
Foote Creek Rim 1 Wind Energy Project Carbon County, Wyoming



SF-299



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November 1, 2018

Cover Letter

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Ms. Janelle Wrigley, Supervisory Realty Specialist
Bureau of Land Management
Rawlins Field Office
1300 N. Third Street/PO Box 2407
Rawlins, WY 82301

Dear Ms. Wrigley,

PacifiCorp (Applicant) is pleased to present this SF-299 application (Attachment 1) to the Bureau of Land Management (BLM). The completed SF-299 application form (Application), is submitted in connection with the proposed Foote Creek Rim 1 Wind Energy Repowering Project (Project), a commercial wind energy conversion system (WECS).

The proposed Project is a repowering of an existing commercial WECS which is located near Arlington, Wyoming in Township 19N, Range 78W, Sections 6 and 18 on leased lands authorized under Right-of-Way agreement number WYW-142464. Currently, there are 68 wind turbines located on BLM and private lands on the Foote Creek Rim 1. The Applicant plans to replace the 68 wind turbines with 12 new units that will generate the same amount of power. The existing project produces up to 41.4 MW (total) and will continue to do so after the turbines are replaced.

The portion on BLM lands originally included 36 wind turbines; however, one turbine (A-11) was removed in 2013 due to a structural failure leaving 35 currently. The proposed repowering will occur on both BLM and private lands. The BLM portion of the repowering project will involve removing 35 wind turbines, 36 concrete pads, 36 pad mounted transformers, 36 gravel access pads and approximately 1/3 mile of gravel road. In addition, 8 of the 12 replacement turbines will be installed on BLM lands along with 8 gravel access pads and 8 concrete pads with a minimal amount of additional gravel access road to the new turbines.

The Project is located on a total of 941 acres of BLM leased lands.

- North section (T19N R78W Section 6) 480 acres
- South section (T19N R78W Section 18) 461 acres

It should be noted that the repowering activities will impact less than 25 acres.

The Project will include all or any of the following (collectively "wind energy project"): (i) wind energy generating systems including supporting towers, foundations and any other associated equipment or structures (together, "wind turbines"); (ii) overhead and underground electrical distribution, collection, transmission and communications lines and facilities, electric transformers, electric substations, energy storage facilities, telecommunications equipment, and other necessary interconnection facilities; (iii) roads and crane pads; (iv) meteorological towers

and wind measurement equipment. The existing O&M/control building, maintenance yard(s), staging yard(s), storage area(s), and related facilities and equipment will remain unchanged.

The Applicant respectfully requests authorization from BLM to install these items within the limitations described below and in the existing Foote Creek Rim 1 Right-of-Way Agreement (WYW-142464) between the BLM and PacifiCorp for the existing project.

It is important to note that at this time, the locations of proposed structures in the site plan in Attachment 2 and other maps included in this Application are preliminary and may change; however, the Applicant proposes to comply with all the setback standards and will provide final locations of proposed structures to the BLM prior to construction.

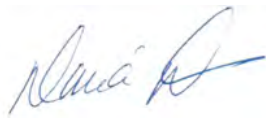
Any studies that are required by any authority having jurisdiction will be conducted over the finalized Project area prior to construction.

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We would like to thank the BLM for its consideration of this Application and respectfully request its approval. We are available to answer any questions there may be about the Application or the proposed Project.

Respectfully,

A handwritten signature in blue ink, appearing to read "Daria Drago".

Daria Drago, P.E., PMP
ENERCON, Senior Engineer

Travis A. Brown
PacifiCorp, Operations Manager

Cc: Susan Foley, Lead NEPA Specialist, BLM Rawlins District

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Attachments

- Attachment 1 – SF-299 Application Form**
- Attachment 2 – Location and Facility Map**
- Attachment 3 – Proposed Turbines**
- Attachment 4 – Tier 1 & 2 Site Characterization Study**
- Attachment 5 – Viewshed Analysis**
- Attachment 6 – Preliminary Construction Schedule**
- Attachment 7 – Weed Management Plan**
- Attachment 8 – Revegetation Seed Mixture**

Statement of Purpose and Need

Provide statement of need for project, including the economic feasibility and items such as: (a) cost of proposal (construction, operation, and maintenance); (b) estimated cost of next best alternative; and (c) expected public benefits.

As part of ongoing operations and maintenance, PacifiCorp is proposing to repower an existing company-owned wind energy facility, Foote Creek Rim I, located in Carbon County, Wyoming. The Foote Creek Rim I Wind Project originally was developed in 1998 and 1999 as a joint venture between PacifiCorp and the Eugene Water and Electric Board. The existing wind turbine generators (turbines) are approximately 18 years old, and replacement components are increasingly difficult to obtain due to the age of the equipment and the lack of manufacturer component availability. The Foote Creek Rim 1 wind energy conversion system (WECS) currently has 68 turbines that PacifiCorp proposes to decommission and replace with 12 new, higher capacity turbines. The total site production will remain unchanged with this proposed repower and will continue to be 41.4 megawatts (MW). Only a portion of the total project is on BLM lands. Of the total proposed turbine replacements, 35 turbines (36 pads) will be replaced with 8 new turbines on BLM lands. The portion of the Foote Creek Rim I wind site located on BLM lands in Township 19N, Range 78W, Sections 6 and 18 near Arlington, Wyoming originally included 36 wind turbines; however, one turbine (A-11) was removed in 2013 due to a structural failure leaving 35 currently.

Due to improvements in turbine technology and generating capacity PacifiCorp proposes to replace the 68 existing 600-kW turbines with 12 new wind turbines, ranging in nameplate capacity from 2.0 MW to 4.2 MW (Attachment 3). The lease terms and year-round operation remain unchanged due to this repower effort. Construction to prepare the site, remove the old turbines and install the 12 new turbines is expected to occur during construction season (summer months) of 2019 and 2020 - weather permitting (Attachment 6).

Economic Feasibility

Wind energy is now the least expensive source of new power in many parts of the United States, and increasingly efficient turbines generate more energy and impact smaller areas. Utility customers, both individuals and commercial and industrial users, are demanding clean, renewable energy. Alternatives to the turbine replacement proposed by PacifiCorp include:

1. Continue to operate the existing turbines as they deteriorate, and efficiency decreases which will result in reduced power production and reduced power generation taxes; or
2. Develop a new site and decommission this one.

The proposed repower uses an existing site which minimizes environmental impacts and maximizes returns for the public and PacifiCorp customers. Replacing the turbines with more efficient models on the existing site maintains the 41.4 MW power production without disturbing a greenfield, and in doing so, the local area and state will experience growth in temporary jobs and generate significant, consistent, long-term tax revenue through sales taxes, property taxes, and wind energy production taxes. These tax revenues will help support local communities and leverage even further economic development. The WECS is expected to generate an estimated \$2-3 million dollars in local sales and use taxes through construction, an estimated additional

property tax income of \$6.4 million dollars above that from the existing turbines and estimated additional wind energy production taxes over a 30-year project life of \$5.1 million dollars.

In total, the repowering effort is expected to generate a total of approximately \$14.1 million over a 30-year project life above and beyond the revenue produced by the existing facility.

Probable Effects on Population

Describe probable effects on the population in the area, including the social and economic aspects, and the rural lifestyles.

The taxes generated by the construction activities will help fund community projects and support the surrounding community which is already very accustomed to wind energy facilities and relies on the jobs and taxes generated to support the residents. Replacing the turbines is not expected to have any effect on the social or rural lifestyles in the area as they have already adapted to the existing facility and numerous other WECS in the area. The proposed repower will also generate a short and long-term boost to the local economy.

Environmental Impacts

Describe likely environmental effects that the proposed project will have on: (a) air quality; (b) visual impact; (c) surface and ground water quality and quantity; (d) the control or structural change on any stream or other body of water; (e) existing noise levels; and (f) the surface of the land, including vegetation, permafrost, soil, and soil stability.

Wind is a renewable energy source that requires no feedstock or fuel and produces no emissions while generating electricity. Minimal water is used during construction and operation, and no pollutants are discharged into the air or into water systems from the generation of electricity. Wind turbines also do not require sewer systems, except for a small sewer system at the O&M building (already in existence). Finally, wind turbines represent a source of reliable, domestic energy, increasing the United States' national energy security. Wind energy is a truly clean, renewable, domestic energy source that plays an important role in American energy independence and provides a further opportunity for Wyoming to assert its dominance as a major American energy producer.

(a) Air Quality

The proposed turbine replacement will have a short-term dust control aspect related to construction activities which will be monitored and appropriately mitigated. No further air quality impacts are expected from the proposed activities.

(b) Visual Impact

While the new turbines will be taller than the existing turbines, the reduction from 68 turbines to 12 turbines is anticipated to have a positive effect on visual impact to the surrounding area. The view scape has multiple existing wind facilities with turbines of similar height as those proposed on this project and the replacement of the 68 existing turbines with these 12 taller turbines are not anticipated to have a negative impact to residents and is in fact anticipated to improve the visual character of the area. Renderings of proposed views from areas of interest are provided in the viewshed analysis (Attachment 5).

(c) Surface and Ground Water Quality

Surface water quality impacts are expected to be limited to impacts during construction activities and will be mitigated with appropriate construction best management practices and permits for surface water protection. Additionally, they are not expected to be significantly different than existing ongoing operations and maintenance impacts. There are no anticipated ground water quality impacts.

(d) Streams or Body of Water

There are no streams or water bodies impacted by this proposed project.

(e) Noise Levels

There may be a temporary increase in noise levels due to construction activities; however, long term operations are not anticipated to impact noise levels.

(f) Land Surface

The site is located on the top of Foote Creek Rim and is flat with very little slope. It is typical cattle grazing lands with shrubs and native grasses. Revegetation efforts on the site have been highly successful and are anticipated to be equally successful after completion of the proposed turbine replacements. A photo of existing conditions/revegetation success is provided below for reference. Overall soil conditions and vegetation are not anticipated to be negatively impacted by the proposed activities. In fact, additional land will be recovered with the reduction of pad sites due to reducing the total pads from 36 to 8. The Weed Management Plan, and the seed mixture approved by the BLM and currently used successfully on the site will remain unchanged and are provided as Attachments 7 and 8, respectively.



Flora and Fauna

Describe probable effects that the proposed project will have on (a) populations of fish, plantlife, wildlife, and marine life including threatened and endangered species; and (b) marine mammals, including hunting, capturing, collecting or killing these animals.

A Tier 1 and 2 evaluation of the proposed project has been completed and is provided as Attachment 4.

Hazardous Materials

State whether any hazardous material, as defined in this paragraph, will be used, produced, transported or stored on or within the right-of-way or any of the right-of-way facilities, or used in the construction, operation, maintenance or termination of the right-of-way or any of its facilities. "Hazardous material" means any substance, pollutant or contaminant that is listed as hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. 9601 et seq., and its regulations. The definition of hazardous substances under CERCLA includes any "hazardous waste" as defined in the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, 42 U.S.C. 6901 et seq., and its regulations. The term hazardous materials also includes any nuclear or byproduct material as defined by the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2011 et seq. The term does not include petroleum, including crude oil or any fraction thereof that is not otherwise specifically listed or designated as a hazardous substance under CERCLA Section

101(14), 42 U.S.C. 9601(14), nor does the term include natural gas.

Dumpsters and portable toilets will be rented from a local sanitation company to collect and dispose of waste during construction. Cleanup crews directed by the environmental inspector will patrol construction sites on a regular basis to remove litter.

Hazardous materials anticipated to be used or produced during operation of FCR1 are not anticipated to change from those already in use on the site. Those materials fall into the following categories:

- fuels - gasoline (potentially containing benzenes, toluene, xylenes, methyl-tert-butyl ether, and tetraethyl lead) and diesel fuel used in construction and operations vehicles;
- combustion emissions - nitrogen oxides (NO_x, carbon monoxide (CO), and non-methane hydrocarbons (NMHCs) from construction and operations vehicles;
- lubricants - grease (potentially containing complex hydrocarbons and lithium compounds), gear oil and motor oil used in construction equipment, operations/construction vehicles, and turbine/road maintenance activities; and
- distribution line emissions - ozone and NO_x

No extremely hazardous materials (40 C.F.R. 355) are presently produced, used, stored, transported, or disposed of as a result of FCR1 operations nor anticipated for the repowering activities. All production, use, storage, transport, and disposal of hazardous materials as a result of this project has been in strict accordance with federal, state, and local government regulations and guidelines and will continue to be handled accordingly. In the event of a spill or leak (i.e., undesirable event), notice is immediately given by owner as required by law.

Spent fluids are currently and will continue to be recycled via a certified waste contractor.

A Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the WDEQ to obtain National Pollutant Discharge Elimination System (NPDES) compliance under Wyoming's NPDES permit WYR10-0000. The SWPPP describes site-specific erosion control and stream crossing measures that will be implemented during construction. The Spill Prevention Containment and Countermeasures (SPCC) Plan describes procedures to be used in the event of an accidental spill from vehicles (e.g., motor oil, hydraulic fluid) or other equipment (e.g., transformer oil).