

City of Rawlins

P.O. Box 953
Rawlins, Wyoming 82301



October 28, 2011

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

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

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

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

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

● **Temporary Construction Employment:**

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

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

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

Notes:

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

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

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

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

City of Rawlins Population Correction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- **Public Works Issues –**

- **Water**

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

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

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

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

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

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

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

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

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

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

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

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

SOC-1 Housing Plan

- Contract with local motels and hotels for temporary accommodation within daily commuting distance of the Project site.** Temporary accommodations will be selected based on value, cleanliness, and proximity to the Project site workers who have access to RVs.
- If temporary accommodation is not available within the Project area, seek motel and hotel accommodations outside the Project area.** In this event, the Proponents would provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the Project site safely.
- If sufficient temporary accommodation is not available, depending on the location and the number of workers involved, the Proponents would explore other temporary housing options, including the use of temporary housing facilities established for other projects, establishing temporary RV lots, and developing Project-specific temporary housing camps.** The Proponents would provide bus or other transportation to the Project site if these facilities were located outside the Project area.
- Contract with local RV parks for rental spaces to accommodate."**

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

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

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

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

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

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

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

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

- Dangerous Building Abatement

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

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

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

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

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

- **DDA/Main Street –**

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

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

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

Sincerely,

Steve Golnar

City Manager

City of Rawlins

521 West Cedar Street

Rawlins, Wyoming 82301

Cc: Rawlins City Council

Amy Bach, City of Rawlins Community Development Director

Dan Massey, City Attorney

Carbon County Commissioners

Sid Fox, Carbon County Planner

Cindy Wallace, Carbon County Economic Development Corporation

Leslie Blythe, Rocky Mountain Power

Attachments –

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

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

Attachments –

City of Rawlins, Wyoming Comment on Draft Visual Resource Management Plan Amendment and Chokecherry and Sierra Madre Wind Energy Project draft Environmental Impact Statement (10/19/2011)

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

Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

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

Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

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

Carbon County Industrial and Natural Resource Development Projects:
Pending and in Development as of August 2011

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

Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

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

Carbon County Industrial and Natural Resource Development Projects:

Pending and in Development as of August 2011

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

City of Rawlins Fire Response Area

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

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

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

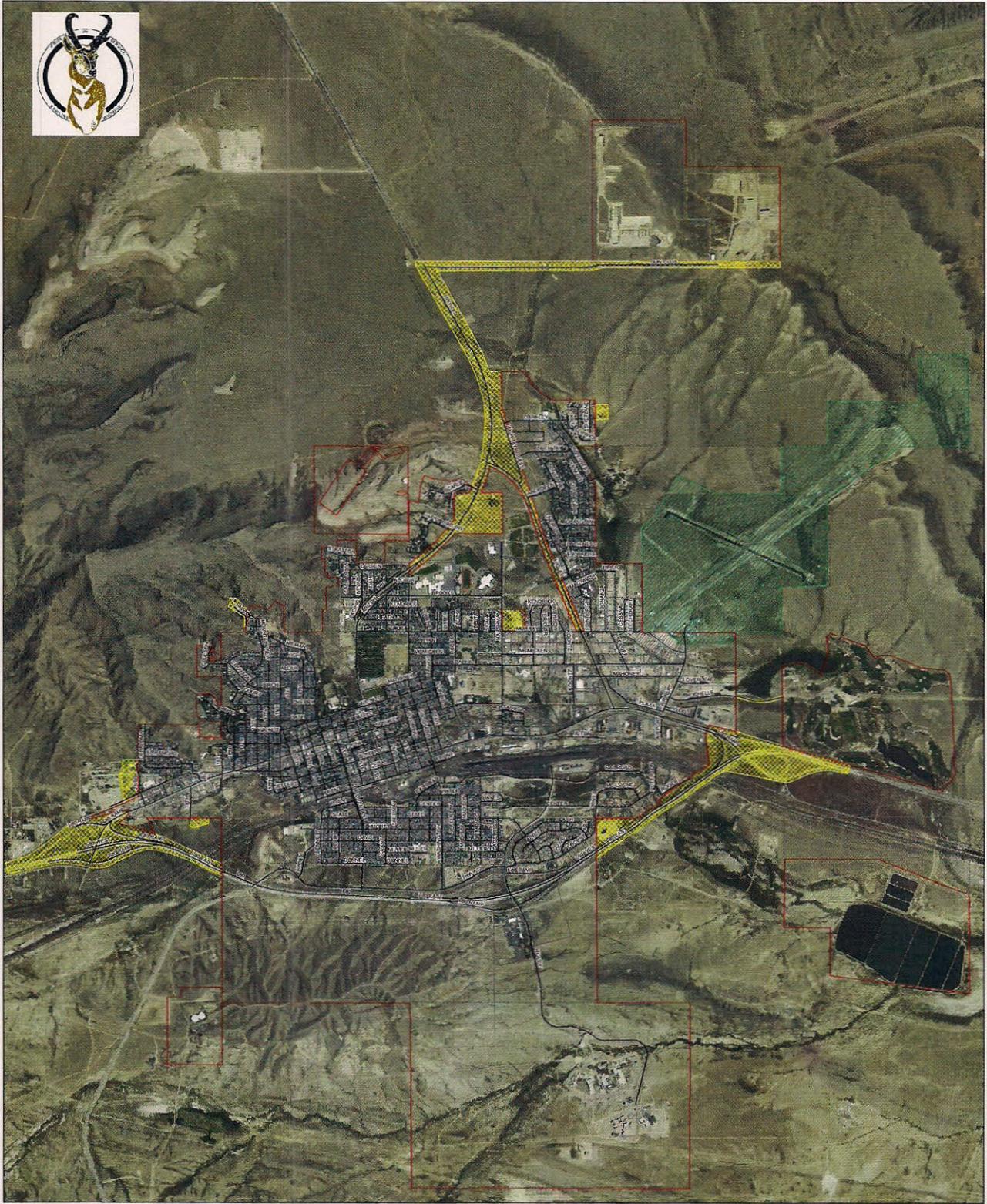
- :anything on 287 North to and including the landfill road and landfill.
- :the house sitting in the middle of the field by the Rec Center, off of 287(the Seldomridge home), as well as the houses west of 3rd Street and the barn around Scarlet Drive)
- : the new elementary school and the Baptist Church.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

We will not respond to:

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

Steve Golnar, Rawlins City Manager

CITY OF RAWLINS FIRE RESPONSE AREAS



-  City Response Inside City Limits
-  Airport - Joint Response
-  City Response Outside City Limits

****City Response Outside City Limits Per City and County Agreement**



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

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

Position Title FY2009-10 Mid Year FY2010-11 Proposed Mid Yr. 10-11

City Hall

AutoCad/GIS Operator (attr.)	1		
Comm. Dev. Dir. (created/ not filled)	1		+1
City Planner	1		
Planning Technician	1		
Secretary – DDA/Main Street	1		
CATS Bus Driver	.25		
Planning/Legal Secretary/Court Clerk		1	+5
Court Clerk (P.T.- new)		+5	
Building Inspector – Commercial (attr.)			1
Grants Manager (attr.)			1
Assistant City Attorney (attr.)			.65
Legal secretary (reorg.)			.5

Public Works Department

Municipal Service Worker I (attr.)	1		
Facilities Maintenance Technician	1		
Municipal Worker I	2		

Police Department

Communications Operator I (attr.)	1		
SRO Officer (not created/not budgeted)			
Victim Advocate	1		
Police Officer		2	
Police Officer	(COPS grant)		

Recreation Department

Recreation Assistant (attr.)	1		
Recreation Assistant	1		
Range Attendant	1		
Golf Course Assist. Superintendent	1		
Drop Off Day Care Provider	.25		
Recreation Rover (new)	+1		

Fire Department

Fire Apparatus Operator 1	2		+2(SAFER grant)*
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Total Reductions in Force 16.5 2.5

FY2009-10 beginning GF FTE* = 114.65 98.15 FTE 95.65 FTE 95.00 FTE

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

RESOLUTION NO.

**A RESOLUTION AUTHORIZING THE DEVELOPMENT OF AN
EXTRATERRITORIAL UTILITY EXPANSION PLAN.**

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

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

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

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

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

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

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

PASSED, APPROVED AND ADOPTED this ____ day of _____, 2010.

CITY OF RAWLINS, a Wyoming
municipal corporation

Kenneth C. Klouda, Mayor

ATTEST:

Marla K. Brown, City Clerk

ORDINANCE NO.

AN ORDINANCE AMENDING SECTION 13.04.170

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

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

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

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

WHEREAS, Section 13.04.170 currently reads:

Service Outside City.

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

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

Service Outside City.

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

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

PASSED, APPROVED AND ADOPTED this _____ day of _____, 2010.

CITY OF RAWLINS, a Wyoming
municipal corporation

Kenneth C. Klouda, Mayor

ATTEST:

Marla K. Brown, City Clerk

1st Reading: _____
2nd Reading: _____
3rd Reading: _____

Publication: _____

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

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

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

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