the only option. A pest infestation may require immediate attention, and the lack of aerial application could cause an entire field to be lost. In addition, this lack of aerial application could also allow an infestation to spread to neighboring fields, causing a wide-spread epidemic. This is a very serious problem that cannot be dismissed by the company saying "they have not received any complaints about aerial application."</p> <p>Many land owners testified about the problems with equipment steering systems in the presence of high voltage transmission towers. Modern farming techniques require extreme precision from farming equipment, which could be damaged or destroyed by the proposed project. The close margins in modern farming require land to be efficiently used, agricultural chemicals to be precisely applied, and waste to be eliminated. All of those goals are directly</p>

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			<p>impacted by the project and thus resulting economic losses to the land owners.</p> <p>The Tetra Tech analysis simply relied upon average cash rent paid for crop land, and presumed the minimal amount of crop land impacted by a project will be less than Power Counties estimates. This is a superficial analysis which does not deal with the reality of agriculture in Power and Cassia Counties. A transmission towers or a series of towers in a field could effectively render that entire field non productive. To take a section out of a field, and presume that the farmer can efficiently and effectively farm around that impacted section ignores reality. The proponent does not guarantee that they will not place transmission towers inside an irrigated field, and in fact their history is that those towers will be wherever the proponent wants them, regardless of impact.</p> <p>The estimates for disturbance used by the task force were based upon actual experience, many members of our task force deal with high voltage transmission lines, including the presence of a 345kv line through the center of Pleasant Valley. Thus Power County estimates were based upon real experience, and not some distant analysis.</p> <p>Tetra Tech seems to attempt to discredit this historical and actual analysis. Tetra Tech disputed, without any basis, the fact that crop dusters would refuse to apply chemicals in or near fields with 185 foot high voltage transmission towers. Similarly apparently Tetra Tech believes that center pivot irrigation systems will work around towers.</p>

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			<p>Tetra Tech then goes on to rely upon an analysis done by Hydro Solutions Inc. to dispute Power Counties figures. An analysis of that Hydro Solutions Inc. report shows that it is so far removed to be irrelevant.</p> <p>That analysis was done for the Montana Alberta Tie power line (MATL), based upon a 2007 study. The Hydro Solutions analysis dealt only with spring wheat in the Great Falls to Cutback Montana area and actually only dealt with the experience of 1 farmer.</p> <p>The model was a 230kv line which would use either single monopole structures of 21 inches in diameter or H frames, 60 feet tall that do not require concrete foundations, and use 2-18 inch diameter poles.</p> <p>The Gateway West Project for segments 5 and 7 will use 500kv lattice towers that would be from 160-190 feet tall. Each tower would require a 20 foot deep rebar enforced concrete foundation. The width of the overhang, simply under the tower, is 162 ½ feet wide. The total foot print of the concrete base for the tower structure is 50 feet by 50 feet, or 2500 square feet. The MATL structure footprints were 385 square feet for the H pole and 141 square feet for the monopole.</p> <p>The Gateway West footprints dwarf those upon which the MATL study was based, yet Tetra Tech tries to use that study to make an analysis with the Gateway West Project. Not only is it obviously inappropriate, there are further problems to be addressed.</p>

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			<p>The Hydro Solutions analysis did not even deal with irrigated crops. In fact, on page 14 of that analysis, the conclusion was that "all care should be taken to not place structures in a sprinkler irrigated field due to the additional costs of having to break apart a wheel line to move it past a pole, and the cost of disrupting a pivot from making a complete revolution. These costs have not been addressed in the alternative analysis because each field will have a unique situation to calculate."</p> <p>Aerial application costs were not addressed. Neither were problems with GPS and auto steer, as the MATL analysis assumed that "technology will figure that out."</p> <p>The Gateway EIS should not be a case of assuming a rental rate for irrigated or non-irrigated crop land, presuming a minimal disturbance by that footprint, and then just relating damage to the loss of that footprint.</p> <p>Furthermore the EIS concludes that the proponents would negotiate damage related issues during the easement acquisition process. No support is given for this statement, and certainly it does not appear that the BLM will require that element of negotiation. It would be welcome.</p> <p>Under Chapter 2.7, the proponents have no proposed mitigation measures for socioeconomic impacts.</p>

# Gateway West Transmission Line Draft Environmental Impact Statement (July 2011 – October 28, 2011)

Comments from Power County Gateway Task Force

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				<p>Suggested change: Tetra Tech should be required to provide an independent economic analysis specific to Power and Cassia Counties. Tetra Tech should be required to meet with the affected land owners and the Power County Task Force to understand and further analyze those entities estimates as to losses. The MATL project should not even be mentioned, as it is irrelevant, based upon the facts.</p> <p>The DEIS should not go forward until this important element, socioeconomic impacts, is fully and properly addressed.</p>	

**From:** [jmclain@blm.gov](mailto:jmclain@blm.gov)  
**To:** [blm@gwcomment.com](mailto:blm@gwcomment.com);  
**Subject:** 16573: Fw: Sweetwater County Wyoming Gateway West DEIS comments  
**Date:** Thursday, October 20, 2011 2:11:46 PM  
**Attachments:** [Gateway West Transmission Project DEIS Sweetwater County final comments.pdf](#)

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----- Forwarded by Joy Mclain/WYSO/WY/BLM/DOI on 10/20/2011 03:09 PM -----

"Mark Kot -  
Planning and  
Zoning"

<kotm@sweet.wy.us  
>

To  
<Gateway\_West\_WYMail@blm.gov>  
cc

10/19/2011 02:28  
PM

Subject  
Sweetwater County Wyoming Gateway  
West DEIS comments

(See attached file: Gateway West Transmission Project DEIS Sweetwater County final comments.pdf)

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 FAX: (307) 872-3992

Tuesday, October 18, 2011

Mr. Walt George, Project Manager  
 Gateway West Transmission Line Project - DEIS  
 P.O. Box 20879  
 Cheyenne, WY 82003

RE: Sweetwater County, Wyoming's comments regarding the Gateway West Transmission Line Project Draft Environmental Impact Statement (DEIS).

Dear Mr. George:

Sweetwater County would like to thank you, your staff and consultants for the excellent work writing and organizing the environmental information and analyses for the DEIS for this 1,100 mile long transmission line project and the opportunity to comment on this project. Sweetwater County recognizes the importance of this project to the economic base of Sweetwater County, the State of Wyoming, and to our community partner, Rocky Mountain Power. Projects such as this will provide the transmission line capacity necessary to expand power generation within Wyoming which will, in turn, stimulate our economy through the utilization of our State and County's vast wind, coal and gas resources.

Sweetwater County believes the Gateway West Transmission Line Project can be accomplished in a manner that balances economic stability and growth with environmental protection. It is in this spirit that Sweetwater County offers the following comments regarding the proposed Gateway West Transmission Line Project DEIS:

**Socioeconomics (DEIS Section 3.4):** In regards to Socioeconomics, Sweetwater County offers the following comments:

**EPC Analysis Area vs. Jurisdiction Boundaries (Section 3.4.2 of the DEIS):** It is Sweetwater County's experience that counties, municipalities, and small towns generally are more experienced in understanding and managing the socioeconomic and land use impacts related to their communities on the basis of jurisdictional boundaries such as city or town limits or county and state boundaries rather than on the basis of Engineering, Procurement and Construction (EPC) Analysis Areas, which the DEIS frequently utilizes to apply its economic analysis.

As defined by the DEIS, an "Analysis Area is a 1000 foot wide area centered over the Proposed Route and Alternatives, as well as a 50 foot wide area centered over any access roads that extend outside of the 1,000 foot wide area." Sweetwater County understands how utilizing an EPC Analysis Area may be useful when addressing issues that relate directly to engineering, procurement and construction, but the County finds it difficult to utilize the EPC Analysis Area to apply the DEIS socioeconomic statistics and demographics to individual cities and towns like Rock Springs or Wamsutter, especially when that EPC Analysis Area spans county and state boundaries.



To make the Socioeconomics section of the DEIS more applicable to individual governmental units, Sweetwater County suggests that this Section be revised to address socioeconomic impacts more from the perspective of jurisdictional boundaries rather than EPC Analysis Area boundaries.

Additionally, since the Gateway West Transmission Line Project will require a State of Wyoming Industrial Siting Administration (ISA) Permit and most Wyoming governments affected by this project will be parties to the ISA public hearings, Sweetwater County suggests that the BLM consider formatting the Socioeconomics Section on a jurisdictional basis that would parallel the ISA socioeconomic reporting requirements. This would make the socioeconomic information not only useful for the DEIS but also for the ISA permit application and public hearing process.

**Cumulative Impacts:** It is important to emphasize that Sweetwater County supports industrial and energy development, and the County views the Gateway West Transmission Line Project and other proposed industrial projects as vital to the foundation of the economic base of Sweetwater County and its residents. To ensure that the Gateway West Transmission Line Project occurs in a manner that balances economic opportunity with the ability of our communities to absorb socioeconomic impacts, Sweetwater County encourages the project proponent, the BLM and the State of Wyoming to carefully inventory the socioeconomic impacts of all industrial projects that are planned to begin construction during the 2013 to 2018 construction phase of the Gateway West Transmission Line Project.

Some of the potential projects that may begin during this time frame include projects not only similar to Gateway West such as the TransWest and Gateway South Transmission Line Projects, but also projects like the Lost Creek In Situ Uranium Project and multiple oil and gas expansion projects like NPL, Moxa Arch, Hiawatha, Continental Divide, La Barge Platform and others.

Even though it is uncertain how many industrial projects will be constructed simultaneously with the Gateway West Transmission Line Project, it is essential for all involved to carefully monitor the cumulative socioeconomic impacts related to these projects and be prepared to implement a plan that has the financial backing to address any potential unmitigated impacts.

**Municipalities and Incorporated Communities:** The municipalities that will potentially receive socioeconomic benefits and impacts from the Gateway West Transmission Line Project and potential cumulative impacts from additional industrial projects include the Cities of Rock Springs and Green River and the Towns of Wamsutter, Superior and Granger. The unincorporated communities that may receive both Gateway West and cumulative impacts include Point of Rocks, Farson and the unincorporated communities surrounding the Cities of Green River and Rock Springs. To provide socioeconomic information which will help these communities address potential impacts, it is important that this information is collected and provided in a manner that addresses jurisdictional or regional boundaries of the previously mentioned communities.

An additional item when considering potential impacts to the Town of Wamsutter is that the Creston Substation is planned to be built south of the Town. To help ensure that the impacts from the Creston Substation are properly addressed, the project proponent may consider renaming the Creston Substation the Wamsutter Substation since the Substation is only approximately 2.5 miles from Wamsutter but approximately 14 miles from Creston Jct. This change would also help in alleviating the confusion that may be related to the location of the Creston Substation.

**2010 Census Data:** To the greatest extent possible the socioeconomic data in DEIS section 3.4 should be based on 2010 U.S. Census data or the most recent data available.

**Free on Board (FOB):** In the DEIS Socioeconomic Section 3.4, Sweetwater County encourages the BLM, to the greatest extent possible under the BLM's authority, to encourage Rocky Mountain Power, its contractors and subcontractors, to deliver construction materials "Free on Board" (FOB) to the County in which the materials will be utilized. This will help ensure that the sales tax will be properly allocated and paid to the County where construction and related impacts will occur.

**Temporary Work Camps:** The construction schedule of the Gateway West project is estimated to span five years starting in 2013 and ending in 2018, and it is likely that other industrial projects will begin construction during this same time frame which will be competing for the same temporary housing market as the Gateway West Project. To meet the demands of a potentially competitive temporary housing market, companies may consider establishing man camps. If a compelling need can be demonstrated, a work camp may be permitted through the Sweetwater County Conditional Use Permit process. Although it is important for Rocky Mountain Power and other companies to keep in mind that it is a policy of the Sweetwater County Comprehensive Plan to encourage "...the location of associated worker housing within existing communities where services are and can be provided." For more information on permitting Temporary Work Camps within Sweetwater County, please contact Eric Bingham, Land Use Director at 307-872-3916.

**Regulatory Framework:** DEIS Section 3.17.1.3 discusses the County plans and regulations that the Gateway West Project must comply with. The planning and regulatory requirements of six Wyoming Counties and 15 Idaho counties are discussed in this Section. After review of the Sweetwater County, Wyoming (Segments 2, 3, and 4) portion of this Section, Sweetwater County suggests that the planning and regulatory summary should be revised to read:

"Sweetwater County has two plans that address land use policies within the County – The 2002 Sweetwater County Comprehensive Plan and the Sweetwater County Growth Management Plan. The Sweetwater County Comprehensive Plan is the statutorily required land use plan that provides the land use policies that guide development within Sweetwater County as a whole. The Growth Management Plan is a subset of the 2002 Sweetwater County Comprehensive Plan. This plan focuses on development policies and development plans that coordinate growth with the Cities of Rock Springs and Green River.

The 2002 Sweetwater County Comprehensive Plan contains several general development policies that apply to the Gateway West Project. These policies include:

- Encourage/support cooperative interaction between local, state and federal agencies and private land owners.
- Encourage and support environmentally responsible resource development.
- Encourage a balance between resource development and environmental protection.
- Recognize and protect the County's unique cultural, recreational, environmental and historical resources.
- Encourage the location of associated worker housing within existing communities where services are/can be provided.
- Support the County's traditional land uses and interests.
- Promote local (private) concerns and interests as an integral part of public land management decisions.
- Encourage the proactive, coordinated planning and delivery of public utilities and infrastructure services.

For the Gateway West Project, the following outlines the required Sweetwater County development permits and requirements:

<b>County Road Crossings and Access Permits, County Road Maintenance Agreements - County Engineering – Contact: John Radosevich, Public Works Director, at 307-872-3921</b>	<b>Construction/Use Permits – County Zoning:</b> required for all structures except Transmission Lines and Towers. Code amendment pending to require Construction/Use Permits of Transmission Lines and Towers. Contact: Eric Bingham, Land Use Director, at 307-872-3917
<b>Small wastewater permits - County Health – Contact: Chuck Sykes, Director Environmental Health, at 307- 872-6317</b>	<b>Conditional Use Permits - County Zoning:</b> required for man camps, construction yards and storage of explosives. Code amendment pending to require Conditional Use Permit for Transmission Line and Tower Corridor. Contact: Eric Bingham, Land Use Director, at 307-872-3917
<b>Recordation of Hazardous Material Storage - County Emergency Management - Contact: Dave Johnson, Emergency Management Coordinator at 307-922-5369.</b>	<b>Grading Permits - County Engineering.</b> Contact John Radosevich, Public Works Director, at 307-872-3921
<b>International Fire Code - Contact: Jim Zimmerman, Code Enforcement Officer at 307-872-3923</b>	<b>Noxious Weed Control - County Weed and Pest.</b> Contact: Gale Lamb, Sweetwater County Weed and Pest at 307- 874-6107.

Since the Gateway West Project crosses approximately 140 miles of checkerboard public and private ownership within Sweetwater County, the County encourages the BLM to support Federal, state and county governments applying their permitting processes as a whole to both public and private lands across this checkerboard area. Separating the various permitting processes into private land permits and public land permits fragments the project making it more difficult for jurisdictions to apply their regulations in a manner that ensures unified development from one unit of ownership to the next.

The Foote Rim Wind Energy Project, near Arlington, Wyoming, is a successful example where both public and private lands were considered as one unit for the purposes of permitting by Federal, state and local governments. This same concept of considering public and private lands together for permitting purposes could be successfully used for the Gateway West Project.

**Protection of Natural Features:**

**Historic Trails, Cultural Sites and Viewsheds:** Sweetwater County’s Comprehensive Plan calls for the County to “Identify and protect the County’s unique cultural, recreational and environmental resources”, and to “Encourage a balance between resource development and environmental protection”. With these goals in mind, Sweetwater County appreciates the BLM’s efforts in inventorying and planning for impacts that may occur to historical and cultural resources and viewsheds. Sweetwater County supports these planning efforts and the protection of these important resources, but at the same time Sweetwater County strongly encourages the BLM to carefully consider and balance how the protection of Historic Trails, Cultural Sites and viewsheds will affect the ability the mineral and agricultural industries to develop and utilize their resources for economic purposes. Sweetwater County’s economy depends on the mineral extraction and agriculture industries making it very important that the protection of Historic Trails, Cultural Sites and viewsheds occur in a balanced manner that also protects the economy of Sweetwater County.

**Natural Areas:** Sweetwater County supports the Gateway West Project’s efforts to avoid the following important Sweetwater County natural areas which include the Seedskaadee National Wildlife Area, the Sand Dunes WSA and the Natural Corrals.

**Wildlife:** Sweetwater County supports the State of Wyoming Sage Grouse Core Area Program, and appreciates that Rocky Mountain Power is planning the Preferred Alternative across Sweetwater County in a manner that complies with this program.

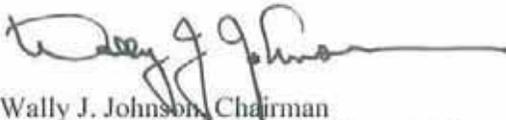
Also, as the proposed Project crosses Sweetwater County, it will travel through areas that have significant raptor populations. It is Sweetwater County's understanding that Rocky Mountain Power is working with the U.S. Fish and Wildlife Service to create a Raptor Management Plan that will provide for the protection of raptors while allowing the Gateway West Project to move forward. Sweetwater County appreciates this effort by Rocky Mountain Power to balance resource development with environmental protection.

**Support of Preferred Route across Sweetwater County and the Support of Alternative 4a in Lincoln County:** Sweetwater County supports Rocky Mountain Power's Preferred Alternative across Sweetwater County with the following caveats:

- Sweetwater County joins Lincoln County, Wyoming in supporting Alternative 4a rather than the Preferred Alternative as the proposed the Gateway West Project leaves the western side of Sweetwater County and enters Lincoln County. Sweetwater County does not support the northern route of the Preferred Alternative as it enters Lincoln County since this route adversely impacts residents of both Sweetwater and Lincoln Counties. Sweetwater County believes this northern route into Lincoln County should be dropped from consideration.
- Sweetwater County supports the Preferred Alternative Route across Sweetwater County to Alternative 4a as long as Rocky Mountain Power obtains the necessary Sweetwater County development permits as outlined in this letter.

Again, thank you for the opportunity to comment on the Gateway West Transmission Line Project DEIS. Sweetwater County strongly supports Rocky Mountain Power in their endeavor to complete this important project. If you have any questions concerning the development issues stated in this letter, please contact me at 307-872-3897 or Mark Kot, Public Lands Specialist, at 307-872-3917.

Sincerely,



Wally J. Johnson, Chairman  
Sweetwater County Board of County Commissioners

cc Don Simpson, BLM Wyoming State Director  
John Ruhs, District Manager, BLM High Desert District  
Lance Porter, Field Manager, BLM Rock Springs Field Office  
Dennis Carpenter, Field Manager, BLM Rawlins Field Office  
John Christensen, Field Manager, BLM Kemmerer Field Office  
Sweetwater County Board of County Commissioners  
Lincoln County Board of County Commissioners  
Wyoming County Commissioners Association  
Wyoming Industrial Siting Division  
Sweetwater County Conservation District  
Coalition of Local Governments  
Eric Bingham, Sweetwater County Land Use Director  
John Radosevich, Sweetwater County Public Works Director

# SWEETWATER

C.O.U.N.T.Y

OFFICE OF THE BOARD OF COUNTY COMMISSIONERS  
80 WEST FLAMING GORGE WAY, STE 109 GREEN RIVER, WY 82935



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Mailed From 82935  
10/19/2011  
US POSTAGE

MR. WALT GENCE, Project Manager  
Gateway West Transmission Line Project-DEIS  
P.O. Box 20879  
Cheyenne, WY 82003

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BOARD OF COUNTY COMMISSIONERS

SWEETWATER  
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RECEIVED  
 DOI-BLM  
 CHEYENNE, WYOMING  
 2011 OCT 18 AM 10:00

Tuesday, October 18, 2011

Mr. Walt George, Project Manager  
 Gateway West Transmission Line Project - DEIS  
 P.O. Box 20879  
 Cheyenne, WY 82003

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 100243  
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RE: Sweetwater County, Wyoming's comments regarding the Gateway West Transmission Line Project Draft Environmental Impact Statement (DEIS).

Dear Mr. George:

Sweetwater County would like to thank you, your staff and consultants for the excellent work writing and organizing the environmental information and analyses for the DEIS for this 1,100 mile long transmission line project and the opportunity to comment on this project. Sweetwater County recognizes the importance of this project to the economic base of Sweetwater County, the State of Wyoming, and to our community partner, Rocky Mountain Power. Projects such as this will provide the transmission line capacity necessary to expand power generation within Wyoming which will, in turn, stimulate our economy through the utilization of our State and County's vast wind, coal and gas resources.

Sweetwater County believes the Gateway West Transmission Line Project can be accomplished in a manner that balances economic stability and growth with environmental protection. It is in this spirit that Sweetwater County offers the following comments regarding the proposed Gateway West Transmission Line Project DEIS:

**Socioeconomics (DEIS Section 3.4):** In regards to Socioeconomics, Sweetwater County offers the following comments:

**EPC Analysis Area vs. Jurisdiction Boundaries (Section 3.4.2 of the DEIS):** It is Sweetwater County's experience that counties, municipalities, and small towns generally are more experienced in understanding and managing the socioeconomic and land use impacts related to their communities on the basis of jurisdictional boundaries such as city or town limits or county and state boundaries rather than on the basis of Engineering, Procurement and Construction (EPC) Analysis Areas, which the DEIS frequently utilizes to apply its economic analysis.

As defined by the DEIS, an "Analysis Area is a 1000 foot wide area centered over the Proposed Route and Alternatives, as well as a 50 foot wide area centered over any access roads that extend outside of the 1,000 foot wide area." Sweetwater County understands how utilizing an EPC Analysis Area may be useful when addressing issues that relate directly to engineering, procurement and construction, but the County finds it difficult to utilize the EPC Analysis Area to apply the DEIS socioeconomic statistics and demographics to individual cities and towns like Rock Springs or Wamsutter, especially when that EPC Analysis Area spans county and state boundaries.



To make the Socioeconomics section of the DEIS more applicable to individual governmental units, Sweetwater County suggests that this Section be revised to address socioeconomic impacts more from the perspective of jurisdictional boundaries rather than EPC Analysis Area boundaries.

Additionally, since the Gateway West Transmission Line Project will require a State of Wyoming Industrial Siting Administration (ISA) Permit and most Wyoming governments affected by this project will be parties to the ISA public hearings, Sweetwater County suggests that the BLM consider formatting the Socioeconomics Section on a jurisdictional basis that would parallel the ISA socioeconomic reporting requirements. This would make the socioeconomic information not only useful for the DEIS but also for the ISA permit application and public hearing process.

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**Cumulative Impacts:** It is important to emphasize that Sweetwater County supports industrial and energy development, and the County views the Gateway West Transmission Line Project and other proposed industrial projects as vital to the foundation of the economic base of Sweetwater County and its residents. To ensure that the Gateway West Transmission Line Project occurs in a manner that balances economic opportunity with the ability of our communities to absorb socioeconomic impacts, Sweetwater County encourages the project proponent, the BLM and the State of Wyoming to carefully inventory the socioeconomic impacts of all industrial projects that are planned to begin construction during the 2013 to 2018 construction phase of the Gateway West Transmission Line Project.

Some of the potential projects that may begin during this time frame include projects not only similar to Gateway West such as the TransWest and Gateway South Transmission Line Projects, but also projects like the Lost Creek In Situ Uranium Project and multiple oil and gas expansion projects like NPL, Moxa Arch, Hiawatha, Continental Divide, La Barge Platform and others.

Even though it is uncertain how many industrial projects will be constructed simultaneously with the Gateway West Transmission Line Project, it is essential for all involved to carefully monitor the cumulative socioeconomic impacts related to these projects and be prepared to implement a plan that has the financial backing to address any potential unmitigated impacts.

**Municipalities and Incorporated Communities:** The municipalities that will potentially receive socioeconomic benefits and impacts from the Gateway West Transmission Line Project and potential cumulative impacts from additional industrial projects include the Cities of Rock Springs and Green River and the Towns of Wamsutter, Superior and Granger. The unincorporated communities that may receive both Gateway West and cumulative impacts include Point of Rocks, Farson and the unincorporated communities surrounding the Cities of Green River and Rock Springs. To provide socioeconomic information which will help these communities address potential impacts, it is important that this information is collected and provided in a manner that addresses jurisdictional or regional boundaries of the previously mentioned communities.

An additional item when considering potential impacts to the Town of Wamsutter is that the Creston Substation is planned to be built south of the Town. To help ensure that the impacts from the Creston Substation are properly addressed, the project proponent may consider renaming the Creston Substation the Wamsutter Substation since the Substation is only approximately 2.5 miles from Wamsutter but approximately 14 miles from Creston Jct. This change would also help in alleviating the confusion that may be related to the location of the Creston Substation.

**2010 Census Data:** To the greatest extent possible the socioeconomic data in DEIS section 3.4 should be based on 2010 U.S. Census data or the most recent data available.

**Free on Board (FOB):** In the DEIS Socioeconomic Section 3.4, Sweetwater County encourages the BLM, to the greatest extent possible under the BLM's authority, to encourage Rocky Mountain Power, its contractors and subcontractors, to deliver construction materials "Free on Board" (FOB) to the County in which the materials will be utilized. This will help ensure that the sales tax will be properly allocated and paid to the County where construction and related impacts will occur.

**Temporary Work Camps:** The construction schedule of the Gateway West project is estimated to span five years starting in 2013 and ending in 2018, and it is likely that other industrial projects will begin construction during this same time frame which will be competing for the same temporary housing market as the Gateway West Project. To meet the demands of a potentially competitive temporary housing market, companies may consider establishing man camps. If a compelling need can be demonstrated, a work camp may be permitted through the Sweetwater County Conditional Use Permit process. Although it is important for Rocky Mountain Power and other companies to keep in mind that it is a policy of the Sweetwater County Comprehensive Plan to encourage "...the location of associated worker housing within existing communities where services are and can be provided." For more information on permitting Temporary Work Camps within Sweetwater County, please contact Eric Bingham, Land Use Director at 307-872-3916.

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**Regulatory Framework:** DEIS Section 3.17.1.3 discusses the County plans and regulations that the Gateway West Project must comply with. The planning and regulatory requirements of six Wyoming Counties and 15 Idaho counties are discussed in this Section. After review of the Sweetwater County, Wyoming (Segments 2, 3, and 4) portion of this Section, Sweetwater County suggests that the planning and regulatory summary should be revised to read:

"Sweetwater County has two plans that address land use policies within the County – The 2002 Sweetwater County Comprehensive Plan and the Sweetwater County Growth Management Plan. The Sweetwater County Comprehensive Plan is the statutorily required land use plan that provides the land use policies that guide development within Sweetwater County as a whole. The Growth Management Plan is a subset of the 2002 Sweetwater County Comprehensive Plan. This plan focuses on development policies and development plans that coordinate growth with the Cities of Rock Springs and Green River.

The 2002 Sweetwater County Comprehensive Plan contains several general development policies that apply to the Gateway West Project. These policies include:

- Encourage/support cooperative interaction between local, state and federal agencies and private land owners.
- Encourage and support environmentally responsible resource development.
- Encourage a balance between resource development and environmental protection.
- Recognize and protect the County's unique cultural, recreational, environmental and historical resources.
- Encourage the location of associated worker housing within existing communities where services are/can be provided.
- Support the County's traditional land uses and interests.
- Promote local (private) concerns and interests as an integral part of public land management decisions.
- Encourage the proactive, coordinated planning and delivery of public utilities and infrastructure services.

For the Gateway West Project, the following outlines the required Sweetwater County development permits and requirements:

<b>County Road Crossings and Access Permits, County Road Maintenance Agreements</b> - County Engineering – Contact: John Radosevich, Public Works Director, at 307-872-3921	<b>Construction/Use Permits</b> – County Zoning: required for all structures except Transmission Lines and Towers. Code amendment pending to require Construction/Use Permits of Transmission Lines and Towers. Contact: Eric Bingham, Land Use Director, at 307-872-3917
<b>Small wastewater permits</b> - County Health – Contact: Chuck Sykes, Director Environmental Health, at 307- 872-6317	<b>Conditional Use Permits</b> - County Zoning: required for man camps, construction yards and storage of explosives. Code amendment pending to require Conditional Use Permit for Transmission Line and Tower Corridor. Contact: Eric Bingham, Land Use Director, at 307-872-3917
<b>Recordation of Hazardous Material Storage</b> - County Emergency Management - Contact: Dave Johnson, Emergency Management Coordinator at 307-922-5369.	<b>Grading Permits</b> - County Engineering. Contact John Radosevich, Public Works Director, at 307-872-3921
<b>International Fire Code</b> - Contact: Jim Zimmerman, Code Enforcement Officer at 307-872-3923	<b>Noxious Weed Control</b> - County Weed and Pest. Contact: Gale Lamb, Sweetwater County Weed and Pest at 307- 874-6107.

Since the Gateway West Project crosses approximately 140 miles of checkerboard public and private ownership within Sweetwater County, the County encourages the BLM to support Federal, state and county governments applying their permitting processes as a whole to both public and private lands across this checkerboard area. Separating the various permitting processes into private land permits and public land permits fragments the project making it more difficult for jurisdictions to apply their regulations in a manner that ensures unified development from one unit of ownership to the next.

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The Foote Rim Wind Energy Project, near Arlington, Wyoming, is a successful example where both public and private lands were considered as one unit for the purposes of permitting by Federal, state and local governments. This same concept of considering public and private lands together for permitting purposes could be successfully used for the Gateway West Project.

**Protection of Natural Features:**

**Historic Trails, Cultural Sites and Viewsheds:** Sweetwater County’s Comprehensive Plan calls for the County to “Identify and protect the County’s unique cultural, recreational and environmental resources”, and to “Encourage a balance between resource development and environmental protection”. With these goals in mind, Sweetwater County appreciates the BLM’s efforts in inventorying and planning for impacts that may occur to historical and cultural resources and viewsheds. Sweetwater County supports these planning efforts and the protection of these important resources, but at the same time Sweetwater County strongly encourages the BLM to carefully consider and balance how the protection of Historic Trails, Cultural Sites and viewsheds will affect the ability the mineral and agricultural industries to develop and utilize their resources for economic purposes. Sweetwater County’s economy depends on the mineral extraction and agriculture industries making it very important that the protection of Historic Trails, Cultural Sites and viewsheds occur in a balanced manner that also protects the economy of Sweetwater County.

**Natural Areas:** Sweetwater County supports the Gateway West Project’s efforts to avoid the following important Sweetwater County natural areas which include the Seedskaadee National Wildlife Area, the Sand Dunes WSA and the Natural Corrals.

**Wildlife:** Sweetwater County supports the State of Wyoming Sage Grouse Core Area Program, and appreciates that Rocky Mountain Power is planning the Preferred Alternative across Sweetwater County in a manner that complies with this program.

Also, as the proposed Project crosses Sweetwater County, it will travel through areas that have significant raptor populations. It is Sweetwater County's understanding that Rocky Mountain Power is working with the U.S. Fish and Wildlife Service to create a Raptor Management Plan that will provide for the protection of raptors while allowing the Gateway West Project to move forward. Sweetwater County appreciates this effort by Rocky Mountain Power to balance resource development with environmental protection.

**Support of Preferred Route across Sweetwater County and the Support of Alternative 4a in Lincoln County:** Sweetwater County supports Rocky Mountain Power's Preferred Alternative across Sweetwater County with the following caveats:

- Sweetwater County joins Lincoln County, Wyoming in supporting Alternative 4a rather than the Preferred Alternative as the proposed the Gateway West Project leaves the western side of Sweetwater County and enters Lincoln County. Sweetwater County does not support the northern route of the Preferred Alternative as it enters Lincoln County since this route adversely impacts residents of both Sweetwater and Lincoln Counties. Sweetwater County believes this northern route into Lincoln County should be dropped from consideration.
- Sweetwater County supports the Preferred Alternative Route across Sweetwater County to Alternative 4a as long as Rocky Mountain Power obtains the necessary Sweetwater County development permits as outlined in this letter.



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Again, thank you for the opportunity to comment on the Gateway West Transmission Line Project DEIS. Sweetwater County strongly supports Rocky Mountain Power in their endeavor to complete this important project. If you have any questions concerning the development issues stated in this letter, please contact me at 307-872-3897 or Mark Kot, Public Lands Specialist, at 307-872-3917.

Sincerely,

Wally J. Johnson, Chairman  
Sweetwater County Board of County Commissioners

cc Don Simpson, BLM Wyoming State Director  
John Ruhs, District Manager, BLM High Desert District  
Lance Porter, Field Manager, BLM Rock Springs Field Office  
Dennis Carpenter, Field Manager, BLM Rawlins Field Office  
John Christensen, Field Manager, BLM Kemmerer Field Office  
Sweetwater County Board of County Commissioners  
Lincoln County Board of County Commissioners  
Wyoming County Commissioners Association  
Wyoming Industrial Siting Division  
Sweetwater County Conservation District  
Coalition of Local Governments  
Eric Bingham, Sweetwater County Land Use Director  
John Radosevich, Sweetwater County Public Works Director

---

**From:** info@gatewayeis.com  
**Sent:** Friday, October 28, 2011 3:11 PM  
**To:** Gateway BLM  
**Subject:** A comment from gatewayeis.com

Name:  
Chet Brackett

Organization:  
Twin Falls Citizens Impact Committee

Mailing Address:  
P.O. Box 111

Mailing Address 2:

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State:  
Idaho

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83302

Daytime Phone:  
208-731-0135

E-mail:  
[chetbrack@gmail.com](mailto:chetbrack@gmail.com)

Confidential:  
No

DEIS Location:  
chapter 2 section 2

Comment:

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**From:** info@gatewayeis.com  
**Sent:** Friday, October 28, 2011 4:11 PM  
**To:** Gateway BLM  
**Subject:** A comment from gatewayeis.com

Name:  
Chet Brackett

Organization:  
Twin Falls Citizens Impact Committee

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208-731-0135

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Confidential:  
No

DEIS Location:  
chapter 2 section 2 page 2-90

Comment:  
To begin with our comments are directed at three alternatives that are contained in chapter 2 pages 2-90 through 2-105.

The segments are 7 I, 7J, and 9 D. These segments interconnect to make a more viable route through southern Idaho. All of these routes have common comments.

1. They avoid homes, farms, pivot irrigation, confined animal feeding operations.
2. If the route is for the public good it should be on public lands as much as possible, avoiding homes, livelihoods and human impact.
3. In the 7J alternative, one of the objections to it was the proposed rogerson south substation. This is no longer an issue as Idaho power and Exergy corp have recently received permission to construct a substation in this location. Since Idaho power has intimate knowledge of these plans there should be no problem relocating the Cedar Hill proposed substation to the Rogerson South location.

4. In addition to the Rogerson (Exergy) windmill project which has been approved and is on line to finish construction in 2012, the China Mountain Wind project will also need a substantial substation to hook it into the grid. There are also proposed wind projects in Shoshone Basin which will need a substation hookup.
5. We believe that Idaho Power has been disingenuous to the point of lying about cumulative impact on the citizens of Idaho. They were aware of the fact that Exergy was planning in conjunction with them, the substation at Rogerson south. Therefore it should have been studied as a part of the cumulative impacts of the Gateway West project.
6. Since there is in fact going to be a substation located where the proposed Rogerson south substation would be located it would be redundant and an burdensome impact on the citizens of this county to have yet another substation located where the Cedar Hill substation is proposed. Therefore it makes absolute sense for the 7 J alternative to be selected.
7. One of the objections we have seen to both the 7 I and 7 J alternatives was that the transmission lines might have a negative impact on Sage Grouse. These claims are based solely on opinion and anecdotal evidence. We know of no credible scientific study to back up these claims and would like to know what scientific data has been used to support such claims.
8. There are studies and court cases (Vierstra vs. Idaho Power) that prove a negative impact of stray voltage on people and also on confined animals. Free ranging livestock and wild life can move in and out of the impact area surrounding the lines without significant negative impact. Therefore we strongly feel that the transmission lines must be located away from major population area (peoples homes) farms and confined animal feeding operations. Alternatives 7 I and 7 J and 9 D offer that relief.
9. One of the negatives sited in the DEIS is that the proposed alternatives 7 I and 7 J and 9 D would not conform with the B.L.M. 's land use plan. However the proposed segment 7 does not conform with the plans of individual home owners and farm operators that would be negatively impacted by this plan.
10. Where is the study that supports the fact that Idaho would either need or be able to utilize wind power from Wyoming? This claim is the hook that was used to bring this project through the state of Idaho with an eminent domain right of way. In fact recent projections have lowered the estimate of the power requirement of Idaho power in the coming years. So where is the proof that this project is even necessary for the state of Idaho and her citizens. Before such a major project should be approved with the impacts that have been suggested that proof should be required other wise the transmission line should either be kept on public land or impacting minimally as we have suggested in lines such as on the state line and away from population centers.

In conclusion, as citizens of Twin Falls Co. and the State of Idaho we feel that if in fact Gateway West is to be built, it should be built using alternatives 7 I, 7J and 9 D. to minimize the impact on the citizens of the area.

Sincerely,  
Chet Brackett  
T.F. Citizens Impact Committee

---

**From:** info@gatewayeis.com  
**Sent:** Thursday, October 27, 2011 6:29 PM  
**To:** Gateway BLM  
**Subject:** A comment from gatewayeis.com

**Name:**  
Mike Colling

**Organization:**  
Converse County Commission

**Mailing Address:**  
1 Prairie Lane

**Mailing Address 2:**

**City:**  
Glenrock

**State:**  
WY

**Zip:**  
82637

**Daytime Phone:**  
307-277-1812

**E-mail:**  
[Mike.Colling@AOL.gov](mailto:Mike.Colling@AOL.gov)

**Confidential:**  
No

**DEIS Location:**

**Comment:**

The Converse County Commissioners adamantly oppose the proposed transmission line south of the Town of Glenrock and north of Interstate 25. Most of my constituents with whom I have spoken also oppose this proposed transmission line. I have heard very little opposition to your other proposed routes.



"Jonathan Teichert"  
<jteichert@lcwy.org>  
10/28/2011 03:17 PM

To Gateway\_West\_WYMail@blm.gov  
cc  
bcc  
Subject CLG Gateway West DEIS Comments

Attached please find the Coalitoin of Local Government's Gateway West DEIS comments for submission.

Jonathan Teichert  
Senior Planner  
520 Topaz, Suite 109  
Kemmerer, WY 83101  
307-877-2100  
[jteichert@lcwy.org](mailto:jteichert@lcwy.org)

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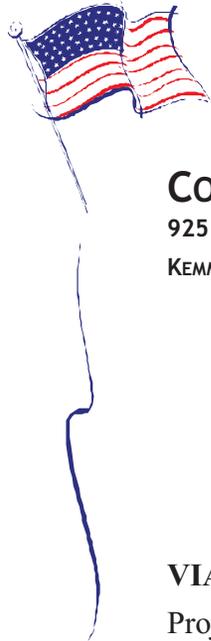
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===== CLG Gateway West DEIS Comments 102811.pdf



CLG Gateway West DEIS Comments Cover Letter 102811.pdf



**COALITION OF LOCAL GOVERNMENTS**

925 SAGE AVENUE, SUITE 302

KEMMERER, WY 83101

COUNTY COMMISSIONS AND CONSERVATION DISTRICTS FOR CARBON, FREMONT, LINCOLN,  
SWEETWATER, UINTA, AND SUBLETTE - WYOMING

October 28, 2011

**VIA E-MAIL**

Project Manager

Gateway West Transmission Line Project EIS

Bureau of Land Management

P.O. Box 20879

Cheyenne, WY 82003

Gateway\_West\_WYMail@blm.gov

Re: Gateway West Transmission Line Draft Environmental Impact  
Statement (DEIS)

Dear Project Manager:

Enclosed please find the Coalition of Local Governments' comments on the Gateway  
West Transmission Line Draft Environmental Impact Statement.

Sincerely,

/s/ Kent Connelly

Kent Connelly, Chairman

Coalition of Local Governments

## I. GENERAL DESCRIPTION AND ISSUES

The Coalition of Local Governments (CLG or Coalition) on behalf of Lincoln County, the Lincoln Conservation District, Sweetwater County (SWC), and the Sweetwater County Conservation District (SWCCD) submits the following comments on the Gateway West Transmission Line draft environmental impact statement (DEIS). Sweetwater County has submitted separate comments and CLG supports those comments as well.

The following comments focus primarily on the Bureau of Land Management (BLM) alternatives prepared for Segment 4 running through Sweetwater and Lincoln Counties. As expressed by SWC, the local governments support the transmission line but strongly recommend that it follow the existing transmission line corridors, as it does for most of the route through western Wyoming with the exception of Lincoln County.

## II. Alternatives Affecting Segment 4 Through Lincoln County, Wyoming

The local government cooperating agencies have repeatedly recommended that the new Gateway West Transmission Line follow, as closely as possible, the existing transmission corridor including the route through Lincoln County, Wyoming and that this route be adopted as the preferred alternative. CLG and the public overwhelmingly supported this as the preferred route. The State BLM office has received written comments by hundreds, if not thousands, of area residents who oppose alternative routes that divert from the main transmission corridor.

The DEIS presents several variations for segment 4 that were proposed by the Kemmerer Field Office (KFO) to limit adverse impacts on historic trails, viewshed, and a special management area. The DEIS does not identify a preferred alternative but analyzes five additional routes for segment 4, all of which were proposed by BLM. These alternatives (4B-4F) sacrifice sage-grouse habitat to protect historic trail values and viewshed. In many cases, the trail segments that are to be protected lack physical integrity, a fact that the DEIS fails to address. BLM should evaluate each affected segment on its actual, as opposed to its assumed, significance and integrity. The recent decision if the Idaho District Court setting aside the Pinedale RMP due to its failure to adequately protect sage-grouse habitat requires BLM to reassess its priorities. *Western Watersheds Project v. Kempthorne*, 08-0516 (D. Idaho Sept. 28, 2011) (holding that the Pinedale RMP failed to adequately protect sage-grouse habitat and was therefore unlawful). It would appear that the BLM generated alternatives for

segment 4 violate the court's ruling. Accordingly, CLG recommends that BLM select the final route in Segment 4 as Alternative 4A.

#### **A. Alternative 4A**

CLG supports Alternative 4A as the preferred alternative. This alternative follows three existing 345-kV transmission lines between the Jim Bridger Power Plant and the Idaho border and is the shortest and most direct route to destination. Although the longer, proposed route would mean additional property tax revenues for the County, the added expense of construction will likely be passed on to the ratepayers. Alternative 4A requires the least amount of Greenfield ROW and also affects the least amount of sage-grouse core area, as compared to all other routes in Lincoln County analyzed.

The State of Wyoming proposed this alternative, which primarily followed the existing transmission line corridor. It avoids sage-grouse core areas and involves less new surface disturbance than in previously undisturbed areas. DEIS at 2-70-2-71.

Alternative 4A also conforms to Wyoming EO 2011-5 which establishes a 2-mile-wide corridor through the Sage and Seedska-dee Core Areas centered on the three existing transmission lines. Constructing this segment adjacent to the existing transmission lines would significantly reduce the environmental impacts, especially to the sage-grouse core area habitat.

#### **B. Kemmerer Field Office Alternatives**

The BLM proposed alternatives for segment 4 cross miles of oil and gas fields, crucial big game winter range and sage-grouse core areas. Regardless of the route selected, BLM must revise the Kemmerer RMP or grant an exception to meet conformance criteria.

Most of the area traversed by the BLM alternative routes is undeveloped (compared to the area crossed by the existing transmission lines) and the impacts to most natural resources are expected to be significantly higher compared to building the transmission line adjacent to the existing transmission lines and within the current corridor. The BLM Alternatives are also inconsistent with Wyoming EO 2011-5 because they would cross through the Fontenelle Core Area 15 miles north of the existing transmission line

corridor. A transmission corridor has not been designated for this core area. Similarly, the alternatives south of Diamondville and Kemmerer would cross the Seedskaadee and Sage Core Areas which are also outside the corridors designated by the EO. The impacts to nearly all natural resources along the southern alternatives would be higher compared to constructing Alternative 4A along the existing transmission line corridor.

**1. Alternative 4B DEIS 2-71**

This Alternative deviates from the proposed route and would involve greater surface disturbance of previously undisturbed areas as well as greater impacts on sage-grouse habitat. It will not conform to Kemmerer RMP sage-grouse management criteria or to the Wyoming EO-2011-155. It also crosses an active trona mine, Cokeville Meadows NWR, and part of the SRMA.

**2. Alternative 4C DEIS 2-71**

This alternative is similar to Alternative 4B except that it skirts the boundary of the Cokeville Meadows NWR and crosses the SRMA.

**3. Alternative 4D DEIS 2-72**

This alternative revises the route to avoid affecting the viewshed from the Fossil Butte National Monument.

**4. Alternative 4E DEIS 2-72**

This Alternative is also requested by the Fossil Butte National Monument. It, like the others, has the similar impacts on sage-grouse habitat and core areas.

**5. Alternative 4F DEIS 2-73**

This alternative was originally proposed by the power company. It was abandoned based on strong public objections.

### C. Protection of Historic Trails

The BLM alternatives are intended to reduce the impacts on the historic trails. The trail segments for the Sublette Cutoff and Slate Creek Cutoff that might be affected by Alternatives 4 and 4A are not congressionally designated historic trails. They were the subject of feasibility studies but BLM never secured the required consent and cooperation from the affected landowners. The protective measures adopted in the Kemmerer RMP are based on BLM's authority under the National Historic Preservation Act (NHPA). The DEIS incorrectly assumes that all of these trail segments could be listed on the National Historic Register without performing the integrity analysis required by the National Park Service (NPS). *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 51 (1995), p. 44 (NRB #51). In order to qualify for protection, the site or trail segment must have integrity. NRB #51 specifies six factors to consider in making the integrity determination: location, design materials, workmanship, feeling, setting and association. Because these trail segments were not constructed or designed, the factors for integrity, such as design, materials, and workmanship do not apply. Thus, the issue of integrity is limited to location, feeling, setting, and association.

Setting is defined by both the site and its surroundings, NRB #51 at 45. The physical features, which constitute the setting include topography, vegetation, manmade structures and the relationship to space and structures.

Feeling is the property's expression of aesthetics or history from a particular period of time. "For example, a rural historic district retaining original design, materials, workmanship, and setting." *Id.*

#### 1. Assessing Integrity

The physical features must "define both why a property is significant and when it was significant." *Id.* p. 46. Moreover, it must retain its essential physical character. *Id.* When roads or trails are mostly invisible or are difficult to follow they cannot be said to retain the essential physical features necessary to meet the criteria for integrity.

Visibility is a necessary part of the essential physical features.

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to

convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.

*Id.* at 46.

CLG members object to the DEIS classification of the trail segments as Class 1 or 2. Virtually all of the affected trail segments have lost their physical integrity. The KFO RMP did not apply this level of analysis and thus the DEIS needs to correct the premise that NHPA can be invoked regardless of the lack of physical integrity.

CLG employees have personally walked these segments and report that the trails are not visible. Under the NPS guidelines for integrity, these trail segments should not be the basis for additional mitigation measures or any recognized protection. Certainly, BLM cannot justify sacrificing sage-grouse habitat in favor of protecting historic trail segments which lost their physical integrity a long time ago.

The DEIS Alternatives 4B-4E avoid the trail segments even though they are no longer physically visible. This is in error because NPS Guidelines require that the site maintain its physical integrity. When it is lost through development or the mere passage of time, NHPA criteria no longer mandate or permit imposition of restrictions to protect what is no longer physically there.

The NRB #51 further states that ‘because feeling and association depend on individual perception, their retention alone is never sufficient to support the eligibility of a property for the National Register.’ *Id.* at 45. Therefore, even if a hiker could imagine the trail route as he hiked, the loss of the physical site integrity precludes protection solely for feeling and association.

#### **D. Proposed Amendments to Kemmerer RMP**

In cases where the Proposed and Alternative Routes are not in compliance with the management objectives provided in the RMPs, the BLM can revise the land use plan or the project. CLG members, however, question the nonconformance decisions reflected in Alternatives 4B through 4E. As explained below, KFO efforts to avoid historic trail segments are based on the incorrect assumption that National Historic Preservation Act

protects trail segments that have lost their physical integrity. Such trail segments should not even be classified as potentially eligible.

## 1. Historic Trails Issues

### a. Decision #5010: National Historic Trails Physical Protection

Protect the physical evidence of NHTs designated under the national trails system act (routes and traces, grades, campsites, landmarks) that exist on lands within federal jurisdiction by prohibiting whole surface disturbing activities that do not benefit the preservation and or interpretation of trails within the following distances:

Class 1 segments: ¼ mile on each side of trails segments and within ¼ mile radius of gravesites and landmarks...Crossings at right angles to trails could be permitted on a case-by-case basis.”

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Manage the viewshed to preserve the existing character of the landscape within the federal sections where physical evidence of the trail occurs (routes and traces, grades, campsites, landmarks).

The RMP proposed historic trail protection pursuant to the NHPA rules, 36 C.F.R. Pt. 800 regulations, which are construed to protect not only specific trail features but the “associated historic landscape,” and Executive Order 13195, “Trails for America in the 21<sup>st</sup> Century, 66 Fed. Reg. 7391 (2001), which requires, *inter alia*, federal agencies to ensure trail corridors are protected and that trail values remain intact. See also BLM Instruction Memorandum No. WY-2002-001 (expired). Most of the work has been done internally and without regard to the fact that the trail segments cross the Checkerboard or are on private land. The National Historic Trails Act requires landowner and local government involvement and cooperation, which has not occurred. 16 U.S.C. §1244(b). BLM’s interpretation of the NHPA and the Executive Order circumvented the statutory limits that otherwise apply to historic trail protection. It also creates significant land use conflicts and management issues, since the trails run through the Checkerboard. The RMP assumptions need to be reassessed based on this project’s actual effect on the

segments which are not visible. The specific segments which are not visible, will not be impacted by the project.

## **2. Utility Corridors**

### **a. Decision #6008: Utility Corridors Prohibited Across NHTs.**

“Utility corridors are not designated where they are in conflict with NHT’s management objectives.”

As noted above, the routes affect undesignated trails and this condition does not apply.

### **b. Lincoln County Proposed Amendment for Alternative 4A:**

Designate a utility corridor one (1) mile in width, generally centered on the existing transmission line (Bridger West #2).

An amendment is not required for any of the routes to be approved; however, Lincoln County recommends designating a corridor for future utility placement since there are two other transmission lines being proposed (TransCanada and Zephyr). Although not currently designated as a corridor, four existing power lines parallel to each other would constitute a corridor to a rational thinking person.

Lincoln County has repeatedly asked the Kemmerer FO to officially designate this corridor. There have been two previous opportunities to do so, during the Kemmerer RMP revision a year ago and during the West-Wide Energy Corridors EIS. Again we request the Kemmerer FO to recognize this as a utility corridor.

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VRM Class II areas:

A visual corridor extending up to 1 mile on either side of the Sublette Cutoff and the Slate Creek Cut-off north of U.S. Highway 189 and east of Slate Creek Ridge in consideration of NHT views. The northwest portion of the planning area...

**b. Lincoln County Proposed Amendment for Alternative 4A:**

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- Gateway Petroglyphs (518 acres)

Several of these areas are either privately-owned or surrounded by privately-owned land. The limits imposed limit lawful access to private land. The presence of existing transmission lines should be considered when determining site eligibility and existing character of the landscape.

The BLM manual regarding cultural resources states

D. Allocations in Support of Goals. Allocate all cultural properties in the RMP area, whether already recorded or projected to occur on the basis of existing-data syntheses, to one or more of the following uses according to their nature and relative preservation value.

DM 8130 ¶.2.D.

***These land use allocations pertain to cultural resources, not to areas of land.***

#### **4. Visual Resource Management**

##### **a. Decision #6054: Class 1 & 2 NHT Viewshed Preservation**

Manage the viewsheds of NHT segments as follows:

(1)(a) Preserve the viewshed within 3 miles of Class 1 segments north and east of U.S. Highway 30 and west of the Hams Fork river (Tunp/Dempsey Trail area), where the visual characteristics of the setting contribute to the eligibility of the site, by managing projects in federal sections to retain the existing character of the landscape so developments do not dominate the visible area to detract from the feeling or sense of the historic time period of the trail setting. Design ROW to preserve the visual integrity of the settings consistent with the BLM visual resources handbook and manual.

(1)(b) Preserve the viewshed within 1 mile of Class I segments outside of the Tunp/Dempsey Trail area and the checkerboard land pattern area, where the visual characteristics of the setting contribute to the eligibility of the site, by managing projects in federal sections to retain the existing character of the landscape so developments do not dominate the visible area to detract from the feeling or sense of the historic time period of the trail setting. Design ROW to preserve the visual integrity of the settings consistent with the BLM visual resources handbook and manual...

(2)(a) Preserve the viewshed within ½ mile of Class 2 segments that exist in blocked federal lands west of U.S. Highway 189 (south of Kemmerer) and south of U.S. Highway 30 by managing projects in federal sections to retain the existing character of the landscape so developments do not attract the attention of the casual observer.

(2)(b) On Class 2 trail segments outside of the area described in (2)(a) manage the viewshed to preserve the existing character of the landscape within the federal section where the trail occurs.

(2)(c) On Class 3 segments, manage the viewshed according to the appropriate VRM class for the area.

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Reclassify all NHT Viewshed Classifications to Class III segments within the portion of the planning area north and east of U.S. Highway 30 and west of the Hams Fork River (Tunp/Dempsey Trail Area).

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The Kemmerer RMP improperly assigned VRM Class II designations to affect existing land uses, rather than having the VRM class be adjusted to reflect the permitted land uses. VRM classifications should be narrowly tailored to reflect previous and current land use decisions and appropriate land uses.

VRM Class II classifications contradict BLM visual resource management policy. The Kemmerer RMP made the error of imposing VRM Class II along historic trail segments to protect cultural resources. A blanket VRM Class II cannot be imposed absent documentation of significance and sensitivity. This evaluation does not occur until the project level and thus the DEIS needs to conduct its own evaluation of significance and sensitivity. As explained above, if the trail segments are now invisible or not physically evident, they are neither significant or sensitive. Thus the DEIS cannot apply VRM Class II measures until it has done the site-specific analysis.

This contradiction should also be addressed in the checkerboard lands and other areas where much or most of the land is owned by the State or private individuals. For example, the southern and central VRM Class II areas cover areas which are more than half private land. The RMP classified most of the land north of Highway 30 as VRM Class II based on federal ownership (lumping) VRM classification criteria does not authorize classification based on general land ownership. BLM policy limits Class II VRM objective to areas that are both sensitive and are not allocated to a conflicting land use.

## **5. Special Management Areas**

### **a. Decision #7014: Special Management Areas**

Manage the Rock Creek/Tunp area of significant resource concern with the objective of preserving and enhancing the critical wildlife habitats and cultural values that occur within the area.

- Restrict all new ROW actions to existing disturbance zones.
- No net loss of habitat function allowed from any construction activity within the boundaries of the management area. Successful re-establishment or improvement of habitats could offset any new disturbance areas.
- Pursue opportunities to reclaim existing roads not necessary

- to attain management objectives.
- Restrict OHV use to existing roads and trails. No off-trail travel is allowed without prior approval from the authorized officer.
- Manage NHTs and sites settings and all surface disturbing activities to retain the existing character of the landscape in federal sections so developments do not dominate settings to detract from the feeling or sense of the historic period of use...

**b. Lincoln County Proposed Amendment for Alternative 4A:**

Designate a utility corridor one (1) mile in width, generally centered on the existing transmission line (Bridger West #2).

Lincoln County questions the merit of prohibiting or restricting disruptive activities. CLG provided the BLM with two reports, one on elk and oil and gas development and a second analyzing the literature said by the KFO planning staff to support the restrictions on disruptive activities. The comments included an exhaustive literature survey done by Renee Taylor to determine whether scientific literature supports the premise that wildlife are stressed by human presence. In addition, Taylor took the Sawyer survey data (Sawyer Nielson, Seasonal distribution and habitat use patterns of elk in the Jack Morrow Hills Planning Area, Wyoming (2005)) and overlaid it with oil and gas development in the Jack Morrow Hills area. Significantly, the data show the elk have become habituated to gas development and calve and winter there. This work supports the local governments' criticism of applying the disruptive activities restriction throughout the planning area. It further shows that current data do not support the disruptive activities restriction.

Even common sense suggests that wildlife habituate to "disruption." If the assumptions upon which the restrictions on disruptive activities are based were true, then the ban on disruptive activities must also be applied to hunting, which is a very disruptive human activity. The fact that game have adapted to rural subdivisions and hunting, as well as oil and gas development, suggest that the concerns about disruptive activities lack quality data to support them.

### **III. PROJECT DESIGN DEIS 2-17**

CLG supports using two single-circuit structures in place of the double-circuit structures that are proposed along Segment 4. Segment 4 parallels three existing transmission lines that use the single-circuit structures and the divergence to much larger double-circuit towers would appear obtrusive. As opposed to the heavier double-circuit tower, the lower structure weight and configuration of the single-circuit structure would allow helicopter-aided construction techniques, providing the Proponents with the option of taking less time to construct. Separating the two 500-kV circuits onto two separate structures would allow energized maintenance procedures to proceed more easily than when both circuits are on the same structure. During a structure failure event, if a double-circuit tower fails, both circuits would be out of service. With two single-circuit lines, it is less likely that both circuits would be affected to the same degree during the same event. Thus, the two single-circuit structure alternative would have a higher operational availability during a tower failure event.

Any route deviation from the existing transmission corridor (proposed route, Alternatives 4B, 4C, 4D, 4E and 4F) that would introduce new structural elements to this view must require non-reflective towers made of wood or dulled ionized steel, with non-specular wire.

Guyed structures must only be used for “tangent” or in-line structures, not for angles or corners. Guyed structures must only be used in rangeland, grassland, and shrub steppe. They must not be used in areas farmed with heavy equipment or using aircraft, in residential areas, or near airports. In those land use types, self-supporting lattice towers must be used.

### **IV. SOCIOECONOMIC MITIGATION MEASURES**

CLG encourages the location of associated worker housing within existing communities where services can be provided. The proponents, contractors and subcontractors must contract with local motels and hotels (within 30 miles) for temporary accommodation during construction of the Project site and with local RV parks for rental spaces to accommodate workers who have access to RVs. The Proponents must provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the Project site safely and to lessen the impacts to existing roads.

All materials used in the construction of the Gateway West Transmission Line through Lincoln County will use Lincoln County as the point of sale. This includes the proponents, contractors and subcontractors who deliver construction materials “Free on Board” (FOB) to the County in which the materials will be utilized. This will help ensure that the sales tax will be properly allocated and paid to the County where construction and related impacts will occur.



"Jonathan Teichert"  
<jteichert@lcwy.org>  
10/28/2011 12:00 PM

To Gateway\_West\_WYMail@blm.gov  
cc  
bcc  
Subject Gateway West Transmission Line Project

Dear Walt,

Please accept the attached comments on behalf of Lincoln County and the Board of Lincoln County Commissioners. Regards,

Jonathan

Jonathan Teichert  
Senior Planner  
520 Topaz, Suite 109  
Kemmerer, WY 83101  
307-877-2100  
[jteichert@lcwy.org](mailto:jteichert@lcwy.org)

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## I. GENERAL DESCRIPTION AND ISSUES

Lincoln County submits the following comments on the draft environmental impact statement (DEIS). Sweetwater County has submitted separate comments and Lincoln County supports those comments as well.

The following comments focus primarily on the Bureau of Land Management (BLM) alternatives prepared for Segment 4 running through Sweetwater and Lincoln Counties. As expressed by SWC, the local governments support the transmission line but strongly recommend that it follow the existing transmission line corridors, as it does for most of the route through western Wyoming with the exception of Lincoln County.

## II. Alternatives Affecting Lincoln County

As a cooperating agency, Lincoln County has repeatedly recommended that the new Gateway West Transmission Line follow, as closely as possible, the existing transmission corridor through the County and that this route be adopted as the preferred alternative. The public has overwhelmingly supported this as the preferred route. The State BLM office has received written comments by hundreds, if not thousands, of area residents who oppose alternative routes that divert from the main transmission corridor.

The DEIS presents several variations for segment 4 that were proposed by the Kemmerer Field Office (KFO) to limit adverse impacts on historic trails, viewshed, and a special management area. The DEIS does not identify a preferred alternative but analyzes five additional routes for segment 4, all of which were proposed by BLM. These alternatives (4B-4F) sacrifice sage grouse habitat to protect historic trail values and view shed. In many cases, the trail segments that are to be protected lack physical integrity, a fact that the DEIS fails to address. Moreover, given recent litigation setting aside the Pinedale RMP due to its failure to adequately protect sage grouse habitat. *Western Watersheds Project v. Kempthorne*, 08-0516 (D. Idaho Sept. 28, 2011) (holding that the Pinedale RMP failed to adequately protect sage grouse habitat and was therefore unlawful). It would appear that the BLM generated alternatives for segment 4 are also in violation of the court's ruling. Accordingly, Lincoln County recommends that BLM select the final route in Segment 4 as Alternative 4A.

### A. Alternative 4A

The State of Wyoming proposed this alternative, which has the advantage of primarily following the existing transmission line corridor. It avoids sage grouse core areas and involves less new surface disturbance than in previously undisturbed areas. DEIS at 2-70-2-71.

Alternative 4A also conforms to Wyoming EO 2011-5 which establishes a 2-mile-wide corridor through the Sage and Seedskafee Core Areas centered on the three existing transmission lines. For most resources, constructing this segment adjacent to the existing transmission lines would significantly reduce the environmental impacts, especially to the sage-grouse core area habitat.

Lincoln County supports Alternative 4A as the preferred alternative. This alternative follows three existing 345-kV transmission lines between the Jim Bridger Power Plant and the Idaho border and is the shortest and most direct route to destination. Although the longer, proposed route would mean additional property tax revenues for the County, the added expense of construction will likely be passed on to the ratepayers. Alternative 4A requires the least amount of Greenfield ROW and also affects the least amount of sage-grouse core area, as compared to all other routes in Lincoln County analyzed.

#### B. Kemmerer Field Office Alternatives

The BLM proposed alternatives for the route cross miles of oil and gas fields, crucial big game winter range, sage-grouse core areas, proposed ACEC's, raptor nests, historic trails and other constraints. Regardless of the route selected, BLM must revise the Kemmerer RMP or grant an exception to meet conformance criteria.

Most of the area traversed by the BLM alternative routes is undeveloped (compared to the area crossed by the existing transmission lines) and impacts to most natural resources are expected to be significantly higher compared to building the transmission line adjacent to the existing transmission lines and within the current corridor. The BLM Alternatives are also inconsistent with Wyoming EO 2011-5 because it would cross through the Fontenelle Core Area 15 miles north of the existing transmission line corridor. A transmission corridor has not been designated for this core area. Similarly, alternatives south of Diamondville and Kemmerer would cross the Seedskafee and Sage Core Areas outside the corridors designated by the EO. The impacts to nearly all

natural resources along the southern alternatives would be higher compared to constructing Alternative 4A along the existing transmission line corridor.

1. Alternative 4B DEIS 2-71

This Alternative deviates from the proposed route and would involve greater surface disturbance of previously undisturbed areas as well as greater impacts on sage-grouse habitat. It will not conform to Kemmerer RMP sage-grouse management criteria or to the Wyoming EO-2011-155. It also crosses an active trona mine, Cokeville Meadows NWR, and part of the SRMA.

2. Alternative 4C DEIS 2-71

This alternative is similar to Alternative 4B except that it skirts the boundary of the Cokeville Meadows NWR and crosses the SRMA.

3. Alternative 4D DEIS 2-72

This alternative revises the route to avoid affecting the viewshed from the Fossil Butte National Monument.

4. Alternative 4E DEIS 2-72

This Alternative is also requested by the Fossil Butte National Monument. This alternative like the others has the similar impacts on sage grouse habitat and core areas.

5. Alternative 4F DEIS 2-73

This alternative was originally proposed by the power company. It was abandoned based on strong public objections.

C. Protection of Historic Trails

The trail segments for the Sublette Cutoff and Slate Creek Cutoff that might be affected by Alternatives 4 and 4A are not congressionally designated historic trails. They were the subject of feasibility studies but BLM never secured the required consent and

cooperation from the affected landowners. The protective measures adopted in the Kemmerer RMP are based on BLM's authority under the National Historic Preservation Act (NHPA). The DEIS incorrectly assumes that these trail segments could be listed on the National Historic Register without performing the integrity analysis required by the National Park Service (NPS). *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 51 (1995), p. 44 (NRB #51). The site or trail segment must have integrity. NRB #51 specifies six factors to consider in making the integrity determination: location, design materials, workmanship, feeling, setting and association. Because these trail segments were not constructed or designed, the factors for integrity, such as design, materials, and workmanship do not apply. Thus, the issue of integrity is limited to location, feeling, setting, and association.

Setting is defined by both the site and its surroundings, NRB #51 at 45. The physical features, which constitute the setting include topography, vegetation, manmade structures and the relationship to space and structures.

Feeling is the property's expression of aesthetics or history from a particular period of time. "For example, a rural historic district retaining original design, materials, workmanship, and setting." *Id.*

#### 1. *Assessing Integrity*

The physical features must "define both why a property is significant and when it was significant." *Id.* p. 46. Moreover, it must retain its essential physical character. *Id.* When roads or trails are mostly invisible or difficult to follow they cannot be said to retain the essential physical features necessary to meet the criteria for integrity.

Visibility is a necessary part of the essential physical features.

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.

*Id.* at 46.

Lincoln County objects to the DEIS classification of the trail segments as Class 1 or 2. Virtually all of the affected trail segments have lost their physical integrity. The KFO RMP did not apply this level of analysis and thus the DEIS needs to correct the premise that NHPA can be invoked regardless of the lack of physical integrity.

Lincoln County employees have personally walked these segments and report that the trails are not visible. Under the NPS guidelines for integrity, these trail segments should not be the basis for additional mitigation measures or any recognized protection. Certainly, BLM cannot justify sacrificing sage-grouse habitat in favor of protecting historic trail segments which lost their physical integrity a long time ago.

The DEIS Alternatives 4B-4E avoid the trail segments even though they are no longer physically visible. This is in error because NPS Guidelines require that the site maintain its physical integrity. When it is lost through development or the mere passage of time, NHPA criteria no longer mandate or permit imposition of restrictions to protect what is no longer physically there.

The NRB #51 further states that 'because feeling and association depend on individual perception, their retention alone is never sufficient to support the eligibility of a property for the National Register.' *Id.* at 45. Therefore, even if a hiker could imagine the trail route as he hiked, the loss of the physical site integrity precludes protection solely for feeling and association.

#### **D. Proposed Amendments to Kemmerer RMP**

In cases where the Proposed and Alternative Routes are not in compliance with the management objectives provided in the RMPs, the BLM can revise the land use plan or the project. Lincoln County, however, questions the nonconformance decisions reflected in Alternatives 4B through 4E. As explained below, KFO efforts to avoid historic trail segments are based on the incorrect assumption that National Historic Preservation Act protects trail segments that have lost their physical integrity.

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This contradiction should also be addressed in the checkerboard lands and other areas where much or most of the land is owned by the State or private individuals. For example, the southern and central VRM Class II areas cover areas which are more than half private land. Putting most of the land north of Highway 30 (lumping) also fails to meet the VRM classification criteria. This does not conform to BLM policy, since it applies a Class II VRM objective to areas without regard to the RMP that have no BLM resource allocation, let alone one consistent with preservation of view scape.

5. Special Management Areas

a. **Decision #7014: Special Management Areas**

Manage the Rock Creek/Tunp area of significant resource concern with the objective of preserving and enhancing the critical wildlife habitats and cultural values that occur within the area.

- Restrict all new ROW actions to existing disturbance zones.
- No net loss of habitat function allowed from any construction activity within the boundaries of the management area. Successful re-establishment or improvement of habitats could offset any new disturbance areas.
- Pursue opportunities to reclaim existing roads not necessary to attain management objectives.
- Restrict OHV use to existing roads and trails. No off-trail travel is allowed without prior approval from the authorized officer.
- Manage NHTs and sites settings and all surface disturbing activities to retain the existing character of the landscape in federal sections so developments do not dominate settings to detract from the feeling or sense of the historic period of use...

b. **Lincoln County Proposed Amendment for Alternative 4A:**

Designate a utility corridor one (1) mile in width, generally centered on the existing transmission line (Bridger West #2).

Lincoln County questions the merit of prohibiting or restricting disruptive activities. Lincoln County, through the Coalition of Local Governments, provided the BLM with two reports, one on elk and oil and gas development and a second analyzing the literature said by the KFO planning staff to support the restrictions on disruptive activities. The comments included an exhaustive literature survey done by Renee Taylor to determine whether scientific literature supports the premise that wildlife are stressed by human presence. In addition, Taylor took the Sawyer survey data (Sawyer Nielson, Seasonal distribution and habitat use patterns of elk in the Jack Morrow Hills Planning Area, Wyoming (2005)) and overlaid it with oil and gas development in the Jack Morrow Hills area. Significantly, the data show the elk have become habituated to gas development and calve and winter there. This work supports the local governments' criticism of applying the disruptive activities restriction throughout the planning area. It further shows that current data do not support the disruptive activities restriction.

Even common sense suggests that wildlife habituate to "disruption." If the assumptions upon which the restrictions on disruptive activities are based were true, then the ban on disruptive activities must also be applied to hunting, which is a very disruptive human activity. The fact that game have adapted to rural subdivisions and hunting, as well as oil and gas development, suggest that the concerns about disruptive activities lack quality data to support them.

### **III. PROJECT DESIGN DEIS 2-17**

Lincoln County supports using two single-circuit structures in place of the double-circuit structures that are proposed along Segment 4. Segment 4 parallels three existing transmission lines that use the single-circuit structures and the divergence to much larger double-circuit towers would appear obtrusive. As opposed to the heavier double-circuit tower, the lower structure weight and configuration of the single-circuit structure would allow helicopter-aided construction techniques, providing the Proponents with the option of taking less time to construct. Separating the two 500-kV circuits onto two separate structures would allow energized maintenance procedures to proceed more easily than when both circuits are on the same structure. During a structure failure event, if a double-circuit tower fails, both circuits would be out of service. With two single-circuit lines, it is less likely that both circuits would be affected to the same degree during the same event. Thus, the two single-circuit structure alternative would have a higher operational availability during a tower failure event.

Any route deviation from the existing transmission corridor (proposed route, Alternatives 4B, 4C, 4D, 4E and 4F) that would introduce new structural elements to this view must require non-reflective towers made of wood or dulled ionized steel, with non-specular wire.

Guyed structures must only be used for “tangent” or in-line structures, not for angles or corners. Guyed structures must only be used in rangeland, grassland, and shrub steppe. They must not be used in areas farmed with heavy equipment or using aircraft, in residential areas, or near airports. In those land use types, self-supporting lattice towers must be used.

#### **IV. SOCIOECONOMIC MITIGATION MEASURES**

Lincoln County encourages the location of associated worker housing within existing communities where services can be provided. The proponents, contractors and subcontractors must contract with local motels and hotels (within 30 miles) for temporary accommodation during construction of the Project site and with local RV parks for rental spaces to accommodate workers who have access to RVs. The Proponents must provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the Project site safely and to lessen the impacts to existing roads.

All materials used in the construction of the Gateway West Transmission Line through Lincoln County will use Lincoln County as the point of sale. This includes the proponents, contractors and subcontractors who deliver construction materials “Free on Board” (FOB) to the County in which the materials will be utilized. This will help ensure that the sales tax will be properly allocated and paid to the County where construction and related impacts will occur.

*City of Kemmerer, Wyoming*  
220 Wyoming Highway 233  
Kemmerer, WY 83101-9700



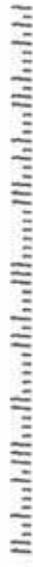
*Fossil Fish Capital  
of the World*

Bureau of Land Management  
Gateway West Project  
P O Box 20879  
Cheyenne, WY 82003



100316

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City of Kemmerer, Wyoming

October 27, 2011

100316  
RECEIVED  
2011 NOV -1 AM 10:00  
CHEYENNE, WYOMING  
DOI-BLM

Bureau of Land Management  
Gateway West Project  
P O Box 20879  
Cheyenne, WY 82003

Dear Sirs:

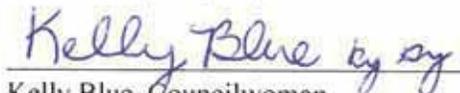
This letter is to ask that the Gateway West Transmission Line Project be constructed through the existing Corridor in section 4, north of the City of Kemmerer. The Existing corridor was established to run power lines through one area, not multiple. Keeping the power lines to one area reduces impact that the power lines have. The Gateway West power lines will affect wildlife no matter where you place them. Unfortunately, when you place power lines in a habitat that has never been exposed to them before, you affect the wildlife, especially sage gross, even more.

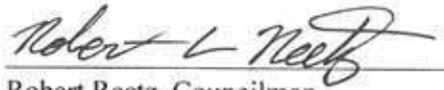
You should also consider the private residence whose view sheds you will be damaging. Again no matter where you place these power lines you will be hurting someone's view, but when you go through new areas you are damaging the view of people that have not previously been affected by power lines. This could bring the value of their land down. In short when you go through an existing corridor you are damaging an area that is already damaged. When you break new ground you do just that, damage land that was previously untouched.

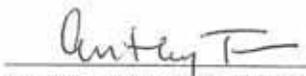
Thank you for listening to our suggestions.

Sincerely,

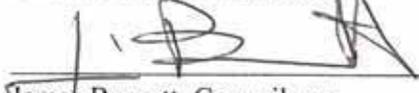
  
Zem D. Hopkins, Mayor

  
Kelly Blue, Councilwoman

  
Robert Reetz, Councilman

  
Anthony Tomassi, Councilman

  
Brian A. Burg, Councilman

  
James Burnett, Councilman

  
Eric Rudy, Councilman

1/1



"Natasia Diers"  
<ndiers@kemmerer.org>  
10/28/2011 10:48 AM

To <Gateway\_West\_wymail@blm.gov>  
cc "Glenda Young" <gryoung@Kemmerer.org>  
bcc  
Subject Gateway West Project

Please see attached letter.

Thank you,

*Natasia Diers*

220 / 233  
83101  
: 307-828-2350 . 122



Gateway West Project Letter.pdf

Duplicate



# City of Kemmerer, Wyoming

October 27, 2011

Bureau of Land Management  
Gateway West Project  
P O Box 20879  
Cheyenne, WY 82003

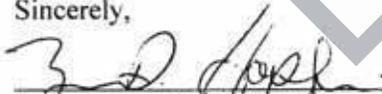
Dear Sirs:

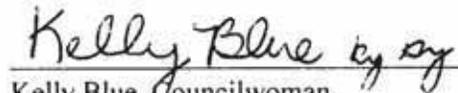
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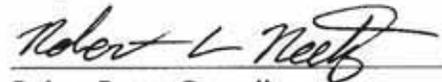
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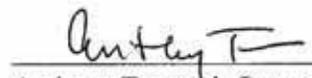
Thank you for listening to our suggestions.

Sincerely,

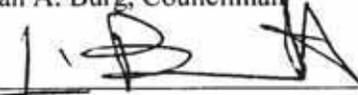
  
Zem D. Hopkins, Mayor

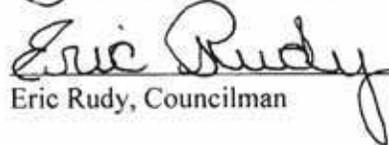
  
Kelly Blue, Councilwoman

  
Robert Reetz, Councilman

  
Anthony Tomassi, Councilman

  
Brian A. Burg, Councilman

  
James Burnett, Councilman

  
Eric Rudy, Councilman



**Robert Reetz**  
<reetz.robert@gmail.com>

10/25/2011 12:06 PM

To Gateway\_west\_wymail@blm.gov

cc

bcc

Subject Gateway west

This letter is to ask that the Gateway West Transmission Line Project be constructed through the existing Corridor in section 4, north of the City of Kemmerer. The Existing corridor was established to run power lines through one area, not multiple. Keeping the power lines to one area reduces impact that the power lines have. The Gateway West power lines will affect wildlife no matter where you place them. Unfortunately, when you place power lines in a habitat that has never been exposed to them before, you affect the wildlife, especially sage gross, even more.

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Thank you for listening to my suggestions.

--

**Bobby Reetz**  
City of Kemmerer  
Councilmen 1st ward  
307-690-5705 Cell  
1100 Pine Ave.  
Suite 3B  
Kemmerer, WY 83101

Bureau of Land Management  
Gateway West Project  
PO Box 20879  
Cheyenne, WY 82003



BOISE ID 8337  
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Bureau of Land Management  
Gateway West Project  
PO Box 20879  
Cheyenne, WY 82003

*6/20/11*

82003+7018



# Draft EIS Comment Form

100292

Gateway West Transmission Line Project

Draft EIS comment period: July 29, 2011 - October 28, 2011

Date: 9-19-2011

2011 SEP 26 AM 10:00

First Name: JUNE

Last Name: MILLER

RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

Organization or Office Name: Planning & Zoning Commission, City of Melba

Mailing Address: 7267 Baseline Rd City: MELBA State: ID Zip: 83641

Daytime Phone: (208) 495-2876 Email: \_\_\_\_\_

Please check here if you wish for your personal information to remain confidential\*

\*If you wish for your contact information to remain confidential, BLM will protect the personal information that you submit to the extent allowed by law. However, the information may be subject to the Freedom of Information Act (U.S.C. etc.). See privacy note on reverse.

Please submit your comments by October 28, 2011. Information submitted on this form is being voluntarily provided solely for the purpose of commenting on the Gateway West Transmission Line Project.

Comment:

*I favor all transmission lines in the Gateway West Project to follow the current <sup>but</sup> transmission lines and go through the Buds of Prey areas and BLM land.*

*On ~~no~~ segment 8, I strongly oppose alternative 8B. This is on or next to the designated Impact area for the City of Melba, Idaho. It would greatly affect future building of town city and all its plans.*



To mail this comment form please send to:

Bureau of Land Management | Gateway West Project | P.O. Box 20879 | Cheyenne, WY 82003

Comments may also be submitted via email to: Gateway\_West\_WYMail@blm.gov or online at www.wy.blm.gov/nepa/cfodocs/gateway\_west

continued on back



Steve Golnar  
<sgolnar@rawlins-wyoming.com>  
10/28/2011 04:23 PM

To "Gateway\_West\_WYMAIL@blm.gov"  
<Gateway\_West\_WYMAIL@blm.gov>  
cc Amy Bach <amybach@rawlins-wyoming.com>, Dan Massey  
<danmassey@rawlins-wyoming.com>,  
"sidneyfox@carbonwy.com" <sidneyfox@carbonwy.com>,  
bcc  
Subject

Enclosed is the City of Rawlins comment on the Draft Gateway West Transmission Line EIS.

A signed original will follow in the mail. The original will include a copy of the map describing the City of Rawlins Fire Response Area.

We will also place a full copy on the City's website at



**Steven B. Golnar**  
City Manager  
City of Rawlins  
521 West cedar Street  
P.O. Box 953  
Rawlins, WY 82301

Office: 307-328-4581  
Cell: 307-710-5399  
Email: citymanager@rawlins-wyoming.com



Gateway West Draft EIS Comment 10-28-11-draft 11-28-11 Final.pdf Carbon County Projects\_08\_2011.docx



City of Rawlins Fire Response Area 11-15-10 cln.docx 1-25-2011 FTE summary 1-25-11(1) (3) (2).docx



10-1-10 Extraterritorial Plan res and ord.pdf Rooms Available for Lodging Tax - Rawlins % of Carbon County uninc 10-11 (2).xlsx

**RESOLUTION NO.****A RESOLUTION AUTHORIZING THE DEVELOPMENT OF AN  
EXTRATERRITORIAL UTILITY EXPANSION PLAN.**

**WHEREAS**, the City of Rawlins has the capacity to provide utility service outside the City limits; and

**WHEREAS**, providing utilities outside the City limits could impact the future development of the City; and

**WHEREAS**, the City of Rawlins and the County of Carbon have areas of concurrent jurisdiction outside the City limits of Rawlins; and

**WHEREAS**, Carbon County Land Use Plan (August 3, 2010) calls for the use of planning to encourage higher density development near municipalities; and

**WHEREAS**, the City of Rawlins can influence development in the one mile area surrounding the city through an Extraterritorial Utility Expansion Plan; and

**WHEREAS**, an Extraterritorial Utility Expansion Plan should be part of the City Master Plan.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF RAWLINS, CARBON COUNTY, WYOMING** that staff is directed to prepare an Extraterritorial Utility Development Plan to be submitted for comment to the Urban Systems Committee Development Council, the City Planning Commission and the County Planning Office, then certified to the City Council for approval.

**PASSED, APPROVED AND ADOPTED** this \_\_\_\_ day of \_\_\_\_\_, 2010.

CITY OF RAWLINS, a Wyoming  
municipal corporation

\_\_\_\_\_  
Kenneth C. Klouda, Mayor

ATTEST:

\_\_\_\_\_  
Marla K. Brown, City Clerk



**ORDINANCE NO.****AN ORDINANCE AMENDING SECTION 13.04.170**

**WHEREAS**, the City of Rawlins has the capacity to provide utility service outside the City limits; and

**WHEREAS**, providing utilities outside the City limits could impact the future development of the City; and

**WHEREAS**, the City of Rawlins and the County of Carbon have areas of concurrent jurisdiction outside the City limits of Rawlins; and

**WHEREAS**, Carbon County Land Use Plan (August 3, 2010) calls for the use of planning to encourage higher density development near municipalities; and

**WHEREAS**, Section 13.04.170 currently reads:

**Service Outside City.**

The City Manager shall have the sole and exclusive to contract to the City owned or operated utility service outside the City corporate limits, under such terms and conditions are in the best interest of the City. The rates for said utility service shall not be less than one and one-third (1 1/3) times the rate for like services within the City limits without prior Council approval.

**WHEREAS**, Section 13.04.170 should be amended to read as follows:

**Service Outside City.**

Utility service outside the City corporate limits shall be in compliance with and under such terms and conditions outlined in the City of Rawlins Extraterritorial Utility Services Expansion Plan as approved by the City Council. The rates for such utility services shall not be less than one and one-third (1 1/3) times the rate for like services within the City limits or as otherwise set from time to time by the City Council pursuant to City Ordinance 1.01.110.

**NOW, THEREFORE BE IT ORDAINED**, that Section 13.04.170 is amended.

**PASSED, APPROVED AND ADOPTED** this \_\_\_\_\_ day of \_\_\_\_\_, 2010.

CITY OF RAWLINS, a Wyoming  
municipal corporation

\_\_\_\_\_  
Kenneth C. Klouda, Mayor

ATTEST:

\_\_\_\_\_  
Marla K. Brown, City Clerk

1<sup>st</sup> Reading: \_\_\_\_\_

2<sup>nd</sup> Reading: \_\_\_\_\_

3<sup>rd</sup> Reading: \_\_\_\_\_

Publication: \_\_\_\_\_

## City of Rawlins General Fund Position Reduction Status: (1/25/2011 update)

[Regular numbers equal reductions, "+" equal additions]

Position Title	<u>FY2009-10 Mid Year</u>	<u>FY2010-11 Proposed</u>	<u>Mid Yr. 10-11</u>
<b>City Hall</b>			
AutoCad/GIS Operator (attr.)	1		
Comm. Dev. Dir. (created/ not filled)	1		+1
City Planner	1		
Planning Technician	1		
Secretary – DDA/Main Street	1		
CATS Bus Driver	.25		
Planning/Legal Secretary/Court Clerk		1	+1
Court Clerk (P.T.- new)		+1	
Building Inspector – Commercial (attr.)			1
Grants Manager (attr.)			1
Assistant City Attorney (attr.)			.65
Legal secretary (reorg.)			.5
<b>Public Works Department</b>			
Municipal Service Worker I (attr.)	1		
Facilities Maintenance Technician	1		
Municipal Worker I	2		
<b>Police Department</b>			
Communications Operator I (attr.)	1		
SRO Officer (not created/not budgeted)			
Victim Advocate	1		
Police Officer		2	
Police Officer	(COPS grant)		
<b>Recreation Department</b>			
Recreation Assistant (attr.)	1		
Recreation Assistant	1		
Range Attendant	1		
Golf Course Assist. Superintendent	1		
Drop Off Day Care Provider	.25		
Recreation Rover (new)	+1		
<b>Fire Department</b>			
Fire Apparatus Operator 1	2		+2(SAFER grant)*
Total Reductions in Force	16.5	2.5	
FY2009-10 beginning GF FTE* = 114.65	98.15 FTE	95.65 FTE	95.00 FTE

\*Grant funded positions not included in General Fund funded positions.

## Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
<b>Pending Coal Technology Projects</b>						
1	Medicine Bow Fuel & Power LLC/DKRW Advanced Fuels LLC	Coalmine, CTL processing facility, associated coal-handling facilities.  Est. Cost: \$2 Billion  Workforce: (mine & plant) Const: 2,307 Peak Ops: 450	13 miles southwest of Medicine Bow	In-service 2014 (DKRW Website)	DKRW has received a Wyoming Industrial Siting Permit and submitted an application for a Federal loan guarantee to the US Department of Energy. DOE is preparing an Environmental Impact Statement to assess potential environmental impacts	MBF&P CTL Project, Industrial Siting Permit Application <sup>i</sup> , 09/2007, Federal Register Volume 74, NO 217, 11/12/2009, DKRW website <sup>ii</sup>
<b>Pending Wind Energy Projects</b>						
2	Chokecherry and Sierra Madre Wind Energy Project	2,000 to 3,000 megawatt wind farm w/ approximately 1,000 wind turbines Est. cost: \$4.2 - \$6.2 billion Workforce: Construction would occur over 4 years during months of April – October. Construction peaks Year 1: 1,189 Year 2: 1,096 Year 3: 935 Year 4: 744	South of Rawlins & Sinclair	Construction start 2012 – 2013; In-service 2015 (PCW website)	Draft Environmental Impact Statement Issued July 2011, <a href="#">comments received for 90 days from this date</a> , also requires Wyoming Industrial Siting Permit	Chokecherry and Sierra Madre Wind Energy Project Draft Environmental Impact Statement (Volume II), PCW website <sup>iii</sup>

## ***Carbon County Industrial and Natural Resource Development Projects:***

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources	
<b>Pending and Approved Natural Gas Projects</b>							
3	Continental Divide-Creston Natural Gas Development Project	BP America, Devon and others	8,950 natural gas wells drilled over 15 years, 20 – 30 years of production	1.1 million acres in Carbon and Sweetwater counties; centered around Wamsutter	Environmental Impact Statement in progress	An average of about 290 wells/year have been drilled in the CDC project area over the last five years.	BLM Scoping Notice, <sup>iv</sup> Wyoming Oil and Gas Conservation Commission Data,
4	Atlantic Rim Natural Gas Field Development Project	Anadarko Petroleum Corporation and others	Up to 2,000 coal bed natural gas wells and ancillary facilities. Annual average of 578 job equivalents (AJE) <sup>v</sup> during drilling and an annual average of 161 production-related AJE.	Southwest of Rawlins and north of Baggs and Dixon	In development since 2007; Operations through 2037	The EIS assumed that 200 wells a year would be drilled during the first five years of the project and a lesser number of wells would be drilled during subsequent years. No new wells have been drilled in the Atlantic Rim project area over the last two years.	Source: Atlantic Rim Gas Development Project DEIS <sup>vi</sup>
5	Desolation Flats Natural Gas Development Project	Marathon Oil and others	Up to 385 natural gas wells and ancillary facilities Average 19 wells year/20 years Employment Drilling/field development: estimated average annual AJE of 246 Production: AJE of 156.	Southwest of Rawlins/northwest of Baggs; located in both Carbon and Sweetwater counties	In development since 2004; Drilling through 2024		Desolation Flats Natural Gas Field Development EIS <sup>vii</sup>

## Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
6	Seminole Road Gas Development Project Dudley and Associates LLC	Up to 1,240 natural gas wells over 10 years. Employment Drilling: annual average of 60 employees. Production: 20 to 50 employees.	20 miles NE of Rawlins	In development		Seminole Road Gas Development Project EIS <sup>viii</sup>
7	South Baggs Area Natural Gas Development Project Merit Energy Company		South-central Carbon County, near the Wyoming/Colorado border	In development since 2000		
<b>Pending Uranium Mining and Processing Projects</b>						
8	Lost Creek Uranium In Situ Recovery Project UR Energy (Lost Creek ISR LLC)	Would include well fields for injection, production and monitoring, wellhead houses, a central processing facility, an access road network and pipeline system	40 miles northwest of Rawlins, 15 miles southwest of Bairoil in Sweetwater County	2011-2024	Environmental Impact Statement in progress- <a href="#">Current Status? Has a draft EIS been Issued, or are we waiting for a Record of Decision?</a>	Federal Register / Volume 76, No 29, 02/11/2011, BLM website <sup>ix</sup>

## Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
<b>Pending and Proposed Transmission Projects</b>						
9	Gateway West Transmission Line Project	230 and 500 kilovolt (kV) transmission lines Carbon County construction over 2 years Average workforce = 142 (average non-local construction workforce =71) Peak construction workforce – 354 (Peak non-local construction workforce – 167)	From the Windstar Substation near Glenrock, Wyoming to the Hemingway Substation near Melba, Idaho – Enters in NW Carbon County near Medicine Bow and exits west of Creston Junction	Construction between 2014 and 2018 (Gateway West website)	<a href="#">Draft EIS released comments received until 10/28/11, also requires Wyoming Industrial Siting Permit</a>	Gateway West Transmission Line Draft EIS <sup>x</sup> , Gateway West website <sup>xi</sup>
10	Gateway South Transmission Line Project	500 kV alternating current overhead transmission line	Several alternative corridors crossing Carbon County from northeast to southwest	Environmental Impact Statement in progress.	<a href="#">STATUS- Has a draft EIS been issued, when does comment period end?</a>	BLM Website <sup>xii</sup>
11	TransWest Express Transmission Line Project	600kV overhead direct current transmission line from south central Wyoming, crossing northwestern Colorado and Utah diagonally from northeast to southwest and ends south of Las Vegas	Several alternative corridors south of Rawlins and west of Baggs to the Colorado and Utah borders	Environmental Impact Statement in progress		BLM Website <sup>xiii</sup>

## ***Carbon County Industrial and Natural Resource Development Projects:***

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
12	Jade Energy	Direct-current transmission line with a maximum transfer capacity of 3,000 megawatts. Chugwater to Jerome Idaho. Would traverse Carbon County	Southern Wyoming to Twin Falls, ID			Jade Energy website <sup>xiv</sup>
13	TransCanada	Designed as a 3,000 MW line from Wyoming southwest.	Southern Wyoming to Las Vegas		Preliminary application filed with the BLM. FERC approval of negotiated rate authority and anchor shipper presubscription of 1500 MW of capacity, February 2009	Wyoming Infrastructure Authority website <sup>xv</sup>
<b>Proposed Wind Energy Projects</b>						
14	Eurus Middlewood Wind LLC	270 wind turbines, totaling 531 MW	South-central Carbon County		Currently developing cost recovery agreement. Project located in sage grouse core area.	WY BLM NEPA Hotsheet <sup>xvi</sup>
15	Eurus Dry Creek LLC	150 wind turbines, totaling 351 MW	South-central Carbon County		Currently developing cost recovery agreement. Project partially located in sage grouse core area.	WY BLM NEPA Hotsheet
16	Big Wind Power Company	1 GW wind energy facility, consisting of approximately 419 wind turbine sites, built in economically viable stages	Shirley Basin		There is a draft Power Producers Agreement (PPA) for phase 1 of the project (total of 80 MW). Phase 1 would tie into an existing transmission line. NEPA process not yet started.	WY BLM NEPA Hotsheet
17	Horizon Wind Energy	300 MW Wind farm, 154 turbines	Eastern Carbon County		Currently on hold, in sage grouse core area	

## **Carbon County Industrial and Natural Resource Development Projects:**

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
18	Terra Moya Aqua Wind Project		Eastern Carbon County			

<sup>i</sup> [http://deq.state.wy.us/out/downloads/MBFP\\_ISA\\_Permit\\_Application\\_09-17-07\\_Final.pdf](http://deq.state.wy.us/out/downloads/MBFP_ISA_Permit_Application_09-17-07_Final.pdf)

<sup>ii</sup> <http://www.dkrwaf.com/Projects/Medicine-Bow/Fact-Sheet-112.html> (08/17/2011)

<sup>iii</sup> <http://www.powercompanyofwyoming.com/> (08/17/2011)

<sup>iv</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/cd\\_creston.Par.34343.File.dat/scoping.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/cd_creston.Par.34343.File.dat/scoping.pdf)

<sup>v</sup> A/E reflect an aggregation of all employees (existing and new) whose employment would be supported in whole or in part by Atlantic Rim project spending. The term A/E is used to emphasize that these are not all discrete or separate new jobs, rather they represent both new and existing jobs and portions of jobs that are wholly or partially supported by the incremental economic activity associated with the project.

<sup>vi</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/atlantic\\_rim.Par.61741.File.dat/00deis.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/atlantic_rim.Par.61741.File.dat/00deis.pdf)

<sup>vii</sup> <http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/desflats.html>

<sup>viii</sup> <http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/seminoeroad/deis.Par.3198.File.dat/SeminoeDEIS.pdf>

<sup>ix</sup> <http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/lostcreek.html>

<sup>x</sup> [http://www.wy.blm.gov/nepa/cfodocs/gateway\\_west/documents/deis/3.04\\_Socioeconomics.pdf](http://www.wy.blm.gov/nepa/cfodocs/gateway_west/documents/deis/3.04_Socioeconomics.pdf) Page 3.4-31

<sup>xi</sup> <http://www.gatewaywestproject.com/>

<sup>xii</sup> [http://www.blm.gov/wy/st/en/info/NEPA/documents/hdd/gateway\\_south.html](http://www.blm.gov/wy/st/en/info/NEPA/documents/hdd/gateway_south.html)

<sup>xiii</sup> <http://www.blm.gov/wy/st/en/info/NEPA/documents/hdd/transwest.html>

<sup>xiv</sup> <http://www.overlandtransmission.com/index.htm>

<sup>xv</sup> <http://wyia.org/projects/transmission-projects/zephyr-project-ztp/>

<sup>xvi</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA.Par.24843.File.dat/hot\\_sheet.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA.Par.24843.File.dat/hot_sheet.pdf)

## **City of Rawlins Fire Response Area**

(Resulting from the joint agreement of City of Rawlins and Carbon County  
on 5/11/2010 – **updated 11-15-10**)

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The following is our understanding of the response area discussed by the County Fire Marshal France, County Commissioner Weickum, Mayor Klouda, Chief Hannum, Police Chief Mike Reed and City Manager Golnar at our meeting of 5/11/2010 and subsequent discussions with the County Fire Chief. I have made the following changes

### **We will respond to all property within the Rawlins City limits and:**

- :anything on 287 North to and including the landfill road and landfill.
- :the house sitting in the middle of the field by the Rec Center, off of 287(the Seldomridge home), as well as the houses west of 3<sup>rd</sup> Street and the barn around Scarlet Drive)
- : the new elementary school and the Baptist Church.
- :Norm Harvey Airport – is a dual response area – both departments will be notified.
- : anything on I-80 between MM 211 and 215 including exit/on ramps.
- ~~:A truck stop and the Wyoming State Prison but nothing else south of the Interstate.~~
- : Dr Couch's office, the Methodist Church, and the Super 8 Motel
- : Rich Wilson's house between Spruce St and the Interstate, and Jim Piche's residence in the canyon
- : the industrial area and to the Rochelle Ranch Golf Course.
- : city property including but not limited to the City outdoor shooting ranges, the water treatment plant, the sewer plant and the 140 acres of city property north east of the City limits by the Painted Hills Water Tank.

### **We will not respond to:**

- :anything west of Dr. Couches office
- :anything west of the 287 – landfill road intersection or beyond the landfill road
- :The Dowlin's Ranch, Miller **Estate** Company, and Don Hansen property east of Inverness street.

Steve Golnar, Rawlins City Manager

October 28, 2011

Mr. Walt George, Project Manager  
Gateway West Transmission Line Project EIS  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, WY 82003  
Gateway\_West\_WYMail@blm.gov

**RE: City of Rawlins, Wyoming Comment on Gateway West Transmission Line  
Draft Environmental Impact Statement**

The City of Rawlins realizes that the Gateway West Transmission project offers opportunities for transmission of up to 3,000 megawatts (MW) of additional energy for the Proponents' large service areas principally into Utah and Idaho and to other interconnected systems. This should increase the opportunity for future development around and in the City of Rawlins but it also comes with challenges to our Community.

○ **Opportunities from the Gateway West Transmission Project include:**

1. We hope that this would increase local electrical energy reliability.
2. This would increase the opportunity for future electricity generation to be transported to distant markets.
3. There would be additional tax revenues generated by the construction of the project. Most of the benefit to the City of Rawlins would come from sales and use tax collections, as property tax would be collected for improvements made in the County which would benefit the State of Wyoming, Carbon County Schools, Statewide schools (SFD), and various special districts. Sales and Use tax collections are estimated to be about \$27.7 million for this project, of which local governments receive 30% or \$8,310,000. The City of Rawlins could anticipate 58% of the local share, or \$4,819,000 over the course of the project.
4. The possible ability to diversify the area's economy by creating additional business opportunities, enhanced commercial and industrial activity for our residents and future residents, to achieve greater sustainability.

- **Challenges Faced from the Gateway West Transmission Project include:**

- **Temporary Construction Employment:**

The Gateway West Transmission Line project workforce is divided into the regions for the workforce analysis, and Rawlins is located in EPC 1 Area (Windstar, Aeolus, Creston) which includes Parts of Converse, Natrona, Albany, Carbon and a part of Sweetwater County. The longest segment (163 miles) of the proposed 1,103 mile Gateway West Transmission Line goes through Carbon County. The Gateway West Project Construction times in segment EPC 1 are expected to last about 124 weeks, or 27 months. The Substation construction in Creston is expected to range from 2 to 9 months.

Table 3.4-22 Projected construction workforce by EPC\* Analysis Area 1  
Workers EPC Area1

<u>Average Weekly Forecast</u>	
Commute to Job Site Daily (1)	28
Move to the Affected Region alone (2)	102
Move to the Affected Region with family (2)	11
Total (3) (4)	142
<u>Peak Employment Forecast</u>	
Commute to Job Site Daily (1)	71
Move to the Affected Region alone (2)	255
Move to the Affected Region with family (2)	28
Total (3)	354

Notes:

\* The Gateway West Transmission Line project workforce is divided into the regions for the workforce analysis, and Rawlins is located in EPC 1 Area (Windstar, Aeolus, Creston) which includes Parts of Converse, Natrona, Albany, Carbon and a part of Sweetwater County.

- (1) Twenty percent of the average and peak workforce is expected to commute to and from the job site each day.
- (2) Eighty percent of the average and peak workforce is expected to temporarily relocate to the Project area. 10 percent of workers temporarily relocating are assumed to be accompanied by their families for the purposes of analysis.
- (3) Total average and peak employment estimates are based on the projected employment patterns illustrated in Figures 3.4-1 through 3.4-4.
- (4) Average employment is estimated for each region based on the projected length of construction in that EPC region, not the overall Project construction period.

- **Cummulative Impacts on Temporary Housing Availability** (see Housing below)
- **Cummulative Service Demands from an increased temporary workforce** population, compounded with other projects that are under planning, or in stages of permitting which may be under construction at the same time including: Chokeycherry Sierra Madre Wind Generation Project, UR Energy in-

situ uranium extraction, Transwest Express Transmission Line, DKRW, Sinclair Refinery, Atlantic Rim and an additional 8,000 gas wells soon to be possibly permitted on Continental Divide Creston Ridge. (See Rawlins Attachment #1 describing potential additional area projects.)

### **City of Rawlins Population Correction**

According to the 2010 Census the population of the City of Rawlins is now 9,259. Please correct Table 3.4-6. Population for Communities Located within 1 Mile of the Proposed Route or Route Alternatives. And other parts of the report that may include old information.

### **The City of Rawlins identifies the following challenges after a review of the Gateway West Draft EIS at this time include:**

- **Municipal Service Needs**
  - ***Legal Services , Felonies, Jail Services, Code Enforcement***
  - **Emergency Services**
    - ***Law Enforcement***
      - **E-911 Service Area**
      - **Coordination with Transportation Mitigation**
    - ***Fire and Emergency Medical Services***
  - **Finance/ IT**
    - **Taxes & Expenditures**
    - **5 Year Financial Plan**
  - **Recreation Services**
    - **Facilities**
    - **Programs**
  - **Public Works**
    - **Water**
    - **Wastewater**
    - **Solid Waste**
  - **Community Development**
    - **Planning**
    - **Code Enforcement / Future Annexation**
    - **Economic Development**
    - **Tourism**
    - **Housing**
  - **DDA/Main Street**
    - **Infill Downtown Development**
    - **Rainbow Te-ton Entrepreneurial Center Services**
- **Human Resource Organizations**

**SPECIFIC ISSUES FROM THE CITY OF RAWLINS (A *brief summary of issues that we anticipate facing and some suggestions on how to approach them follow*):**

**Municipal Service needs** – The City is concerned about being able to respond to *service demand increases from an increased transient workforce population coming to our community before revenues begin to be generated by the project to offset costs. We are also concerned with challenges created by a possible growth environment involving potential multiple project impacts and the associated decline following the construction phase(s).* We are particularly concerned about being able to staff service needs during a boom cycle coming off of our recent revenue decline and employment reductions.

- **Legal Services, Felonies, Jail Services, Code Enforcement** - *Based on past experience during boom times, we have seen an increased demand on the need for law enforcement, judicial, jail services, code enforcement, recreation services and human service organizations, before significant tax revenues are realized locally. Dan Massey the City of Rawlins, City Attorney reports that:*

**“During the boom years of 2006, 2007 and 2008 the City of Rawlins hosted transient workers from three pipe lines and a rebuild at the Sinclair refinery. The transient workers had the following effect on crime and code enforcement for the City of Rawlins:**

- **City Prosecutions:** In 2006, 2007 and 2008 the City was prosecuting on average 147 DWUIs and 1039 non-traffic violations (battery, assault, property damage, disturbing the peace etc.). After all of the transient workers left we went back to prosecuting an average of 72 DWUIs and 476 non-traffic violation in 2010.
- **Jail Expense:** Jail expense (the fee that Carbon County charges the City of Rawlins for incarcerating individuals under violation of City of Rawlins Ordinance) went from over \$110,000.00 in 2006 and 2007 back down to \$48,000.00 in 2010.
- **Code Enforcement:** The City also had a huge increase in code violations (Building, Nuisance, Zoning and Safety) during that period. Workers were renting and living in uninhabitable houses or were turning homes into boarding houses. There was not such a drastic change from the boom years to 2010 when it came to permanent construction. Building Permits averaged 625 a year during the boom and the city issued 531 permits in 2010.
- **Nuisance Abatement:** A citation is only issued after several attempts have been made to get the property owner to comply. During the boom years an average of 30 citations were issued. Six people were issued nuisance citations in 2010.

- **Rawlins City Felonies:** Violent felony and Drugs that our City Police arrested that went through District Court went from an average of 1325 prosecutions during the boom years down to 834 in 2010.

*Obviously there was a significant impact on the Municipal Court, the Police Department, code enforcement, nuisance abatement and the City Attorney's office with problem issues doubling during the boom."*

- **Emergency Services – What is the plan for emergency service response from multiple jurisdictions within the project area?**
  - **Law Enforcement**
    - **E911 Service for project area covered by Rawlins 911-Dispatch.**
    - **Coordination on Transportation Mitigation Issues** – The Rawlins Police Department needs to be involved in coordination of transportation plans in and around Rawlins.
  - **Fire and Emergency Medical Services**
    - **Calls for response will increase** with a large population of temporary workers living in or near Rawlins.
    - **The Rawlins Fire Department has also begun first responder service** where they run parallel with the Memorial Hospital of Carbon County's Ambulance Service since the last boom in the years 2006, 2007 and 2008. An increase in the transient Gateway West Transmission Line workforce as predicted will result in increased demand for Fire services.
    - **A City of Rawlins Fire Response Area near the City limits is defined by mutual agreement** between the City Rawlins and Carbon County. (Attached is a copy of the description of the "City of Rawlins and map of the response area – Rawlins Attachment #2.)
- **Finance/IT Services –**
  - **Taxes & Expenditures–**
    - **Funding Gap - The City of Rawlins will experience lags in revenue receipts during the initial construction year and would be required to provide services to accommodate Gateway West traffic and workforce before we receive substantial revenues from the project. That fact, combined with recent cutbacks in some staffing could result in deterioration of service levels. The City of Rawlins reduced full-time general fund positions by 19.65 FTE from the original FY2009-10 Budget through mid year 2010 -11-- from 114.65 FTE to 95.00 FTE. (see attached chart summarizing "City of Rawlins General Fund Position Reduction Status (1/25/2011 update - Rawlins Attachment #3)**

Excerpts from our 2010-11 budget message narrative read as follows:

- “With our sales and use taxes declining at a rate of 36% to 37% approximately by year-end we are now recommending a 41% decline in our FY 2010-2011 budget from what we received in FY 2008-2009 as the CREG January 2010 anticipates continued decline for FY 2010-2011.
  
- We are recommending that all material & services budgets for all departments within the General Fund and Recreation Fund be no more than what was actually expensed in FY 2008-2009. This is a reduction of approximately \$604,342 from the FY 2009-2010 original budget as stated above.
  
- Our goal to reduce our dependency on the County 1.0% option over three year fiscal year to a 66.7%/33/3% split of capital to operating expenses has been placed **on hold** so we can carry as many employees as possible to provide the services now being provided with a minimal level of funds available to capital expenses. The number in dollars we have in the original FY 2009-2010 budget for “Capital Expenses” was \$4,122,422 for the combined General and Recreation Funds. Our budgeted revenue resources for this amount above were \$1,785,595 from the County Optional 1.0% Sales Tax, \$863,562 from the State of Wyoming Supplemental Direct Distribution, and \$1,473,265 from prior year revenues currently held in our beginning fund balance. The new FY 2010-2011 “Capital Expense Budget” will not exceed \$1,159,661 in total and it will come from the County 1.0% option at only 25% (\$531,488) and the State of Wyoming Supplemental Direct Distribution of \$628,173.
  
- The FY 2009-2010 adopted General Fund Reserve (often called the rainy day reserve) was at 25% or \$2,646,918 for FY 2009-2010. We did have additional reserves of approximately \$728,000 which when combined with the 25% reserve above combined to approximately \$3.3 million. With the losses we are taking in FY 2009-2010 in our primary revenue accounts some of this reserve is being used to cover recurring operating expenses. We have requested operating assistance in the amount of \$250,000 from the Carbon County School District #1 Recreation District and will not know the response until June 2010. Also with an unknown Census count which determines the majority of our State of Wyoming tax distributions we have recommended in the FY 2010-2011 budget to hold onto as many employees as possible until this count is confirmed. To this end goal our recommendation is to use the estimated \$2.9 General Fund accessible reserve fund balance as follows: \$500,501 to operating expenses, \$133,893 to the City’s self insurance fund leaving the City with a reserve fund balance for both the General and Recreation Fund of 24.8% or \$2,294,719.
  
- We propose to monitor our budget performance and report and recommend needed adjustments quarterly throughout FY2010-11.

Please remember the County Option Sales Tax is voted upon every four (4) years for approval by the general public so we will be at a greater potential of significantly reducing services, projects and employees if voted out here in 2010.”

**City of Rawlins – General Fund Operating Revenues by Group comparison:**

	Original	Adjusted	Recommended
	<u>FY 2009-2010</u>	<u>FY 2009-2010</u>	<u>FY 2010-2011</u>
General Fund:			
Taxes:	\$ 8,079,482	\$7,064,929	\$5,705,364
Franchises:	\$ 430,000	\$ 430,000	\$ 400,340
Charges for Services:	\$ 1,030,200	\$ 844,700	\$ 905,884
Police & Court:	\$ 390,900	\$ 390,900	\$ 319,270
Other:	\$ 71,140	\$ 71,140	\$ 284,984
Transfers In:	<u>\$ 687,497</u>	<u>\$ 588,451</u>	<u>\$ 693,607</u>
Recreation Fund:	\$ 322,150	\$ 507,650	\$ 542,950
TOTAL	\$11,011,369	\$9,897,770	\$8,752,399

- FY2011-12 budget was proposed at \$100,000 less than 2010-11 because of a continued decline in sales and use tax revenues. The City of Rawlins’ total sales and use tax receipts for first quarter of FY2011-12 are down \$25,000 from our estimate in the first quarter of FY 2011-12.
- We are operating very leanly at present.
  - Assistance in monitoring and covering the front-end costs of growth related pressures is desired by the City of Rawlins. Hopefully this can be discussed with the Project Proponents as this project progresses.
- **5 Year Financial Plan** - The City of Rawlins will prepare a 5 Year Financial Plan anticipating various revenue levels, service levels and capital expenditures.
- **Recreation Services—**
  - Please note that in addition to Rochelle Ranch Golf Course and numerous municipal parks throughout the City, the City of Rawlins also operates a Recreation Center (with 3 indoor gyms, an indoor track, 3 racquetball courts, a weight room, aerobic equipment, spinning bicycles, and an indoor shooting

range), an outdoor shooting range and a host of recreational programs, green spaces, trails and athletic fields.

- Recreation provides a healthy alternative for off time hours.
- **Recreational Facilities:** Rawlins Recreation Services Director Chris Waller states that: **“The wear and tear on recreational facilities that temporary workers cause is significant. We estimate that during that last boom period, our recreational facilities saw approximately a 33% increased usage due to temporary workers from 2006 to 2008 with some causing extreme over usage in areas such as weight room and cardio areas as well as others.”**
- Recreation facility hours have been limited particularly during the summer months (May 1<sup>st</sup> through September 30<sup>th</sup>) closing early with limited hours on weekends. Hours in the summer are 5:30am to 8pm M-TH and on Friday 5:30am to 7pm. On weekends, Saturday hours are 7am to 3pm and Sunday is closed.
- The possibility of extending hours that the Recreation Center is open to accommodate workers in their off time would be a positive quality of life initiative.
- If the Proponents encourage their employees to use the Rawlins Family Recreation Center or facilities, which increases demand on the facilities and capacity we would encourage that the BLM require the Proponents to coordinate with the City of Rawlins to mitigate the impacts of workforce use of these facilities.
- For example,
  - **Cover Increased Operating Hours** - If increased hours at the recreation facilities are required to accommodate Gateway West workers recreational schedules, then an arrangement with Proponents should be made to offset the costs of staffing and maintaining the facilities for the additional hours, at least until tax revenues from the project are substantial enough to cover such costs.
  - **Mitigate Wear and Tear on Recreational Facilities** - The wear and tear on recreational facilities that temporary workers cause is significant. We estimate that during that last boom period, our recreational facilities saw approximately a 33% increased usage due to temporary workers with some causing extreme over usage in areas such as weight room and cardio areas as well as others.
  - **Air Conditioning of Recreation Center** - Given the fact that the work force population is anticipated to be present in Rawlins during the warmer spring, summer and fall months, we suggest that Proponents could help in funding or advancing funds to achieve air conditioning of the Rawlins Family Recreation Center to make it more accessible and enjoyable in the summer months, during which construction will take place and your workers will be present for up to four years. This would make the facility more accessible

and usable in the summer months and leave a long term benefit to the community.

- **Recreation Center Expansion** – This would be extremely beneficial for project temporary workers and would contribute long term to the community.

- **Public Works Issues –**

- **Water**

- **Water Supply** – Where do the Proponents propose to acquire their water for project construction uses? How much water is proposed to be needed?
    - **Water Quality** - We are concerned about plans and any adverse affects to water quality relating to the Gateway West project plans near the North Plate River intake, in the Sage Creek Basin, or our Nugget Well field which are the City of Rawlins' key sources of municipal water.

- **Wastewater Sewers and Treatment Facilities and Requirements**

- The affect of additional discharge to the Rawlins Wastewater Treatment Facilities will need to be evaluated.
        - The City is currently classified as a Major Discharger under its current permit No. WY0020427. To date however its requirements for WHOLE EFFLUENT TOXICITY TEXTING (ACUTE) has been limited. With just minor increase in sewage volumes the City's requirements for ACUTE and CHRONIC Wet Testing must be anticipated to increase with undetermined cost associated therewith.
        - There is always the potential for needing to upgrade the City's sewage treatment to include tertiary treatment. Should the increase in population trigger such to occur provisions for these new developments to participate in the funding for such needs to be provided.
- At present there is no Master Plan for Sewers for the City. System needs assessments conducted in 2007 indicated portions of the local sewers reaching or exceeding their anticipated service life. Rehabilitation and replacement on parts of the City's sewer system have been ongoing since the 2007 needs assessments were conducted. It is time now to re-evaluate the sewer rehabilitation and replacements as most of the projects identified in the 2007 Needs

Assessments are being completed. As new housing or temporary housing increases service demands on the City's ageing sewer systems the need for additional rehabilitation and or replacement will need to be assessed and addressed.

- The expansion of development into the extraterritorial periphery to the City creates needs for trunk main sewers that have not been provided hereto date.
  - Areas to the South and West of the City need to be Master planned for how such areas can and will need to be sewered.
- **Solid Waste Management**
- The City in February of 2011 ended the disposal of its Municipal Solid Waste (MSW) at the Rawlins Landfill entering into agreement with the City of Casper for transferring its MSW the Casper Regional Landfill. Increased waste handling as well as potential need for expansion of the Rawlins transfer facilities and waste hauling to Casper will increase costs.
  - The bailer for the City's transfer station is now estimated at more than 20 years old and is in need for major overhaul or replacement any increase in waste handling will need to be considered.
  - The Rawlins landfill is currently restricted to accept only Construction and Demolition Wastes to the year 2016 when permit extension will be reconsidered. The need for cover material to continue the current landfill usage is an ongoing concern for the landfill operation.
- **Transportation**
- **Streets** - New Streets and Roadways that would connect to the City that may someday have the potential for City Annexation should be built to City Standard to allow acceptance by the City into the City Street System without having to be upgraded to City Standard. They should contain all standard improvements as far as paving thickness, curbs, gutters, sidewalks, street lighting, traffic striping, signing and signalization.
  - **City Transportation** – The City of Rawlins is currently preparing an RFP for a transportation element of the City's Master Plan. To be identified in it will be traffic counts and street designations for arterial and collector utilization. The affect of temporary and long term housing on the traffic circulation through and within the City needs to be projected as part of the Environmental review. It is anticipated that new signalization for entry into commercial businesses may need to be considered as well as increased traffic routing to and from schools within the City.

- **Community Development –**
  - **Planning –** *Preparing for and responding to cumulative impacts particularly for the spike in construction workforce as described in Gateway West Construction combined with other projects planned and in the permitting process (see Rawlins Attachment #1) In preparation for dealing with anticipated significant growth,*
  - **Rawlins is involved planning including review and comment on the proposed Gateway West Draft EIS, CCSM Draft EIS, UR Energy In-situ Uranium and Transwest Express which has also been fast tracked by the Federal Government in addition to other potential projects mentioned in Attachment #1.** *In addition to updating our master plan, we are working to create an economic development plan, and address housing and extraterritorial utility and infrastructure extension needs to accommodate development.*
  - **Rawlins Master Plan Updated** - The City of Rawlins is in the process of requesting proposals for updating our master plan. This process will help the community and developers to envision and implement future residential, commercial, industrial and economic development. A Rawlins Economic Development Master Plan Element is also being developed as a separate element of the Master Plan and is discussed below.
  - **Extraterritorial Utility and Infrastructure Expansion Plan –** In response to the Goal of the Carbon County Comprehensive Land Use Plan (2010) to: “Locate new residential developments and commercial sites in close proximity to municipalities and developed areas”, the Rawlins City Council changed its policy on extension of water and sewer outside of City limits to not allow such extensions outside of City limits, unless they are in conformance with an adopted utility and infrastructure expansion plan. The reason for adopting this policy was to ensure planned and organized development of water, sewer, storm drainage, streets and right of ways along with annexation consideration for developing properties on the periphery of the City. ( See City of Rawlins Extraterritorial Utility and Infrastructure Extension Policy – **Rawlins Ordinance No. 11-2010 Amending Section 13.04.170** (November 16, 2010) and **Rawlins Resolution No. 10B-2010 Authorizing Development of An Extraterritorial Utility and Infrastructure Expansion Plan** (October 19, 2010) – Rawlins Attachment #4)

- **Economic Development** – We would like to work with the Gateway West Project to diversify our economy by increasing industrial, commercial and retail services in our community. We seek to reduce sales tax leakage through enhanced local economic activity, sustainability, community retail amenities, and attractiveness to those who work here and their families.
  - This can best be achieved by the location of long term jobs in our community which pay a living wage with benefits.
  - The City of Rawlins has prepared and will be advertising in October 2011 a request for proposals for consulting assistance to perform an economic development plan as an element of our Master Plan Update. This will help to drive development of the master plan to accommodate new areas for residential, retail, commercial, business park and industrial development.
- **Tourism** –
  - The City of Rawlins applied and was accepted as the first Tourism Assessment Pilot Community in the State of Wyoming in 2009 by the Wyoming Office of Tourism.
    - This application was supported by business, community and an active and involved Tourism Committee.
    - We have completed the Rawlins Tourism Assessment in coordination with the Wyoming Office of Tourism in 2010.
    - We have been accepted to Tier One of Tourism Assessment Community and are working toward accomplishing the following research on tourism and visitor attractions in Rawlins.
      - Lodging Survey
      - Visitor Profile and Conversion Study
      - Visitor Intercept Study
  - Rawlins has consistently been ranked in the top twenty for the last 4 years Outdoor Life Magazine's top 100 towns to live in for those who hunt and fish.
  - We are concerned about what impact the Gateway West project will have on tourism in Carbon County and Rawlins as a result of project construction and operations.
  - **Housing** – *We don't want to encourage over building for a temporary construction workforce, but we would like to emphasize our interest in encouraging infill development that is of quality construction, accessible to amenities of the community and connected to the community. We see an opportunity with the housing of some of your temporary workers that facilities could be turned into other uses when the Gateway West Transmission project is done, or used by other employees of organizations and companies that expect to need housing for their employees. (Including The Wyoming State Penitentiary, Sinclair Oil Refinery, City of Rawlins, Carbon County, School District #1, BLM and the list of Current and Planned Projects and employers identified in Rawlins Attachment #1.)*

- The City would be interested in working with the Gateway West Proponents and BLM to coordinate solutions to temporary and permanent workforce housing challenges.
- New or temporary house located adjacent to or in close proximity to the City where City Services and or Utilities may be needed should be considered for annexation to the City, or at minimum be built to City Standard so annexation may be considered in the future.
- Streets and Utility Construction should also be built to City Standards so that they can be accepted by the City for future annexation. Connecting to said facilities should require the consideration for annexation before such is allowed.
- Building Setback should also be consistent with City Standard to allow annexation without having to consider variance before acceptance.
- **Housing Mitigation Measures Recommended by BLM** - The City has reviewed and agrees to participate in helping to achieve the following Mitigation proposals *suggested by BLM in Section 3.4.3 of the Draft EIS for the implementation of the Gateway West Transmission Project which includes:*

*“Construction activities, depending on alternatives chosen, could extend approximately 1,100 miles across three states and multiple counties, and some of the areas crossed have limited housing resources. Housing shortages could occur in some locations if the Project coincides in time and space with other construction or development projects that involve large transient workforces. This type of scenario could result in fewer housing resources being available than is normally the case.*

*The Proponents should address these types of potential housing shortages prior to construction by updating the housing analysis to reflect current conditions at the time of construction, including EPC-specific housing demands by community and housing type, the available supply of housing units, and projected demand from other sources, based on average demand patterns and demand from other large permitted and scheduled projects.*

*In addition, the Proponents should prepare and submit a Housing Plan for review and approval. The Housing Plan must address those areas in Wyoming and Idaho where potential housing shortage concerns are identified and must demonstrate mitigation*

of any projected housing shortage during construction. The Agencies recommend that the Proponents incorporate the following measure into their EPMs and apply it Project-wide.

*SOC-1 Housing Plan*

- Contract with local motels and hotels for temporary accommodation**

**within daily commuting distance of the Project site.** Temporary accommodations will be selected based on value, cleanliness, and proximity to the Project site workers who have access to RVs.

- If temporary accommodation is not available within the Project area, seek motel and hotel accommodations outside the Project area.** In this event, the Proponents would provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the Project site safely.

- If sufficient temporary accommodation is not available, depending on the location and the number of workers involved, the Proponents would explore other temporary housing options, including the use of temporary housing facilities established for other projects, establishing temporary RV lots, and developing Project-specific temporary housing camps.** The Proponents would provide bus or other transportation to the Project site if these facilities were located outside the Project area.

- Contract with local RV parks for rental spaces to accommodate.”**

The following questions identified in the draft Gateway West Transmission Project EIS on the bottom of page 3.4-84 need to be answered relating to the Housing Plan and the City of Rawlins would like to be involved in this process:

- *To whom should this housing plan be submitted?*
  - *Who will approve it?*
  - *What will happen if it is neither submitted nor approved?*
- **2007 Rawlins Housing Study needs updating** - The City is interested in maintaining a diversified and safe housing mix paying special attention to

the needs identified in the 2007 Rawlins Housing Assessment. This includes the need for affordable housing, transitional housing (entry level apartments and townhomes to retain new residents in our community), senior citizen accessible small single family homes and assisted living housing options to encourage the location and retention of new residents and long term ones. The Rawlins May 2007 Housing Assessment needs to be updated because the supply and quality of structures has changed, as has the economy. An analysis should take into consideration a baseline analysis and various growth scenarios based on temporary workforce plans for Gateway West Project and other large scale reasonably foreseeable development projects (like those identified Rawlins Attachment #1 “Carbon county Industrial and Natural Resource Projects) beginning construction or development in overlapping time frames. Perhaps a synergistic approach to developing workforce and employee housing in Rawlins could be pursued which would benefit multiple parties (Employers and Employees).

- Since the Rawlins Housing Study was completed in May of 2007:
  - Hotels developed in Rawlins after May 2007:
    - Hampton Inn – 78 units
    - Comfort Inn & Suites - 65 units
    - Microtel Inn - 59 units
    - The following hotels/motels were opened around the time the Housing assessment was completed:
      - Holiday Inn Express – 72 units
      - Oak Tree Inn – 62 units

(See attached summary of “**Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming (7/2010)**” – Rawlins Attachment #5) which was provided by the City of Rawlins to CH2MHill in July 2010.) We have asked Lisa Howell, with Carbon County Visitors Council to review and update the information contained in the enclosed 7/2010 report and will forward any update when it becomes available.

Use of hotels and motels by construction workforces for long periods of time impacts Tourism stays, and lodging tax collections if they are staying for extended periods of time.

Use of hotels and motels as temporary lodging facilities for April through November may create significant housing shortages if a snow closure of Interstate 80 where to be necessary during this period, causing a flood of additional people in town looking for temporary quarters.

Building Permit Activity	New Commercial	New Residential	Mobile Home set-up
▪ 2007 (after 4/30/07)	5	47	85
▪ 2008	1	21	36
▪ 2009	5	3	11
▪ 2010 (9/8/10)	11	4	12

- Dangerous Building Abatement

	Buildings Abated	Buildings Demolished	Buildings Pending
• 2007	4	20	--
• 2008	12	16	--
• 2009	22	20	--
• 2010 (to 9/8/10)	23	7	10

(These figures include both residential and commercial buildings. Improved existing facility condition and safety creates a greater opportunity for infill development.)

- Nuisance Abatement
 

	Nuisance Cases	Vehicle Impound
• 2009	236	122
• 2010	226	155

(This concerted nuisance abatement effort has contributed to improved community, safety, beautification and livability.)

- Subdivision activity after 5/2007:
  - Approved Stone Ridge Village Planned Unit Development – 99 lots, approved 3/17/2009.
  - Post and Rail subdivision (3 phases included 47 lots), conditionally approved, not formally completed.
  - The City has also explored a possible infill development on 50 acres of City owned property through a contract with a private developer to develop transitional housing, including apartments, town homes and entry level single family houses. This project was not implemented due to the change in the economy beginning in late 2008. This project is no longer active.

- **DDA/Main Street –**
  - If the CCSM project develops and indirect and induced support businesses and industries develop, we encourage the development of appropriate infill businesses in the downtown area and in other places where such development is properly zoned.
  - Services through the Rawlins Entrepreneurial Center are available if needed.

**Human Resource Organizations** – the Human Resource Organizations in Rawlins, many of them non-profit, will see an increase in demand for their services with a large influx of temporary workers as described in the Gateway West Transmission Line Project Draft EIS.

Thank you for the opportunity to comment and please let us know if we can be of assistance in planning, commenting and preparing for the future.

Sincerely,

Steve Golnar  
City Manager  
City of Rawlins  
521 West Cedar Street  
Rawlins, Wyoming 82301

Cc: Rawlins City Council  
Amy Bach, City of Rawlins Community Development Director  
Dan Massey, City Attorney  
Carbon County Commissioners  
Sid Fox, Carbon County Planner  
Cindy Wallace, Carbon County Economic Development Corporation  
Leslie Blythe, Rocky Mountain Power

**Attachments –****City of Rawlins, Wyoming Comment on Gateway West Transmission Project Draft Environmental Impact Statement (10/28/2011)**

1. ***Carbon County Industrial and Natural Resource Development Projects*** - Pending and in Development as of August 2011
2. **City of Rawlins Fire Response Area – description and map** (updated 11/15/2010).
3. **City of Rawlins General Fund Position Reduction Status** (1/25/2011 update).
4. **City of Rawlins Extraterritorial Utility and Infrastructure Extension Policy – Rawlins Ordinance No. 11-2010 Amending Section 13.04.170** (November 16, 2010) **and Rawlins Resolution No. 10B-2010 Authorizing Development of An Extraterritorial Utility and Infrastructure Expansion Plan** (October 19, 2010)
5. **Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming** (7/2010)

### Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming (10/2011)

Community	Rooms Available	Camp Ground / RV Spaces	Total
Baggs	21	23	44
Elk Mountain	17	0	17
Dixon	20	0	20
Encampment	33	0	33
Hanna	0	0	0
Medicine Bow	56	4	60
Rawlins	1172	383	1555
Riverside	20	33	53
Saratoga	177	30	207
County/Unincorporated	71	35	106
	1587	508	2095

Rawlins Breakdown	Rooms Available
America's Best Value Inn	76
Best Motel	28
Best Western Cottontree Inn	122
Comfort Inn & Suites	65
Days Inn	119
Econo Lodge	38
Express Inn	48
Ferris Mansion B&B	4
First Choice Inn	48
Hampton Inn	78
Jade Lodge	24
Holiday Inn Express	72
Key Motel	30
Labella Motel	7
Microtel Inn	59
Motel 7	31
Oak Tree Inn	62
Quality Inn	131
Rimrock Lodge	4
Sunset Motel	29
Super 8 Motel	47
Travel Lodge	50
American President's Campground	70
RV World	80
KOA Campground	62
Western Hills Campground	171
	1555

74%  
Rawlins as a % of City and  
County Motel rooms  
Camp Ground / RV Spaces  
in Carbon County

City of Rawlins  
Steve Golnar, City Manager  
P.O. Box 953  
Rawlins, WY 82301



Mr. Walt George, Project Manager  
Gateway West Transmission Line Project EIS  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, WY 82000

Deliverable

100513



# City of Rawlins

P.O. Box 953  
Rawlins, Wyoming 82301

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CHEYENNE, WYOMING



October 28, 2011

Mr. Walt George, Project Manager  
Gateway West Transmission Line Project EIS  
Bureau of Land Management  
P.O. Box 20879  
Cheyenne, WY 82003  
WYMail\_PCW\_windfarm@blm.gov

## RE: City of Rawlins, Wyoming Comment on Gateway West Transmission Line Draft Environmental Impact Statement

The City of Rawlins realizes that the Gateway West Transmission project offers opportunities for transmission of up to 3,000 megawatts (MW) of additional energy for the Proponents' large service areas principally into Utah and Idaho and to other interconnected systems. This should increase the opportunity for future development around and in the City of Rawlins but it also comes with challenges to our Community.

- o **Opportunities from the Gateway West Transmission Project include:**
  1. We hope that this would increase local electrical energy reliability.
  2. This would increase the opportunity for future electricity generation to be transported to distant markets.
  3. There would be additional tax revenues generated by the construction of the project. Most of the benefit to the City of Rawlins would come from sales and use tax collections, as property tax would be collected for improvements made in the County which would benefit the State of Wyoming, Carbon County Schools, Statewide schools (SFD), and various special districts. Sales and Use tax collections are estimated to be about \$27.7 million for this project, of which local governments receive 30% or \$8,310,000. The City of Rawlins could anticipate 58% of the local share, or \$4,819,000 over the course of the project.
  4. The possible ability to diversify the area's economy by creating additional business opportunities, enhanced commercial and industrial activity for our residents and future residents, to achieve greater sustainability.

o **Challenges Faced from the Gateway West Transmission Project include:**

• **Temporary Construction Employment:**

The Gateway West Transmission Line project workforce is divided into the regions for the workforce analysis, and Rawlins is located in EPC 1 Area (Windstar, Aeolus, Creston) which includes Parts of Converse, Natrona, Albany, Carbon and a part of Sweetwater County. The longest segment (163 miles) of the proposed 1,103 mile Gateway West Transmission Line goes through Carbon County. The Gateway West Project Construction times in segment EPC 1 are expected to last about 124 weeks, or 27 months. The Substation construction in Creston is expected to range from 2 to 9 months.

Table 3.4-22 Projected construction workforce by EPC\* Analysis Area 1  
Workers EPC Area1

<u>Average Weekly Forecast</u>	
Commute to Job Site Daily (1)	28
Move to the Affected Region alone (2)	102
Move to the Affected Region with family (2)	11
Total (3) (4)	142
 <u>Peak Employment Forecast</u>	
Commute to Job Site Daily (1)	71
Move to the Affected Region alone (2)	255
Move to the Affected Region with family (2)	28
Total (3)	354

Notes:

\* The Gateway West Transmission Line project workforce is divided into the regions for the workforce analysis, and Rawlins is located in EPC 1 Area (Windstar, Aeolus, Creston) which includes Parts of Converse, Natrona, Albany, Carbon and a part of Sweetwater County.

- (1) Twenty percent of the average and peak workforce is expected to commute to and from the job site each day.
- (2) Eighty percent of the average and peak workforce is expected to temporarily relocate to the Project area. 10 percent of workers temporarily relocating are assumed to be accompanied by their families for the purposes of analysis.
- (3) Total average and peak employment estimates are based on the projected employment patterns illustrated in Figures 3.4-1 through 3.4-4.
- (4) Average employment is estimated for each region based on the projected length of construction in that EPC region, not the overall Project construction period.

- o **Cummulative Impacts on Temporary Housing Availability** (see Housing below)
- o **Cummulative Service Demands from an increased temporary workforce** population, compounded with other projects that are under planning, or in stages of permitting which may be under construction at the same time including: Chokecherry Sierra Madre Wind Generation Project, UR Energy in-

situ uranium extraction, Transwest Express Transmission Line, DKRW, Sinclair Refinery, Atlantic Rim and an additional 8,000 gas wells soon to be possibly permitted on Continental Divide Creston Ridge. (See Rawlins Attachment #1 describing potential additional area projects.)

#### **City of Rawlins Population Correction**

According to the 2010 Census the population of the City of Rawlins is now 9,259. Please correct Table 3.4-6. Population for Communities Located within 1 Mile of the Proposed Route or Route Alternatives. And other parts of the report that may include old information.

**The City of Rawlins identifies the following challenges after a review of the Gateway West Draft EIS at this time include:**

- **Municipal Service Needs**
  - *Legal Services , Felonies, Jail Services, Code Enforcement*
  - **Emergency Services**
    - *Law Enforcement*
      - E-911 Service Area
      - Coordination with Transportation Mitigation
    - *Fire and Emergency Medical Services*
  - **Finance/ IT**
    - Taxes & Expenditures
    - 5 Year Financial Plan
  - **Recreation Services**
    - Facilities
    - Programs
  - **Public Works**
    - Water
    - Wastewater
    - Solid Waste
  - **Community Development**
    - Planning
    - Code Enforcement / Future Annexation
    - Economic Development
    - Tourism
    - Housing
  - **DDA/Main Street**
    - Infill Downtown Development
    - Rainbow Te-ton Entrepreneurial Center Services
- **Human Resource Organizations**

**SPECIFIC ISSUES FROM THE CITY OF RAWLINS (A brief summary of issues that we anticipate facing and some suggestions on how to approach them follow):**

**Municipal Service needs** – The City is concerned about being able to respond to service demand increases from an increased transient workforce population coming to our community before revenues begin to be generated by the project to offset costs. We are also concerned with challenges created by a possible growth environment involving potential multiple project impacts and the associated decline following the construction phase(s). We are particularly concerned about being able to staff service needs during a boom cycle coming off of our recent revenue decline and employment reductions.

- **Legal Services, Felonies, Jail Services, Code Enforcement** - Based on past experience during boom times, we have seen an increased demand on the need for law enforcement, judicial, jail services, code enforcement, recreation services and human service organizations, before significant tax revenues are realized locally. Dan Massey the City of Rawlins, City Attorney reports that:

**“During the boom years of 2006, 2007 and 2008 the City of Rawlins hosted transient workers from three pipe lines and a rebuild at the Sinclair refinery. The transient workers had the following effect on crime and code enforcement for the City of Rawlins:**

- **City Prosecutions:** In 2006, 2007 and 2008 the City was prosecuting on average 147 DWUIs and 1039 non-traffic violations (battery, assault, property damage, disturbing the peace etc.). After all of the transient workers left we went back to prosecuting an average of 72 DWUIs and 476 non-traffic violation in 2010.
- **Jail Expense:** Jail expense (the fee that Carbon County charges the City of Rawlins for incarcerating individuals under violation of City of Rawlins Ordinance) went from over \$110,000.00 in 2006 and 2007 back down to \$48,000.00 in 2010.
- **Code Enforcement:** The City also had a huge increase in code violations (Building, Nuisance, Zoning and Safety) during that period. Workers were renting and living in uninhabitable houses or were turning homes into boarding houses. There was not such a drastic change from the boom years to 2010 when it came to permanent construction. Building Permits averaged 625 a year during the boom and the city issued 531 permits in 2010.
- **Nuisance Abatement:** A citation is only issued after several attempts have been made to get the property owner to comply. During the boom years an average of 30 citations were issued. Six people were issued nuisance citations in 2010.

- **Rawlins City Felonies:** Violent felony and Drugs that our City Police arrested that went through District Court went from an average of 1325 prosecutions during the boom years down to 834 in 2010.

*Obviously there was a significant impact on the Municipal Court, the Police Department, code enforcement, nuisance abatement and the City Attorney's office with problem issues doubling during the boom."*

- **Emergency Services – What is the plan for emergency service response from multiple jurisdictions within the project area?**
  - **Law Enforcement**
    - **E911 Service for project area covered by Rawlins 911-Dispatch.**
    - **Coordination on Transportation Mitigation Issues –** The Rawlins Police Department needs to be involved in coordination of transportation plans in and around Rawlins.
  - **Fire and Emergency Medical Services**
    - **Calls for response will increase** with a large population of temporary workers living in or near Rawlins.
    - **The Rawlins Fire Department has also begun first responder service** where they run parallel with the Memorial Hospital of Carbon County's Ambulance Service since the last boom in the years 2006, 2007 and 2008. An increase in the transient Gateway West Transmission Line workforce as predicted will result in increased demand for Fire services.
    - **A City of Rawlins Fire Response Area near the City limits is defined by mutual agreement** between the City Rawlins and Carbon County. (Attached is a copy of the description of the "City of Rawlins and map of the response area – Rawlins Attachment #2.)
- **Finance/IT Services –**
  - **Taxes & Expenditures–**
    - **Funding Gap -** *The City of Rawlins will experience lags in revenue receipts during the initial construction year and would be required to provide services to accommodate Gateway West traffic and workforce before we receive substantial revenues from the project. That fact, combined with recent cutbacks in some staffing could result in deterioration of service levels. **The City of Rawlins reduced full-time general fund positions by 19.65 FTE from the original FY2009-10 Budget through mid year 2010 -11-- from 114.65 FTE to 95.00 FTE. (see attached chart summarizing "City of Rawlins General Fund Position Reduction Status (1/25/2011 update - Rawlins Attachment #3)***

Excerpts from our 2010-11 budget message narrative read as follows:

- "With our sales and use taxes declining at a rate of 36% to 37% approximately by year-end we are now recommending a 41% decline in our FY 2010-2011 budget from what we received in FY 2008-2009 as the CREG January 2010 anticipates continued decline for FY 2010-2011.
  
- We are recommending that all material & services budgets for all departments within the General Fund and Recreation Fund be no more than what was actually expended in FY 2008-2009. This is a reduction of approximately \$604,342 from the FY 2009-2010 original budget as stated above.
  
- Our goal to reduce our dependency on the County 1.0% option over three year fiscal year to a 66.7%/33/3% split of capital to operating expenses has been placed **on hold** so we can carry as many employees as possible to provide the services now being provided with a minimal level of funds available to capital expenses. The number in dollars we have in the original FY 2009-2010 budget for "Capital Expenses" was \$4,122,422 for the combined General and Recreation Funds. Our budgeted revenue resources for this amount above were \$1,785,595 from the County Optional 1.0% Sales Tax, \$863,562 from the State of Wyoming Supplemental Direct Distribution, and \$1,473,265 from prior year revenues currently held in our beginning fund balance. The new FY 2010-2011 "Capital Expense Budget" will not exceed \$1,159,661 in total and it will come from the County 1.0% option at only 25% (\$531,488) and the State of Wyoming Supplemental Direct Distribution of \$628,173.
  
- The FY 2009-2010 adopted General Fund Reserve (often called the rainy day reserve) was at 25% or \$2,646,918 for FY 2009-2010. We did have additional reserves of approximately \$728,000 which when combined with the 25% reserve above combined to approximately \$3.3 million. With the losses we are taking in FY 2009-2010 in our primary revenue accounts some of this reserve is being used to cover recurring operating expenses. We have requested operating assistance in the amount of \$250,000 from the Carbon County School District #1 Recreation District and will not know the response until June 2010. Also with an unknown Census count which determines the majority of our State of Wyoming tax distributions we have recommended in the FY 2010-2011 budget to hold onto as many employees as possible until this count is confirmed. To this end goal our recommendation is to use the estimated \$2.9 General Fund accessible reserve fund balance as follows: \$500,501 to operating expenses, \$133,893 to the City's self insurance fund leaving the City with a reserve fund balance for both the General and Recreation Fund of 24.8% or \$2,294,719.
  
- We propose to monitor our budget performance and report and recommend needed adjustments quarterly throughout FY2010-11.

Please remember the County Option Sales Tax is voted upon every four (4) years for approval by the general public so we will be at a greater potential of significantly reducing services, projects and employees if voted out here in 2010."

**City of Rawlins – General Fund Operating Revenues by Group comparison:**

	Original	Adjusted	Recommended
	<u>FY 2009-2010</u>	<u>FY 2009-2010</u>	<u>FY 2010-2011</u>
General Fund:			
Taxes:	\$ 8,079,482	\$7,064,929	\$5,705,364
Franchises:	\$ 430,000	\$ 430,000	\$ 400,340
Charges for Services:	\$ 1,030,200	\$ 844,700	\$ 905,884
Police & Court:	\$ 390,900	\$ 390,900	\$ 319,270
Other:	\$ 71,140	\$ 71,140	\$ 284,984
Transfers In:	<u>\$ 687,497</u>	<u>\$ 588,451</u>	<u>\$ 693,607</u>
Recreation Fund:	\$ 322,150	\$ 507,650	\$ 542,950
TOTAL	\$11,011,369	\$9,897,770	\$8,752,399

- FY2011-12 budget was proposed at \$100,000 less than 2010-11 because of a continued decline in sales and use tax revenues. The City of Rawlins' total sales and use tax receipts for first quarter of FY2011-12 are down \$25,000 from our estimate in the first quarter of FY 2011-12.
- We are operating very leanly at present.
  - Assistance in monitoring and covering the front-end costs of growth related pressures is desired by the City of Rawlins. Hopefully this can be discussed with the Project Proponents as this project progresses.
- **5 Year Financial Plan** - The City of Rawlins will prepare a 5 Year Financial Plan anticipating various revenue levels, service levels and capital expenditures.
- **Recreation Services--**
  - Please note that in addition to Rochelle Ranch Golf Course and numerous municipal parks throughout the City, the City of Rawlins also operates a Recreation Center (with 3 indoor gyms, an indoor track, 3 racquetball courts, a weight room, aerobic equipment, spinning bicycles, and an indoor shooting

range), an outdoor shooting range and a host of recreational programs, green spaces, trails and athletic fields.

- Recreation provides a healthy alternative for off time hours.
- **Recreational Facilities:** Rawlins Recreation Services Director Chris Waller states that: **"The wear and tear on recreational facilities that temporary workers cause is significant. We estimate that during that last boom period, our recreational facilities saw approximately a 33% increased usage due to temporary workers from 2006 to 2008 with some causing extreme over usage in areas such as weight room and cardio areas as well as others."**
- Recreation facility hours have been limited particularly during the summer months (May 1<sup>st</sup> through September 30<sup>th</sup>) closing early with limited hours on weekends. Hours in the summer are 5:30am to 8pm M-TH and on Friday 5:30am to 7pm. On weekends, Saturday hours are 7am to 3pm and Sunday is closed.
- The possibility of extending hours that the Recreation Center is open to accommodate workers in their off time would be a positive quality of life initiative.
- If the Proponents encourage their employees to use the Rawlins Family Recreation Center or facilities, which increases demand on the facilities and capacity we would encourage that the BLM require the Proponents to coordinate with the City of Rawlins to mitigate the impacts of workforce use of these facilities.
- For example,
  - **Cover Increased Operating Hours** - If increased hours at the recreation facilities are required to accommodate Gateway West workers recreational schedules, then an arrangement with Proponents should be made to offset the costs of staffing and maintaining the facilities for the additional hours, at least until tax revenues from the project are substantial enough to cover such costs.
  - **Mitigate Wear and Tear on Recreational Facilities** - The wear and tear on recreational facilities that temporary workers cause is significant. We estimate that during that last boom period, our recreational facilities saw approximately a 33% increased usage due to temporary workers with some causing extreme over usage in areas such as weight room and cardio areas as well as others.
  - **Air Conditioning of Recreation Center** - Given the fact that the work force population is anticipated to be present in Rawlins during the warmer spring, summer and fall months, we suggest that Proponents could help in funding or advancing funds to achieve air conditioning of the Rawlins Family Recreation Center to make it more accessible and enjoyable in the summer months, during which construction will take place and your workers will be present for up to four years. This would make the facility more accessible

and usable in the summer months and leave a long term benefit to the community.

- **Recreation Center Expansion** – This would be extremely beneficial for project temporary workers and would contribute long term to the community.

- **Public Works Issues –**

- **Water**

- **Water Supply** – Where do the Proponents propose to acquire their water for project construction uses? How much water is proposed to be needed?
- **Water Quality** - We are concerned about plans and any adverse affects to water quality relating to the Gateway West project plans near the North Plate River intake, in the Sage Creek Basin, or our Nugget Well field which are the City of Rawlins' key sources of municipal water.

- **Wastewater Sewers and Treatment Facilities and Requirements**

- The affect of additional discharge to the Rawlins Wastewater Treatment Facilities will need to be evaluated.
  - The City is currently classified as a Major Discharger under its current permit No. WY0020427. To date however its requirements for WHOLE EFFLUENT TOXICITY TEXTING (ACUTE) has been limited. With just minor increase in sewage volumes the City's requirements for ACUTE and CHRONIC Wet Testing must be anticipated to increase with undetermined cost associated therewith.
  - There is always the potential for needing to upgrade the City's sewage treatment to include tertiary treatment. Should the increase in population trigger such to occur provisions for these new developments to participate in the funding for such needs to be provided.
- At present there is no Master Plan for Sewers for the City. System needs assessments conducted in 2007 indicated portions of the local sewers reaching or exceeding their anticipated service life. Rehabilitation and replacement on parts of the City's sewer system have been ongoing since the 2007 needs assessments were conducted. It is time now to re-evaluate the sewer rehabilitation and replacements as most of the projects identified in the 2007 Needs

Assessments are being completed. As new housing or temporary housing increases service demands on the City's ageing sewer systems the need for additional rehabilitation and or replacement will need to be assessed and addressed.

- The expansion of development into the extraterritorial periphery to the City creates needs for trunk main sewers that have not been provided hereto date.
  - Areas to the South and West of the City need to be Master planned for how such areas can and will need to be sewered.
- **Solid Waste Management**
- The City in February of 2011 ended the disposal of its Municipal Solid Waste (MSW) at the Rawlins Landfill entering into agreement with the City of Casper for transferring its MSW the Casper Regional Landfill. Increased waste handling as well as potential need for expansion of the Rawlins transfer facilities and waste hauling to Casper will increase costs.
  - The bailer for the City's transfer station is now estimated at more than 20 years old and is in need for major overhaul or replacement any increase in waste handling will need to be considered.
  - The Rawlins landfill is currently restricted to accept only Construction and Demolition Wastes to the year 2016 when permit extension will be reconsidered. The need for cover material to continue the current landfill usage is an ongoing concern for the landfill operation.
- **Transportation**
- **Streets** - New Streets and Roadways that would connect to the City that may someday have the potential for City Annexation should be built to City Standard to allow acceptance by the City into the City Street System without having to be upgraded to City Standard. They should contain all standard improvements as far as paving thickness, curbs, gutters, sidewalks, street lighting, traffic striping, signing and signalization.
  - **City Transportation** – The City of Rawlins is currently preparing an RFP for a transportation element of the City's Master Plan. To be identified in it will be traffic counts and street designations for arterial and collector utilization. The affect of temporary and long term housing on the traffic circulation through and within the City needs to be projected as part of the Environmental review. It is anticipated that new signalization for entry into commercial businesses may need to be considered as well as increased traffic routing to and from schools within the City.

- **Community Development –**
  - **Planning –** *Preparing for and responding to cumulative impacts particularly for the spike in construction workforce as described in Gateway West Construction combined with other projects planned and in the permitting process (see Rawlins Attachment #1) In preparation for dealing with anticipated significant growth,*
  - **Rawlins is involved planning including review and comment on the proposed Gateway West Draft EIS, CCSM Draft EIS, UR Energy In-situ Uranium and Transwest Express which has also been fast tracked by the Federal Government in addition to other potential projects mentioned in Attachment #1.** *In addition to updating our master plan, we are working to create an economic development plan, and address housing and extraterritorial utility and infrastructure extension needs to accommodate development.*
  - **Rawlins Master Plan Updated -** The City of Rawlins is in the process of requesting proposals for updating our master plan. This process will help the community and developers to envision and implement future residential, commercial, industrial and economic development. A Rawlins Economic Development Master Plan Element is also being developed as a separate element of the Master Plan and is discussed below.
  - **Extraterritorial Utility and Infrastructure Expansion Plan –** In response to the Goal of the Carbon County Comprehensive Land Use Plan (2010) to: "Locate new residential developments and commercial sites in close proximity to municipalities and developed areas", the Rawlins City Council changed its policy on extension of water and sewer outside of City limits to not allow such extensions outside of City limits, unless they are in conformance with an adopted utility and infrastructure expansion plan. The reason for adopting this policy was to ensure planned and organized development of water, sewer, storm drainage, streets and right of ways along with annexation consideration for developing properties on the periphery of the City. ( See City of Rawlins Extraterritorial Utility and Infrastructure Extension Policy – **Rawlins Ordinance No. 11-2010 Amending Section 13.04.170** (November 16, 2010) and **Rawlins Resolution No. 10B-2010 Authorizing Development of An Extraterritorial Utility and Infrastructure Expansion Plan** (October 19, 2010) – Rawlins Attachment #4)

- **Economic Development** – We would like to work with the Gateway West Project to diversify our economy by increasing industrial, commercial and retail services in our community. We seek to reduce sales tax leakage through enhanced local economic activity, sustainability, community retail amenities, and attractiveness to those who work here and their families.
  - This can best be achieved by the location of long term jobs in our community which pay a living wage with benefits.
  - The City of Rawlins has prepared and will be advertising in October 2011 a request for proposals for consulting assistance to perform an economic development plan as an element of our Master Plan Update. This will help to drive development of the master plan to accommodate new areas for residential, retail, commercial, business park and industrial development.
- **Tourism** –
  - The City of Rawlins applied and was accepted as the first Tourism Assessment Pilot Community in the State of Wyoming in 2009 by the Wyoming Office of Tourism.
    - This application was supported by business, community and an active and involved Tourism Committee.
    - We have completed the Rawlins Tourism Assessment in coordination with the Wyoming Office of Tourism in 2010.
    - We have been accepted to Tier One of Tourism Assessment Community and are working toward accomplishing the following research on tourism and visitor attractions in Rawlins.
      - Lodging Survey
      - Visitor Profile and Conversion Study
      - Visitor Intercept Study
  - Rawlins has consistently been ranked in the top twenty for the last 4 years Outdoor Life Magazine's top 100 towns to live in for those who hunt and fish.
  - We are concerned about what impact the Gateway West project will have on tourism in Carbon County and Rawlins as a result of project construction and operations.
- **Housing** – *We don't want to encourage over building for a temporary construction workforce, but we would like to emphasize our interest in encouraging infill development that is of quality construction, accessible to amenities of the community and connected to the community. We see an opportunity with the housing of some of your temporary workers that facilities could be turned into other uses when the Gateway West Transmission project is done, or used by other employees of organizations and companies that expect to need housing for their employees. (Including The Wyoming State Penitentiary, Sinclair Oil Refinery, City of Rawlins, Carbon County, School District #1, BLM and the list of Current and Planned Projects and employers identified in Rawlins Attachment #1.)*

- o The City would be interested in working with the Gateway West Proponents and BLM to coordinate solutions to temporary and permanent workforce housing challenges.
  - o New or temporary house located adjacent to or in close proximity to the City where City Services and or Utilities may be needed should be considered for annexation to the City, or at minimum be built to City Standard so annexation may be considered in the future.
  - o Streets and Utility Construction should also be built to City Standards so that they can be accepted by the City for future annexation. Connecting to said facilities should require the consideration for annexation before such is allowed.
  - o Building Setback should also be consistent with City Standard to allow annexation without having to consider variance before acceptance.
- o **Housing Mitigation Measures Recommended by BLM** - The City has reviewed and agrees to participate in helping to achieve the following Mitigation proposals *suggested by BLM in Section 3.4.3 of the Draft EIS for the implementation of the Gateway West Transmission Project which includes:*

*"Construction activities, depending on alternatives chosen, could extend approximately 1,100 miles across three states and multiple counties, and some of the areas crossed have limited housing resources. Housing shortages could occur in some locations if the Project coincides in time and space with other construction or development projects that involve large transient workforces. This type of scenario could result in fewer housing resources being available than is normally the case.*

*The Proponents should address these types of potential housing shortages prior to construction by updating the housing analysis to reflect current conditions at the time of construction, including EPC-specific housing demands by community and housing type, the available supply of housing units, and projected demand from other sources, based on average demand patterns and demand from other large permitted and scheduled projects.*

*In addition, the Proponents should prepare and submit a Housing Plan for review and approval. The Housing Plan must address those areas in Wyoming and Idaho where potential housing shortage concerns are identified and must demonstrate mitigation*

of any projected housing shortage during construction. The Agencies recommend that the Proponents incorporate the following measure into their EPMs and apply it Project-wide.

*SOC-1 Housing Plan*

- Contract with local motels and hotels for temporary accommodation**

**within daily commuting distance of the Project site.** Temporary accommodations will be selected based on value, cleanliness, and proximity to the Project site workers who have access to RVs.

- If temporary accommodation is not available within the Project area, seek motel and hotel accommodations outside the Project area.** In this event, the Proponents would provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the Project site safely.
- If sufficient temporary accommodation is not available, depending on the location and the number of workers involved, the Proponents would explore other temporary housing options, including the use of temporary housing facilities established for other projects, establishing temporary RV lots, and developing Project-specific temporary housing camps.** The Proponents would provide bus or other transportation to the Project site if these facilities were located outside the Project area.
- Contract with local RV parks for rental spaces to accommodate."**

The following questions identified in the draft Gateway West Transmission Project EIS on the bottom of page 3.4-84 need to be answered relating to the Housing Plan and the City of Rawlins would like to be involved in this process:

- To whom should this housing plan be submitted?
  - Who will approve it?
  - What will happen if it is neither submitted nor approved?
- **2007 Rawlins Housing Study needs updating** - The City is interested in maintaining a diversified and safe housing mix paying special attention to

the needs identified in the 2007 Rawlins Housing Assessment. This includes the need for affordable housing, transitional housing (entry level apartments and townhomes to retain new residents in our community), senior citizen accessible small single family homes and assisted living housing options to encourage the location and retention of new residents and long term ones. The Rawlins May 2007 Housing Assessment needs to be updated because the supply and quality of structures has changed, as has the economy. An analysis should take into consideration a baseline analysis and various growth scenarios based on temporary workforce plans for Gateway West Project and other large scale reasonably foreseeable development projects (like those identified Rawlins Attachment #1 "Carbon county Industrial and Natural Resource Projects) beginning construction or development in overlapping time frames. Perhaps a synergistic approach to developing workforce and employee housing in Rawlins could be pursued which would benefit multiple parties (Employers and Employees).

- Since the Rawlins Housing Study was completed in May of 2007:
  - Hotels developed in Rawlins after May 2007:
    - Hampton Inn – 78 units
    - Comfort Inn & Suites - 65 units
    - Microtel Inn - 59 units
    - The following hotels/motels were opened around the time the Housing assessment was completed:
      - Holiday Inn Express – 72 units
      - Oak Tree Inn – 62 units

(See attached summary of "Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming (7/2010)" – Rawlins Attachment #5) which was provided by the City of Rawlins to CH2MHill in July 2010.) We have asked Lisa Howell, with Carbon County Visitors Council to review and update the information contained in the enclosed 7/2010 report and will forward any update when it becomes available.

Use of hotels and motels by construction workforces for long periods of time impacts Tourism stays, and lodging tax collections if they are staying for extended periods of time.

Use of hotels and motels as temporary lodging facilities for April through November may create significant housing shortages if a snow closure of Interstate 80 where to be necessary during this period, causing a flood of additional people in town looking for temporary quarters.

Building Permit Activity	New Commercial	New Residential	Mobile Home set-up
▪ 2007 (after 4/30/07)	5	47	85
▪ 2008	1	21	36
▪ 2009	5	3	11
▪ 2010 (9/8/10)	11	4	12

• Dangerous Building Abatement

Pending	Buildings Abated	Buildings Demolished	Buildings
• 2007	4	20	--
• 2008	12	16	--
• 2009	22	20	--
• 2010 (to 9/8/10)	23	7	10

(These figures include both residential and commercial buildings. Improved existing facility condition and safety creates a greater opportunity for infill development.)

Nuisance Abatement	Nuisance Cases	Vehicle Impound
• 2009	236	122
• 2010	226	155

(This concerted nuisance abatement effort has contributed to improved community, safety, beautification and livability.)

- Subdivision activity after 5/2007:
  - Approved Stone Ridge Village Planned Unit Development – 99 lots, approved 3/17/2009.
  - Post and Rail subdivision (3 phases included 47 lots), conditionally approved, not formally completed.
  - The City has also explored a possible infill development on 50 acres of City owned property through a contract with a private developer to develop transitional housing, including apartments, town homes and entry level single family houses. This project was not implemented due to the change in the economy beginning in late 2008. This project is no longer active.

- **DDA/Main Street –**

- If the CCSM project develops and indirect and induced support businesses and industries develop, we encourage the development of appropriate infill businesses in the downtown area and in other places where such development is properly zoned.
- Services through the Rawlins Entrepreneurial Center are available if needed.

**Human Resource Organizations** – the Human Resource Organizations in Rawlins, many of them non-profit, will see an increase in demand for their services with a large influx of temporary workers as described in the Gateway West Transmission Line Project Draft EIS.

Thank you for the opportunity to comment and please let us know if we can be of assistance in planning, commenting and preparing for the future.

Sincerely,

  
Steve Golnar

City Manager

City of Rawlins

521 West Cedar Street

Rawlins, Wyoming 82301

Cc: Rawlins City Council  
Amy Bach, City of Rawlins Community Development Director  
Dan Massey, City Attorney  
Carbon County Commissioners  
Sid Fox, Carbon County Planner  
Cindy Wallace, Carbon County Economic Development Corporation  
Leslie Blythe, Rocky Mountain Power

**Attachments –**

**City of Rawlins, Wyoming Comment on Gateway West Transmission Project Draft Environmental Impact Statement (10/28/2011)**

1. ***Carbon County Industrial and Natural Resource Development Projects*** - Pending and in Development as of August 2011
2. **City of Rawlins Fire Response Area – description and map** (updated 11/15/2010).
3. **City of Rawlins General Fund Position Reduction Status** (1/25/2011 update).
4. **City of Rawlins Extraterritorial Utility and Infrastructure Extension Policy – Rawlins Ordinance No. 11-2010 Amending Section 13.04.170** (November 16, 2010) and **Rawlins Resolution No. 10B-2010 Authorizing Development of An Extraterritorial Utility and Infrastructure Expansion Plan** (October 19, 2010)
5. **Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming** (7/2010)

DUPLICATE

**Attachments –****City of Rawlins, Wyoming Comment on Draft Visual Resource Management Plan Amendment and Chokecherry and Sierra Madre Wind Energy Project draft Environmental Impact Statement (10/19/2011)**

1. ***Carbon County Industrial and Natural Resource Development Projects*** - Pending and in Development as of August 2011
2. **City of Rawlins Fire Response Area – description and map** (updated 11/15/2010).
3. **City of Rawlins General Fund Position Reduction Status** (1/25/2011 update).
4. **City of Rawlins Extraterritorial Utility and Infrastructure Extension Policy – Rawlins Ordinance No. 11-2010 Amending Section 13.04.170** (November 16, 2010) and **Rawlins Resolution No. 10B-2010 Authorizing Development of An Extraterritorial Utility and Infrastructure Expansion Plan** (October 19, 2010)
5. **Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming** (7/2010)

# Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

100513

Project	Developer	Description	Location	Schedule	Comments	Sources
<b>Pending Coal Technology Projects</b>						
1	Medicine Bow Fuel & Power LLC/DKRW Advanced Fuels LLC	Coalmine, CTL processing facility, associated coal-handling facilities.  Est. Cost: \$2 Billion  Workforce: (mine & plant) Const: 2,307 Peak Ops: 450	13 miles southwest of Medicine Bow	In-service 2014 (DKRW Website)	DKRW has received a Wyoming Industrial Siting Permit and submitted an application for a Federal loan guarantee to the US Department of Energy. DOE is preparing an Environmental Impact Statement to assess potential environmental impacts	MBF&P CTL Project, Industrial Siting Permit Application, 09/2007, Federal Register Volume 74, NO 217, 11/12/2009, DKRW website <sup>ii</sup>
<b>Pending Wind Energy Projects</b>						
2	Chokecherry and Sierra Madre Wind Energy Project	2,000 to 3,000 megawatt wind farm w/ approximately 1,000 wind turbines Est. cost: \$4.2 - \$6.2 billion  Workforce: Construction would occur over 4 years during months of April - October. Construction peaks Year 1: 1,189 Year 2: 1,096 Year 3: 935 Year 4: 744	South of Rawlins & Sinclair	Construction start 2012 - 2013; In-service 2015 (PCW website)	Draft Environmental Impact Statement Issued July 2011, <u>comments received for 90 days from this date</u> , also requires Wyoming Industrial Siting Permit	Chokecherry and Sierra Madre Wind Energy Project Draft Environmental Impact Statement (Volume II), PCW website <sup>iii</sup>

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10/27/118/19/11

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# Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

100513

Project	Developer	Description	Location	Schedule	Comments	Sources
<b>Pending and Approved Natural Gas Projects</b>						
3	Continental Divide-Creston Natural Gas Development Project BP America, Devon and others	8,950 natural gas wells drilled over 15 years, 20 - 30 years of production	1.1 million acres in Carbon and Sweetwater counties; centered around Wamsutter	Environmental Impact Statement in progress	An average of about 290 wells/year have been drilled in the CDC project area over the last five years.	BLM Scoping Notice, <sup>iv</sup> Wyoming Oil and Gas Conservation Commission Data,
4	Atlantic Rim Natural Gas Field Development Project Anadarko Petroleum Corporation and others	Up to 2,000 coal bed natural gas wells and ancillary facilities. Annual average of 578 job equivalents (AJE) <sup>v</sup> during drilling and an annual average of 161 production-related AJE.	Southwest of Rawlins and north of Baggs and Dixon	In development since 2007; Operations through 2037	The EIS assumed that 200 wells a year would be drilled during the first five years of the project and a lesser number of wells would be drilled during subsequent years. No new wells have been drilled in the Atlantic Rim project area over the last two years.	Source: Atlantic Rim Gas Development Project DEIS <sup>vi</sup>
5	Desolation Flats Natural Gas Development Project Marathon Oil and others	Up to 385 natural gas wells and ancillary facilities Average 19 wells year/20 years Employment Drilling/field development: estimated average annual AJE of 246 Production: AJE of 156.	Southwest of Rawlins/northwest of Baggs; located in both Carbon and Sweetwater counties	In development since 2004; Drilling through 2024		Desolation Flats Natural Gas Field Development EIS <sup>vii</sup>

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# Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

100513

Project	Developer	Description	Location	Schedule	Comments	Sources
6	Seminole Road Gas Development Project Dudley and Associates LLC	Up to 1,240 natural gas wells over 10 years. Employment Drilling: annual average of 60 employees. Production: 20 to 50 employees.	20 miles NE of Rawlins	In development		Seminole Road Gas Development Project EIS <sup>viii</sup>
7	South Baggs Area Natural Gas Development Project Merit Energy Company		South-central Carbon County, near the Wyoming/Colorado border	In development since 2000		
<b>Pending Uranium Mining and Processing Projects</b>						
8	Lost Creek Uranium In Situ Recovery Project UR Energy (Lost Creek ISR LLC)	Would include well fields for injection, production and monitoring, wellhead houses, a central processing facility, an access road network and pipeline system	40 miles northwest of Rawlins, 15 miles southwest of Bairoil in Sweetwater County	2011-2024	Environmental Impact Statement in progress- <u>Current Status? Has a draft EIS been Issued. or are we waiting for a Record of Decision?</u>	Federal Register / Volume 76, No 29, 02/11/2011, BLM website <sup>ix</sup>

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# Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

100513

Project	Developer	Description	Location	Schedule	Comments	Sources
<b>Pending and Proposed Transmission Projects</b>						
9	Gateway West Transmission Line Project	230 and 500 kilovolt (kV) transmission lines Carbon County construction over 2 years Average workforce = 142 (average non-local construction workforce = 71) Peak construction workforce - 354 (Peak non-local construction workforce - 167) 500 kV alternating current overhead transmission line	From the Windstar Substation near Glenrock, Wyoming to the Hemingway Substation near Melba, Idaho - Enters in NW Carbon County near Medicine Bow and exits west of Creston Junction	Construction between 2014 and 2018 (Gateway West website)	Draft EIS released comments received until 10/28/11, also requires Wyoming Industrial Siting Permit	Gateway West Transmission Line Draft EIS, Gateway West website <sup>vi</sup>
10	Gateway South Transmission Line Project	600kV overhead direct current transmission line from south central Wyoming, crossing northwestern Colorado and Utah diagonally from northeast to southwest and ends south of Las Vegas	Several alternative corridors crossing Carbon County from northeast to southwest	Environmental Impact Statement in progress.	STATUS- Has a draft EIS been issued, when does comment period end?	BLM Website <sup>vii</sup>
11	TransWest Express Transmission Line Project	600kV overhead direct current transmission line from south central Wyoming, crossing northwestern Colorado and Utah diagonally from northeast to southwest and ends south of Las Vegas	Several alternative corridors south of Rawlins and west of Baggs to the Colorado and Utah borders	Environmental Impact Statement in progress		BLM Website <sup>viii</sup>

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# Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
12	Jade Energy	Direct-current transmission line with a maximum transfer capacity of 3,000 megawatts. Chugwater to Jerome Idaho. Would traverse Carbon County	Southern Wyoming to Twin Falls, ID			Jade Energy website <sup>xiv</sup>
13	TransCanada	Designed as a 3,000 MW line from Wyoming southwest	Southern Wyoming to Las Vegas		Preliminary application filed with the BLM. FERC approval of negotiated rate authority and anchor shipper presubscription of 1500 MW of capacity, February 2009	Wyoming Infrastructure Authority website <sup>v</sup>
<b>Proposed Wind Energy Projects</b>						
14	Eurus Middlewood Wind LLC	270 wind turbines, totaling 531 MW	South-central Carbon County		Currently developing cost recovery agreement. Project located in sage grouse core area.	WY BLM NEPA Hotsheet <sup>vi</sup>
15	Eurus Dry Creek LLC	150 wind turbines, totaling 351 MW	South-central Carbon County		Currently developing cost recovery agreement. Project partially located in sage grouse core area.	WY BLM NEPA Hotsheet
16	Big Wind Power Company	1 GW wind energy facility, consisting of approximately 419 wind turbine sites, built in economically viable stages	Shirley Basin		There is a draft Power Producers Agreement (PPA) for phase 1 of the project (total of 80 MW). Phase 1 would tie into an existing transmission line. NEPA process not yet started.	WY BLM NEPA Hotsheet
17	Horizon Wind Energy	300 MW Wind farm, 154 turbines	Eastern Carbon County		Currently on hold, in sage grouse core area	

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# Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

Project	Developer	Description	Location	Schedule	Comments	Sources
18	Terra Moya Aqua Wind Project		Eastern Carbon County			

<sup>i</sup> [http://deq.state.wy.us/out/downloads/MBFP\\_ISA\\_Permit\\_Application\\_09-17-07\\_Final.pdf](http://deq.state.wy.us/out/downloads/MBFP_ISA_Permit_Application_09-17-07_Final.pdf)  
<sup>ii</sup> <http://www.dkrwaf.com/Projects/Medicine-Bow/Fact-Sheet-112.html> (08/17/2011)  
<sup>iii</sup> <http://www.powercompanyofwyoming.com/> (08/17/2011)  
<sup>iv</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/cd\\_creston.Par.34343.File.dat/scoping.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/cd_creston.Par.34343.File.dat/scoping.pdf)  
<sup>v</sup> AJE reflect an aggregation of all employees (existing and new) whose employment would be supported in whole or in part by Atlantic Rim project spending. The term AJE is used to emphasize that these are not all discrete or separate new jobs, rather they represent both new and existing jobs and portions of jobs that are wholly or partially supported by the incremental economic activity associated with the project.  
<sup>vi</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/atlantic\\_rim.Par.61741.File.dat/00deis.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/atlantic_rim.Par.61741.File.dat/00deis.pdf)  
<sup>vii</sup> <http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/desflats.html>  
<sup>viii</sup> <http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/seminoeroad/deis.Par.3198.File.dat/SeminoeDEIS.pdf>  
<sup>ix</sup> <http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/lostcreek.html>  
<sup>x</sup> [http://www.wy.blm.gov/nepa/cfodocs/gateway\\_west/documents/deis/3.04\\_Socioeconomics.pdf](http://www.wy.blm.gov/nepa/cfodocs/gateway_west/documents/deis/3.04_Socioeconomics.pdf) Page 3.4-31  
<sup>xi</sup> <http://www.gatewaywestproject.com/>  
<sup>xii</sup> [http://www.blm.gov/wy/st/en/info/NEPA/documents/hdd/gateway\\_south.html](http://www.blm.gov/wy/st/en/info/NEPA/documents/hdd/gateway_south.html)  
<sup>xiii</sup> <http://www.blm.gov/wy/st/en/info/NEPA/documents/hdd/transwest.html>  
<sup>xiv</sup> <http://www.overlandtransmission.com/index.htm>  
<sup>xv</sup> <http://wyia.org/projects/transmission-projects/zephyr-project-ztp/>  
<sup>xvi</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA.Par.24843.File.dat/hot\\_sheet.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA.Par.24843.File.dat/hot_sheet.pdf)

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## City of Rawlins Fire Response Area

(Resulting from the joint agreement of City of Rawlins and Carbon County  
on 5/11/2010 – updated 11-15-10)

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The following is our understanding of the response area discussed by the County Fire Marshal France, County Commissioner Weickum, Mayor Klouda, Chief Hannum, Police Chief Mike Reed and City Manager Golnar at our meeting of 5/11/2010 and subsequent discussions with the County Fire Chief. I have made the following changes

### We will respond to all property within the Rawlins City limits and:

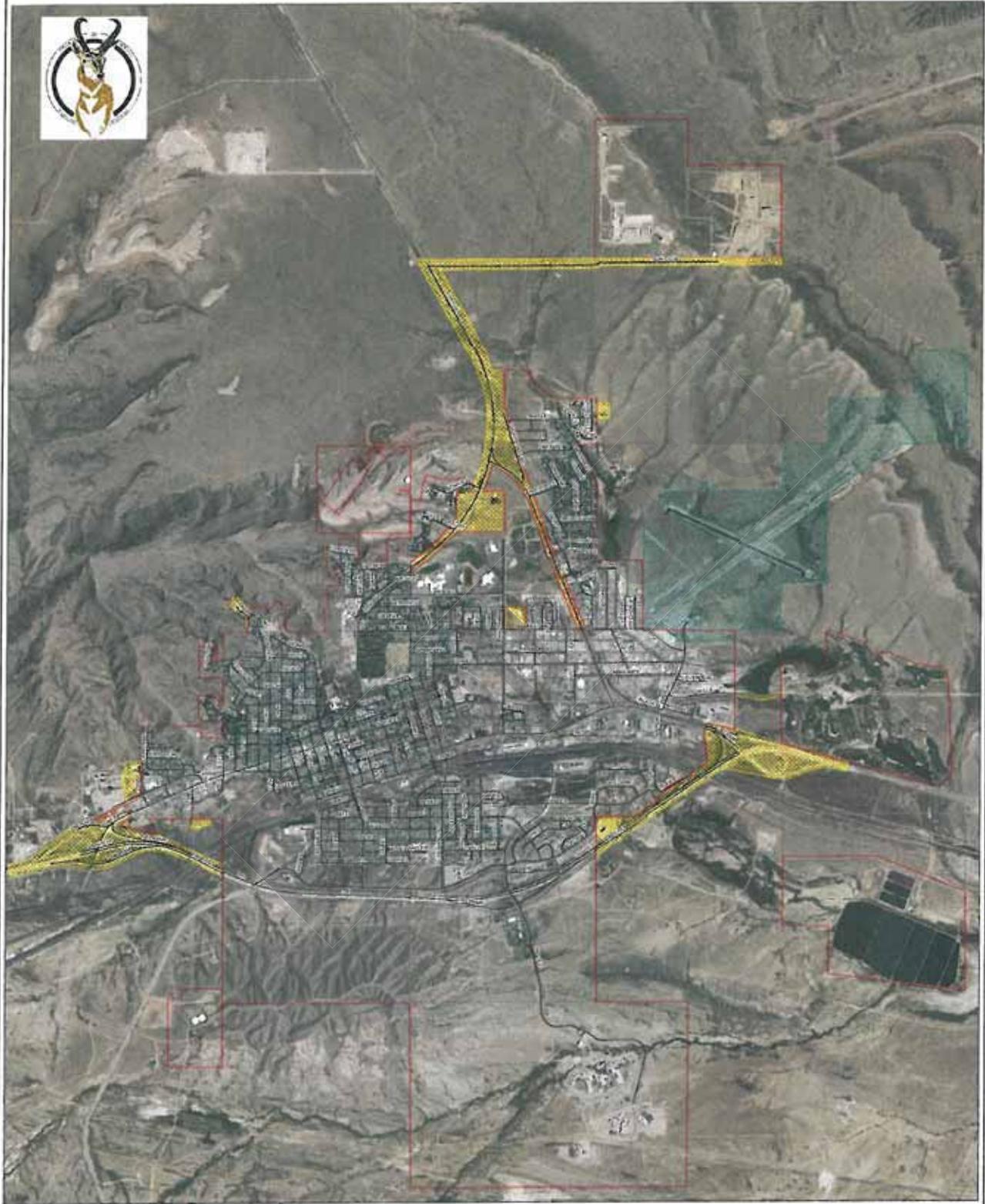
- : anything on 287 North to and including the landfill road and landfill.
- : the house sitting in the middle of the field by the Rec Center, off of 287 (the Seldomridge home), as well as the houses west of 3<sup>rd</sup> Street and the barn around Scarlet Drive
- : the new elementary school and the Baptist Church.
- : Norm Harvey Airport – is a dual response area – both departments will be notified.
- : anything on I-80 between MM 211 and 215 including exit/on ramps.
- : ~~TA truck stop and the Wyoming State Prison but nothing else south of the Interstate.~~
- : Dr Couch's office, the Methodist Church, and the Super 8 Motel
- : Rich Wilson's house between Spruce St and the Interstate, and Jim Piche's residence in the canyon
- : the industrial area and to the Rochelle Ranch Golf Course.
- : city property including but not limited to the City outdoor shooting ranges, the water treatment plant, the sewer plant and the 140 acres of city property north east of the City limits by the Painted Hills Water Tank.

### We will not respond to:

- : anything west of Dr. Couches office
- : anything west of the 287 – landfill road intersection or beyond the landfill road
- : The Dowlin's Ranch, Miller Estate Company, and Don Hansen property east of Inverness street.

Steve Golnar, Rawlins City Manager

# CITY OF RAWLINS FIRE RESPONSE AREAS



- City Response Inside City Limits
- Airport - Joint Response
- City Response Outside City Limits

*\*\*City Response Outside City Limits Per City and County Agreement*



Map Prepared By: Scott Stammen 6-7-2016

## City of Rawlins General Fund Position Reduction Status: (1/25/2011 update)

[Regular numbers equal reductions, "+" equal additions]

Position Title                      FY2009-10 Mid Year                      FY2010-11 Proposed    Mid Yr. 10-11

## City Hall

AutoCad/GIS Operator (attr.)	1		
Comm. Dev. Dir. (created/ not filled)			+1
City Planner	1		
Planning Technician	1		
Secretary – DDA/Main Street	1		
CATS Bus Driver	.25		
Planning/Legal Secretary/Court Clerk		1	+1.5
Court Clerk (P.T.- new)		+1.5	
Building Inspector – Commercial (attr.)			1
Grants Manager (attr.)			1
Assistant City Attorney (attr.)			.65
Legal secretary (reorg.)			.5

## Public Works Department

Municipal Service Worker I (attr.)	1		
Facilities Maintenance Technician	1		
Municipal Worker I	2		

## Police Department

Communications Operator I (attr.)	1		
SRO Officer (not created/not budgeted)			
Victim Advocate	1		
Police Officer		2	
Police Officer (COPS grant)			

## Recreation Department

Recreation Assistant (attr.)	1		
Recreation Assistant	1		
Range Attendant	1		
Golf Course Assist. Superintendent	1		
Drop Off Day Care Provider	.25		
Recreation Rover (new)	+1		

## Fire Department

Fire Apparatus Operator 1	2		+2(SAFER grant)*
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Total Reductions in Force	16.5	2.5	
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FY2009-10 beginning GF FTE* = 114.65	98.15 FTE	95.65 FTE	95.00 FTE
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\*Grant funded positions not included in General Fund funded positions.

**RESOLUTION NO.**

**A RESOLUTION AUTHORIZING THE DEVELOPMENT OF AN EXTRATERRITORIAL UTILITY EXPANSION PLAN.**

*WHEREAS*, the City of Rawlins has the capacity to provide utility service outside the City limits; and

*WHEREAS*, providing utilities outside the City limits could impact the future development of the City; and

*WHEREAS*, the City of Rawlins and the County of Carbon have areas of concurrent jurisdiction outside the City limits of Rawlins; and

*WHEREAS*, Carbon County Land Use Plan (August 3, 2010) calls for the use of planning to encourage higher density development near municipalities; and

*WHEREAS*, the City of Rawlins can influence development in the one mile area surrounding the city through an Extraterritorial Utility Expansion Plan; and

*WHEREAS*, an Extraterritorial Utility Expansion Plan should be part of the City Master Plan.

***NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF RAWLINS, CARBON COUNTY, WYOMING*** that staff is directed to prepare an Extraterritorial Utility Development Plan to be submitted for comment to the Urban <sup>Systems Committee</sup> Development Council, the City Planning Commission and the County Planning Office, then certified to the City Council for approval.

**PASSED, APPROVED AND ADOPTED** this \_\_\_\_ day of \_\_\_\_\_, 2010.

CITY OF RAWLINS, a Wyoming  
municipal corporation

\_\_\_\_\_  
Kenneth C. Klouda, Mayor

ATTEST:

\_\_\_\_\_  
Marla K. Brown, City Clerk

**ORDINANCE NO.**

**AN ORDINANCE AMENDING SECTION 13.04.170**

*WHEREAS*, the City of Rawlins has the capacity to provide utility service outside the City limits; and

*WHEREAS*, providing utilities outside the City limits could impact the future development of the City; and

*WHEREAS*, the City of Rawlins and the County of Carbon have areas of concurrent jurisdiction outside the City limits of Rawlins; and

*WHEREAS*, Carbon County Land Use Plan (August 3, 2010) calls for the use of planning to encourage higher density development near municipalities; and

*WHEREAS*, Section 13.04.170 currently reads:

**Service Outside City.**

The City Manager shall have the sole and exclusive to contract to the City owned or operated utility service outside the City corporate limits, under such terms and conditions are in the best interest of the City. The rates for said utility service shall not be less than one and one-third (1 1/3) times the rate for like services within the City limits without prior Council approval.

*WHEREAS*, Section 13.04.170 should be amended to read as follows:

**Service Outside City.**

Utility service outside the City corporate limits shall be in compliance with and under such terms and conditions outlined in the City of Rawlins Extraterritorial Utility Services Expansion Plan as approved by the City Council. The rates for such utility services shall not be less than one and one-third (1 1/3) times the rate for like services within the City limits or as otherwise set from time to time by the City Council pursuant to City Ordinance 1.01.110.

***NOW, THEREFORE BE IT ORDAINED***, that Section 13.04.170 is amended.

**PASSED, APPROVED AND ADOPTED** this \_\_\_\_\_ day of \_\_\_\_\_, 2010.

CITY OF RAWLINS, a Wyoming  
municipal corporation

\_\_\_\_\_  
Kenneth C. Klouda, Mayor

ATTEST:

\_\_\_\_\_  
Marla K. Brown, City Clerk

1<sup>st</sup> Reading: \_\_\_\_\_

2<sup>nd</sup> Reading: \_\_\_\_\_

3<sup>rd</sup> Reading: \_\_\_\_\_

Publication: \_\_\_\_\_

Duplicate

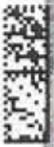
**Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming (10/2011)**

Community	Rooms Available	Camp Ground / RV Spaces	Total
Baggs	21	23	44
Elk Mountain	17	0	17
Dixon	20	0	20
Encampment	33	0	33
Hanna	0	0	0
Medicine Bow	56	4	60
Rawlins	1172	383	1555
Riverside	20	33	53
Saratoga	177	30	207
County/Unincorporated	71	35	106
	1587	508	2095

Rawlins Breakdown	Rooms Available
America's Best Value Inn	76
Best Motel	28
Best Western Cottontree Inn	122
Comfort Inn & Suites	65
Days Inn	119
Econo Lodge	38
Express Inn	48
Ferris Mansion B&B	4
First Choice Inn	48
Hampton Inn	78
Jade Lodge	24
Holiday Inn Express	72
Key Motel	30
Labella Motel	7
Microtel Inn	59
Motel 7	31
Oak Tree Inn	62
Quality Inn	131
Rimrock Lodge	4
Sunset Motel	29
Super 8 Motel	47
Travel Lodge	50
American President's Campground	70
RV World	80
KOA Campground	62
Western Hills Campground	171
	1555

74%  
Rawlins as a % of City and  
County Motel rooms  
Camp Ground / RV Spaces  
in Carbon County

US POSTAGE  
FIRST-CLASS  
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B43134.10



Bureau of Land Management  
Gateway West Project  
Walter George, National Project Manager  
PO Box 20879  
Cheyenne, Wyoming 82003

166352

100352

# Town of Glenrock



2011 AUG 24 AM 10:00

PHONE (307) 436-9294

P. O. BOX 417

GLENROCK, WYOMING 82637

2011 AUG 24 AM 10:00  
 RECEIVED  
 DOI-BLM  
 CHEYENNE, WYOMING

August 18, 2011

Bureau of Land Management  
 Gateway West Project  
 Walter George, National Project Manager  
 PO Box 20879  
 Cheyenne, Wyoming 82003

Dear Mr. George:

Thank you for supplying the Town a more detailed map of the proposed location of the transmission line. With the updated town limits drawn on the map, the line is clearly within the town limits. This area was annexed to the town in 2004 as a growth area for the town and zoned Commercial Highway Business (a copy of which is attached).

At this time we are opposing the location of the transmission line and requesting the line be moved to one of the feasible alternatives (green lines) as shown on the map - Segment 1E/1W. If you would like to discuss this, please contact me at 307-436-9294 ext 313 or email at [glenrockwyomayor@aol.com](mailto:glenrockwyomayor@aol.com). In my absence, please contact Kathy Patceg at 307-436-9294 ext 314 or email at [kathy.glenrockplanner@gmail.com](mailto:kathy.glenrockplanner@gmail.com).

Sincerely,

  
 Michael L. McQueary, Mayor

Cc: Town Council  
 Frank Peasley, Town Attorney

1/5

# ORDINANCE NO. 577

2011 AUG 24 AM 10: 00

AN ORDINANCE AMENDING CHAPTER 31, ARTICLE II - DISTRICTS BY ADDING A NEW ZONING DESIGNATION COMMERCIAL HIGHWAY BUSINESS ZONE - CHB AND AMENDING SECTION - 31-1-4 - DEFINITIONS.

RECEIVED  
DOI-BLM  
CHEYENNE, WYOMING

BE IT ORDAINED by the governing body of the Town of Glenrock, Wyoming, that the Glenrock Town Code is amended as follows:

## CHAPTER 31

### ZONING

#### ARTICLE II - DISTRICTS

#### SECTION 31-2-9      COMMERCIAL HIGHWAY BUSINESS ZONE, (CHB)

(a) Purpose and Intent

- i. To allow a variety of commercial uses to serve people and industry, and maintain and strengthen the economic base of the town.
- ii. To allow development of commercial facilities catering to the traveling public along major highway entrances into the town.
- iii. To allow business park type settings compatible with other commercial uses.
- iv. To establish a mix of uses, which will serve the needs to the community and the surrounding area, as well as permitting recreational and entertainment type uses.

(b) Site Plan Approval

Due to the importance of attractive vistas and appearances of entryways into town, all developments in this district shall be reviewed by the Planning Commission and the Town Council for compatibility with surrounding uses. Compatibility shall be determined based on, but not limited to, the following criteria:

- i. Architecture/Design
- ii. Noise
- iii. Traffic generation
- iv. Parking
- v. Landscaping
- vi. Lighting
- vii. Screening
- viii. Outside storage

(c) Permitted Uses:

- i. Animal Clinics and Veterinary hospital
- ii. Assembly and fabrication plants;
- iii. Assisted Living, Long Term Care
- iv. Automobile sales;
- v. Automobile service stations;
- vi. Banks;
- vii. Builders supply yards;
- viii. Churches;
- ix. Clubs and lodges;
- x. Convenience store;
- xi. Child care center
- xii. Farm implement sales and service;
- xiii. Frozen food lockers;
- xiv. Green houses;
- xv. Grocery stores;
- xvi. Hotels, motels and recreational vehicle parks
- xvii. Manufactured home sales;
- xviii. Offices, general and professional;
- xix. Parks, playgrounds, historical sites, golf courses and other similar recreational facilities;
- xx. Plumbing, welding, electrical supply, and service shops;
- xxi. Public utility and public service installations and facilities;
- xxii. Radio and television stations, including transmitting and receiving towers;
- xxiii. Restaurants, package liquors stores;
- xxiv. Retail Sales;
- xxv. Single family residential unit or mobile home to be used as a caretaker unit;
- xxvi. Trade or business schools;
- xxvii. Transportation depots;
- xxviii. Truck/car stops;
- xxix. Warehouses, indoor and limited outdoor storage.

(d). Conditional Uses: (See Chapter 31, Article III for procedure)

- i. Oil and Gas wells;
- ii. Aboveground bulk liquid or gaseous petroleum storage tanks;
- iii. Foundries;
- iv. Communication towers;
- v. Fabrication shops.
- vi. Any use permitted in GB - General Business

(e) Development Standards and Requirements:

- i. Minimum building site area - none.
- ii. Maximum building height - Thirty-two (32) feet.
- iii. Minimum setback from property lines:  
Front yard - twenty (20) feet

Side yard - ten (10) feet, with a minimum of fifteen (15) feet between main structures, unless a greater distance is required by the building code.

Rear yard - ten (10) feet.

- (f) Off Street Parking: Adequate off-street parking shall be provided in accordance with Chapter 31, Article VII
- (g) Residential buffer: Where a commercial use abuts either a R-1 or R-2 District, the commercial use shall provide an adequate buffer in the form of plantings, berms and /or decorative walls or fences to buffer the residential district.

#### CHAPTER 31, SECTION 31-1-4 - DEFINITIONS

- (x)a Assembly and Fabrication Plant - The manufacturing from standardized parts of a distinct object differing from the individual components.
- (x)b Assisted Living Facility - Residences for adults who require limited assistance. The facility provides rooms, meals, personal care, and supervision of self-administered medication. They may provide other services, such as recreational activities, financial services, and transportation.
- (x)c Automobile Salvage - Any establishment or place of business which is maintained or used for the storage, keeping, buying, or selling of wrecked, scrapped, or dismantled motor vehicles or parts thereof.
- (x)d Automobile Storage - A location with a contained and buffered area used for storing new and used operable vehicles not awaiting repair or demolition. Such business **excludes** commercial wrecking yards, dismantling of vehicles or junk yards.
- (xxxviii) Convenience Store - Any retail establishment offering for sale prepacked food products, household items, newspapers and magazines, sandwiches and other freshly prepared foods such as salads, for off-site consumption.
- (lvii) Garage, Automotive Repair - Any building or premises used for the repair of vehicles for profit. Repair activity shall be conducted in enclosed places or screen from public view. **Outdoor storage of vehicles awaiting repair, materials, or supplies shall be housed in an enclosed area with an opaque fence or wall constructed to a height adequate to conceal any vehicles, equipment or supplies located on the lot.**
- (lxxiii)a Long Term Care Facility - An institution or a distinct part of an institution that is licensed or approved to provide health care under medical supervision for twenty-four or more consecutive hours to two or more

patients who are not related to the governing authority or its members by marriage, blood, or adoption.

- (cx1)a Truck/Car Stop - Any building, premises, or land in which or upon which a business, service, or industry involving the maintenance, servicing, storage, or repair of commercial vehicles is conducted or rendered, including the dispensing of motor fuel or other petroleum products directly into motor vehicles and the sale of accessories or equipment for trucks and similar commercial vehicles. A truck stop also may include overnight accommodations and restaurant facilities primarily for the use of truck crews.
- (cxxxvii)a Site Plan - A site plan is a plot plan of the entire area to be developed, which shows the location and size of buildings, the area of the land under consideration, drainage plan, street names and widths, and any other information that may be pertinent to the development.

**PASSED ON FIRST READING** the 22th day of March , 2004.

**PASSED ON SECOND READING** the 12th day of April, 2004.

**PASSED, APPROVED, and ADOPTED on THIRD and FINAL READING** the 26<sup>th</sup> day of April, 2004.

ATTEST:

\_\_\_\_\_  
Steve Cielinski, Mayor

\_\_\_\_\_  
Donna M. Geho, Clerk/Treasurer

PUBLISHED: APRIL 29, 2004

EFFECTIVE: MAY 10, 2004