

October 19, 2011

Bureau of Land Management  
Attn: Pamela Murdock  
Rawlins Field Office  
1300 North Third Street  
P.O Box 2407  
Rawlins, WY 82301  
WYMail\_PCW\_windfarm@blm.gov

**RE: City of Rawlins, Wyoming Comment on Draft Visual Resource Management Plan Amendment and Chokecherry and Sierra Madre Wind Energy Project draft Environmental Impact Statement**

**Draft Visual Resource Management Plan**

Of the options presented, the City sees Alternative 4 (BLM preferred alternative) as the most balanced approach for a revised visual resource management within the decision area, as described in figure 1-1, page 1.2 of the draft plan. However we have the following concerns and wonder if you could work with the developer to protect the following views as best as possible:

- Views of Elk Mountain from Rawlins
- Views south of Rawlins from the Wind Generation Towers and High-voltage transmission lines
- Views from the Continental Divide National Trail
- Views from the Overland Trail – while CCSM proposes to set back development considerably from the section of the Overland Trail that passes through their property, are there similar setbacks provided for this historic resource in other parts of the Carbon County? Currently the Draft Visual Resource Management Plan's preferred Alternative (Alternative 4) as described in figure 2-5 includes the Overland Trail in the Class IV VRM area, which seems inconsistent with how the resource is being treated by CCSM and should be by others in the decision area for the VRM plan.

As discuss later in our comments on the CCSM draft EIS, we are also concerned about the impact of this change to BLM's area visual resource management plan and its implications on area industrial development and the resulting effects on our area tourism industry.

**Chokecherry Sierra Madre Draft Environmental Impact Statement**

The City of Rawlins realizes that the CCSM project offers multiple opportunities to the City of Rawlins but it also comes with challenges to our Community.

- o **Opportunities include:**
  1. The CCSM project is proposed to construct a \$4 to \$6 billion wind energy project.
  2. The creation of additional long term operating employees numbering about 205 between CCSM (114 operating jobs for 25 years +) and support employment (91 jobs), (Table 4.8-2 Total Project-related Employment, CCSM Project, Alternative 1R).
  3. Potential enhancement of railroad access to Carbon County and Rawlins through a new railroad offloading facility near Sinclair (Which would enhance local sales tax collections and hopefully provide future availability for rail unloading facilities for multiple parties.)
  4. Taxes revenues are to be paid by the project through:
    - a. Property Tax,
    - b. Sales tax, and
    - c. A \$1/mWh (megawatt hr.) fee for energy generated.
  5. The ability to diversify the area's economy by creating additional business opportunities, enhanced commercial, industrial activity and housing for our residents and future residents, to achieve greater sustainability.
- o **Challenges Faced include:**  
 According to section 4.8.3.1 of CCMS draft EIS, Alternative 1R PCW's revised alternative anticipates the following:
  - "A 6-day workweek, with 10-hour shifts is envisioned in order to achieve the desired construction schedule. During the first year, two shifts of construction activity are planned."
  - Temporary Construction Employment:

Construction Workforce (CCSM Table 4.8-2)

	<u>Peak</u>	<u>Average</u>	<u>Indirect/Induced</u>	<u>Total</u>
Year 1	1,189	1,096	548	1,644
Year 2	1,039	935	468	1,403
Year 3	782	782	402	1,184
Year 4	818	794	421	1,215

- Construction Season will involve a ramp up in the spring, several months of high employment, and then a sharp drop-off in the fall.(April through November)
- Workers Immigrating to Area (from Table 4.8-4 CCSM Draft EIS)

	Construction	
	Workers	Accompanied Workers
Year 1	1,244	1,363
Year 2	1,078	1,199
Year 3	859	936
Year 4	889	1,008
	Full Operations	
	Workers	Accompanied Workers
25 Yrs +	119 to 198	253 to 424

### Mitigation Measures Recommended by BLM

- o The City has reviewed and agrees to participate in helping to achieve with the following Mitigation proposals suggested by BLM for the implementation of the CCSM project which include:
  - o **GEN-1:** Four separate ROW grants would be issued as part of Phased Construction Sequencing. The sequencing is designed to limit disturbance to the area anticipated to be developed within the following 12 months. Which would effectively result in project development occurring over five construction seasons, rather than the four seasons included under the PCW's revised proposal which would redistribute and extend the employment and related effects over five years, resulting in lower employment and associated demands on temporary housing and community services in the initial year of development, as compared to the corresponding levels under Alternative 1R.
    - Question: Is there a chart and graph quantifying data comparing 1R workforce versus BLM's preferred GEN-1 mitigation measure?**
    - Question: Please describe how would the impact over 5 seasons be better than 4?**
  - SOCIO-1:** PCW will be required to develop and implement a Workforce Housing Plan to be approved in conjunction with a Wyoming Industrial Siting Permit that must be issued prior to the commencement of project construction. Carbon County, the City of Rawlins and if appropriate, other Carbon County communities and Wamsutter should be consulted in the development of that plan. PCW should work with Carbon County and local communities to address housing needs associated with construction related indirect and induced jobs that would be created in the community. The plan should have an ongoing assessment element to monitor the types of housing used, residency patterns, and selected other characteristics in year 1, using the information to adapt and improve the plan for subsequent years.
  - o **SOCIO-2:** PCW will work with the BLM and local governments near the PCW Application Area to develop and implement a plan to house non-local

decommissioning and final reclamation workers and to ensure that local government services are adequate to accommodate the additional demand associated with the non local construction workforce, industrial activity and traffic prior to the initiation of these activities. The specific elements, strategies and programs to be used will be depend on the future availability of temporary worker housing and competing demands for housing at the time.

- **SOCIO-3:** PCW should acquire and require its contractors to acquire Carbon County sales and use tax licenses and to the maximum extent practicable, purchase materials, equipment and supplies to be used on the project under these licenses so that proper attribution of sales and use tax payments can occur. This would be highly effective in insuring that local governments receive the maximum vital tax revenue benefit during the construction of the project to help address the temporary demands on public facilities and services.
- **TRANS-1:** PCW shall participate in a coordinated transportation planning process with the BLM, WYDOT, Carbon County, the Town of Sinclair, the Sinclair Refinery, the Colorado Interstate Gas (CIG) compressor station, the City of Rawlins, affected grazing operators, and other major property owners (including the operator of the truck stop just north of I-80 Exit 221) in the affected area, to identify and develop measures to avoid, manage or mitigate transportation impacts of construction. The group shall meet prior to and during the construction phase of the project and in the initial year of project operations, as needed.
- **TRANS-2:** PCW shall develop measures to inform and update Carbon County residents and travelers on I-80 near Sinclair and WY 71 about potential delays during peak months and especially during peak hours. In coordination with WYDOT, electronic signage shall be used near I-80 Exit 221 to encourage I-80 travelers to use alternate access to Sinclair during peak hours.
- **TRANS-3:** PCW shall coordinate with WYDOT to identify measures to control traffic and enhance traffic flows in the vicinity of I-80 Exit 221 during shift changes and at times when oversized vehicles will be crossing the bridge over I-80.
- **TRANS-4:** PCW shall implement incentives for carpooling and/ or other workforce transportation measures to reduce traffic and congestion during shift changes.

***Question: Is there an update table A.3-4 "Offsite Project Generation Daily Construction Traffic" which includes recalculation with BLM's proposed GEN-1 extended construction phase project mitigation measures?***

- **VR-4:** Lighting for ancillary facilities shall be motion-activated and shielded downward to limit night lighting impacts beyond the site.
- **VR-5:** Use non-reflective 30 percent gray on WTGs, which would be less obtrusive from most distances and viewing angles, and would still be light enough to blend with the sky.

- **VR-6:** Utilize an Audio Visual Warning System (AVWS) aircraft detection and warning system to reduce day and night lighting requirements for turbines. An AVWS is a radar-based obstacle avoidance system that uses obstruction lighting and audio signals to alert aircraft of potential collisions with wind turbines.
- **WR-1:** Stream water quality monitoring sites will be identified by the BLM. Stream monitoring shall be continued through construction, operation, and decommissioning of the project by PCW to monitor for changes in water quality.
- **WR-2:** PCW will be required to submit the site-specific SWPPP as part of the ROW grant application for approval by the BLM.
- **WR-3:** Erosion pin cross section and longitudinal profile transects shall be monitored through interim reclamation and again following final reclamation of the project at BLM established locations within the Application Area. Monitoring shall consist of annual measurements at erosion pins. If monitoring indicates that the established erosion-control measures do not minimize upland erosion impacts, additional mitigation may be developed.

**The City of Rawlins identifies the following challenges after a review of the CCSM 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
    - Broadband Access
  - Recreation Services
    - Facilities
    - Programs
  - Public Works
    - Water
    - Wastewater
    - Solid Waste
    - Coordination with Transportation Mitigation
  - 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
- Education

**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 BLM mitigation measures TRANS-1 through TRANS-4.
  - **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 CCSM 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 #1.)
- **Finance/IT Services –**
  - **Taxes & Expenditures–**
    - **Legislative Taxation Issues –** *Current tax revenue estimates as depicted in the EIS document are uncertain because of proposed changes to State Legislation on Taxation of Wind Energy which are proposed to be discussed during the 2012 Wyoming Legislative budget session. We are seeking to ensure a predictable and long term revenue stream for City government in cooperation with Carbon County, Wind power developers including PCW and the Wyoming State Legislature.*
    - **Funding Gap -** *As mentioned in Section 4.8.6.5 Local governments including the City of Rawlins will experience lags in revenue receipts during the initial construction year and would be required to provide services to accommodate CCSM traffic and workforce before we receive substantial revenues from the project. The EIS goes on to state: "That fact, combined with recent cutbacks in some staffing could result in deterioration of service levels .... During the initial construction year, but such effects may be tempered in subsequent years..." 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 #2)*

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

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

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

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

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

- o 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.
- o We are operating very leanly at present.
  - o 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 PCW and ISC as this project progresses.
- o **5 Year Financial Plan** - The City of Rawlins will prepare a 5 Year Financial Plan anticipating various revenue levels, service levels and capital expenditures.
- o **Broadband Access** – The City of Rawlins would be interested in working with CCSM and other area industries and governments to achieve high speed broadband internet access for high speed communications and data transfer. City of Rawlins IT Director/Finance Director Dan Izzo can be contacted at 307-328-4500 for more information. Wyoming Business Council representative Pat Robbins may also be of assistance.

- **Recreation Services–**

- On page 3.7-6 at the bottom of the page where City of Rawlins Recreation is described, 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 gym, 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 with some causing extreme over usage in areas such as weight room and cardio areas as well as others.”**

- Recreation facility hours have been limited particularly during the summer months (May 1<sup>st</sup> through September 30<sup>th</sup>) closing early with limited hours on weekends. Hours in the summer are 5:30am to 8pm M-TH and on Friday 5:30am to 7pm. On weekends, Saturday hours are 7am to 3pm and Sunday is closed.

- The possibility of extending hours that the Recreation Center is open to accommodate workers in their off time would be a positive quality of life initiative.

- If PCW encourages its 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 PCW 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 CCSM workers recreational schedules, then an arrangement with PCW 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 PCW 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 PCW temporary and permanent staffs and would contribute long term to the community.

- **Public Works Issues –**

- **Water**

- **Water Supply** - We understand that CCSM will not use more than their current water rights allocated to The Overland Trail Company (TOTCO) which they have under contracted. Because TOTCOs water rights are more senior than the City of Rawlins' from the Sage Creek basin, is there a plan for mitigation measures to ensure municipal supply if a shortage is experienced through drought or some other circumstances?
  - Will the implementing of BLM's GEN-1 project phasing plan change water supply issues? Can BLM provide quantities identifying changes in water supply needed if the construction period is extended as proposed in BLM's GEN-1 mitigation measure?
  - Even though there are existing and untapped water rights their usage are affected by recent and historic North Platte River agreements and regulatory issues that impact water-supply management in the Rawlins area.
  - The City is also interested in working cooperatively with PCW to ensure adequate supply for the City and the project in the future through the cooperative development of enhanced production in the drainage collection area.
- **Water Quality** - We are concerned about plans and any adverse affects to water quality relating to CCSM project plans in the Sage Creek Basin which is one of the City of Rawlins' key sources of municipal water.
- **CCSM Operating and Maintenance Building Water Needs** – At this time, the City of Rawlins has not been contacted for supply of

water and/or sewer services to the CCSM operations building or other facility.

- Because the water is treated by the Rawlins Water Plant, significant use of potable water might impact City of Rawlins available Water treatment capacity for future expansion.
- The arrangement between the two municipalities is spelled out in the "Town of Sinclair-City of Rawlins Municipal Water Supply Joint Powers Agreement" (File Number 394, Date Filed 4-11-03 with the Wyoming Secretary of State's Office.) This agreement would need to be consulted if this project moves forward.

○ **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 sewerred.
- **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.
    - **Project Transportation** - Coordination with BLM Transportation Mitigation noted below.

- **Community Development –**
  - **Planning** – *Preparing for and responding to cumulative impacts particularly for the spike in construction workforce as described in CCSM Employment summary for a multiyear seasonal employment impact the first 4 years of the project, peaking at over 1,189 direct seasonal employees the first year with, and boom/bust impacts to the local economy. (See Construction and Operating Employment Schedule as described in CCSM Draft EIS pages 4.8-6 – 4.8-9 attached).* In preparation for dealing with anticipated significant growth,
    - **Rawlins is involved planning including review and comment on the proposed CCSM Draft EIS and follow-up with mitigation, a master plan update, creation of an economic development plan, and addressing housing and extraterritorial utility and infrastructure extension needs to accommodate development.**
  - In preparation for dealing with anticipated significant growth Rawlins has initiated the following planning actions:
    - **Rawlins will Participate in Mitigation measures for CCSM project -** Based upon the mitigation recommendations in the CCSM Draft EIS referred to previously in this letter, Rawlins will be involved with BLM and ISC, Carbon County and others in of planning and coordinating on issues from housing to transportation.
    - **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 ad 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 #3)

- **Economic Development** – We would like to work with the Sierra Madre/Chokecherry 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. Toward this end, we would encourage and work with the Power Company of Wyoming to locate corporate operations, potential suppliers and support industries in Rawlins.
  - 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 CCSM project will have on tourism in Carbon County and Rawlins as a result of project construction and operations. There is similar concern about the partner Transwest Express project.

- **Housing** – We understand from the draft CCSM EIS that PCW would be required to address the shortfall in local housing accommodations in its Wyoming Industrial Siting Permit Application.
  - 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 CCSM 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 Table 5.0-1 of the CCSM EIS).
  - The City would be interested in working with CCSM 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.
  - **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 and permanent workforce plans for CCSM and other large scale reasonably

foreseeable development projects (like those identified summarized in Table 5.0-1 "List of Current and Planned 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).

- o Since the Rawlins Housing Study was completed in May of 2007:
  - o 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 #4) 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 were 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.

- **Project Transportation** – Regarding the project-related transportation scenarios discussed in section 3.8, The City of Rawlins would favor the use of internal haul roads by the construction workers. If state roads or county roads are used this should be kept to a minimum.

**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 CCSM Draft EIS.

#### **Education –**

- **Carbon County School District #1 is in the process of planning the construction of a new high school.** Base upon historic student population figures the Wyoming School Facilities Department (SFD) will only allow for a replacement school to be built for 501 high school students. The SFD will only build a new facility based upon actual historic information or definite written and confirmed plans for scheduled increases in population and student enrollment. This will replace a facility that was designed for 1,100 students.
  - The excess capacity noted in the community facility evaluation of the schools will be a new, state of the art design for a twenty first century learning environment and safer, but greatly reduced from what the capacity analysis by the BLM reported in the CCSM draft EIS.
  - A community bond issue is also being pursued to achieve enhancements to the new high school facility that the SFD won't fund. These enhancements include:
    - Enlargement of the Auditorium and performing arts center,
    - A New a vocational center in coordination with Carbon County Higher Education Center,
    - Replacement of the existing competitive swimming pool with a similar competitive swimming pool combined with a more community oriented Aquatic Center, and
    - Locker room enhancements in Baggs.
  - CCSM help to revise the expected student population by providing evidence that the School Facilities Department would take into account in revising the Student population for the new high school to be built beginning in late 2012 would help to increase school capital construction funds and operations funds, which are based on a per student formula.
  - CCSD #1 School Superintendent Neil Terhune can be contacted for more information at 307-321-4525. – (authorized by Dr. Terhune 10-17-11 by e-mail)

- **Carbon County Higher Education Center is planning on developing a new Campus which is proposed to include a Vocational Center.**
  - One of the strengths of the CCHEC vocational program is its electronics program which would be very supportive of future wind-smiths trained locally.
  - They hope to coordinate vocational education with junior college and high school students.
  - For more information, contact CCHEC Director David Throgmorton at 307-328-9204. (authorized by Dr. Throgmorton 10-17-11 by phone)

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,

Sincerely,

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

Kenneth C. Klouda  
 Mayor  
 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  
 Dr. Neil Terhune, Superintendent, Carbon County School District #1  
 Dr. David Throgmorton, Director Carbon County Higher Education Center  
 Cindy Wallace, Carbon County Economic Development Corporation  
 Kara Choquette, PCW, Communications Director

**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. **City of Rawlins Fire Response Area – description and map (updated 11/15/2010).**
2. **City of Rawlins General Fund Position Reduction Status (1/25/2011 update).**
3. **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)**
4. **Rooms, Campgrounds and RV Spaces Available in Carbon County, Wyoming (7/2010)**