Application for Conditional Use Permit
Carbon County, Wyoming

Gateway West Segment D-1 Transmission Line Project

Submitted by:

Rocky Mountain Power
1407 West North Temple
Salt Lake City, Utah 84116

Prepared by:

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FIGURES:

ACRONYMS AND ABBREVIATIONS

Application	Conditional Use Permit Application
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CIC	Compliance Inspection Contractor
CUP	Conditional Use Permit
CWA	Clean Water Act
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act of 1973
IRP	Integrated Resource Plan
ISC	Wyoming Industrial Siting Council
ISD	Wyoming Industrial Siting Division
kV	kilovolt
MW	megawatt
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
OPGW	optical ground wire
POD	Plan of Development
Project	Gateway West Segment D-1 Transmission Line Project
RAM	Ranching, Agriculture, and Mining zoning district
ROD	Record of Decision
ROW	right-of-way
SHPO	State Historic Preservation Office
U.S.	United States
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
WGFD	Wyoming Game and Fish Department

PART A CONDITIONAL USE PERMIT APPLICATION

PART A-1 Minimum Contents for a Conditional Use Permit Application

The minimum contents for a Conditional Use Permit (CUP) Application are presented in the Carbon County, Wyoming CUP application package, revised July 1, 2019, and available on the Carbon County website at: http://www.carbonwy.com/DocumentCenter/View/485/Application---Conditional-Use-Permit?bidId=. The application package includes the following items; Rocky Mountain Power's responses are included after each item:

1. Application for Conditional Use Permit

   Response:

   a. The Carbon County CUP Application Form in support of the Gateway West Segment D-1 Transmission Line Project (Project) is included in **Part A-2**.

   b. The Affidavit is provided in **Part A-2**.

   c. The Nature of Request and Project Information is provided in **Part B**.

   d. Supporting Documentation is included in **Part C:**

      - **Attachment C-1** includes the Project Overview Map, which shows the Project's location in Carbon County as well as land jurisdiction.
      - **Attachment C-2** includes four maps that show Project facilities, parcel boundaries, zoning, and future land use designations in Carbon County:
        - **Map 1** shows Project facilities, including locations where the Project crosses Carbon County roads.
        - **Map 2** shows non-federal land that the Project crosses.
        - **Map 3** shows Carbon County zoning districts that the Project crosses.
        - **Map 4** shows the Carbon County future land use designations that the Project crosses.
      - **Attachment C-3** includes a summary and additional description of the Project facilities in Carbon County.
      - **Attachment C-4** includes the names and mailing addresses of property owners for parcels crossed by the Project's right-of-way (ROW) as well as parcels adjacent to the Project's ROW. Parcels and landowners are shown on **Attachment C-2, Map 2**.
      - **Attachment C-5** lists aliquot parcels crossed by the Project's ROW.

2. The application packet must include:

   a. A site plan and vicinity map.

      Response: Attachments C-1 and **C-2** above satisfy this requirement.

   b. Survey or engineering drawings prepared by a Wyoming licensed engineer or surveyor, if applicable.

      Response: At this stage of the Project, Rocky Mountain Power does not have survey or engineering drawings prepared. Prior to construction, Rocky Mountain Power will provide survey or engineering drawings to Carbon County as a condition of approval of the CUP. Please refer to **Section 9.0** for a complete list of Rocky Mountain Power-proposed CUP conditions.

c. Statement of purpose and need.

Response: See **Part B, Section 5.0 – Project Purpose, Need, and Benefits**.

d. Project description and projected timeline.

Response: See **Part B, Section 2.0 – Project Description and Location**.

e. Any other information determined to be necessary to make a comprehensive evaluation by the staff, Planning and Zoning Commission and Board of County Commissioners.

Response: Additional supporting information is included in **Parts B and C**.

f. Proof of ownership.

1. Typically a warranty deed or title policy.

2. If not the property owner, submit a letter of authorization from the property owner.

Response:

Rocky Mountain Power submitted an application on August 26, 2020 to the Wyoming Public Service Commission for a certificate of public convenience and necessity for the Project codifying that the Project is necessary and in the public interest. An order is expected by the Commission by March 2021 and will include a condition that Rocky Mountain Power submit 100 percent of the ROW prior to construction. Rocky Mountain Power is in the process of obtaining easements from multiple landowners for the transmission line ROW and will submit proof of legal access to Carbon County as a condition of approval of the CUP.

3. Provide a completed affidavit (attached) that must accompany the mailing labels, attesting that the submittal includes an accurate listing of the adjacent/abutting property owners as reflected in the records of the Carbon County Assessor's Office.

Response: Please see **Part A-2** and **Attachment C-4**.

4. Provide copies of the Current Notice of Valuation(s) for the subject property. Notice of Valuation(s) can be obtained from either the County Assessor's Office or from the County's website.

Response: This is not applicable to Rocky Mountain Power because the Current Tax Assessment Notice is a requirement for underlying property owners. Rocky Mountain Power will be obtaining easements from the underlying property owners and has included a Tax Certificate and Notice of Valuation for Rocky Mountain Power-company owned property to Carbon County with the electronic version of this Application. **Section 9.0** lists Rocky Mountain Power-proposed CUP conditions.

5. Current Tax Certificate(s) – must be signed by the Carbon County Treasurer or authorized deputy.

Response: See response to Item 4 above.

6. Proof of legal access/easements to subject property. The access/easements must be recorded and contain metes and bounds descriptions.

Response: Prior to construction, Rocky Mountain Power requests that proof of legal access be required as a condition of the CUP to be provided to Carbon County as requested in Item 2(f) above.

In addition to the Project's ROW grant issued by the United States (U.S.) Department of the Interior's Bureau of Land Management (BLM) for Project facilities located on BLM-managed lands, Rocky Mountain Power is in the process of negotiating details regarding needed land acquisition across private lands, either in fee simple or as an easement, for the transmission line and associated facilities with each landowner. In exchange for the right to operate the transmission line and facilities, Rocky Mountain Power will compensate the landowner for the use of the land.

The negotiations between Rocky Mountain Power and the individual landowner could include compensation for loss of use during construction, loss of non-renewable or other resources, and the reclamation of unavoidable damage to property during construction. Private landowners may negotiate stipulations as part of their agreements. If a fee ownership or an easement cannot be negotiated with the landowner, Rocky Mountain Power may acquire the rights needed per eminent domain. State statutes have been enacted that define the acquisition process on private and non-federal public lands for utilities. Rocky Mountain Power has started the process of contacting landowners along the Project's route and discussing easements.

7. Application fee based on a fee schedule approved by the Board. In addition, the cost of all notices and recording fees shall be paid by the applicant.

   Response: The application fee of $4,100 is included in the application submittal.

8. Applicant's response to the following review criteria. Attach additional sheets if necessary.

   a. The Conditional Use generally shall be consistent with the Goals, Strategies, and Actions of the Comprehensive Land Use Plan, including the Future Land Use Map. If no comments are provided, the staff will provide a summary at the Planning & Zoning Commission's meeting.

   b. The proposed use should serve a public need.

   c. The proposed use should be appropriate for the proposed location and will not be detrimental to the surrounding area or to established uses.

   d. The proposed conditional use should be adequately served by facilities and services including legal and physical access and circulation, water and wastewater facilities, solid waste, law enforcement, fire protection, and emergency medical services.

   e. That any resulting commercial and truck traffic shall not use a residential street nor create a hazard to a developed residential area.

   f. That the record owner has taken adequate steps to minimize and control potential environmental problems that might result from the proposed use.

   Response: Part B, Section 3.2 provides responses to these items.

9. Multiple copies of the application and supporting documents may be required for distribution to the Planning & Zoning Commission and Board of County Commissioners.

   Response: Rocky Mountain Power agrees to provide electronic or paper copies of the CUP Application and supporting documents, as requested by the Carbon County Planning and Development Department.

10. Posted Notice. A Sign must be posted on the property by the applicant at least 14 days before the Planning & Zoning Commission's hearing date. The sign will be provided by the Planning and Development Department and must include a summary of the request, the date, time and place of the hearing, and a telephone number to contact for more information.

    Response: Due to the broad geographic extent of the Project in Carbon County, it will not be practical to post signs on all of the properties crossed by the transmission line's ROW. Rocky Mountain Power proposes to work with Carbon County to determine key locations to post signs and will post the signs prior to the hearing in accordance with these requirements.

PART A-2 Conditional Use Permit Application Form

CARBON COUNTY
Department of Planning and Zoning
215 West Buffalo, Suite 336
Rawlins, WY 82301
Tel (307) 328-2651 FAX (307) 328-2735

www.carbonwy.com

Current Application Fee ***Plus*** public notice costs.
Fee Paid $_____ Date_____
Case File No. **C.U. CASE #**_____

APPLICATION FOR CONDITONAL USE PERMIT
(Please Print or Type)

Applicant: PacifiCorp, doing business as Rocky Mountain Power Date: September 21, 2020

Mailing Address: 1407 West North Temple, Suite 250 Salt Lake City, UT 84116 Phone: (801) 220-4561

Email Address for all notifications: rod.fisher@rockymountainpower.net

Owners (if ***not*** Applicant):_____ Date:_____

Mailing Address:_____ Phone:_____

Representative (authorization required):_____ Date:_____

Mailing Address:_____ Phone:_____

Email Address:_____

LEGAL DESCRIPTION OF THE PROPERTY(S) (Attach additional sheets if necessary): Meets and Bounds legal descriptions must be submitted in "WORD" format. The Planning Director may require that legal descriptions be prepared by a surveyor licensed in the State of Wyoming.

GEO/Parcel Identification Number(s) (PIN) #: 06- See Application: Attachment C-4

Quarter Sections See Application: Attachment C-5 Section _____ Township _____ Range _____

Subdivision Name Not applicable Block _____ Lots _____

Site Address or Location: See Application: Attachments C-1 and C-2

Current Zone District: Ranching, Agriculture, and Mining (RAM)

Project Acreage Size (No. of Acres): See Application: Part B, Section 2.0

Project Description and\or Proposed Use: See Application: Part B, Section 2.0

Pre-Application Meeting.

Prior to submittal of any application for Conditional Use Permit, all applicants will schedule a pre-application meeting with the Planning Director or his/her designee. The purpose of the pre-application meeting is to: 1) help facilitate a complete application; 2) result in timely processing, as well as affording an opportunity to determine if a conditional use permit is appropriate; and to discuss any other issues relevant to an application.

Pre-Application Meeting: ■ Yes Date: September 16, 2020 ☐ No

MINIMUM CONTENTS OF APPLICATION:

Conditional Use Permit Application Procedure.

1. An application for a Conditional Use Permit must be submitted on this application form and must be signed by the record owner and applicant, if different from the owner. No application will be scheduled until it is accepted as complete by the Planning Director or Commission.

2. The application packet must include:
   a. A site plan and vicinity map.
   b. Survey or engineering drawings prepared by a Wyoming licensed engineer or surveyor, if applicable.
   c. Statement of purpose and need.
   d. Project description and projected timeline.
   e. As well as any other information determined to be necessary to make a comprehensive evaluation by the staff, Commission and Board.
   f. Proof of Ownership:
      1. Typically a warranty deed or title policy.
      2. If not the property owner, submit a letter of authorization from the property owner.

3. Provide a completed affidavit (attached) that must accompany the mailing labels, attesting that the submittal includes an accurate listing of the adjacent/abutting property owners as reflected in the records of the Carbon County Assessor's Office.

4. Provide copies of the Current Notice of Valuation(s) for the subject property. Notice of Valuation(s) can be obtained from either the County Assessor's Office or from the County's website.

5. Current Tax Certificate(s) – must be signed by the Carbon County Treasurer or authorized deputy.

6. Proof of legal access/easements to subject property. The access/easements must be recorded and contain meets and bounds descriptions.

7. Application fee based on a fee schedule approved by the Board. In addition, the cost of all notices and recording fees shall be paid by the applicant.

8. Applicant's response to the following review criteria. Attach additional sheets if necessary.

   a. The Conditional Use shall be generally consistent with the Goals, Strategies, and Actions of the Comprehensive Land Use Plan, including the Future Land Use Map. If no comments are provided, the staff will provide a summary at the Planning & Zoning Commission's meeting.
   Comments: See Application: Part B, Section 3.2

   b. The proposed use should serve a public need.
   Comments: See Application: Part B, Section 3.2

   c. The proposed use should be appropriate for the proposed location and will not be detrimental to the surrounding area or to established uses.
   Comments: See Application: Part B, Section 3.2

d. The proposed conditional use should be adequately served by facilities and services including legal and physical access and circulation, water and wastewater facilities, solid waste, law enforcement, fire protection and emergency medical services.
Comments: See Application: Part B, Section 3.2

e. That any resulting commercial and truck traffic shall not use a residential street nor create a hazard to a developed residential area.
Comments: See Application: Part B, Section 3.2

f. That the record owner has taken adequate steps to minimize and control potential environmental problems that might result from the proposed use.
Comments: See Application: Part B, Section 3.2

9. Multiple copies of the application and supporting documents may be required for distribution to the Planning & Zoning Commission and the Board of County Commissioners.

10. Posted Notice. A Sign must be posted on the property by the applicant at least 14 days before the Planning & Zoning Commission's hearing date. The sign will be provided by the Planning and Development Department and must include summary of the request, the date, time and place of the hearing and a telephone number to contact for more information.

PUBLIC LANDS ADMINISTRATION:
Land Owner's signature *not required* when lease or other public land use authorization is provided.

Public Land Use Lease or other Authorization #: _____

PRINTED SIGNATURE-landowner	**SIGNATURE-landowner**	**DATE**
ROD FISHER		9/18/2020
PRINTED SIGNATURE-applicant	**SIGNATURE-applicant**	**DATE**

The applicant is solely responsible for the contents of this application and verifies that this is accurate.

ATTACHMENTS:
Affidavit and APO Listing, Tax Certificate, and Current Fee Schedule.

AFFIDAVIT
Attesting to the Accuracy of Information Provided to Carbon County, Wyoming

In Carbon County, Wyoming,

ROD FISHER,

(Applicant or Authorize Representative – Please Print)

has made application to Carbon County that requires notice to abutting\adjacent property owners, and being duly sworn, deposes and says that the mailing labels of abutting\adjacent property owners (land having a common property line or separated only by an alley, easement or private road) submitted with their application, is a true and accurate listing of those property owners, as reflected in the records of the Carbon County Assessor's office on SEPTEMBER 1, 20 20.

The Applicant does hereby accept responsibility for any inaccuracies in the production of these mailing labels of abutting\adjacent property owners that result from applicant's errors, rather than errors in the Assessor's records, and holds harmless Carbon County for any delays in processing of the applicant's petition that result from these inaccuracies.

(Applicant or Authorize Representative Signature)

I, ROGER B. RIGBY, a Notary Public of the SALT LAKE (COUNTY), UTAH (STATE) aforesaid, hereby certify that ROD FISHER personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

Witness my hand and official seal this the 18th day of SEPTEMBER, 20 20.

(SEAL)

Notary Public - State of Utah
ROGER B. RIGBY
Comm. #712992
My Commission Expires
July 8, 2024

Notary Public

My Commission expires:

7 / 8 / 2024.

Date Revised: June 25, 2012

Adjacent Property Owners

Example:
PIN No: 12890100000600
Name: Bureau of Land Management – Attn: Realty Division
Mailing Address: PO Box 2407
City: Rawlins State: WY Zip: 82301

PIN No: See Application: Attachment C-4, Table C-4B
Name:
Mailing Address:
City: State: Zip:

PIN No:
Name:
Mailing Address:
City: State: Zip:

PIN No:
Name:
Mailing Address:
City: State: Zip:

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City: State: Zip:

PIN No:
Name:
Mailing Address:
City: State: Zip:

PIN No:
Name:
Mailing Address:
City: State: Zip:

TAX CERTIFICATE

STATE OF WYOMING)
) SS.
COUNTY OF CARBON)

I, PATRICIA BENTSEN, TREASURER OF CARBON COUNTY, WITHIN AND FOR THE COUNTY OF CARBON, STATE OF WYOMING, DO HEREBY CERTIFY, I HAVE EXAMINED THE RECORDS OF THIS OFFICE AND FROM SUCH EXAMINATION DO FIND THE TAXES UPON:

OWNER NAME: **PACIFICORP / PACIFIC POWER & LIGHT CO**

PROPERTY DESCRIPTION: **MULTIPLE**

ACCOUNT: **SEE ATTACHED**
PARCEL: **SEE ATTACHED**
GEO PIN: **SEE ATTACHED**

TAXES DUE AS FOLLOWS FOR THE YEAR: **2019**

ALL PARCELS WITH THE EXCEPTION OF 2 ARE STATE ASSESSED AND EXEMPT

PARCEL: R0016098 TAXES ARE PAID IN FULL TOTAL FOR THE 2019 TAX YEAR $182.37
PARCEL: R0012601 TAXES ARE PAID IN FULL TOTAL FOR THE 2019 TAX YEAR $21.28

DATED AT RAWLINS, WYOMING, ON THIS 12TH DAY OF JUNE, 2020

Stacey Ward

STACEY WARD, DEPUTY

County Parcel ID	Account	Owner Name	PAC Internal
19780520003500	R0016614	PacifiCorp	WYCY-0015
21861630001700	R0016118	Pacific Power & Light Co	WYCY-0012
21862120190000	R0016266	Pacific Power & Light Co	WYCY-0011
21870840800200	R0006478	PacifiCorp	WYCY-0018
21871840090000	R0016111	PacifiCorp	WYCY-0001
21872120000400	R0016628	Pacific Power & Light Co	WYCY-0002
21883610007000	R0010698 Pd,	Rawlins Electric Co. C/O Pacific Power	WYCY-0007
22810540004100	R0011136	PacifiCorp	WYCY-5003
22811830090000	R0016224	PacifiCorp	WYCY-0010, 13, XXXX
22812820001600	R0016873	PacifiCorp	WYCY-0019
23790420000400	R0012342	PacifiCorp	WYCY-0020
24780310000400	R0012394	PacifiCorp	WYCY-0014
24790110000300	R0012398	PacifiCorp	WYCY-0014
24791020000500	R0012400	PacifiCorp	WYCY-0014
24803510000700	R0016620	PacifiCorp	WYCY-0017
25842920000500	R0012601 Pd,	Pacific Power & Light Co	WYCY-0006
26783110001000	R0016312	PacifiCorp	WYCY-0016
26892110001200	R0016368	Pacific Power & Light Co	WYCY-0004

CARBON COUNTY www.carbonwy.com
PLANNING AND DEVELOPMENT
TEL (307) 328-2651 FAX (307)328-2735

FEE SCHEDULE

Please make checks payable to Carbon County Planning. Application Fee and Subdivision Permit Fees must be paid at the time the application is submitted and is not refundable. The newspaper(s) will bill the applicant directly for Public Notice charges.

APPLICATION TYPES:	**FEES:** Plus the cost of public notice.
Conditional Use Permit (Minor)	$300.00
Conditional Use Permit (Major)	See Page 2
Conditional Use Permit Transfers	$200.00
Zone Change	$200.00
Planned Unit Development ZC	$350.00
Planned Unit Development SUB	Application fees in accordance with the Subdivision Application/Filing Fees below.
Subdivision Application/Filing Fees: Minor Subdivision Major Subdivision: • Sketch Plan • Preliminary Plat • Final Plat	Due upon submittal of the Application. $200.00 (Final Plat) $100.00 $200.00 + $100 per lot, up to $1,000.00 $200.00
Subdivision Permit Fee	The greater of $100.00 or $10.00 per lot up to $1,000.00
Variance	$200.00
Sign, Floodplain and Solar Access	$60.00

BUILDING PERMIT APPLICATION, INCLUDES ZONING CERTIFICATES:			
***VALUE OF IMPROVEMENTS OR REPLACEMENT COST NEW:**			**APPLICATION FEE:**
$0.00	TO	$5,000.00	$25.00
$5,001.00	TO	$20,000.00	$75.00
$20,001.00	TO	$100,000.00	$125.00
$100,001.00	TO	$200,000.00	$150.00
$200,001.00	TO	$300,000.00	$250.00
$300,001.00	TO	$400,000.00	$350.00
$400,001.00	TO	$500,000.00	$450.00
$500,001.00	TO	$600,000.00	$550.00
$600,001.00	TO	$700,000.00	$650.00
$700,001.00	TO	$800,000.00	$750.00
$800,001.00	TO	$900,000.00	$850.00
$900,001.00	TO	$1,000,000.00	$950.00
$1,000,001.00	and	over	$1,150.00
Non-Commercial Wind Energy Generators, in accordance with above.			
*The cost including material and labor that will be incurred in constructing the improvement. Includes hired or contract labor but does not include owner/builder labor.			

OTHER BUILDING PERMIT APPLICATION FEES:
• Commercial Wind Energy Facilities - Each Wind Turbine - $175.00 • Re-tooling\Reconstruction of Existing Facilities - Each Wind Turbine - $175.00
• Transmission Line Towers or Poles - Each Tower or Pole - $175.00
• Telecommunication and MET Towers - Each Tower or Pole - $350.00

Major Conditional Use Permit Applications:

Commercial Wind Energy Facilities
Transmission Lines over 115,000KV

Number of Project Structures- Wind Turbines:	**Application Fee:** $100.00** Plus	**Number of Project Structures- Transmission Towers or Poles:**	**Application Fee:** $100.00** Plus
1-199	$3,000.00	1-199	$3,000.00
200-299	$4,000.00	200-299	$4,000.00
300-499	$5,000.00	300-499	$5,000.00
500-699	$7,000.00	500-699	$7,000.00
700-899	$9,000.00	700-899	$9,000.00
900 and over	$10,000.00	900 and over	$10,000.00
Not to exceed $10,100.00 **Plus the actual cost of public notice charges.			

PUBLICATIONS: available on-line: www.carbonwy.com **Free**

Carbon County Zoning Resolution	$25.00*
Carbon County Subdivision Regulations	$25.00*
Carbon County Land Use Plan	$50.00*

*=Plus applicable postage charges.

GIS Data and Maps:
Custom Maps: $31.00 per hour (1 hour minimum)

Employee time for assistance with preparing a complete application may be charged as per Resolution for professional time – 1 hour minimum.

PART B NATURE OF REQUEST AND PROJECT INFORMATION

1.0 INTRODUCTION AND PROJECT OVERVIEW

PacifiCorp, doing business as Rocky Mountain Power, hereby files this Conditional Use Permit Application (CUP Application or Application) seeking approval to permit as a conditional use the Gateway West Segment D-1 Transmission Line Project (Project) in Carbon County, Wyoming. This Application provides the basis for approval per requirements of the *Carbon County Comprehensive Land Use Plan* (Adopted 2010; last updated April 3, 2012), and the *Carbon County Zoning Resolution*, amended July 7, 2020 as authorized by Wyoming Statutes 18-5-201 through 207.

The purpose of **Part B** is to provide detailed information concerning the Project in support of the Application Parts **A-1:** Minimum Contents of the Conditional Use Permit Application and **A-2:** Conditional Use Permit Application Form.

1.1 Project Overview

Rocky Mountain Power proposes to construct, operate, and maintain a total of approximately 118 miles of 230 kilovolt (kV), overhead, single-circuit, alternating current transmission lines that include two segments in southwest Converse County, southeast Natrona County, and northeast Carbon County in eastern Wyoming. The segments parallel each other in permitted ROW and include:

- Segment 1W(a) – New Build: this segment includes constructing a new 230 kV transmission line extending approximately 60 miles between the existing Shirley Basin Substation in Carbon County and the existing Windstar Substation in Converse County. This segment also includes adding one new circuit breaker each to Shirley Basin and Windstar substations, but no expanded footprint will be required at either substation.

- Segment 1W(c) – Rebuild: this segment includes rebuilding an existing 230 kV transmission line extending approximately 58 miles between the existing Shirley Basin Substation and the existing Dave Johnston Substation in Converse County. This segment includes removing the existing transmission line and structures; rebuilding the line and installing new structures; replacing two existing circuit breakers with two new circuit breakers at Dave Johnston Substation, which will not require an expanded footprint; upgrading interconnections to Shirley Basin Substation; and constructing the proposed Heward Substation immediately adjacent to and on the west side of the existing Difficulty Substation in Carbon County. The proposed Heward Substation will require seven acres for construction and five acres for operations. Equipment to be installed at Heward Substation includes three circuit breakers, one control building, one diesel generator, and four dead-end transmission structures.

These two segments comprise the Gateway West Segment D-1 Transmission Line Project. The Project is designed to accommodate increasing development of renewable generation in southeastern Wyoming.

In Carbon County only, the Project also includes rebuilding 4.1 miles of transmission line from Aeolus Substation to Freezeout Substation (Aeolus-Freezeout Rebuild). The existing transmission line will need to be removed and rebuilt with new towers in the existing 100-foot-wide ROW. Access roads used for the construction of the Aeolus-Standpipe 230 kV line, which was placed in service in 2020, will be used for removal and new construction activity.

The Project's purpose is to provide existing and new renewable (e.g., wind, solar, and storage) generation sources to meet growing customer needs, ease transmission congestion, and improve the flow of

electricity throughout the West as further discussed in **Section 5.0**. The Project will also supplement existing transmission lines and relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid. The Project crosses private lands, state lands, and federal lands administered by the BLM and U.S. Forest Service (USFS). In Carbon County, Segment 1W(a)'s 20.1-mile-long route crosses 16.3 miles of BLM-administered land, 0.5 mile of state of Wyoming-administered land, and 3.3 miles of private land for which Carbon County regulates use and development. Segment 1W(a) also includes a temporary "tie-line" into the Heward Substation. The "tie-line" includes approximately five transmission structures and crosses approximately 1,500 feet of BLM-administered land. In Carbon County, Segment 1W(c)'s 19.4-mile-long route crosses 15.3 miles of BLM-administered land, 1.3 miles of state of Wyoming-administered land, and 2.8 miles of private land for which Carbon County regulates use and development. Along the Aeolus-Freezeout Rebuild, the 4.1-mile-long route crosses approximately 1.0 mile of BLM-administered land and 3.0 miles of private land for which Carbon County regulates use and development. Land jurisdictions are shown in **Attachment C-1**.

The following information supports Rocky Mountain Power's Application pursuant to Chapter 7 of the *Carbon County Zoning Resolution* (2020) and addresses the following:

- Section 2.0 – Project Description and Location
- Section 3.0 – Land Use Ordinance Compliance
- Section 4.0 – Project Permits and Approvals
- Section 5.0 – Project Purpose, Need, and Benefits
- Section 6.0 – Right-of-Way Acquisition and Construction Process
- Section 7.0 – Operation and Maintenance Procedures
- Section 8.0 – Public Outreach Activities Associated with the Project
- Section 9.0 – CUP Applicant-proposed Conditions of Approval
- Section 10.0 – Literature Cited

In addition to the information provided in Sections 2.0 through 10.0 of this Application, maps of the Project's proposed facilities in Carbon County are included in **Attachment C-2**. A summary list of the Project facilities in Carbon County is provided in **Attachment C-3**. Tables of affected landowners in Carbon County are included in **Attachment C-4**, including properties crossed by the Project ROW and adjacent property owners. The aliquot parcels crossed by the Project in Carbon County are provided in **Attachment C-5**. Additionally, the Wyoming Department of Environmental Quality's "Gateway West D1 DEQ/ISC Docket 20-07 Industrial Siting Division Determination of Nonjurisdiction" letter is included in **Attachment C-6** to document that no Industrial Siting Council permit is required for the Project.

2.0 PROJECT DESCRIPTION AND LOCATION

2.1 Description of Project in Carbon County

In Carbon County, the Project consists of (1) construction of Segment 1W(a), a new single-circuit 230 kV transmission line between the existing Shirley Basin Substation and the Natrona County border, a distance of 20.1 miles of which 3.3 miles cross private land and are subject to this CUP; (2) rebuild of Segment 1W(c), an existing single-circuit 230 kV transmission line between the existing Shirley Basin Substation and the Natrona County border, a distance of 19.4 miles of which 2.8 miles cross private land and are subject to this CUP; (3) construction of the Heward Substation, which will be constructed adjacent to and on the west side of the existing Difficulty Substation, situated approximately 34 miles north of Medicine Bow, Wyoming entirely on BLM-administered land and not subject to this CUP; (4) upgrades to the existing Shirley Basin Substation, which is situated 19 miles north of Medicine Bow, Wyoming and not subject to this CUP as the substation's existing footprint is not being expanded to accommodate the upgrades; and (5) rebuild of the 4.1-mile-long route between the Aeolus and Freezeout substations of which 3.0 miles cross private land and are subject to this CUP. **Attachment C-1, Project Overview Map** shows the alignments for the Project in Carbon County.

As noted above, the Project's transmission line route will extend 9.1 miles across private land in Carbon County. The transmission line routes will use a 125-foot-wide ROW, except for the Aeolus-Freezeout Rebuild, which will use a 100-foot-wide ROW. Due to the long, linear nature of this Project, which is different from most other Carbon County CUP applications that concern a specific site and/or address, some of the county's requirements for a typical CUP application are not applicable to this Project. More specifically, the county's requirement that a CUP applicant provide a Notice of Valuation from underlying property owners is not applicable to the transmission line's route, for which Rocky Mountain Power will obtain easements from landowners and will not be purchasing property along the route. Rocky Mountain Power provided a Tax Certificate for company-owned property assessed by Carbon County with the electronic version of this Application. Additionally, some of the review criteria noted above are not applicable as the Project will not construct residential or commercial developments. The Project may require limited public services, as needed, but in general, will not require long-term service contracts for water, wastewater, solid waste, law enforcement, or emergency services.

2.2 Project Facilities

2.2.1 Transmission Structures

The Project's 230 kV transmission lines will use single-circuit, steel H-frame towers using either dulled galvanized or self-weathering steel. **Attachment C-3, Table C-3A** provides design characteristics for the transmission line conductors and towers and typical structure information, including structure height, span length, and ROW width. **Attachment C-3, Table C-3B** provides the temporary and permanent disturbance areas for the Project's typical H-frame tower design. **Attachment C-3, Figure C-3A** shows the proposed transmission line structure and **Figure C-3B** illustrates the typical configuration and placement of the transmission line structure in the Project's ROW. Approximately 268 new transmission line structures will be installed in Carbon County, of which approximately 64 new transmission line structures will be installed on private land: 22 structures in Segment 1W(a), 21 structures in Segment 1W(c), and 21 structures along the Aeolus-Freezeout Rebuild. Approximately seven new transmission line structures will be installed per mile.

Each structure is individually designed, depending on the line angle and underlying soil and rock conditions, to withstand the pull of the wires in different directions. The exact height of each structure will be determined by topography and operational safety requirements for conductor clearance. Steel structures will be either dulled galvanized or self-weathering steel and conductors will be treated to produce a dulled, galvanized finish to reduce reflectivity.

2.2.2 Heward Substation

Along Segment 1W(c), the Project will include construction of the new Heward Substation. This new substation will be situated entirely on BLM-administered land adjacent to and on the west side of the existing Difficulty Substation and immediately east of Wyoming State Highway 487, approximately 34 miles north of Medicine Bow, Wyoming in Carbon County; see **Attachment C-2, Map 1**. Construction of the substation will disturb approximately seven acres, and five acres will be required permanently for operations. The Heward Substation is required because the existing 230 kV bus and other equipment in the Difficulty Substation is underrated for accommodating the additional electrical capacity that will be added by the Project. Adding the new 230 kV substation will increase the flow-through capacity of the 230 kV system and maintain power to Difficulty Substation customers during construction.

Equipment to be installed will include:

- Addition of 230 kV circuit breakers, high-voltage switches, bus supports, and transmission line termination structures that will be approximately 70 feet tall.
- A control house in the fenced area to accommodate the necessary system communications and control equipment in the substation yard.
- A 230 kV bus will be extended to interconnect to the existing Difficulty Substation 230 kV bus.

2.2.3 Shirley Basin Substation

Shirley Basin Substation is situated in Carbon County approximately 19 miles north of Medicine Bow, Wyoming; see **Attachment C-2, Map 1**. Rocky Mountain Power will replace existing 230 kV circuit breakers, high-voltage switches, tubular and wire bus, bus supports, and transmission line termination structures. No expansion of the substation is proposed. All construction will occur inside the existing substation fence.

2.2.4 Access Roads

Access roads are essential for construction, operation, and maintenance of the Project. Large foundation-auger equipment, heavily-loaded trucks, cranes, and specialized line-construction equipment will be required for construction, maintenance, and emergency activities. Existing roads, existing roads that require improvements, new roads, and temporary roads will be needed for the Project. To the extent possible, existing roads will be used in their present condition without improvements. In areas where improvements will be required, the roads will be graded to provide a smooth all-weather travel surface.

All access roads will meet Rocky Mountain Power's construction road standards, which will include the use of a minimum travel surface width of 14 feet and could require a travel surface width of up to 22 feet depending on the radius of curves to facilitate safe movement of equipment and vehicles.

The following types of access roads are anticipated to be used and/or developed for the Project:

- **Existing Roads Requiring No Improvement**. This type of access road includes paved or all-weather surfaced roads, including well-traversed and established dirt roads that meet Rocky Mountain Power's construction road standards.
- **Existing Roads Requiring Improvement**. This type of access road includes existing roads that require improvements to meet Rocky Mountain Power's construction road standards. This type of access road includes existing roads that may require widening to a minimum 14-foot-wide travel surface.
- **New Roads**. This type of access road includes the construction of new permanent access roads where existing roads do not exist to allow access to the Project's ROW.
- **Temporary Roads**. This type of access road includes temporary construction of new access roads, the use of existing trails/two-track roads, or overland travel access to support the construction of the Project and access the Project's ROW. Unless otherwise noted by the BLM or landowner, this access road type requires reclamation, to the extent practicable, to pre-construction conditions.

Section 6.2.3 describes construction of transmission line access roads.

Table B-1 lists the estimated miles of access roads based on preliminary engineering.

TABLE B-1 PRELIMINARY MILES OF ACCESS ROADS SUBJECT TO CARBON COUNTY CUP

ROAD TYPE	MILES
Existing Roads Requiring No Improvement	14.5
Existing Roads Requiring Improvement	6.2
New Roads	4.8
Temporary Roads	1.5

2.2.5 Multi-Purpose Construction Yard and Helicopter Fly Yards

There is one multi-purpose construction yard proposed for use in Carbon County; it is not situated on private land; see **Attachment C-2, Map 1**. The multi-purpose construction yard will serve as a field office; reporting location for workers; parking spaces for vehicles and equipment; and a site for material storage, fabrication, assembly, concrete batch plants, and a station for equipment maintenance. This yard will cover approximately 20 acres. For the Aeolus-Freezeout Rebuild, no new multi-purpose construction yards will be required; instead, areas in the Aeolus and Freezeout substation fenced yards will be used.

There are 10 helicopter fly yards proposed for use in Carbon County, one of which will be situated on private land; see **Attachment C-2, Map 1**. Temporary use helicopter fly yards will cover approximately 10-15 acres and will be situated approximately every five miles along the route where helicopter-assisted construction may occur. The fly yards will be used to transport materials to structure work areas during construction and may include space dedicated to refueling helicopters. No additional helicopter fly yards are anticipated to be needed for the Aeolus-Freezeout Rebuild.

2.2.6 Material Delivery Yards

Two material delivery yards are proposed for use in Carbon County. One of them will be situated in the existing footprint of the Shirley Basin Substation. The other yard will be situated in the existing footprint of the Difficulty Substation.

2.2.7 Pulling-and-Tensioning Sites

Pulling-and-tensioning sites for the Project will be required for each wire reel length (9,250 feet or approximately every two miles) along the ROW and will cover approximately 1.2 acres (125 feet by 400 feet) each to accommodate required equipment. There are 40 pulling-and-tensioning sites proposed for use in Carbon County; six of which will be situated on private land and associated with Segment 1W(c); there are none situated on private land associated with Segment 1W(a); see **Attachment C-2, Map 1**. Equipment at sites required for pulling-and-tensioning activities will include tractors and trailers with spooled reels that hold the conductors, and trucks with the tensioning equipment.

To the extent practicable, pulling-and-tensioning sites will be situated in the ROW. Depending on topography, minor grading may be required at some sites to create level pads for equipment. Typically, the only sites that will be situated outside of the ROW will be at large angle dead-end structures. It is estimated that of the 40 sites in Carbon County, portions of six sites will be situated outside of the ROW on private land. All six sites are associated with Segment 1W(c). When construction occurs in steep and rough terrain, larger, less symmetrical pulling-and-tensioning sites may be required.

2.3 Land Disturbance

The Project includes ground-disturbing activities associated with the construction of above-ground, single-circuit transmission lines and associated construction of the Heward Substation, as well as access roads, multi-purpose construction yard, helicopter fly yards, and wire pulling-and-tensioning sites. **Table B-2** lists the anticipated acreages of temporary and permanent land disturbance subject to this CUP associated with the Project's construction and operation activities, respectively.

TABLE B-2 ESTIMATED LAND DISTURBANCE DURING PROJECT CONSTRUCTION AND OPERATION ACTIVITIES SUBJECT TO CARBON COUNTY CUP

PROJECT FACILITY	CARBON COUNTY	
	Construction Disturbance (acres)	Operations Disturbance (acres)
Structure Work Areas	25.6	0.6
Existing Roads Requiring No Improvement	--	--
Existing Roads Requiring Improvement	To be determined by Construction Contractor in coordination with affected landowner	To be determined by Construction Contractor in coordination with affected landowner
New Roads	8.1	8.1
Temporary Roads	To be determined by Construction Contractor in coordination with affected landowner	--
Multi-Purpose Construction Yard	--	--

PROJECT FACILITY	CARBON COUNTY	
	Construction Disturbance (acres)	**Operations Disturbance (acres)**
Helicopter Fly Yards	3.2	--
Material Delivery Yards	--	--
Pulling-and-Tensioning Sites	6.3	--
TOTAL	**43.2**	**8.7**

Table Notes:
1. The exact land requirements will depend on the final detailed design of the transmission line and associated facilities and is influenced by terrain, land use, and economics. Alignment options may also slightly increase or decrease these values.
2. Acreages in the table are rounded to the nearest tenth of an acre. Columns may not sum exactly.
3. ROW width for the Project is 125 feet. The dimensions of the structure work areas and area permanently occupied by the structures after reclamation are based on the dimensions specified in Attachment C-3.
4. The multi-purpose construction yard will be used for a field office, reporting location for employees, material laydown and storage, portable concrete batch plants, structure staging, helicopter landing, storage, refueling, construction trailers, and vehicle parking.
5. The multi-purpose construction yard will cover approximately 20 acres.
6. Helicopter fly yards will cover approximately 10 to 15 acres and will be situated approximately every five miles along the ROW. Values in this table assume helicopter construction. However, use of helicopters is at the discretion of the Construction Contractor(s) who may choose to construct using ground-based techniques.
7. Pulling-and-tensioning sites will cover approximately 1.2 acres and will be situated approximately every two miles along the ROW. The acreage total in the table does not reflect 1.2 acres per pulling-and-tensioning site because these sites often overlap private and public lands both inside and outside of the ROW and required pulling data sets apart to arrive at the portions only on private land. The acreage reported in the table is the acreage on private land only.
8. Refer to Table B-1 for access road miles.

3.0 LAND USE ORDINANCE COMPLIANCE

This section summarizes the applicable zoning requirements for Carbon County, as described in the *Carbon County Zoning Resolution* (last amended July 7, 2020), and is divided into two sections:

- Specific Zoning Requirements – describes the specific requirements for each zone crossed by the Project
- General Zoning Requirements – describes other applicable requirements for the Project

3.1 Specific Zoning Requirements

In Carbon County, the Project will extend across 9.1 miles of private land zoned as Ranching, Agriculture, and Mining (RAM). Per Chapter 4, Section 4.4 of the *Carbon County Zoning Resolution*, Carbon County established the RAM zoning district to preserve historic uses and open spaces in the County while permitting ranching, agriculture, animal husbandry, forestry, and mining. Chapter 5, Section 5.4 (D) of the *Carbon County Zoning Resolution* describes the requirements for electrical substations and transmission lines.

- Chapter 5, Section 5.4 (D.2) states that "Electrical substations and underground and overhead transmission lines of over 115,000 volts, together with accessory structures including but not limited to switching stations and communications facilities are only allowed by conditional use permits in all zones. Building permits are required prior to construction."
- Chapter 5, Section 5.4 (D.3): Setbacks and Height Requirements states that "There are no Minimum Setbacks and no Maximum Height Limitations for new Electrical Substations and Transmission Towers; however, the proposed setbacks and maximum height proposed must be included in the CUP Application and justified to the Commission as part of the CUP review process."

As discussed in **Section 2.1**, the Project will be an overhead 230 kV transmission line and, as such, will only be allowed by issuance of a Carbon County CUP and building permits, which Rocky Mountain Power's Construction Contractor(s) will apply for and obtain. The Project will require a 125-foot-wide ROW. **Table C-3B** in **Attachment C-3** describes the type of structures including typical height, typical distances between structures, and temporary and permanent disturbance areas by structure for the Project.

The maximum structure width for the Project is estimated to be 43 feet for the self-supporting H-frame structure within a 125-foot-wide ROW and 100-foot-wide ROW for the Aeolus-Freezeout Rebuild. **Figure C-3B** in **Attachment C-3** illustrates the placement of transmission structures in the ROW. The typical maximum structure height for the H-frame structure will be approximately 60-90 feet above ground level.

3.2 General Zoning Requirements

In addition to the specific zoning requirements described above, additional review criteria are required for the consideration of the Planning & Zoning Commission and Board of County Commissioners. In **Part A-1**, Item 8 above requires Rocky Mountain Power's response to six review criteria; each criterion and the response is provided below.

1. The Conditional Use shall be generally consistent with the Goals, Strategies, and Actions of the Comprehensive Land Use Plan, including the Future Land Use Map.

   Response: The *Carbon County Comprehensive Land Use Plan* (amended April 3, 2012) was reviewed to determine Project consistency with the Goals, Strategies, and Actions, as well as the Future Land Use Map. Project consistency with each of the seven goals and Future Land Use Map is presented below.

   Goal 1: Achieve a sustainable balance between energy development, agriculture, and the environment.

   Response: In preparing the Environmental Impact Statement (EIS) required for compliance with the National Environmental Policy Act (NEPA), Rocky Mountain Power developed and sited the Project to minimize impacts on agricultural and environmental resources. A Construction Plan of Development (POD), including a series of Implementation Plans, is being developed for the Project. The purpose of the Project's Construction POD is to communicate Rocky Mountain Power's development plan and comprehensively identify the environmental protection requirements for Project construction, operation, and maintenance activities. The Construction POD will incorporate the natural and cultural resource protection measures identified during the NEPA process as well as other applicable stipulations for avoiding, minimizing, and mitigating agricultural and environmental impacts associated with the Project's construction, operation, and maintenance activities.

   Goal 2: Protect water supplies of established users.

   Response: The Project will not affect water supplies of established users. Measures to protect water supplies are included in the Project Construction POD's Implementation Plans: *Stormwater Pollution Prevention Plan; Spill Prevention, Containment, and Countermeasures Management Plan*; and *Stream, Wetland, Well, and Spring Protection Plan*.

   Goal 3: Sustain scenic areas, wildlife habitat, and other important open spaces.

   Response: The Project has been situated in BLM-designated utility corridors or adjacent to other existing or planned transmission lines for much of its length in Carbon County. The Project has been developed and sited to have limited impacts on scenic areas, wildlife habitat, and important open spaces through the comprehensive NEPA process. The Project's NEPA process analyzed the environmental impacts of the Project. Measures to protect sensitive wildlife habitat and other areas are included in the Project Construction POD's Implementation Plans: *Plant and Wildlife Conservation Measures Plan, Paleontological Resources Protection Plan, and Cultural Resources Protection Plan*.

   Goal 4: Retain ranching and agriculture as the preferred land uses in rural areas.

   Response: The Project will have minimal impact on ranching and agriculture, as determined through the Project's NEPA review. Measures intended to mitigate or provide compensation for agricultural impacts that may occur due to the construction, operation, and maintenance of the Project are included in the Project's Construction POD and specifically the *Agricultural Protection Plan*.

   Goal 5: Locate new residential developments and commercial sites in close proximity to municipalities and developed areas.

   Response: The Project is not a new residential development or commercial site and as such this goal is not applicable to the Project. The Project has been sited to be located as far away from developed areas as practicable.

Goal 6: Ensure that future land development is fiscally responsible and has adequate roads and other infrastructure.

Response: The Project will secure and have in place, prior to construction, all necessary easements (**Section 6.1** provides details). Rocky Mountain Power will construct adequate roads and any applicable infrastructure to support Project operations (**Sections 2.2.4** and **6.2.3**). Rocky Mountain Power does not anticipate increases in costs for county services associated with the Project's construction, operation, or maintenance activities.

Goal 7: Retain diversity of use on public lands and provide for conversion of public lands to other land uses as would benefit the orderly development of the county.

Response: The Project's ROW and associated facilities will allow the BLM and State of Wyoming to retain diverse land uses near the Project's route. Should these public lands be converted to other land uses, the Project would be consistent with the county's future land use designations, as noted below.

Future Land Use Map Consistency.

Response: The Project is located in the Rural Agricultural Areas Land Use Designation (see **Attachment C-2, Map 4**). Per the *Carbon County Comprehensive Land Use Plan*, the Rural Agricultural Areas designation is intended to maintain rural lands for ranching, agriculture, mining, forestry, and related uses and industrial uses and has been carefully sited to avoid conflicts with other land uses. As such, the Project will not interfere with the goals of the Rural Agricultural Areas designation as described in the *Carbon County Comprehensive Land Use Plan*.

2. The proposed use should serve a public need.

   Response: The Project Need is described in **Section 5.0** of this Application. The Project is needed for Rocky Mountain Power to meet obligations for expanding its transmission system to provide firm transmission service and to construct and place into service sufficient capacity to reliably deliver resources to network and native load customers.

   Rocky Mountain Power submitted an application on August 26, 2020 to the Wyoming Public Service Commission for a certificate of public convenience and necessity for the Project codifying that the Project is necessary and in the public interest. An order is expected by the Commission by March 2021.

3. The proposed use should be appropriate for the proposed location and will not be detrimental to the surrounding area or to established uses.

   Response: The Project is compatible with existing and future land uses. The general area in which the Project is located is in the RAM zone (see **Attachment C-2, Map 3**) consisting of open rangeland used primarily for livestock grazing. Current zoning regulations for the RAM zone encourage this type of use. If regulations remain unchanged, it is anticipated that livestock grazing will remain the primary use in the general area. The Project has been analyzed by the BLM in accordance with NEPA and other federal requirements as described in **Section 4.1** and will be constructed according to Implementation Plans included in the Project's Construction POD to minimize impacts on the surrounding area.

4. The proposed conditional use should be adequately served by facilities and services including legal and physical access and circulation, water and wastewater facilities, solid waste, law enforcement, fire protection, and emergency medical services.

   Response: Once the Project is constructed, public facility use and services from local or Carbon County service providers will either not be required or only required on a limited basis. Due to the

nature of the Project, the providers of services such as those from water and wastewater facilities, solid waste providers, law enforcement and fire protection officials, and emergency medical services may be required on a limited basis, as warranted. Access for emergency responders may be required during potential accidents, which may occur during construction activities.

During construction, with a greater number of construction personnel and vehicles/equipment, there may be a greater need for local emergency responders. However, measures and procedures that will be implemented in emergency situations are included in the Project Construction POD's Implementation Plans: *Traffic and Transportation Management Plan, Fire Prevention and Suppression Plan, Hazardous Materials Management Plan, Construction Emergency Preparedness and Response Plan, and Operations and Maintenance Emergency Response Plan*.

All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials will be removed to a disposal facility authorized to accept such materials in accordance with applicable requirements.

5. That any resulting commercial and truck traffic shall not use a residential street nor create a hazard to a developed residential area.

   Response: The Project will have a dedicated access road network for all construction-related traffic. The Project access road network does not include any residential streets and as such, no residential streets will be used for Project construction. Similarly, there will be no Project hazards to any developed residential area.

6. That the record owner has taken adequate steps to minimize and control potential environmental problems that might result from the proposed use.

   Response: The Project has been developed and sited to minimize environmental impacts through the NEPA process. A Construction POD, including a series of Implementation Plans, is being developed for the Project. The purpose of the Project's Construction POD is to communicate Rocky Mountain Power's plan for construction and comprehensively identify the environmental requirements for construction, operation, and maintenance of the Project. The Construction POD will incorporate the measures identified during the NEPA process as well as other applicable stipulations for avoiding, minimizing, and mitigating environmental impacts associated with the Project's construction, operation, and maintenance activities.

3.3 CUP Requirements

Chapter 5, Section 5.4 of the *Carbon County Zoning Resolution* contains the requirements for filing an application for a CUP. As outlined in Chapter 7, Section 7.7 of the *Carbon County Zoning Resolution*, these CUP requirements include completion of a pre-application meeting with the Zoning Officer or their designee and completion of a CUP application. Rocky Mountain Power completed a pre-application meeting via conference call with the Carbon County Planning and Development Department on September 16, 2020.

Public hearings with the Planning & Zoning Commission and Board of County Commissioners are required. Rocky Mountain Power will participate in public hearings with the Planning & Zoning Commission and Board of County Commissioners and will complete all required public notifications and sign postings prior to the hearings.

Prior to both hearings, adjacent landowners must be notified and an advertisement must be published in a newspaper having general circulation in the County. The applicant must post a sign that the property is

under consideration for a conditional use. If the CUP is approved, the project must commence within two years from the date of approval.

Rocky Mountain Power will comply with all of the CUP requirements described in Chapter 7, Section 7.7 of the *Carbon County Zoning Resolution*, as applicable.

4.0 PROJECT PERMITS AND APPROVALS

4.1 Federal Approvals

4.1.1 Gateway West Right-of-Way Grant and Environmental Impact Statement

Since 2007, Rocky Mountain Power, with stakeholder involvement including participation from state and federal regulators, local government agencies, private and public energy providers, independent developers, consumer advocates, renewable energy groups, environmental groups, and elected officials, has pursued permitting the Project. Rocky Mountain Power prepared and submitted an *Application for Transportation and Utility Systems and Facilities on Federal Lands* (Standard Form 299) to the BLM (Case Files: WYW 174598) and the USFS. This application included all segments of the Gateway West Project including Segment D-1. The original application was submitted and received on May 7, 2007. Rocky Mountain Power revised the application in October 2007, August 2008, May 2009, and January 2010 to reflect changes and refinements in Gateway West and in response to feedback from the public regarding routing alternatives.

The BLM is the lead federal agency for the NEPA process for the Project. The Final EIS for the Project was announced in the *Federal Register* on April 26, 2013. On November 12, 2013, the BLM issued its Record of Decision (ROD) for the Project and the ROW authorization has subsequently been granted.

The USFS' Final ROD for the Project was signed on September 23, 2013. The USFS is currently preparing a special-use authorization to grant use of the ROW across USFS-administered lands; it is anticipated to be granted prior to construction.

The BLM ROD lists many pre-construction requirements that must be met prior to BLM issuing a full notice to proceed for construction on public lands. Rocky Mountain Power is currently addressing those requirements that consist of biological, cultural, and paleontological surveys to identify resources in the vicinity of the Project to further protection of those resources during construction and operation of the facility.

The Project's Construction POD is currently being finalized. The purpose of the Construction POD is to communicate Rocky Mountain Power's development plan, which comprehensively identifies the environmental requirements for construction, operation, and maintenance of the Project. The Construction POD incorporates the EIS-identified measures and other applicable stipulations for avoiding, minimizing, and mitigating environmental impacts associated with implementing the Project. The EIS-identified measures are in accordance with the BLM's Draft – Regional Mitigation Manual, Section 1794, for the sequence of mitigation action(s) per the mitigation hierarchy to avoid, minimize, rectify, reduce or eliminate over time, and compensate. The Construction POD incorporates the various regulatory approvals, permits, and other authorizations that contain environmental requirements, including those measures stipulated in resource management plans for the BLM, land and resource management plans for the USFS, and other land use plans, as applicable.

The Construction POD is intended to be used Project-wide per jurisdictional determination as (1) a summary of Project environmental requirements and protection measures; and (2) a description of the processes and procedures that will be used to ensure compliance, including the requirements of the United States Fish and Wildlife Service (USFWS); the BLM; the USFS; and other federal, state, and/or local

agencies, as appropriate. The Construction POD will be submitted to Carbon County when complete and approved by the BLM.

Private Land

On private land, federal agencies have the authority to enforce the Project's Construction POD provisions specific to the National Historic Preservation Act (NHPA) and the Endangered Species Act (ESA). Federal agencies have an obligation and authority to enforce the requirements of the NHPA and the ESA to protect important historic properties and threatened and endangered species. The federal land management agencies' responsibilities on private land will include inspecting and monitoring pre-construction and construction activities for compliance with the NHPA and ESA, documenting Project disturbance on all lands analyzed in the EIS, documenting Construction POD compliance, and enforcing requirements related to federal land management agencies' responsibilities per the NHPA and the ESA.

4.1.2 Other Authorities and Policies

The analysis conducted in the NEPA process also supports the analysis needed for compliance with the requirements of other federal laws and to inform and support other agency actions. These include:

- Section 106 of the NHPA – Consultation requirements with the Advisory Council on Historic Preservation
- Rivers and Harbors Act, Section 10 permits and Clean Water Act, Section 404 permits issued by the United States Army Corps of Engineers
- Clean Water Act Section 401 permits issued by the Wyoming Department of Environmental Quality
- Section 7 of the ESA consultation requirements with the USFWS
- Fish and Wildlife Coordination Act consultation with the USFWS
- Migratory Bird Treaty Act compliance and consultation with the USFWS
- Bald and Golden Eagle Protection Act compliance and consultation with the USFWS

4.2 State of Wyoming Permits and Approvals

4.2.1 Wyoming Public Service Commission Certificate of Public Convenience and Necessity

Rocky Mountain Power submitted an application on August 26, 2020 to the Wyoming Public Service Commission for a certificate of public convenience and necessity for the Project codifying that the Project is necessary and in the public interest. An order is expected by the Commission by March 2021. Project construction cannot begin until Rocky Mountain Power demonstrates that 100 percent of the ROWs have been acquired.

4.2.2 Wyoming Industrial Siting Council Permit

No Industrial Siting Council (ISC) permit is needed for the Project. Rocky Mountain Power discussed the Project with the ISC in July 2020 and determined that the Project's construction costs are below the

threshold set by the ISC of $227,715,000. Rocky Mountain Power received a letter from the ISC dated July 21, 2020 confirming that a permit is not required. **Attachment C-6** includes this letter.

4.2.3 Wyoming Governor Executive Orders

Each participating Wyoming state agency must comply with the Wyoming Governor's Executive Orders (EOs) regarding greater sage-grouse and mule deer and pronghorn migration corridor protections. On June 2, 2011, the Governor of Wyoming established EO 2011-5, which designates Core Areas for greater sage-grouse. On July 29, 2015, the State of Wyoming updated the sage-grouse designations in EO 2015-4 and its supplement of EO 2017-2. In practice, the Wyoming Game and Fish Department (WGFD) generally issues the finding of compliance or non-compliance with the EO that the other state agencies rely on. The WGFD was actively involved in reviewing and commenting on the Project's EIS. On February 13, 2020, the Governor of Wyoming established EO 2020-1, which provides mule deer and pronghorn migration corridor protections. Rocky Mountain Power reached out to WGFD shortly after the EO was established and confirmed that the Project is exempted from the EO as a prior approved project. **Section 8.2.2** describes Rocky Mountain Power's coordination with the WGFD.

4.3 Carbon County Non-CUP Permits and Approvals

After Carbon County issues the CUP, Rocky Mountain Power or the Construction Contractor(s) will apply for building permits and road access permits. Prior to commencing construction activities, Rocky Mountain Power or the Construction Contractor(s) will apply for and obtain building permits from Carbon County's Department of Planning and Development for Project facilities in Carbon County. Road access permits from Carbon County's Road and Bridge Department will be required for new access roads that connect to county roads.

5.0 PROJECT PURPOSE, NEED, AND BENEFITS

5.1 Project Purpose

Rocky Mountain Power is a regulated public utility operating in accordance with the Federal Energy Regulatory Commission and six state regulatory commissions. As such, it is obligated to expand its transmission system to provide firm transmission service and to construct and place into service sufficient capacity to reliably deliver resources to network and native load customers across the Western U.S.

On a periodic cycle, PacifiCorp undertakes a comprehensive Integrated Resource Plan (IRP) process. The IRP is developed with considerable public involvement from customer interest groups, regulatory staff, regulators, and other stakeholders. Each of these entities is asked to participate actively and provide input and guidance as PacifiCorp considers issues related to long-term resource planning. The IRP planning horizon is typically 20 years, and an action plan identifies steps that will be taken to secure resources for the first 10 years of that horizon. During the IRP process, all material planning assumptions are updated (e.g., load/resource forecasts and a prudent planning margin), and a resource deficiency is identified. The IRP process includes creating models of potential new resource portfolios and ultimately selecting a preferred portfolio, which is expected to result in the least cost on a risk-adjusted basis. The current IRP was released on October 18, 2019 (PacifiCorp 2019).

The Project is part of PacifiCorp's Energy Gateway Transmission Expansion Plan, which is the result of several robust local and regional planning efforts. In May 2007, PacifiCorp announced a multi-year program to reinforce its existing power transmission system by developing approximately 2,000 miles of high-voltage transmission lines to provide power from existing and new renewable generation sources to meet growing customer needs, ease transmission congestion, and improve the flow of electricity throughout the West. Stakeholder involvement has played an important role in each initiative, including participation from state and federal regulators, government agencies, private and public energy providers, independent developers, consumer advocates, renewable energy groups, environmental groups, and elected officials.

The purpose of this Project is to expand PacifiCorp's existing transmission system to provide reliable transmission service and to construct and place into service sufficient capacity to reliably deliver resources to network and native load customers across the Western U.S.

5.2 Project Need

The Project is needed to fulfill five key responsibilities of Rocky Mountain Power:

1. **Local Electric Service.** Rocky Mountain Power is responsible for providing electric service to 1.9 million retail customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. Rocky Mountain Power has a legal obligation to ensure sufficient firm point-to-point and network transmission capacity is available to meet the electric demands of all its customers now and into the future.
2. **Ensure Reliability.** The Project is needed to improve Rocky Mountain Power's ability to provide reliable electrical service to all its customers in a non-discriminatory manner. The Project also is needed to provide redundancy during transmission and generation contingencies for other planned and existing transmission segments, including Gateway West and Gateway Central, thereby providing operational flexibility for the bulk electric system, ensuring reliability, and supporting capacity ratings for each segment.

3. **Access to Energy Resources.** Rocky Mountain Power has a legal obligation to transport identified third-party network generation to serve network loads. The Project is needed to provide Rocky Mountain Power with access to diverse generation resources throughout its service territory needed to meet the growing electrical demands of its customers. In general, expansion of the transmission system is needed to accommodate a variety of future resource scenarios and plans.
4. **Maximize Infrastructure Benefits.** When interconnected to the wider electric system in the Western U.S., including the components of the Energy Gateway program, the Project will function as a fully interconnected electric system element in the West-wide electric grid and will be expected to carry its fully rated capacity across the system.
5. **Serve Third-party Network Customers.** In addition to providing service to its native load customers, Rocky Mountain Power also is required to provide transmission service to its third-party network customers, which in turn directly serve customers in these same states. Rocky Mountain Power has a legal responsibility to provide reliable transmission service to third parties if transmission capacity is available.

5.3 Project Benefits

The Project will relieve congestion on the current transmission system in eastern Wyoming, provide critical voltage support to the Wyoming transmission network, improve overall reliability of the transmission system, enhance Rocky Mountain Power's ability to comply with the mandated reliability and performance standards, reduce line losses, and create the potential for further increases to the transfer capability across the Gateway West 500 kV and 230 kV system with the construction of additional segments of PacifiCorp's Energy Gateway Transmission Expansion Plan.

The Project, in Carbon County, Wyoming, is expected to generate sales and use tax revenues and property taxes providing economic benefits to the county.

6.0 RIGHT-OF-WAY ACQUISITION AND CONSTRUCTION PROCESS

This section summarizes construction planning, ROW activities, and landowner involvement during the construction process.

6.1 Right-of-Way Acquisition

New permanent and temporary land rights are required for the transmission line facilities, such as the transmission line ROW, access roads, and temporary work sites. Rocky Mountain Power will negotiate with federal, state, and local governments; private landowners; and private utility and railroad companies as necessary to obtain land rights for Project facilities. The land rights will be obtained through ROW grants, easements, license agreements, or in fee simple. On November 12, 2013, the BLM issued the Gateway West ROD and, subsequently, a ROW grant to use the National System of Public Lands for the Project (ROW Grant WYW 17459). The USFS' Final ROD for the Project was signed on September 23, 2013. The USFS is currently preparing a special-use authorization to grant use of the ROW across USFS-administered lands; it is anticipated to be granted prior to construction. Rocky Mountain Power is in final negotiations with various federal, state, and local governments; private utilities and railroads; and private landowners to finalize easement agreements.

It is anticipated that Project facilities may need to be adjusted to address landowner concerns, engineering constraints, unforeseen environmental conflicts, or sharp angles. All negotiations with landowners are conducted in good faith and the Project's effect on the parcel or other concerns the landowner may have will be addressed. ROWs for transmission line facilities on private lands are obtained as perpetual easements. A good faith effort will be made to purchase the land and/or obtain easements on private lands through reasonable negotiations with the landowners.

The Project's ROW width must be sufficient to accommodate maintenance clearances and conductor blowout due to wind. Blowout refers to the swinging of the conductor between tower structures. The Project will require a permanent 125-foot-wide ROW for Segments 1W(a) and 1W(c) and a 100-foot-wide ROW for the Aeolus-Freezeout Rebuild.

6.2 Construction Process

The Project has commenced the pre-construction phase. Construction of the Project is anticipated to begin in August 2021. The Project is anticipated to be in-service by the end of 2023.

The Project development and major pre-construction and construction activities identified below are listed sequentially, in the order they would typically occur; however, they may not be performed sequentially.

The major activities associated with the construction of the Project will include:

- Pre-construction activities
- Transmission line removal
- Access road construction
- Transmission line construction
- Transmission substation upgrades as described above in Section 2.2.3
- Special construction techniques

- Reclamation of disturbed areas

6.2.1 Pre-construction Activities

Construction Plan of Development Implementation Plans

A Construction POD, including a series of Implementation Plans, is being finalized for the Project. The Project's Construction POD consists of (1) background information, direction, and implementation plans; and (2) detailed mapping to facilitate execution of environmental protection and mitigation measures. Background information and direction includes the Project description, including explanations of Rocky Mountain Power's and agencies' roles and responsibilities; descriptions of construction, operation, and maintenance activities; specifications of land use and access; and descriptions of design features and other measures for environmental protection to avoid sensitive environmental resources. The supporting implementation plans are designed to prevent adverse impacts to human health and safety, property, and the environment that could potentially occur as a result of the Project's construction, operation, and maintenance activities. **Table B-3** lists the implementation plans. During the Project's construction activities described below, the BLM's Compliance Inspection Contractor (CIC) will monitor the activities to ensure that Rocky Mountain Power and its Construction Contractor(s) comply with all of the design features, mitigation measures, and other Project requirements included in the BLM's ROW grant, Construction POD, and the following implementation plans. As the Project's lead federal agency, the BLM will direct the CIC.

TABLE B-3 IMPLEMENTATION PLANS FOR THE CONSTRUCTION PLAN OF DEVELOPMENT

PLAN	DESCRIPTION	LOCATION IN CONSTRUCTION POD
Environmental Compliance Management Plan	Serves as the primary guidance document that states how Rocky Mountain Power will uphold, document, and manage compliance with the BLM ROW grant, the Construction POD, landowner agreements, and all applicable federal, state, and local permits.	Included as Appendix C
Reclamation Plan	Provides reclamation treatments to be applied to the Project on identification of construction-related disturbance to prevent unnecessary degradation of the environment during construction, reclaim temporary-use areas, and reclaim disturbed areas such that these areas are ecologically functional and visually compatible with the surrounding environment to the greatest extent practicable.	Included as Appendix D
Noxious Weed Plan	Provides methods to control the potential occurrence/infestation of noxious and invasive weeds during and following construction of the Project. The purpose of the plan is to ensure noxious weeds are identified and controlled during the construction of Project facilities and all federal, state, county, and other local requirements are satisfied.	Included as Appendix E
Stormwater Pollution Prevention Plan	Describes how erosion and sediment transport would be minimized to adjacent water.	Included as Appendix F
Spill Prevention, Containment, and Countermeasures Plan	Provides preventive procedural actions for use of fuel, lubricant, or hazardous materials used during construction, operation, and maintenance of the Project within 100 feet of waterbodies, wetland boundaries, or in municipal watersheds.	Included as Appendix G

PLAN	DESCRIPTION	LOCATION IN CONSTRUCTION POD
Plant and Wildlife Conservation Measures Plan	Assists the affected federal land management agencies and Project personnel in meeting their obligations to protect biological resources during the planning, design, and implementation of the Project. Presents the measures for avoidance and minimization of impacts to plant and wildlife species as related to construction activities for the Project. It also outlines specific conservation measures to be implemented in the event that state- or federal-listed species, or BLM sensitive species, or their habitats are identified within or adjacent to the Project ROW.	Included as Appendix H
Stream, Wetland, Well, and Spring Protection Plan	Provides measures to protect these resources from potential impacts during construction, operation, and maintenance activities.	Included as Appendix I
Paleontological Resources Protection Plan	Assists the affected federal land management agencies in planning and design efforts for the Project as it relates to paleontological resource issues. It identifies the mitigation measures needed to avoid or reduce Project-related impacts to paleontological resources, wherever feasible.	Included as Appendix J
Agricultural Protection Plan	Provides measures to protect agricultural lands (including grazing) and associated structures (e.g., fences, gates, stock ponds).	Included as Appendix K
Traffic and Transportation Management Plan	Includes measures that require compliance with federal policies and standards relative to planning, siting, improvement, maintenance, and operation of roads for the Project. Provides a description of the type of access associated with the construction, operation, and maintenance of the Project.	Included as Appendix L
Blasting Plan	Outlines methods to prevent adverse impacts to human health and safety, property, and the environment that could potentially result from the use of explosives during Project construction and mitigate risks and potential impacts associated with blasting procedures that may be required for construction. Provides construction crews, the CIC, and environmental monitors with Project-specific information concerning blasting procedures.	Included as Appendix M
Erosion, Dust Control and Air Quality Plan	Addresses regulatory compliance, environmental concerns, mitigation recommendations, and monitoring to ensure impacts associated with construction activities are minimized as they relate to soil conservation and air quality.	Included as Appendix N
Fire Prevention and Suppression Plan	Provides detailed measures that would be implemented to (1) reduce the risk of starting a fire and (2) suppress a fire in the event one does occur in the construction area during Project construction, operation, and maintenance. The plan addresses the specific requirements of the BLM and provides BMPs for fire management on privately-owned lands.	Included as Appendix O

PLAN	DESCRIPTION	LOCATION IN CONSTRUCTION POD
Hazardous Materials Management Plan	This plan identifies Project-specific mitigation measures and other specific stipulations and methods to address spill prevention, response, and cleanup procedures for the Project. Clearly identifies which legal requirements apply to specific types of hazardous materials.	Included as Appendix P
Construction Emergency Preparedness and Response Plan	Provides an overview of methods to be implemented if the need for emergency management is imminent. This document will describe the existing support structure, chain of command, and emergency communications protocols.	Included as Appendix Q
Operations and Maintenance Emergency Response Plan	Provides an overview of operations and maintenance requirements and methods to be implemented if the need for emergency management is imminent during operations and maintenance. Includes measures to be employed while conducting routine, corrective, and emergency operations and maintenance activities. Measures identified are in compliance with applicable state and federal laws and policies; and will ensure consistency across and within federal jurisdictions; allowing for Rocky Mountain Power to access the transmission line and ancillary facilities in a timely, cost effective, and safe manner.	Included as Appendix R
Cultural Resources Protection Plan	Identifies the mitigation measures needed to avoid or reduce Project-related impacts to cultural resources, wherever feasible. Provides the methodology through which steps would be implemented to avoid, minimize, or mitigate impacts on historic properties.	Included as Appendix S
Preconstruction Checklist	Identifies when specific actions related to completion of plans are to take place as well as when Construction Contractor-secured permits are to be applied for.	Included as Appendix T
Flagging, Fencing, and Signage Plan	Describes the methods that will be used in the field to delineate limits of disturbance and protect sensitive environmental and cultural resources during Project construction.	Included as Appendix U
PacifiCorp's Transmission Construction Standards	Provides standards for all aspects of overhead transmission line construction.	Included as Appendix V
PacifiCorp's Transmission and Distribution Vegetation Management Manual	Provides standards and guidelines for proper vegetation management near electric infrastructure to ensure electric reliability and prevent wildfires.	Included as Appendix W
Environmental Protection Measures	List of all environmental protection measures to be implemented for the Project and are organized by resource to provide an easy reference document.	Included as Appendix Z
Environmental and Safety Training Plan	Contains an environmental training program that will be implemented to educate managers and field crews on compliance with the Construction POD and Project permits. The program will include the following topics: biological, cultural, paleontological, and other environmental requirements and protection measures.	Included as Appendix C

Environmental and Safety Education Program

The Construction Contractor(s) will provide an environmental and safety education program training to all construction personnel prior to the commencement of any construction activities that will address how compliance with all Project-specific permitting documents will be met.

Resource and Pre-construction Surveys

Rocky Mountain Power conducted extensive environmental resource surveys in 2020. The results of these surveys were used as part of Rocky Mountain Power's design process wherein Project features were micro-sited to minimize or avoid impacts to the greatest extent possible. The applicable elements of these survey results and any related seasonal restriction areas are depicted graphically in Volume II of the Construction POD and explained further in the applicable Construction POD Implementation Plans.

Surveying and Staking

Prior to the commencement of construction, Project features will undergo engineering survey and staking. The Construction POD's *Flagging, Fencing, and Signage Plan* provides more specific detail relative to the field marking of Project features and environmental resources. Implementing this plan is required before the commencement of construction.

6.2.2 Transmission Line Removal

To construct Segment 1W(c), the existing 230 kV transmission line and structures must be removed between the existing Shirley Basin and the existing Dave Johnston substations. This line will be replaced in its entirety, including structures; however, as a rebuild and within existing ROW. Similarly, the Aeolus-Freezeout Rebuild will require removing existing towers and rebuilding with new towers in the existing 100-foot-wide ROW.

Access for Removal

Existing access roads or overland travel, including the roads and trails used for construction, maintenance, and inspection of the line will be used to remove the existing transmission line.

Site Preparation

In general, the existing pads surrounding existing structures are sufficient to allow access for the bucket trucks and small cranes needed to remove the structures. If needed, vegetation on the existing pads may be cut or crushed to allow safe equipment access. Grading will only be used if essential for worker safety. Erosion control measures as specified in the *Stormwater Pollution Prevention Plan* and *Environmental Protection Measures* of the Project's Construction POD will be employed where needed.

Remove Conductors

The next step after establishment of access and a safe work area for the line workers is to remove the conductors and shield wire. To remove the conductors, the line is taken out of service. Bucket trucks are generally used to hoist the workers to the wire positions to allow workers to remove the hardware holding the wires in place and drop the wires to the ground. Guard equipment or structures are used to prevent the

wires being removed from coming in contact with the energized wires (utilizing the same process as used when installing new wires).

Remove Structures

Structure removal follows wire removal. In most cases, a 20- to 30-ton lift capacity crane attaches to the structure upper section and holds it in place while the poles are cut off near ground level and the structure is laid to the ground for disassembly. Once all the equipment has been removed, the poles are cut off near ground level and allowed to fall or may be supported by crane and lowered to the ground. All materials are loaded onto trucks and hauled to a multi-purpose area or to a pre-approved disposal site.

Site Reclamation

After conductors, structures, and associated hardware have been removed, workers dig out around the base of the remaining pole section and cut off the pole below the ground. The resulting holes are filled and compacted with soils that have been approved for backfill and from approved sources if not available on-site. The final step is to remove and reclaim work areas, pads, and other disturbed areas to a condition agreed upon by the landowner, tenant, or land managing agency. The *Reclamation Plan* and *Environmental Protection Measures* in the Project's Construction POD will be implemented for site reclamation.

6.2.3 Access Road Construction

Project ROW access will be a combination of new access, improvements to existing access, and use of existing access. Existing roads that require improvement and new roads will be constructed using a bulldozer or grader, followed by a roller, to compact and smooth the ground. Front-end loaders will be used to move the soil locally or off-site. Per Rocky Mountain Power's construction road standards, Project access roads require a minimum 14-foot-wide travel surface width for straight sections and a 16- to 22-foot-wide travel way at curves, depending on the radius of the particular curve, to facilitate safe movement of equipment and vehicles. Erosion control and sedimentation measures, such as crossroad drainage, at-grade water bars, culverts, sediment basins, or perimeter control will be installed per Rocky Mountain Power's construction road standards and as required to minimize erosion during and subsequent to construction of the Project.

After Project construction, existing and new permanent access will be used by operation and maintenance crews and vehicles for inspection and maintenance activities. Access roads not required for operation and maintenance activities will be reclaimed after completion of Project construction. Gates or other barriers will be installed as required by Rocky Mountain Power, the BLM, or landowner to restrict unauthorized vehicular access to the ROW. Cattle guards with or without access gates will be installed where permanent access roads cross fence lines as required by the BLM or landowner and in accordance with Rocky Mountain Power's standards.

6.2.4 Transmission Line Construction

The following sections describe the transmission line construction activities and procedures for the Project. Various construction activities will occur during the construction process, with construction crews operating simultaneously at different locations along the ROW.

Geotechnical Investigation and Soil Boring

The purpose of the geotechnical investigations is to perform tests, to collect soil resistivity properties, and to collect hydrogeologic and geotechnical soil properties and geophysical data to provide information for detailed Project engineering and design. Geotechnical investigations provide critical data that has been incorporated into the electrical and structure foundation design and the Project construction bid package. This activity is necessary to help ensure the system is designed and constructed to be safe, reliable, and cost-effective and can reduce the overall temporary and permanent land disturbance in the ROW during initial build and during the life of the Project. The investigations were completed in 2013. Further investigations may be completed by Rocky Mountain Power's engineering consultant during the construction phase.

Multi-Purpose Construction Yard and Helicopter Fly Yards

Construction of the Project will begin with the establishment of a multi-purpose yard, which will serve as a field office; reporting location for workers; parking spaces for vehicles and equipment; and a site for material storage, fabrication, assembly, concrete batch plants, and stations for equipment maintenance. The multi-purpose yard will cover approximately 20 acres for 230 kV transmission line construction.

Helicopter fly yards will be situated where helicopter-assisted construction may occur. Each helicopter fly yard will cover approximately 10 to 15 acres and will be situated approximately every five miles along the route. In areas of heavy helicopter construction, fly yards will be situated in closer proximity, approximately every one to two miles. Lighting will be the minimum required to meet safety and security standards. Typically, helicopter fly yards will be situated in relatively flat areas with easy, existing access to minimize site grading and new road construction. When possible, these yards will be situated in previously disturbed sites or in areas of minimal vegetative cover.

The multi-purpose yard and helicopter fly yards will be fenced, have locked gates, and have security guards stationed where needed. **Section 6.2.5** provides more information concerning helicopter-assisted construction activities.

Site Access and Preparation

Construction of the Project will require access to each structure site for construction crews, materials, and equipment. Project facilities, including but not limited to structure work areas, wire pulling-and-tensioning sites, wire-splicing sites, guard structure locations, and the multi-purpose yard will be bladed, as necessary, to allow for safe construction and construction-related activities to occur. More specifically, clearing of vegetation will be required for construction purposes, clearances for electrical safety, long-term maintenance, and reliability of the transmission line. In the ROW, mature vegetation will be removed under or near the conductors to provide adequate electrical clearance as required by the National Electrical Safety Code. Areas where Project facilities are situated will be cleared of vegetation only to the extent necessary and any removed topsoil will be segregated and stockpiled separately in the structure work area and stabilized to limit erosion.

At each single-circuit 230 kV structure location, an area approximately 125 feet by 150 feet, depending on slope, will be needed for construction equipment to assemble and erect each structure. This area will provide a safe working space for equipment, vehicles, and materials. At each structure site in rough and steep terrain, work area requirements will vary depending on site-specific conditions.

Installation of Structure Foundations

Each 230 kV H-frame support structure requires the poles to be directly embedded in the ground. Holes are drilled in the ground using a truck- or track-mounted auger. The diameter of the hole evacuated for embedment is typically the pole diameter plus 18 inches. The depth is typically 10 percent of the pole length plus two feet for 230 kV structures; for this Project, it will be between nine and 12 feet. When the pole is placed in the hole, native or select backfill is used to fill the voids around the perimeter of the hole. When backfill must be imported, material is obtained from commercial sources or from areas free of noxious weed species.

Erect Support Structures

After the holes are dug for the 230 kV H-frame installation, the structure components are brought to tower locations by truck or helicopter. Assembly at the final installation site of each structure is the most common method used in transmission line construction. The structure components are assembled into sub-structures at the structure location and in most locations, cranes will be employed for lifting and installing the sub-structures to form the entire structure. Where the environmental conditions, access, or constructability issues persist, the structures may be assembled using helicopters. In which case, the components will be delivered to fly yards where they are assembled into sub-structures and then flown to the final structure location and installed to form the entire structure. The crane will move along the ROW from structure site to structure site erecting the structures.

String Conductors, Shield Wire, and Fiber Optic Ground Wire

Conductor, shield wire, and overhead optical ground wire (OPGW) will be placed on the transmission line structures by a process called wire-stringing. The first step to wire-stringing will be to install insulators, if not already installed on the structures during ground assembly, and stringing sheaves. Stringing sheaves are rollers that are attached temporarily to the lower portion of the insulators or overhead ground wire assemblies at each transmission line structure to allow the wire to be pulled along the line. These sheaves will each have one, two or three rollers corresponding to the number of conductors designated as a “bundle” at each phase or overhead ground wire location. All conductors of one phase will be pulled in together. Temporary clearance structures, also called guard structures, will be erected where required prior to wire-stringing activities.

Once the stringing sheaves and guard structures are in place, the initial stringing operation will commence with the pulling of a lighter weight “sock line” through the sheaves. Typically, the sock line is pulled in via helicopter. The sock line is attached to the hard line, which follows the sock line as it is pulled through the sheaves. The hard line will be attached to the conductor, shield wire, or OPGW and be used to pull these wires through the sheaves into their final location. Pulling the lines may be accomplished by attaching them to large bull wheels on a specialized wire-stringing vehicle.

Following the initial stringing operation, pulling and tensioning the line will be required to achieve the correct sagging of the transmission lines between support structures. Pulling-and-tensioning sites for 230 kV construction are required for each reel length (9,250 feet or approximately every two miles) along the ROW and are approximately 1.2 acres each to accommodate required equipment. Some of these sites will extend outside of the ROW as designated in the Construction POD, while other sites are situated in the ROW and may be used for wire-splicing as required.

Equipment at sites required for pulling-and-tensioning activities will include cranes, tractors, and trailers with wire reels and trucks and trailers with the pulling-and-tensioning equipment mounted. Depending on

topography, grading may be required at some sites to create level pads for equipment. Finally, the tension and sag of conductors and wires will be fine-tuned, stringing sheaves will be removed, and the conductors will be attached permanently to the insulators at the support structures.

6.2.5 Special Construction Techniques

Blasting

Typical 230 kV H-frame structure foundations will be directly embedded. If hard rock is encountered in the planned drilling depth, blasting may be required to loosen or fracture the rock to reach the required depth to install the foundations. Precise locations where blasting could be expected will be based on the site-specific geotechnical investigations conducted in 2010 through 2013 as part of detailed design. The Construction POD's *Blasting Plan* has been developed for implementation by the Construction Contractor(s) if blasting is to occur on the Project.

Helicopter Use

The specific types of helicopters used will be based on the Project need, the weight of the load being transported, and the altitude of the flight path. The various needs will range from light loads including crew/inspector transportation and conductor stringing; to medium to heavy loads including equipment, tool, material delivery/removal, and structure removal/construction activities; to heavy loads such as structure erection. Where the Project requires construction using helicopter support, the multi-purpose yard will serve as a helicopter support yard for fueling and maintenance, and for transporting equipment, material, and personnel to and from the structure work areas.

During helicopter operations, public access to defined areas will be restricted. Flagging, temporary road closures, traffic detours, and posted notices and signs may be used to restrict public access to construction areas. This will be in addition to general public access restrictions to protect public health and safety.

Construction During Winter Conditions

Construction is expected to occur year-round. The techniques mentioned below are provided as suggestions and options that are known to aid and meet requirements for winter construction. The Construction Contractor(s) will be responsible for coordinating with the local, state, and federal agencies and compliance inspection contractors to use necessary means in meeting Project objectives.

Snow Removal

The following activities will be implemented during snow removal:

- Snow typically will be blown, bladed, or pushed off the roads and construction area but in the ROW.
- The storage of snow will be confined to areas approved for disturbance and where appropriate surveys for biological, cultural, and paleontological resources have been completed. Snow removal will be done typically with a motor grader, snowplow, snowblower, or dozer. The Construction Contractor(s) will use the proper equipment, such as extended blade shoes or other equivalent methods modified as necessary to not allow any additional soil disturbance during snow-plowing operations.

- To accommodate big game movements, 100-foot gaps will be provided every 0.25 mile in the snow berms created as a result of snow removal.
- The Construction Contractor(s) will take special precautions where the surface of the ground is uneven and at drainage crossings to ensure that equipment blades do not destroy vegetation.
- In areas where snow fills trenches or holes, the Construction Contractor(s) will be responsible for removing it to allow visual inspection of trenches or holes prior to installing Project facilities and backfilling.
- The Construction Contractor(s) will backfill trenches with unfrozen soils to the extent practicable to minimize the potential for ditch line settlement resulting from voids between frozen chunks of backfill.

Water Use

Construction of the Project will require water. Major water uses are for transmission line foundations and dust control. The required water will be procured by the Construction Contractor(s) from municipal, commercial, or previously allocated sources or per a temporary water use agreement with landowners holding existing water rights. All procured water will include documentation as to how much water will be used and a map and geographic information system shapefile showing the location of the procurement site.-No new water rights will be required.

Construction of the Project will generate a temporary increase in fugitive dust. If the level of fugitive dust is too great in specific Project areas, as determined in cooperation with the landowner or land management agency, water will be applied to disturbed areas to minimize dust as outlined in the Construction POD's *Erosion, Dust Control and Air Quality Plan*.

For constructing Heward Substation's foundation, water will be transported to a batch plant site where it will be used to produce concrete. From the batch plant, the wet concrete will be transported to the work area in concrete trucks for use in foundation construction.

6.2.6 Reclamation of Disturbed Areas

Upon completion of construction, all areas not needed for typical Project operation and maintenance activities will be reclaimed. This includes all temporary Project facilities or permanent Project facilities that will be partially reclaimed. These areas will be graded to blend, as near as possible, with the natural contours and reclaimed and reseeded in accordance with the Construction POD's *Reclamation Plan*. All practical means will be made to reclaim the land outside the minimum areas needed for safe operation to its original contour and to restore natural drainage patterns along the ROW. All temporary features required to support construction activities, such as culverts or safety berms, will be removed unless approved by Rocky Mountain Power, the BLM, or the private landowner. All permanent features required to support construction activities, such as water bars and culverts, will remain and will meet Rocky Mountain Power's construction standards.

Construction sites, the multi-purpose yard, helicopter fly yards, and access roads will be kept in an orderly condition throughout the construction period. Approved, enclosed refuse containers will be used throughout the Project. Refuse and trash will be removed from the sites and disposed of on a daily basis in an approved manner. Oils or chemicals will be hauled to a disposal facility authorized to accept such materials. Open burning of construction trash will not be allowed. Disturbed areas not required for access

roads and maintenance areas around structures will be reclaimed, as required by the landowner or land management agency.

The Project's Construction POD includes a *Reclamation Plan*, which will provide specific guidance for reclamation treatments to be applied to Project-related disturbance, prevent unnecessary degradation of the environment during construction, operation, and maintenance, and reclaim temporary use areas and disturbed areas such that these areas are compatible with the surrounding environment, to the greatest extent practicable.

7.0 OPERATION AND MAINTENANCE PROCEDURES

7.1 Operation and Maintenance

The 230 kV transmission line to be constructed as part of the Project will comprise critical infrastructure of Rocky Mountain Power's transmission system, and of the Western U.S. electrical grid. Limiting the duration of unplanned outages and planning for the use of live-line maintenance techniques to minimize the requirement for any outages is an important part of the design, construction, operation, and maintenance requirements for this Project.

Rocky Mountain Power's goal is to provide their customers with a reliable supply of electricity while maintaining the overall integrity of the regional electrical grid. Rocky Mountain Power's obligation to maintain reliable operation of the electrical system is documented in their agreements with the various states through the public service commissions and is directed through compliance with industry standard codes and practices, such as the National Electrical Safety Code, which governs the design and operation of high-voltage electric utility systems.

After the transmission line has been energized, land uses that are compatible with applicable regulations can be permitted in and adjacent to the ROW. Existing land uses such as agriculture and grazing are generally permitted in the ROW. Incompatible land uses in the ROW include construction and maintenance of inhabited dwellings and any use requiring changes in surface elevation that will affect electrical clearances of existing or planned facilities.

Compatible uses of the Project ROW on federal-administered lands will have to be approved by the appropriate agency. Permission to use the Project ROW on private lands will have to be obtained from Rocky Mountain Power. Land uses that comply with state and local regulations can be permitted adjacent to the Project ROW.

The following system inspection, maintenance, and repair activities are described in the Construction POD's *Operations and Maintenance Emergency Response Plan:*

- Aerial and ground inspections
- Maintenance activities using live-line techniques
- Vegetation management activities
- ROW maintenance and access maintenance
- Substation maintenance activities
- Major maintenance activities, including relocating structures and access roads and replacing conductors

7.2 Emergency Response

The operation of the system will be remotely managed and monitored from control rooms at PacifiCorp's operation center in Portland, Oregon. Electrical outages or variations from normal operating protocols are sensed and reported at this operation center. The implementation of routine operation and maintenance activities on power lines minimizes the need for most emergency repairs. Emergency maintenance

activities are often those activities necessary to repair natural hazard, fire, or human-caused damages to a line. Such work is required to eliminate a safety hazard, prevent imminent damage to the power line, or restore service if there is an outage. In an emergency, Rocky Mountain Power must respond as quickly as possible to restore power.

In practice, as soon as an incident is detected, the control room dispatchers notify the responsible operations staff in the area(s) affected and crews and equipment are organized and dispatched to respond to the incident. The equipment necessary to carry out emergency repairs is similar to that necessary to conduct routine maintenance, in most situations. Emergency response to outages may require additional equipment to complete the repairs. For example, where the site of the outage is remote, helicopters will be used to respond quickly to emergencies. In the event of an outage or interruption in the transmission of electricity or other failure, Rocky Mountain Power will perform detailed inspections of the Project to determine the cause. It is important to note that Rocky Mountain Power does not anticipate that emergency maintenance activities will be a significant or widespread occurrence.

7.3 Decommissioning

The projected life of the Project is 50 years. Typically, transmission lines that have been maintained through that period will continue to provide service for a much longer lifetime. At the end of the service life of the Project, assuming it is not upgraded or otherwise kept in service, the transmission line will be removed from service. At such time, conductors, insulators, and hardware will be dismantled and removed from the ROW. Structures will be removed and foundations removed to below ground surface. Following abandonment and removal of the transmission line structures and equipment from the ROW, any areas disturbed during line dismantling will be reclaimed and rehabilitated.

Rocky Mountain Power is responsible for the reclamation of access roads following decommissioning of the Project in accordance with the landowner's direction but is not responsible for reclamation of public access roads unless mutually agreed upon with the landowner or required by the land management agency. Access roads will be decommissioned following removal of the structures. Access roads might also be decommissioned while the transmission line is in service, if the roads are no longer necessary. Rocky Mountain Power may decommission access roads by entering into an agreement with the BLM by which the agency reclaims the road situated on federal lands and is reimbursed for costs by Rocky Mountain Power, or Rocky Mountain Power or their Construction Contractor(s) implement reclamation measures.

8.0 PUBLIC OUTREACH ACTIVITIES ASSOCIATED WITH THE PROJECT

Community outreach and public involvement have been essential components of this Project. The Project has been advertised directly to agencies, communities, and interested groups and individuals in a variety of ways to provide information on the Project and solicit comments. A variety of tools were used for government consultation and public outreach during the EIS public scoping period, including activities in proximity to or affecting Carbon County.

Beginning in 2008, the Project has been presented and discussed in numerous public and stakeholder outreach meetings and at other venues in and around Carbon County, providing citizens with multiple opportunities to provide comments, ask questions, and learn more about the Project. The BLM and Rocky Mountain Power both currently host active Gateway West websites. Rocky Mountain Power's Gateway West project website is available at: http://gatewaywestproject.com/. The BLM's Gateway West project website is available at: https://eplanning.blm.gov/eplanning-ui/project/65164/510.

8.1 Meetings in Support of the NEPA Process

After much coordination among the participating agencies, the BLM began the EIS process in earnest in June 2008 with a series of nine public open houses at various locations in the Project area to inform those in attendance about the Project and the upcoming EIS process and solicit comments on the Project. The comments received helped identify the scope and depth of issues to be addressed in the studies and analyses for the EIS. The comments also helped refine the alternative routes.

The BLM and USFS each published a Notice of Availability of the Draft EIS for public review and comment in the *Federal Register* on July 29, 2011. The United States Environmental Protection Agency also published a Notice of Availability of the Draft EIS for public review and comment in the *Federal Register* on the same day, which initiated a 90-day public comment period. During the comment period, the BLM held 17 public meetings to provide information and solicit public comments on the Draft EIS. Four of the 17 public meetings occurred in Wyoming: in Kemmerer on October 3, 2011; in Rock Springs on October 4, 2011; in Rawlins on October 5, 2011; and in Douglas on October 6, 2011. A total of 165 members of the general public attended these four meetings.

Information about the Project, including dates of public meetings, was disseminated throughout the NEPA process through the *Federal Register*, newsletters, media releases and advertisements, and website postings. An open-house format was used for the meetings. Information provided at the meetings included maps displaying Project alternatives, a summary of the purpose and need for the Project, how to provide comments and deadlines for comments, and maps of specific resource impacts. Representatives from the BLM and Rocky Mountain Power were present and available to explain the displays, answer questions, and assist in accepting and recording comments.

In addition to BLM-sponsored meetings, Rocky Mountain Power has conducted outreach via in-person meetings, newsletters, news articles, interviews, social media outlets, and attendance at events with state officials, key stakeholders, county commissions, the public, consumer groups, and advocacy groups.

8.2 Meetings with State and Local Governments

Rocky Mountain Power has collaborated with state and county agencies to keep the agencies informed on the Project progress, solicit guidance on necessary permits and approvals, and to solicit comments. The key activities regarding state and local governments are described below.

In December 2012, Rocky Mountain Power sent a letter to 22 different Wyoming State Agencies as recommended by the Wyoming Department of Environmental Quality's Industrial Siting Division to describe the Project and invite input. Rocky Mountain Power followed up with in-person meetings with five of the agencies that requested meetings and held several conference calls.

8.2.1 Wyoming State Historic Preservation Office

Following consultation requirements of the NHPA, a notification letter was sent to the Wyoming State Historic Preservation Office (SHPO) in March 2008. The BLM met with the Wyoming SHPO to discuss phasing of cultural and historic surveys and sampling. A Programmatic Agreement between the BLM, USFS, Advisory Council on Historic Preservation, Idaho SHPO, Wyoming SHPO, Bureau of Reclamation, National Park Service, U.S. Army Corps of Engineers – Omaha District, Idaho Power, and Rocky Mountain Power and other pertinent agencies and parties was finalized on September 12, 2013. The BLM and Rocky Mountain Power continue to coordinate with the Wyoming SHPO on the review of cultural reports and development of necessary historic property treatment plans for the Project. These reports and treatment plans will be finalized prior to the start of construction.

8.2.2 Wyoming Game and Fish Department

Following consultation requirements of the Fish and Wildlife Coordination Act, the BLM involved and notified the WGFD through mailing and stakeholder meetings throughout the NEPA process. Rocky Mountain Power has coordinated with the WGFD throughout the Project.

The WGFD is involved in the Gateway West Grouse Mitigation Plan oversight committee, which is a group consisting of BLM, WGFD, USFWS, and Rocky Mountain Power personnel working collaboratively to define the mitigation plan and application for the protection of greater sage-grouse along the Project route.

Rocky Mountain Power has received the following letters from the WGFD regarding Gateway West:

- January 9, 2018 – Concurrence with the State of Wyoming Office of the Governor Consistency Review for Gateway West
- January 30, 2018 – Includes comments about the updated from EO-2011 to EO-2015 during the course of development of the Project resulting in a change to the classification of habitat in the transmission line corridors. The comments state: "While the construction may exceed thresholds in some areas and will add to the total disturbance in sage grouse core it will not affect the ability of the project to be constructed as planned." The letter requests that the Project go through the Density Disturbance Calculation Tool analysis process which Rocky Mountain Power is currently preparing. This process will be completed prior to the start of construction.

8.2.3 Carbon County

Since 2008, Rocky Mountain Power has regularly met with and updated the Carbon County Planning and Development Department. Rocky Mountain Power has presented map and informational materials about the Project. On March 18, 2020, Rocky Mountain Power contacted Carbon County's Planning and Development Department to understand CUP Application requirements for the Gateway South Transmission Project, the requirements for which also apply to the Gateway West Segment D-1 Transmission Line Project. On September 16, 2020, Rocky Mountain Power conducted a pre-application conference call with Carbon County Planning and Development Department representatives to further discuss the requirements of the CUP Application.

8.2.4 Land Owners

All land owners have been contacted by Rocky Mountain Power regarding the Project.

9.0 CUP APPLICANT-PROPOSED CONDITIONS OF APPROVAL

In this Application, Rocky Mountain Power is providing Carbon County with the most current information available for all Project elements that require a CUP. This section presents the permitting requirements that Rocky Mountain Power will follow to comply with the requirements of the CUP approval process. Because the Project is currently going through final design, some materials required as part of this Application are not currently available for county review. However, these materials will be provided to Carbon County prior to commencement of construction.

- Rocky Mountain Power will provide survey or engineering drawings to Carbon County prior to construction as a condition of approval of the CUP.
- Rocky Mountain Power will submit proof of legal access to Carbon County prior to construction as a condition of approval of the CUP (see **Part A-1**, Response to Item 6).
- Rocky Mountain Power will submit the Project Construction POD to Carbon County when completed and approved by the BLM (see **Section 4.1.1**).

10.0 LITERATURE CITED

Bureau of Land Management. 2013. Final Environmental Impact Statement for the Gateway West Transmission Line Project. Wyoming State Office, Cheyenne, Wyoming. https://eplanning.blm.gov/eplanning-ui/project/65164/570. Accessed June 26, 2020.

Carbon County. 2010. Carbon County Comprehensive Land Use Plan. Adopted November 9, 2010, last amended April 3, 2012. Carbon County, Rawlins, Wyoming. https://www.carbonwy.com/DocumentCenter/View/515/Comprehensive-Land-Use-Plan-Amended-04-03-2012?bidId=. Accessed March 26, 2020.

_____. 2019. Carbon County Zoning Resolution of 2015. Adopted October 6, 2015, last amended July 7, 2020. Carbon County, Rawlins, Wyoming. https://www.carbonwy.com/1111/Zoning-Resolution-and-Map. Accessed February 11, 2020.

PacifiCorp. 2019. Integrated Resource Plan. Volumes I and II. Filed October 18, 2019. Portland, Oregon. https://www.pacificorp.com/energy/integrated-resource-plan.html. Accessed March 26, 2020.

Part C: Supporting Documentation

Attachment C-1: Project Overview Map

Attachment C-2: Carbon County Detailed Route and Facility Maps

Attachment C-3: Summary of Project Facilities in Carbon County

Attachment C-4: List of Property Owners

Attachment C-5: List of Aliquot Parcels Crossed

Attachment C-6: Wyoming DEQ ISC Correspondence

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ATTACHMENT C-1: PROJECT OVERVIEW MAP

Attachment C-1 shows the Project in Carbon County.

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NATRONA COUNTY

CONVERSE COUNTY

CARBON COUNTY

ALBANY COUNTY

487

77

102

77

Heward Substation

Difficulty Substation

Shirley Basin Substation

Aeolus Substation

Freezeout Substation

0 2 4

Miles

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

WYOMING

Rawlins

Cheyenne

Evanston

Map Area

Date: 9/21/2020

Sources: Rocky Mountain Power, BLM, Platts, ESRI

Legend

Project Facilities

- Segment 1W(a): New Build
- Segment 1W(c): Rebuild
- Aeolus-Freezeout Rebuild
- Project Substation

Land Jurisdiction

- Bureau of Land Management
- Other Federal
- State
- Private or Unknown
- County Line

Other Features

- Existing Substation
- Existing Transmission Line
- Gateway West Transmission Line Project Routes *(currently being constructed and permitted by Carbon County in 2018)*

Roads

- State Highway
- Local Road

Gateway West Segment D-1
Transmission Line Project

Attachment C-1

Project Overview Map

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ATTACHMENT C-2: CARBON COUNTY DETAILED ROUTE AND FACILITY MAPS

Attachment C-2, Map 1 shows the Project in Carbon County, including the locations of temporary work areas.

Attachment C-2, Map 2 includes the names and locations of non-federal land crossed by the Project in Carbon County.

Attachment C-2, Map 3 shows the Carbon County zoning districts that the Project crosses.

Attachment C-2, Map 4 shows the Project relative to Carbon County future land use designations.

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NATRONA COUNTY

CONVERSE COUNTY

CARBON COUNTY

ALBANY COUNTY

County Rd 2 - Shirley Ridge Rd

County Rd 97 - Bates Creek Rd

County Rd 4

County Rd 6 - Shirley Basin Rd

County Rd 2 - Shirley Ridge Rd

County Road 26 - Shirley Basin Access Rd

County Road 270

77

487

102

Heward Substation

Difficulty Substation

Shirley Basin Substation

Aeolus Substation

Freezeout Substation

0 2 4

Miles

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

WYOMING

Rawlins

Cheyenne

Evanston

Map Area

Date: 9/21/2020

Sources: Rocky Mountain Power, BLM, Platts, ESRI

Legend

Project Facilities

- Segment 1W(a): New Build
- Segment 1W(c): Rebuild
- Aeolus-Freezeout Rebuild
- Project Substation

Temporary Work Areas

- F — Helicopter Fly Yard
- M — Multi-Purpose Construction Yard
- P — Pulling-and-Tensioning Site

Other Features

- Existing Substation
- County Road Crossed by Transmission Line

Roads

- State Highway
- Local Road

Land Jurisdiction

- Federal or State Lands
- Private or Unknown
- County Line

Gateway West Segment D-1
Transmission Line Project

Attachment C-2
Map 1

Project Facilities Map

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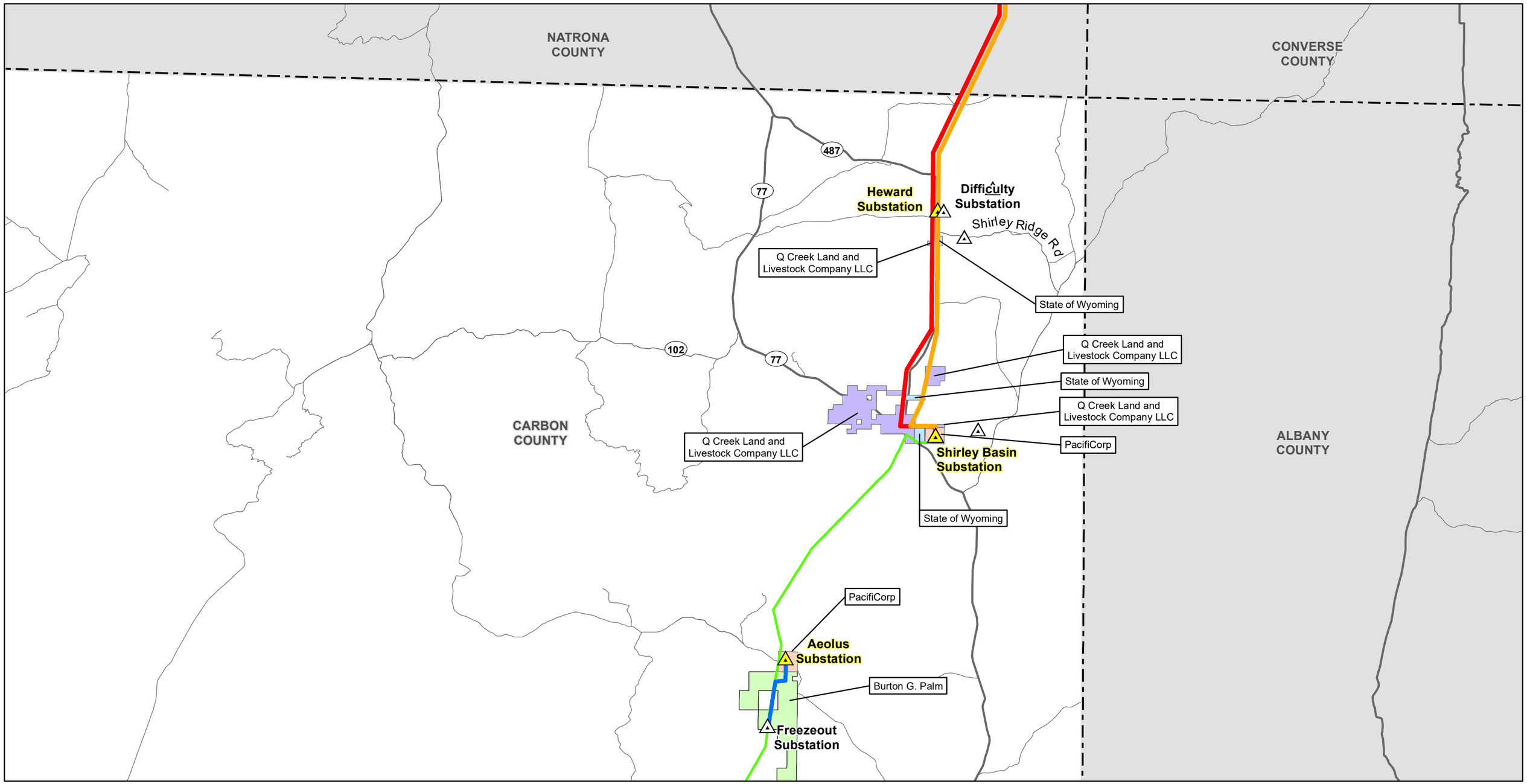

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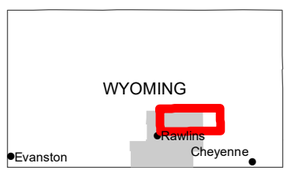
Miles

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

Date: 9/21/2020



Map Area

Legend

Project Facilities
- Segment 1W(a): New Build
- Segment 1W(c): Rebuild
- Aeolus-Freezeout Rebuild
- Project Substation

Other Feature
- Existing Substation

Parcels Crossed by Transmission Line
- PacifiCorp
- Q Creek Land and Livestock Company LLC
- State of Wyoming
- Burton G. Palm

Roads
- State Highway
- Local Road

Gateway West Segment D-1
Transmission Line Project

Attachment C-2
Map 2
Non-Federal Landowners
Crossed by Transmission Line

Sources: Rocky Mountain Power, ESRI, BLM

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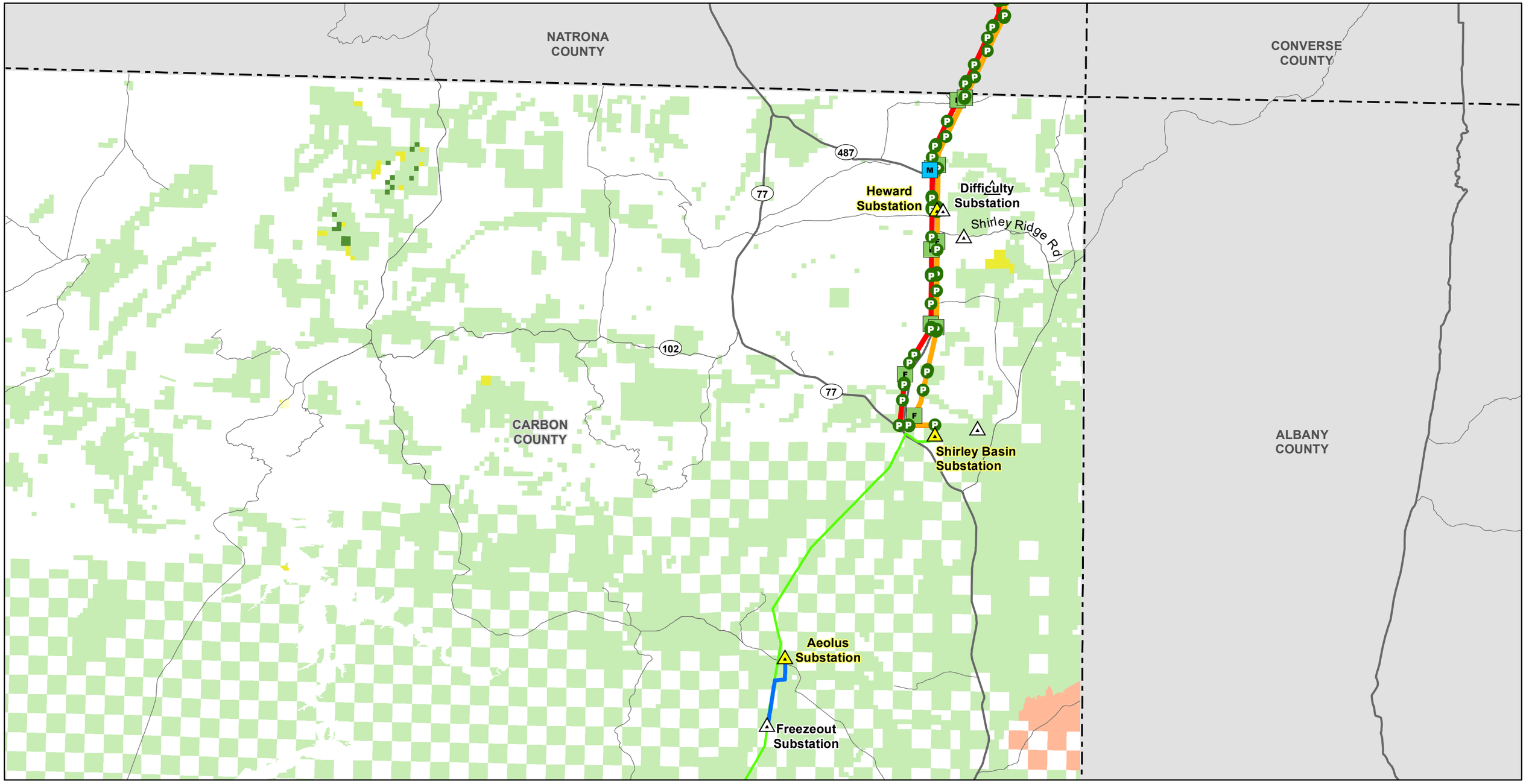
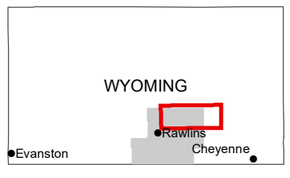


0 2 4

Miles

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP



Map Area

Date: 9/21/2020

Legend

Project Facilities
- Segment 1W(a): New Build
- Segment 1W(c): Rebuild
- Aeolus-Freezeout Rebuild
- Project Substation

Other Feature
- Existing Substation

Temporary Work Areas
- F — Helicopter Fly Yard
- M — Multi-Purpose Construction Yard
- P — Pulling-and-Tensioning Site

Zoning
- RAM - Ranching, Agriculture, and Mining
- RD - Residential Single Family
- PUD - Planned Unit
- Public Lands

Roads
- State Highway
- Local Road

Gateway West Segment D-1
Transmission Line Project

Attachment C-2
Map 3

Zoning Districts Map

Sources: Rocky Mountain Power, BLM, Platts, ESRI

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NATRONA COUNTY

CONVERSE COUNTY

CARBON COUNTY

ALBANY COUNTY

487

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Heward Substation

Difficulty Substation

Shirley Ridge Rd

Shirley Basin Substation

Aeolus Substation

Freezeout Substation

0 2 4

Miles

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

WYOMING

Rawlins

Cheyenne

Evanston

Map Area

Legend

Project Facilities

- Segment 1W(a): New Build
- Segment 1W(c): Rebuild
- Aeolus-Freezeout Rebuild
- Project Substation

Other Feature

- Existing Substation

Temporary Work Areas

- F — Helicopter Fly Yard
- M — Multi-Purpose Construction Yard
- P — Pulling-and-Tensioning Site

Future Land Use Designations

- Rural Agricultural Areas
- Agricultural Rural Living
- Smaller Lot Rural
- Federal or State Lands

Roads

- State Highway
- Local Road

Gateway West Segment D-1
Transmission Line Project

Attachment C-2
Map 4

Future Land Use Designations

Date: 9/21/2020

Sources: Rocky Mountain Power, BLM, Platts, ESRI

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ATTACHMENT C-3: SUMMARY OF PROJECT FACILITIES IN CARBON COUNTY

Table C-3A provides additional information about the Project in Carbon County. Permitting requirements for the Project are identified. **Table C-3B** describes the type of structures including typical height, typical distances between structures, and temporary and permanent disturbance areas by structure for the Project that require a CUP. **Figure C-3A** illustrates the proposed structure type that will be used in Carbon County. **Figure C-3B** illustrates the placement of transmission structures and access roads in the ROW.

TABLE C-3A PROJECT DESIGN CHARACTERISTICS IN CARBON COUNTY

PROJECT COMPONENT	DESCRIPTION	TYPE OF PERMIT REQUIRED
Transmission Line – Segment 1W(a): Construction of a new 230 kV transmission line parallel to an existing 230 kV transmission line	• Conductors: Bundled 1272 kcmil 45/7 ACSR "Bittern" with two subconductors per phase • Approximate number of structures: 9 on private land • Line length: 1.6 miles on private land	CUP and building permit for each structure (tower). Building permits to be applied for and obtained by Rocky Mountain Power's Construction Contractor(s).
Transmission Line – Segment 1W(c): Transmission line rebuild to replace existing 230 kV transmission line	• Conductors: Bundled 1557.4 kcmil 36/7 ACSS/TW "Potomac" with two subconductors per phase • Approximate number of structures to be replaced: 21 on private land • Line length: 2.8 miles on private land	
Transmission Line – Aeolus-Freezeout Rebuild	• Conductors: Either bundled 1272 kcmil or 1557.4 kcmil as described for 1W(a) and 1W(c) above. • Approximate number of structures to be replaced: 21 on private land • Line Length: 3.0 miles on private land	
Shirley Basin Substation	• Replace existing 230 kV circuit breakers, high-voltage switches, tubular and wire bus, bus supports, and transmission line termination structures	Not subject to this CUP Application.
Heward Substation	• New station adjacent to existing Difficulty Substation • Developed acreage: approximately 5 acres fenced • 230 kV circuit breakers and related switching equipment, bus and support structures, potential and current transformers • 230 kV termination structures approximately 70 feet in height • Control, protection, and communications equipment • Addition of new control building within the substation fenced area	No county permit required. Located on BLM-administered land.

TABLE C-3B TRANSMISSION STRUCTURE CONFIGURATION SUMMARY

STRUCTURE TYPE	TYPICAL HEIGHT (FEET)	TYPICAL DISTANCE BETWEEN STRUCTURES (FEET)	TEMPORARY DISTURBANCE PER STRUCTURE (ACRES)	PERMANENT DISTURBANCE PER STRUCTURE (ACRES)
230 kV Steel H-Frame	60-90	800	0.4	0.01

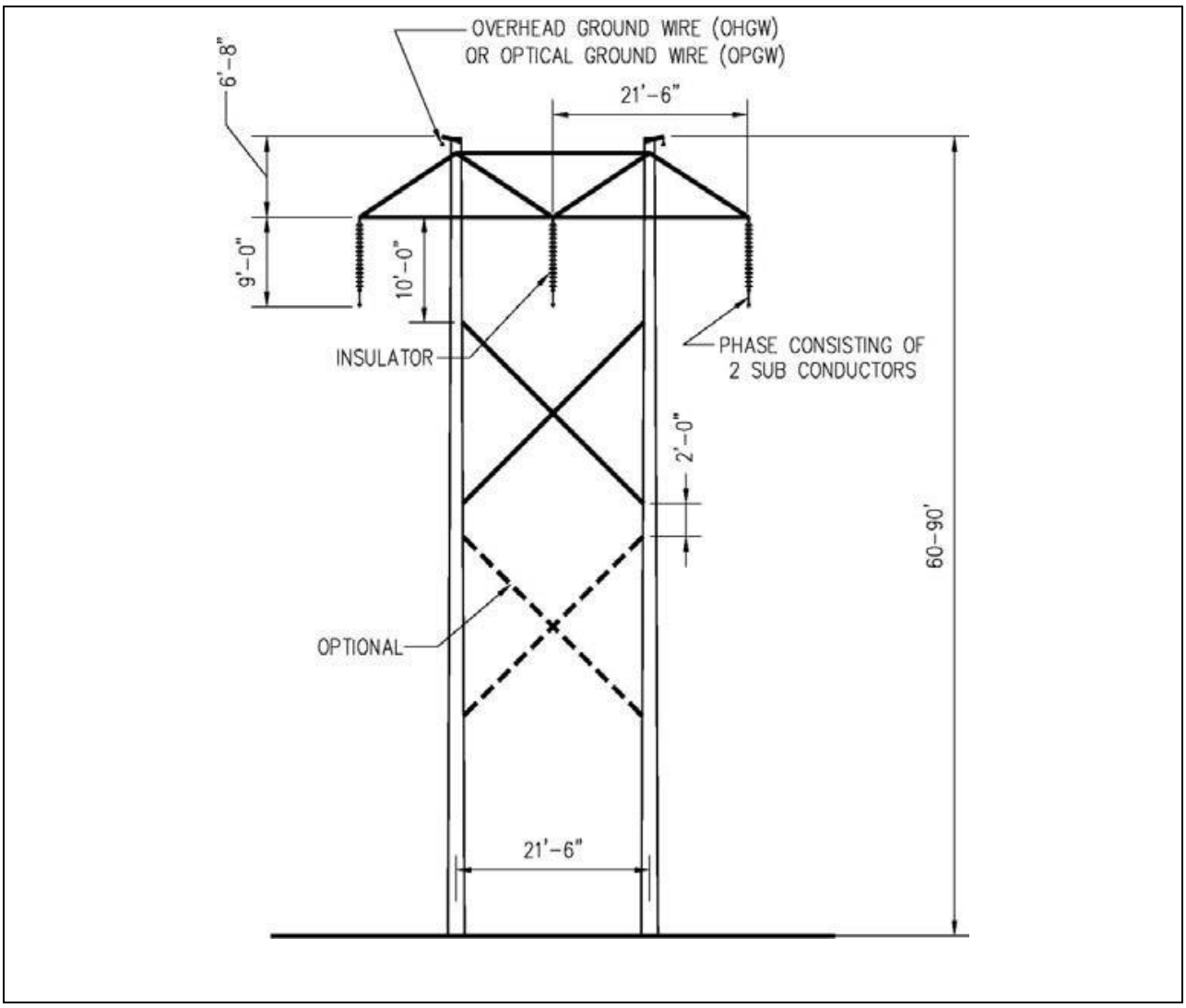

FIGURE C-3A PROPOSED TANGENT SINGLE-CIRCUIT 230 KV H-FRAME STRUCTURE

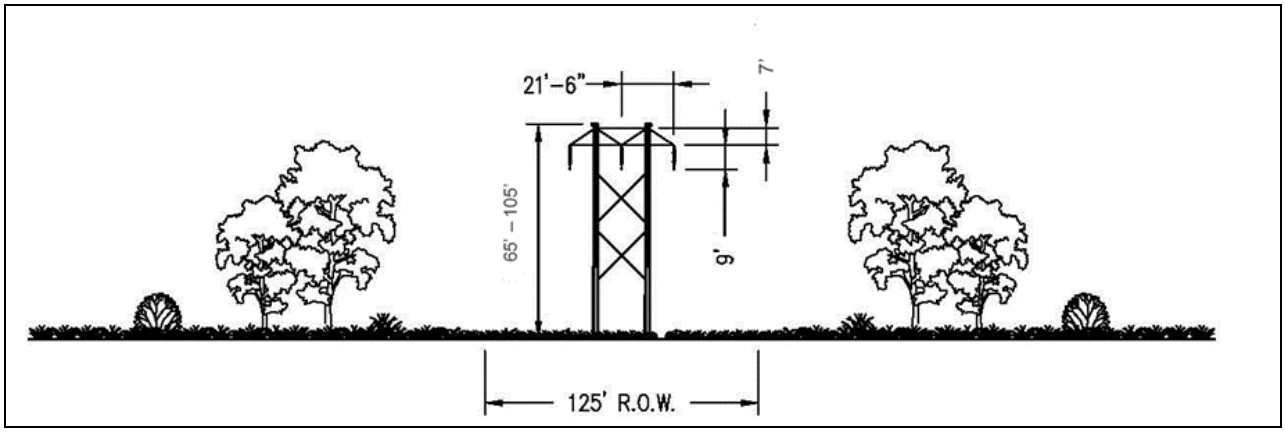

FIGURE C-3B TYPICAL RIGHT-OF-WAY CONFIGURATION

ATTACHMENT C-4: LIST OF PROPERTY OWNERS

Table C-4A provides the Assessor's Parcel Number and names and addresses of landowners whose parcels are crossed by the Project ROW or access roads in Carbon County.

Table C-4B provides the Assessor's Parcel Number and names and addresses of landowners whose parcels are adjacent to the parcels that are crossed by the Project ROW or access roads in Carbon County.

Data included in **Tables C-4A** and **C-4B** were obtained from Carbon County in 2019.

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TABLE C-4A PRIVATE LANDOWNERS CROSSED BY THE PROJECT'S ROW OR ACCESS ROADS

LANDOWNER NAME	MAILING ADDRESS	CITY	STATE	ZIPCODE	ASSESSOR'S PARCEL NUMBERS
PACIFICORP	825 NE MULTNOMAH STREET SUITE 1900	PORTLAND	OR	97232-2151	2678-31-1-00-010-00 2480-35-1-00-007-00
PALM, BURTON G. – TRUSTEE OF THE BURTON GERALD PALM TRUST	P. O. BOX 96	MEDICINE BOW	WY	82329	2380-02-1-00-004-00
Q CREEK LAND AND LIVESTOCK COMPANY LLC	P. O. BOX 11350	BOZEMAN	MT	59719	2678-01-1-00-003-00 2679-08-2-00-003-00

TABLE C-4B PRIVATE LANDOWNERS ADJACENT TO THE PROJECT'S ROW OR ACCESS ROADS

LANDOWNER NAME	MAILING ADDRESS	CITY	STATE	ZIPCODE	ASSESSOR'S PARCEL NUMBERS
BIG SKY MONTANA HOLDINGS, LLC	P. O. BOX 39	WIGGINS	CO	80654	2380-13-1-00-007-00 2379-07-1-00-011-00
BURTON, JOHN AND STEVEN – CO-TRUSTEES OF NANCY PALM REVOCABLE TRUST	P. O. BOX 96	MEDICINE BOW	WY	82329	2380-02-1-00-004-00 2480-31-1-00-005-00
CRONBERG, MARVIN H. AND ALOMA L.	BOX 7	MEDICINE BOW	WY	82329	2878-17-3-00-010-00
CUIN, DON AND CECILIA	419 6TH STREET	RAWLINS	WY	82301-5441	2878-17-3-00-004-00
DIFFICULTY CREEK RANCH LLC	P. O. BOX 11350	BOZEMAN	MT	59719	2480-01-1-00-003-00 2479-05-1-00-004-00
ELLIS, WILLIAM R. AND MARY LOU	P. O. BOX 330	MEDICINE BOW	WY	82329	2480-17-1-00-006-00
HEWARDS 7E RANCH LLC	7E RANCH	SHIRLEY BASIN	WY	82615	2879-01-2-00-003-00 2878-01-2-00-003-00
HI ALLEN RANCH LLC	P. O. BOX 96	MEDICINE BOW	WY	82329	2280-01-1-00-003-00
ITURRIAN, WILLIAM BEN AND ROSANNE C.	P. O. BOX 98	CRAWFORD	GA	30630	2678-34-1-00-008-00
MOORE, KEVIN R.	NO ADDRESS PROVIDED				2678-34-3-00-011-00
PATHFINDER MINES CORPORATION	5880 ENTERPRISE SUITE 200	CASPER	WY	82609-4326	2878-17-4-00-012-00 2878-22-3-00-020-00
Q CREEK LAND AND LIVESTOCK COMPANY LLC	P. O. BOX 11350	BOZEMAN	MT	59719	2678-01-1-00-003-00

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ATTACHMENT C-5: LIST OF ALIQUOT PARCELS CROSSED

The following lists the aliquot parcels crossed by quarter section for the Project facilities in Carbon County:

Carbon County, WY

Sixth Principal Meridian, Wyoming

T.23 N., R. 80 W.,
sec. 03
sec. 10
sec. 11
sec. 15
T.24 N., R. 80 W.,
sec. 34
sec. 35
T.26 N., R. 78 W.,
sec. 06, lots 2 thru 7, SW1/4NE1/4, E1/2SW1/4, and SE1/4NW1/4;
sec. 07, lots 1, 3, and 4, E1/2NW1/4, and NE1/4SW1/4;
sec. 18, lots 1 thru 4;
sec. 19, lot 1;
sec. 30, SW1/4SE1/4;
sec. 31, lot 1 and 4, E1/2W1/2, W1/2NE1/4, and NW1/4SE1/4.
T.26 N., R. 79 W.,
sec. 01, E1/2SE1/4 and SW1/4SE1/4;
sec. 12, W1/2NE1/4, SE1/4NW1/4, NE1/4SW1/4, and S1/2SW1/4;
sec. 13, W1/2NW1/4, N1/2S1/2, and SE1/4SE1/4;
sec. 14, E1/4;
sec. 18, SE1/4SE1/4;
sec. 23, E1/4;
sec. 24, E1/4 and SW1/4SE1/4;
sec. 25, NE1/4NE1/4, W1/2NE1/4, E1/2NW1/4, SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, and NW1/4SE1/4;
sec. 26, E1/4 and SW1/4SE1/4;
sec. 35, N1/2NE1/4;
sec. 36, N1/4 and S1/2SE1/4.
T.27 N., R. 78 W.,
sec. 06, lots 2 thru 7, SE1/4NW1/4, SW1/4NE1/4, W1/2SE1/4, and E1/2SW1/4;
sec. 07, lots 1 thru 4, W1/2E1/2, and E1/2W1/2;
sec. 18, lots 1 thru 4, W1/2E1/2, and E1/2W1/2;
sec. 19, lots 1 thru 4, W1/2E1/2, and E1/2W1/2;
sec. 30, lots 1 thru 4, W1/2E1/2, and E1/2W1/2;
sec. 31, lots 1 thru 4, W1/2E1/2, and E1/2W1/2.
T.28 N., R. 78 W.,
sec. 05, lots 5, 6, 7, 9, 10, 11, and 12, SW1/4, and W1/2SE1/4;
sec. 07, E1/4 and W1/2SE1/4;
sec. 08, W1/4 and E1/2NW1/4;
sec. 18, lots 2 thru 6, NE1/4, W1/2SE1/4, and E1/2SW1/4;
sec. 19, lots 1 thru 6, E1/2SW1/4;
sec. 30, lots 1, 2, 7, 8, and 9, E1/2NW1/4, and NE1/4SW1/4;
sec. 31, lots 7 thru 10, and lots 14 thru 19.
T.28 N., R. 79 W.,
sec. 01, lots 1 and 6, S1/2NE1/4, and SE1/4NW1/4;
sec. 02, lot 6, SW1/4NE1/4, SE1/4NW1/4, and N1/2SW1/4;
sec. 03, E1/2SE1/4;

sec. 10, E1/4
sec. 15, E1/2NE1/4, N1/2SE1/4, and SW1/4SE1/4;
sec. 22, W1/2NE1/4 and SE1/4NE1/4;
sec. 24, SE1/4SE1/4;
sec. 25, W1/2E1/2 and SE1/4SE1/4.

ATTACHMENT C-6: WYOMING DEQ ISC CORRESPONDENCE

The attached letter from the Wyoming DEQ documents that no ISC permit is required for the Project.

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Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

DEQ

Mark Gordon, Governor

Todd Parfitt, Director

July 21, 2020

Rod Fisher
Principal Project Manager
Rocky Mountain Power
1407 West North Temple, Ste 250
Salt Lake City, UT 84116

GATEWAY WEST D1 DEQ/ISC DOCKET 20-07 INDUSTRIAL SITING DIVISION DETERMINATION OF NONJURISDICTION

Dear Mr. Fisher,

Following the jurisdictional meeting that the Industrial Siting Division held with PacifiCorp/Rocky Mountain Power (RMP) on July 17, 2020, it is the judgment of ISD that the Gateway West D1 project is not jurisdictional under the Industrial Development Information and Siting Act (Act). An industrial facility which is jurisdictional under the Act is defined in W.S. 35-12-102(vii). The Industrial Siting Council (ISC) recently adjusted the jurisdictional threshold to $227,715,000. As stated by RMP, the Gateway West D1 project has an estimated construction cost of $137 million, below the jurisdictional threshold. RMP does not require a permit from the ISC.

Additionally, according to ISD's rules, Chapter 1, Section 3(b)(i), no person shall commence to construct an industrial facility without first receiving a Certificate of Insufficient Jurisdiction from the ISC if the estimated cost of the facility is at least eighty percent of the jurisdictional threshold. The estimated construction cost of the Gateway West D1 project are below eighty-percent of the current jurisdictional threshold, alleviating RMP from the requirement to obtain a Certificate of Insufficient Jurisdiction.

ISD appreciates the opportunity to meet with RMP regarding this project. Please let me know if we can be of further assistance.

Sincerely,

Brian Lovett
Administrator
Industrial Siting Division

Cc: Todd Parfitt, Director, Wyoming Department of Environmental Quality
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