



LARAMIE COUNTY PLANNING & DEVELOPMENT DEPARTMENT

Planning • Building

MEMORANDUM

TO: Laramie County Board of Commissioners

FROM: Bryan Nicholas, Associate Planner

DATE: February 19, 2019

TITLE: Review and action on a Board Approval for the Roundhouse Wind Energy Transmission Line, located in portions of lands in Townships 12 and 13 North, Ranges 68, 69, and 70 West, of the 6th PM, Laramie County, WY.

EXECUTIVE SUMMARY

Roundhouse Renewable Energy, LLC (an indirect subsidiary of NextEra Energy Resources, LLC), on behalf of Duck Creek Grazing Association, Inc., has submitted a Board Approval application for the Roundhouse Wind Energy Transmission Line, located approximately 9 miles southwest of Cheyenne. The application has been submitted to seek approval by the Board for a 230-kV generation-tie transmission line.

BACKGROUND

This transmission line will bring the electricity generated by the Roundhouse Wind Energy Wind Turbines, to the Rawhide Energy Station for the Platte River Power Authority in Larimer County. A 150-foot easement, approximately 5.6 miles long will encompass the portion of the route located in Laramie County.

Pertinent Regulations

Section 1-2-100 of the Laramie County Land Use Regulations governing the criteria for the Board Approval Process.

Section 2-2-127 of the Laramie County Land Use Regulations governing the criteria for High-power Transmission Lines, water pipelines over 12" in diameter and energy pipelines.

DISCUSSION

The Laramie County Comprehensive Plan identifies the area for this project as Ag and Range Land (AGR). Within this area, primary uses include agriculture crop and livestock production, and a lower level of road access exists.

As stated prior, the boundaries of PlanCheyenne or the Zoned Boundary governed by the Laramie County Land Use Regulations (LCLUR) do not reach this proposed transmission line. After construction is complete, all agricultural uses will continue on the land; which supports the Comprehensive Plan, PlanCheyenne, and Zoning Boundaries designations of agricultural uses for the surrounding areas.

Per Section 1-2-100(a), before any application for a Board Approval can be granted, the Board shall find:

- i. The proposed use is permitted by Board approval in the proposed location and in conformance with all applicable development standards.
- ii. The proposed use is in general conformance with all other applicable policies adopted by Laramie County.
- iii. There is no defined negative impact to the community.

These necessary findings under the Board Approval process are required due to Section 2-2-127(a) which states “No *high-power transmission lines.... shall be constructed in Laramie County without the approval of the Board of County Commissioners.*”

The applicant is in compliance with all applicable items above. Staff finds the proposal to be in general conformance with the plans and policies of the Laramie County Land Use Regulations and the Laramie County Comprehensive Plan.

Section 1-2-100(b), governing the limits of approval, states “*The decision by the Board shall be final. Approval by the Board shall be valid for one (1) year. Any application that has not established the use within one year from approval shall be void.*”

Just like the Site Plan for the Wind Energy Project, the route of the transmission line is also designated as preliminary, and will need to be submitted to the Planning Department for review before being recorded along with the Resolution, if approved. The requirement of Section 2-2-127(b), locating transmission lines within consolidated utility corridors, has been fulfilled. Per the Project Narrative provided by the applicant, “*The proposed HPTL is reasonably co-located with six pipelines....and one electrical line...*” The applicant has filed a Non-Roadway Easement Application with the Wyoming Office of State Land and Investments, owner of said easement, who awaits the decision of this Board.

Public notice was provided by the Applicant to adjacent neighbors within 1,500 feet of the proposed transmission line, per Section 2-2-127(d)(i) of the Land Use Regulations, and the Planning Office published a legal notice thirty days prior to this public hearing per Section 2-2-125(d)(ii). No public comment has been received by the Planning Department at this time

RECOMMENDATION and FINDINGS

Based on evidence provided, staff recommends the Board find that:

- a) This application meets the criteria for Board Approval pursuant to section 1-2-100 of the Laramie County Land Use Regulations.
- b) This application meets the criteria for High-power Transmission Lines pursuant to section 2-2-127 of the Laramie County Land Use Regulations.

and that the Board approve the Roundhouse Wind Energy Transmission Line with no conditions.

PROPOSED MOTION

I move to approve the Wind Energy Transmission Line for the Roundhouse Wind Energy Project, and adopt the findings of facts a and b of the staff report.

ATTACHMENTS

- Attachment 1: Context Map**
- Attachment 2: Comprehensive Plan Map**
- Attachment 3: Preliminary HPTL Route Map**
- Attachment 4: Preliminary Site Plan Map**
- Attachment 4: Applicant Project Narrative**
- Attachment 5: OSLI Easement Letters**
- Attachment 6: Agency Comments Report**
- Attachment 7: Applicant Agency Comments Response Letter 2.07.19**
- Attachment 8: Resolution**
- Attachment 9: Resolution Exhibit 'A'**

Laramie County, Wyoming



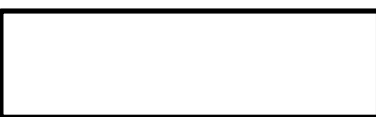
Roundhouse Wind Energy High Power Transmission Line

BOARD APPROVAL

PZ-19-00009

Context Map

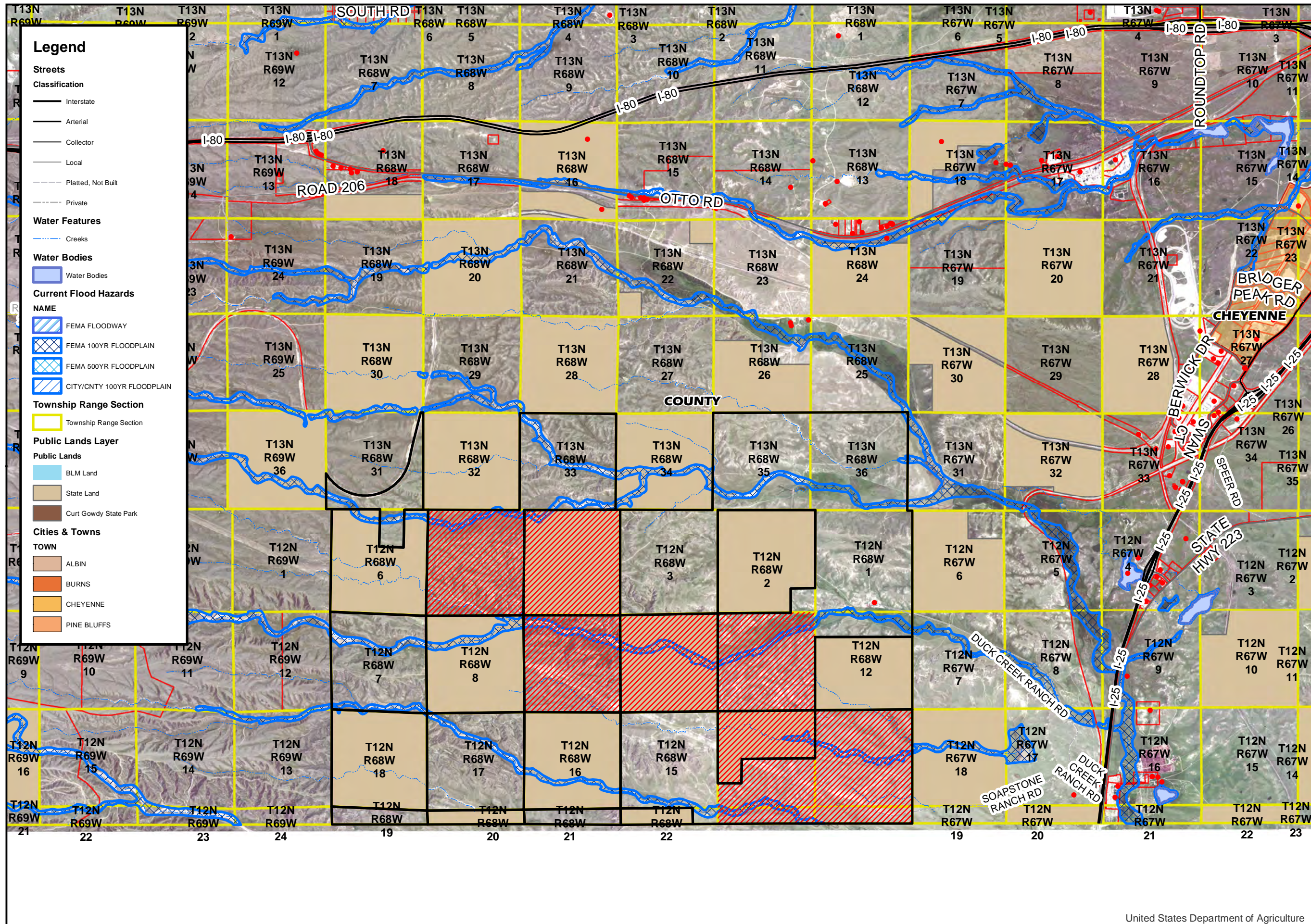
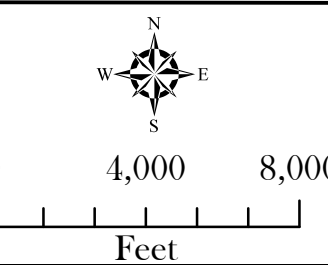
SUBJECT PROPERTIES



TRANSMISSION LINE IMPACTED LANDS

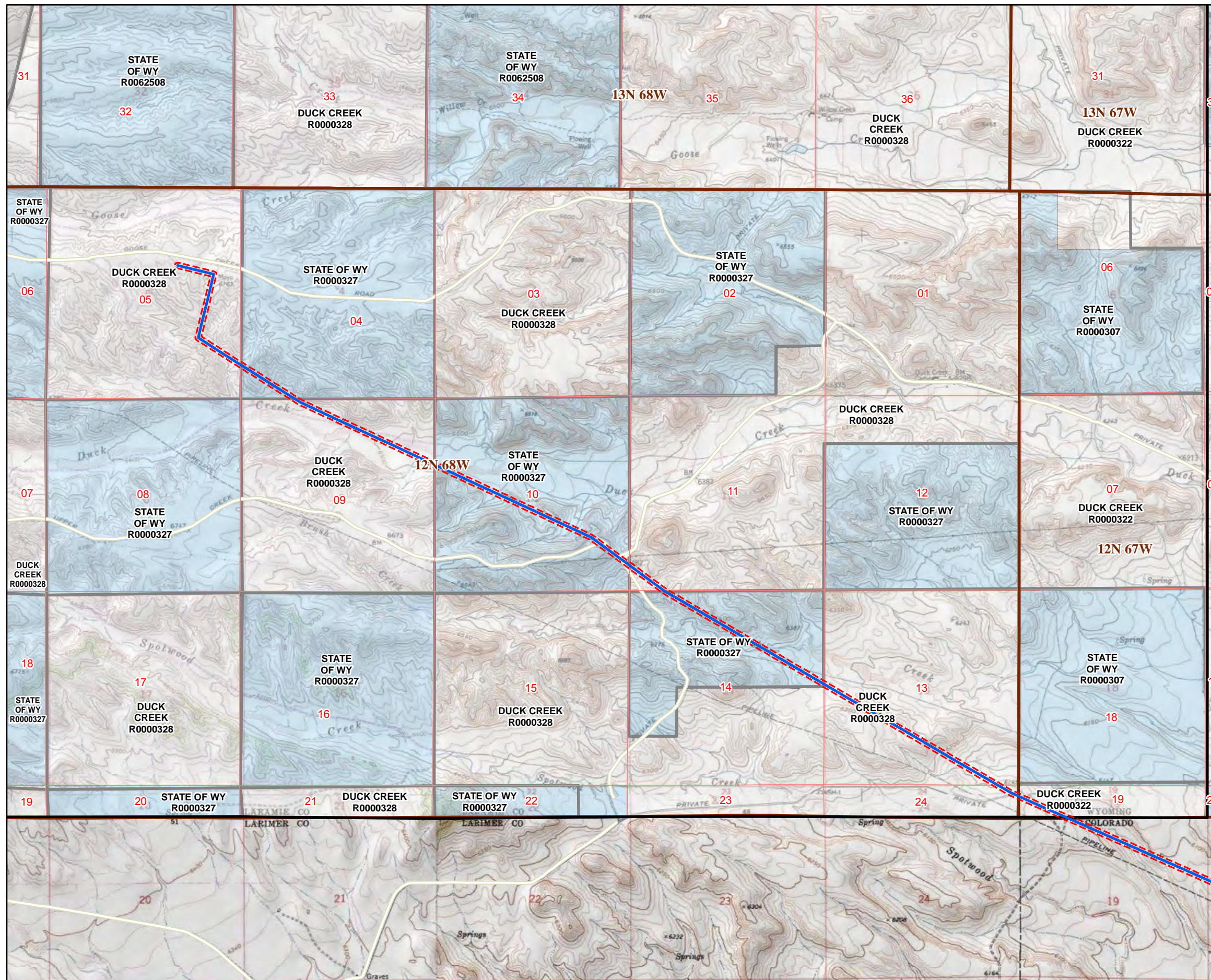


Printed on Dec 13, 2018



United States Department of Agriculture

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- LEGEND**
- Preliminary 230-kV Transmission Line Route
 - - - 150-Foot Right-of-Way
 - Project Boundary
 - Township
 - Section
 - Parcel Boundary
 - Land Ownership**
 - Private
 - State
 - City of Cheyenne

Data Source: Bureau of Land Management;
Esri USA Topo Map

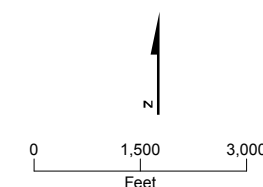
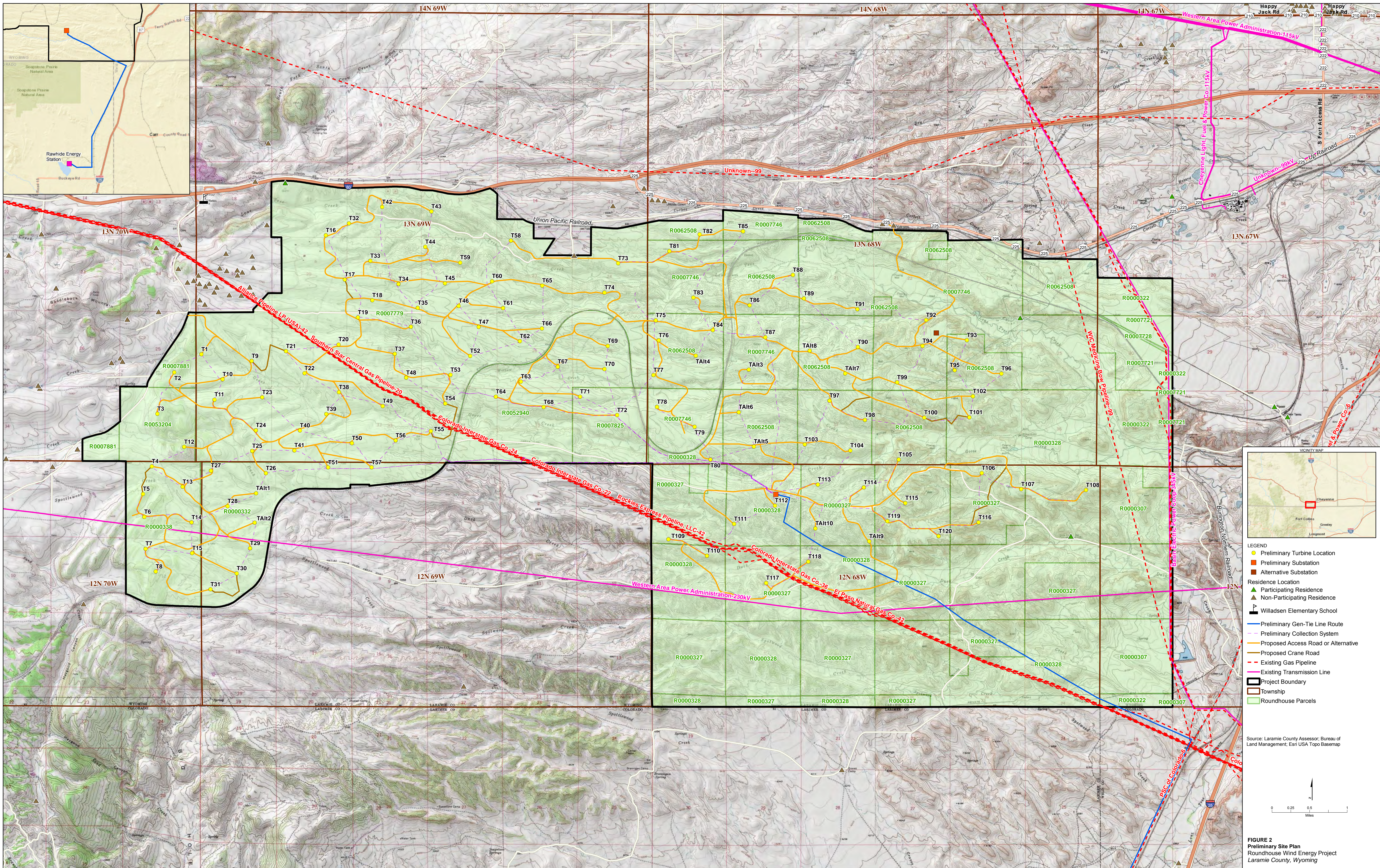


FIGURE 3
Preliminary High-Power Transmission Line Route
Roundhouse Wind Energy Project
Laramie County, Wyoming





230-Kilovolt Generation-Tie Transmission Line for the Roundhouse Wind Energy Project – Laramie County, Wyoming

Laramie County High-Power Transmission Line Application

January 2019

Submitted to:
Laramie County Planning and Development Office

Submitted by:
Roundhouse Renewable Energy, LLC



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- 2 Preliminary Site Plan
- 3 Preliminary High-Power Transmission Line Route

Acronyms and Abbreviations

Applicant	Roundhouse Renewable Energy, LLC
bgs	below ground surface
Board	County Board of Commissioners
Council	Wyoming Industrial Siting Council
County	Laramie County
HPTL	High-Power Transmission Line
I-80	Interstate 80
ISA	Wyoming Industrial Development Information and Siting Act
kV	kilovolt
LUR	Land Use Regulation
NextEra	NextEra Energy Resources, LLC
Project	Roundhouse Wind Energy Project
Roundhouse	Roundhouse Renewable Energy, LLC
ROW	right-of-way
W.S.	Wyoming Statute
WYDOT	Wyoming Department of Transportation

1. Introduction

Roundhouse Renewable Energy, LLC (Roundhouse, referred to herein as Applicant), a wholly owned indirect subsidiary of NextEra Energy Resources, LLC (NextEra), is proposing to develop a 230-kilovolt (kV) generation-tie transmission line as part of the Roundhouse Wind Energy Project (Project) in unincorporated Laramie County (County), Wyoming. The Project site is approximately 9 miles west of Cheyenne and south of Interstate 80 (I-80) (**Figure 1, Appendix A**). The portion of the proposed 230-kV generation-tie transmission line in the County is approximately 5.6 miles long and will be developed within an approximately 150-foot-wide right-of-way (ROW) that consists of approximately 102 acres of private and State of Wyoming acreage. The proposed 230-kV generation-tie transmission line will convey electricity produced by the Project's turbines to the electrical grid. Project construction is scheduled to start in August 2019 or as soon as appropriate permits have been obtained.

1.1 Request

The proposed 230-kV generation-tie transmission line meets the County's definition of a high-power transmission line (referred to hereafter as HPTL) and must demonstrate compliance with the applicable standards in Sections 1-2-100, 1-2-104, and 2-2-127 of the *Laramie County Land Use Regulations* (LURs) (Laramie County, 2011). These standards require County Board of Commissioners (Board) approval of a HPTL application for the portion of the Project's 230-kV generation-tie transmission line in Laramie County, Wyoming. The Applicant's HPTL application is the subject of this request. Under separate cover, on December 14, 2018, the Applicant submitted a Wind Energy Site Plan application. Once the Wind Energy Site Plan and HPTL permits have been obtained, the Applicant will submit an application for a Wind Energy Permit.

The Applicant requests County Board review and approval to build and operate a 230-kV HPTL as part of the Roundhouse Wind Energy Project. This application narrative and supporting materials demonstrate the Applicant's compliance with the applicable standards and general requirements under LUR 1-2-100, LUR 1-2-104, and LUR 2-2-127 for the County Board's approval of this HPTL permit application.

The Applicant is also applying for a Wyoming Industrial Siting Permit in accordance with the Wyoming Industrial Development Information and Siting Act (Wyoming Statute (W.S.) §§ 35-12-101 *et seq.*) (ISA) and the rules and regulations of the Wyoming Industrial Siting Council (Council). Certain applicable standards in the County's LURs for an HPTL project are similar to certain standards applicable to the Council. Accordingly, this request references the Applicant's ISA Permit application to further demonstrate Project compliance with the County's HPTL regulations.

1.2 Owner and Applicant Information

This section includes a description of the owner, Applicant, and operator, including its respective business structures:

Roundhouse Renewable Energy, LLC
700 Universe Boulevard
Juno Beach, FL 33408
www.nexteraenergy.com

The following manager has been designated by Roundhouse to be responsible for permitting the Project:

Ryan Fitzpatrick
NextEra Energy Resources
700 Universe Boulevard
Juno Beach, FL 33408
307-399-1393
ryan.fitzpatrick@nexteraenergy.com

Roundhouse (Applicant) is a wholly owned indirect subsidiary of NextEra, headquartered in Juno Beach, Florida, and is responsible for permitting, construction, and operation of the Project. Roundhouse will obtain property control for the area within the Project site boundary through signed agreements with the underlying landowners prior to commencing construction.

The following person has been designated as the point of contact for questions on this HPTL application:

Paul Hicks
Jacobs Engineering Group, Inc.
2020 SW 4th Avenue, Suite 300
Portland, OR 97201
503-872-4421
paul.hicks@jacobs.com

2. Project Description

The HPTL site boundary, facility components, and related infrastructure are located entirely in unincorporated Laramie County, Wyoming (**Figure 1, Appendix A**). The Project site is approximately 9 miles west of Cheyenne and south of I-80.

The Project is in the High Plains ecological region of the Wyoming Basin. The area is generally characterized by rolling plains and tablelands with short grass and mixed-grass prairie vegetation. Most of the land is rangeland that is actively grazed by cattle from local ranches and can continue to be grazed throughout the life of the Project.

2.1 Preliminary Site Plan

The Applicant completed a preliminary site plan layout for the Roundhouse Wind Energy Project, including the associated HPTL, that minimizes environmental impacts and addresses community concerns to the greatest extent practical. See **Figure 2 in Appendix A** for the preliminary site plan. The preliminary site plan shows the location of the proposed HPTL in relation to the nearby components of the Project. This preliminary site plan will continue to evolve prior to construction to allow for environmental mitigation and construction optimization. The final site plan, showing any revisions to the location of Project facilities, ancillary components, and infrastructure, will be provided to the County with the Applicant's Wind Energy Permit application prior to construction.

2.2 Legal Description

The 150-foot-wide HPTL ROW consists of approximately 102 acres of private and State of Wyoming lands. The Applicant will obtain property control for the area within the Project site boundary through signed agreements with the underlying landowners. The legal description of each parcel, or parts thereof, crossed by the HPTL are attached to the application form with this application package.

2.3 High-Power Transmission Line

Power generated by the turbines associated with the Roundhouse Wind Energy Project will be collected from the proposed Project substation and transmitted to the existing Platte River Power Authority Rawhide Substation in northern Colorado via the proposed, approximately 19-mile-long, 230-kV HPTL. The portion of the proposed 230-kV HPTL located in the County and subject to this permit request is approximately 5.6 miles long. The HPTL conductor will be supported on 127 corten steel monopole structures. The proposed structures are approximately 100 feet in height. The average distance between power poles is approximately 750 feet and will vary depending on factors, including but not limited to topography, location of jurisdictional waters, existing land use, and clearance requirements. The preliminary HPTL route is shown on **Figure 3 in Appendix A**.

2.4 Construction Schedule

Completion of construction is anticipated to occur in fourth quarter 2020 with commercial operation required by December 31, 2020. Contingent upon obtaining approval from the Council and securing other required permits, an assumed 17-month construction period is planned to begin with road building for the wind energy Project in August 2019. Except for possible winter weather shutdown of certain activities, construction is expected to be continuous through complete build-out and commercial operation by the end of 2020.

2.5 Construction Procedures

An overview of the construction procedures associated with the Project is provided below. The first year of construction is expected to consist largely of civil work. **Table 3-1** provides a list of general construction equipment that is likely to be used in the Project.

The following sections detail the transmission line construction activities and procedures for the Project.

2.5.1 Access Roads

Construction of the new HPTL will require vehicle, truck, and crane access to each new structure site for construction crews, materials, and equipment. Similarly, construction of other components related to the Roundhouse Wind Energy Facility, such as multi-purpose areas and pulling and tensioning sites, will require vehicle access. Transmission line ROW access may consist of a combination of new access roads, improvements to existing roads, and use of unimproved existing roads.

A traffic analysis for the overall Project is provided in Appendix D to the Applicant's previously submitted Wind Energy Site Plan application. Trips associated with construction and operation of the HPTL are incorporated into this comprehensive analysis. The analysis anticipates that during construction, the overall Project will generate up to 240 total daily trips and up to 120 trips during each peak hour for employee commuting. There will be an initial mobilization period during which approximately four dozen vehicles will be transported to the Project site. These vehicles will be a combination of heavy, medium, and light trucks. Because this mobilization effort is likely to extend over several months between September 2019 and May 2020, traffic impacts during any given hour will likely be negligible. The analysis anticipates that during operation, the overall Project will generate up to 22 total daily trips and up to 11 trips during each peak hour for employee commutes. Deliveries by light to medium trucks are expected to be sporadic rather than occur on a regular basis during the Project operations period and, therefore, are not included in the traffic analysis for the total operations period. The analysis concludes that additional vehicle and truck trips generated by the construction and operation of the Project will have a minimal impact on the operations of the roadway network near the Project site.

New access roads or improvements to existing access roads will be constructed using a bulldozer or grader, followed by a roller to compact and smooth the ground. Front-end loaders will be used to move the soil locally or offsite. Road widths will be approximately 30 to 40 feet during construction. After construction is complete, most access roads will be reduced to approximately 16.5 feet in width. Wherever possible, new access roads will be constructed within the transmission line ROW, or existing roads will be used. In other cases, new access roads may be required between the transmission line and existing roads. Erosion and sediment control measures such as at-grade water bars, culverts, sediment basins, or perimeter control will be installed as required to minimize erosion during and after construction of the HPTL.

During Project construction, roads and highways may be impacted by vehicles hauling materials to and from the site. Contractors will comply with existing federal, state, and county requirements and restrictions to protect the road network and the traveling public. In addition, load limits will be observed at all times to prevent damage to existing paved road surfaces. If necessary, arrangements to transport oversized loads will be coordinated with and approved by Wyoming Department of Transportation (WYDOT).

2.5.2 Site Preparation

Prior to breaking ground, the construction work area will be surveyed and clearly demarcated with stakes and flagging. Locations will be grubbed, cleared, and prepared for site activities. Roads are expected to be constructed in advance of the HPTL. Grading will be minimized, and topsoil will be preserved, to the extent practicable. Excavated topsoil will be stockpiled alongside the excavated area for replacement after construction, or as agreed with the landowner.

2.5.3 Structure Installation

The HPTL will be supported by approximately 100-foot-tall steel monopoles, which may be directly embedded into the ground using a truck- or track-mounted auger. When the pole is placed in the hole, native or select backfill will be used to fill the voids around the perimeter of the hole. When backfill must be imported, material will be obtained from commercial sources or from areas free of noxious weed species.

There are two options for assembling the structures. The first is to assemble the poles, braces, cross arms, hardware, and insulators on the ground; a crane is then used to set the fully framed structure by placing the poles in the excavated holes. Alternatively, aerial framing can be used by setting the poles in the ground first and assembling the braces, cross arms, hardware, and insulators in the air. A crane moves along the ROW from structure site to structure site setting the structures.

Typical equipment for construction of the HPTL is provided in **Table 3-1**.

Table 3-1. List of General Construction Equipment

Equipment	Construction Use
Bulldozers	Road Construction
Motor Graders	Road Construction
Gravel Truck Haulers/Bottom Dump	Hauling and Placement of Road Aggregate
Water Trucks	Compaction, Erosion, and Dust Control
Rollers/Compactors	Road Compaction
18-Wheel Semi-Tractors	Component Delivery
Truck-Mounted Drill Rigs	Drilling Holes for Monopoles
Conventional and Small Cranes	Off-Loading Equipment Onsite
Heavy and Intermediate Cranes	Off-Loading Equipment Onsite
Pickup Trucks	General Use by Construction Personnel
Small Hydraulic Cranes/Forklifts	Loading and Unloading Minor Project Equipment
All-Terrain Vehicles	Site Access
Rough-Terrain Forklift	Lifting Equipment

2.5.4 Cleanup and Site Reclamation

After construction, temporarily disturbed areas will be restored similar to pre-construction conditions. Disturbed areas will be contoured and reseeded with a designated reclamation seed mixture, in consultation with the reclamation contractor and landowner and in accordance with any landowner agreement requirements. The Section 109 Industrial Siting Act Decommissioning and Reclamation Plan submitted with the Laramie County Wind Energy Site Plan application for the Roundhouse Wind Energy Project provides additional detail on the interim reclamation, final reclamation, and decommissioning procedures that will be applicable to both the HPTL and the wind energy facility.

3. Compliance with Laramie County High-Power Transmission Line Regulations

This section identifies the County's Board approval process and HPTL requirements and demonstrates Applicant acknowledgement and compliance with the approval process in LUR 1-2-100, notification requirements in LUR 1-2-104, and the Board hearing and site location criteria in LUR 2-2-127.

As described in Section 1.1, the Applicant is also applying for a Wyoming Industrial Siting Permit in accordance with Wyoming Statutes as well as rules and regulations governed by the Council. Certain items in LUR 2-2-127 are substantively similar to requirements in the ISA and the Council rules and regulations. Accordingly, the Applicant's responses reference the Applicant's ISA Permit application to further demonstrate Project compliance with the *Laramie County Land Use Regulations* (Laramie County, 2011). Following review of the Applicant's responses below, the County Board may find that the HPTL complies with the applicable requirements in LUR 1-2-100, LUR 1-2-104, and LUR 2-2-127 necessary for approval of this HPTL application.

3.1 Board Approval Process (LUR 1-2-100)

In each of the districts in this regulation, there are uses which may be approved by the Board, according to specific procedures. The Board shall consider applications for such uses at its next regularly scheduled meeting no less than (30) days after the application has been submitted. The Board shall approve, approve with conditions, disapprove, or continue action on the application. Conditions may be attached to the approval to assure that there is no departure from the intent of this regulation. Public notification of the hearing shall conform to the notice requirements of this regulation.

Finding: The Applicant acknowledges these process requirements.

a. Findings Necessary - Before any application for a Board Approval can be granted, the Board shall find:

- i. The proposed use is permitted by Board approval in the proposed location and in conformance with all applicable development standards.*
- ii. The proposed use is in general conformance with all other applicable policies adopted by Laramie County.*
- iii. There is no defined negative impact to the community.*

These findings shall be documented in the minutes of the Board meeting. Any conditions placed on approval shall refer to the appropriate code or policies upon which the conditions are based. All disapprovals shall reference the code section on which disapproval is based. All findings shall be recorded with the Laramie County Clerk's Office in the form of a resolution by the Board.

Finding: The HPTL is an allowed use that occurs entirely within an unzoned area of unincorporated Laramie County. Section 3.3 demonstrates that the proposed HPTL complies with the applicable development standards under LUR 2-2-127 for development of high-power transmission lines. Furthermore, the Applicant's responses to the applicable development standards under LUR 2-2-127 demonstrate that the Applicant has taken steps to ensure the HPTL has no defined negative impacts on County residents, landowners, and the surrounding community. The HPTL is in conformance with all other applicable policies adopted by Laramie County, including the Laramie County Comprehensive Plan (Laramie County, 2016). The Laramie County Comprehensive Plan identifies the future land use as ag and range land. The HPTL is compatible with the current and future agricultural use of the land. Therefore, the Applicant demonstrates that the proposed HPTL complies with these criteria and acknowledges these requirements for Board approval.

- b. Limits of Approval** - *Uses approved by the Board have not been exercised within twelve (12) months from its date of approval, any new regulations governing the use or development of the property shall apply.*

Finding: The Applicant acknowledges the limits of Board approval outlined in this criterion.

3.2 Notice (LUR 1-2-104)

All public notice required in association with these regulations will be in accordance with the appropriate state statutes. The following notice procedures are required, except as otherwise provided in this regulation.

a. Legal Notice

Legal notice shall be published in a local newspaper at least thirty (30) days before any public hearing. The notice shall include the time, date, location and purpose of the hearing and shall direct interested parties to address questions to the Planning and Development Office. The following development actions require publication of legal notice:

iii. Board Approvals

vi. Highpower transmission lines, energy pipelines and water pipelines

Finding: As identified on the application form, the Applicant acknowledges that the Laramie County Planning and Development Office shall publish a legal notice in the local newspaper no less than 30 days prior to the Board hearing for this HPTL application. Therefore, these criteria will be met.

b. Notice to Area Property Owners

- i. Except where otherwise provided in this regulation, the Laramie County Planning and Development Office shall send, by certified mail, a letter to adjacent property owners describing the purpose, location and public hearing procedures for the following development actions:*

C. Board Approvals

- ii. Except where otherwise provided, certified letters shall be sent to all adjacent property owners of record. Rights-of-way shall not be included when determining property adjacency.*
- iii. The Director may increase the notification area based on potential impacts to surrounding properties.*
- iv. The Director may require that additional notice be sent to area property owners by regular mail in addition to the certified mail requirements.*
- v. Except where otherwise provided, certified letters shall be sent at least thirty (30) days prior to the first scheduled public hearing. Certified letters regarding Preliminary Development Plans shall be sent at least ten (10) working days prior to the Planning Commission hearing date.*

Finding: The Applicant acknowledges that the Laramie County Planning and Development Office shall send, by certified mail, a letter to adjacent property owners describing the purpose, location and public hearing procedures for this HPTL application which requires Board approval. The Applicant acknowledges that notification will be sent by the County to adjacent property owners at least 30 days prior to the Board hearing for this HPTL application. The Applicant further acknowledges that the Director may increase the notification area or require additional notice associated with this HPTL application. Therefore, these criteria will be met.

c. Posted Notice

- i. *The applicant shall place signs provided by the Planning and Development Office giving notice of the proposed development on the property so that they are clearly visible from all abutting public rights of way. Signs shall be erected no less than thirty (30) days prior to the public hearing and be removed from the property within seven (7) days from final Board or Administrative action on the proposed development.*
- ii. *Except where otherwise provided in this regulation, posted notice shall be required for the following development actions:*

C. Board Approvals

Finding: The Applicant will place signs provided by the Laramie County Planning and Development Office so that they are clearly visible from abutting public rights of way no less than 30 days prior to the Board hearing. Therefore, the Applicant demonstrates that these criteria will be met.

d. Rulemaking Notice

Rulemaking notice shall be completed in accordance with State Statutes.

Finding: This criterion is not applicable to this HPTL application.

e. Cost of Notice

Applicants shall be responsible for the cost of all notifications and shall reimburse the County for said costs.

Finding: The Applicant made the requisite payment for this HPTL application online through the Laramie County Planning and Development Office homepage. Receipt of payment is attached to the application form. Further, Applicant acknowledges and will be responsible for the cost of all notifications and shall reimburse the County for said costs. Therefore, this criterion is met.

3.3 Standards for High-Power Transmission Lines (LUR 2-2-127)

- a. Hearing and approval required -** *No high-power transmission lines, water pipelines over 12" in diameter serving more than one property or energy pipeline shall be constructed in Laramie County without the approval of the Board of County Commissioners. Prior to approval, the Board shall hold at least one public hearing.*

Finding: The Applicant acknowledges this requirement and has submitted this HPTL application to obtain approval from the Board through the County's public hearing process.

- i. *Purpose - The purpose of the hearing shall be to assure that the high-power transmission line, water pipeline over 12", or energy pipeline will be located so as to minimize disruption of existing county residents and land users.*

Finding: The Applicant has taken steps to ensure the HPTL has minimal impacts on County residents and landowners. The HPTL route is located approximately 1.8 miles from the nearest residence to the northeast, away from ridgelines, avoids riparian areas where feasible. Further, the HPTL route follows the alignments of existing features in the landscape, including a gas pipeline, electrical transmission line, a roadway and rail line (see **Figure 2** in **Appendix A**). As described in Section 2.5.4, following construction, temporarily disturbed areas will be restored similar to pre-construction conditions. Disturbed areas will be contoured and reseeded with a designated reclamation seed mixture, in consultation with the reclamation contractor and landowner and in accordance with any landowner agreement requirements.

As previously explained, the HPTL is proposed as part of a wind energy project known as the Roundhouse Wind Energy Facility. On December 14, 2018, the Applicant submitted a Wind Energy Site Plan application for the Project (including the HPTL) in which the Applicant addressed the wind energy site plan criteria under LUR 2-2-125. In doing so, the Applicant demonstrated that the Project (including the HPTL) preserves and protects public health and safety, reasonably preserves and protects natural and cultural resources, protects the quality of life for nearby property owners, facilitates economic opportunities for both County and local residents, and allows for the orderly development of land. By way of example, public health and safety and the quality of life for nearby property owners are protected by the Project's compliance with applicable setback standards, minimizing potential impacts associated development of new and improved access roads, and meeting other applicable standards. As described in Sections 4.2 and 4.4 of the Wind Energy Site Plan application, the Project will be developed to preserve and protect natural and cultural resources to the extent feasible. The Project will facilitate economic opportunities for both County and residents by providing employment opportunities, contributing tax dollars, supporting the economy through capital investment, and diversifying the economy. Since the HPTL was included in analysis of the overall Project, the Applicant has previously demonstrated compliance with this criterion. Therefore, the HPTL complies with the purpose of LUR 2-2-127.

- ii. Notice - Notice of the hearing shall be given in accordance with this regulation. In addition, all property owners of record of land adjacent to and within 1,500 feet of the proposed location of the transmission line, water pipeline over 12" in diameter or energy pipeline shall be notified of the hearing by the applicant via certified letter.*

Finding: The Applicant acknowledges in Section 3.2 that notice of the Board hearing required for approval of this HPTL application will be given in accordance with the applicable notification criteria under LUR 1-2-104. In addition, the Applicant sent notice via certified mail to all property owners of record within 1 mile of the perimeter of the Project site boundary. Notice was provided in accordance with LUR 2-2-125 for the Wind Energy Site Plan application and in accordance with Wyoming Statutes required for a Wyoming Industrial Siting Permit.

Appendix B provides an example copy of the landowner notification packet sent to landowners within 1 mile of the perimeter of the Project site boundary. The landowner notification packet includes a general description of the Project which includes the HPTL and County hearing, fact sheet, location map, anticipated dates for commencement of construction and operations, and the likely routes of ingress and egress. **Appendix B** also provides a list of participating and non-participating landowners within 1 mile of the Project site, which incorporates the HPTL, and signed certified delivery receipts and/or tracking information for the mailed landowner notification packets. Therefore, the Applicant demonstrates compliance with this criterion.

- b. Location - Consolidated utility corridors shall be required unless:**

Finding: The proposed HPTL is reasonably co-located with six pipelines (Southern Star Central Gas Pipeline-20, Colorado-Interstate Gas Co.-24, Colorado Interstate Gas Co.-22, Rockies Express Pipeline, LLC-42, Colorado interstate Gas Co.-36, and El Paso Natural Gas Co.-42) and one electrical transmission line (Western Area Power Administration [230 kV]). In addition, the Wyoming portion of the HPTL will be located entirely within the site boundary of the associated Roundhouse Wind Energy Project (see **Figures 2 and 3** in **Appendix A**). Therefore, this criterion is met.

- i. The applicant supplies information, satisfactory to the Board, that locating the line or pipeline adjacent to or within an existing utility corridor is physically impossible.*

Finding: As previously demonstrated, the HPTL is reasonably co-located with six pipelines and one electrical transmission line. Therefore, this criterion does not apply.

- ii. The applicant supplies information, satisfactory to the Board, that locating the line or pipeline adjacent to or within an existing utility corridor would increase the financial cost so as to prohibit project development.*

Finding: Financial cost was not the only factor considered in siting the HPTL. Other logistical factors were analyzed, including proximity to existing utility corridors and wind turbines. The HPTL is reasonably co-located with six pipelines and one electrical transmission line and will not be sited outside of an existing utility corridor for financial reasons. Therefore, this criterion does not apply.

- iii. Wherever possible, overhead transmission lines shall be located in a manner to reduce their visual impact on the surrounding landscape. Mitigation strategies may include, but are not limited to, avoiding riparian areas and ridge lines and using color to reduce visual impacts.*

Finding: The HPTL route alignment is designed to carry the electricity generated by the Roundhouse Wind Energy Facility to the Platte River Power Authority Rawhide Substation. The route travels through open ranch lands where there are few sensitive viewers. The nearest residence is located approximately 1.8 miles northeast of the proposed HPTL route (see **Figure 2** in **Appendix A**). The route has been sited and designed to integrate into its landscape setting. For the most part, the transmission line route is located off ridgelines, avoids riparian areas where feasible, and follows the alignments of existing features in the landscape, including a gas pipeline, electrical transmission line, a roadway and rail line (see **Figure 2** in **Appendix A**). The transmission line will be carried on steel monopoles that will have a neat, trim form. The steel poles will have a galvanized finish that will dull over time, giving the poles an unobtrusive dull gray color that will blend well with both land and sky backdrops. Therefore, this criterion is met.

4. References

Laramie County. 2011. The Laramie County Land Use Regulations. Adopted February 15. Accessed on November 21, 2018.

https://www.laramiecounty.com/_departments/PlanningDevelopment/_pdfs/LandUseRegulations/Laramie%20County%20Land%20Use%20Regulations%2006082011.pdf.

Laramie County. 2016. Laramie County Comprehensive Plan 2016. Accessed on November 21, 2018.

https://www.laramiecounty.com/_departments/PlanningDevelopment/_pdfs/2016%20Laramie%20County%20Comprehensive%20Plan%20Map/2016%20Laramie%20County%20Comprehensive%20Plan%20Map.pdf

WYOMING OFFICE OF STATE LANDS AND INVESTMENTS

122 West 25th Street
Cheyenne, WY 82002
Phone: 307-777-7331
Fax: 307-777-3524
slfmail@wyo.gov



MARK GORDON
Governor

BRIDGET HILL
Director

January 9, 2019

Laramie County Planning & Development Department
3966 Archer Parkway
Cheyenne, WY 82009

RE: Roundhouse Renewable Energy, LLC
Non-Roadway Easement Application with State of Wyoming

Dear Laramie County Planning & Development Department,

Roundhouse Renewable Energy, LLC ("Roundhouse") has filed a Non-Roadway Easement Application with the State of Wyoming seeking an easement on state lands in Laramie County for a 230-kilovolt generation-tie transmission line (hereinafter "Easement Application"). The state lands subject to the Easement Application are owned by the State of Wyoming and are described in Exhibit 1.

The State of Wyoming will not process or consider the Easement Application until Roundhouse obtains Laramie County Board Approval for the 230-kV generation-tie transmission line.

The State of Wyoming is aware of and consents to Roundhouse submitting an Application of Board Approval for the 230-kilovolt generation-tie transmission line with Laramie County.

Please do not hesitate to contact me with any questions regarding the Easement Application and its status. I can be reached at (307) 777-6521 or mardy.rapp@wyo.gov.

Sincerely,

A handwritten signature in black ink that reads "Mardy Rapp". The signature is written in a cursive, flowing style.

Mardy Rapp
Lands Management Program Analyst
Trust Land Management Division

Enclosure

Exhibit 1

Township 12 North, Range 68 West of the 6th P.M., Laramie County, Wyoming

Section 4: SW4

Section 10: S2, S2N2

Section 14: N2

**PZ-19-00009 ROUNDHOUSE WIND ENERGY HIGH POWER TRANSMISSION LINE BOARD
APPROVAL**

WYDOT: Randy Griesbach COMMENTS ATTACHED 02/01/2019

Comments same as for overall Roundhouse Wind Energy Project: Road use agreement needed with WYDOT to ensure any damage cause by development to the highway system is addressed. WYDOT access permit needed for any modifications to access points to the highway system.

12/28/2018 – WYDOT Comments for PZ-18-00280

Contact WYDOT district office in Laramie to discuss possible road maintenance agreement for WY 225.

Access permits will be needed for modifications to access and interchange ramp/crossroad intersections where large radii are required to accommodate turning path for long loads.

Assumed peak hour volume percentage in traffic study of 8% would be considered an urban value. A more realistic value for rural setting would be 15% - 18%. Overall volumes are quite low show the results should still be within acceptable parameters.

Any location that would disturb or damage any right of way markers for WYDOT right of way must be reference in a physical survey. If any right of way makers are destroyed, they must be replaced by a Professional Land Surveyor. Monuments tied prior to possible damage must be sent to District 1 with their coordinate location.

Planners: Bryan Nicholas COMMENTS ATTACHED 01/31/2019

1. Application is dependent on approval of the Roundhouse Wind Energy Project Site Plan (PZ-18-00280).
2. Prior to issuance of a Wind Energy Permit, a Site Plan showing the final layout of the project, including the transmission line will be required.
3. LCLUR Regulation 2-2-127 is governing the requirements for this project.
4. Upon approval by the Board, the Line Route Map showing the final location will need to be submitted to the Planning and Development office for review. Once reviewed and approved, the Line Route Map is to be submitted to the Clerk's office in order to be recorded along with the resolution.

AGENCIES WITH NO COMMENTS:

County Assessor
County Engineer
County Public Works Department
Fire District No. 1

AGENCIES WITH NO RESPONSE:

Cheyenne Regional Airport
County Attorney
County Real Estate Office
County Treasurer
Black Hills Energy
County Conservation District
Environmental Health Department
Department of Energy (WAPA)
Wyoming DEQ
Wyoming Game & Fish
Combined Communications Center
Emergency Management
Fire District No. 10
Sheriff's Office
Rockies Express Pipeline
Building Dept.
Laramie County Weed & Pest

February 7, 2019

Brad Emmons / Director
Laramie County Planning and Development Office
3966 Archer Parkway
Cheyenne, WY 82009

Subject: 230-Kilovolt Generation-Tie Transmission Line for the Roundhouse Wind Energy Project (PZ-19-00009) – Agency Comment Responses

Dear Mr. Emmons:

Roundhouse Renewable Energy, LLC (Roundhouse, referred to herein as Applicant), a wholly owned, indirect subsidiary of NextEra Energy Resources, LLC (NextEra), submitted a High Power Transmission Line application (PZ-19-00009) to Laramie County (County) on January 9, 2019. The Applicant seeks approval to build and operate the proposed 230-kV generation-tie transmission line [referred to hereafter as high-power transmission line (HPTL)] in association with the proposed Roundhouse Wind Energy Project (Project) in the County.

This letter provides responses to agency comments received by the County Planning and Development Office on the Applicant's HPTL application. This letter contains the following information:

- Table 1: Provides the Applicant's responses to specific comments received from state and local agencies.
- Attachment 1: Provides documentation of the original agency comments from the Wyoming Department of Transportation (WYDOT) and County Planning and Development Office.

Should you have any questions or comments regarding the responses provided herein, please do not hesitate to contact me at ryan.fitzpatrick@nexteraenergy.com or 307-399-1393. We look forward to working with you on this Project.

Sincerely,



Ryan Fitzpatrick
Roundhouse Renewable Energy, LLC

700 Universe Boulevard
Juno Beach, FL 33408

Table 1. Agency Comment Responses to PZ-19-00009

Roundhouse Wind Energy Project - Laramie County High Power Transmission Line Application

Agency/Department	Comment	Applicant Response
Wyoming Department of Transportation (WYDOT)	<p><i>Comments same as for overall Roundhouse Wind Energy Project: Road use agreement needed with WYDOT to ensure any damage cause by development to the highway system is addressed. WYDOT access permit needed for any modifications to access points to the highway system.</i></p> <p><i>By reference: 12/28/2018 – WYDOT Comments for PZ-18-00280</i></p> <p><i>Contact WYDOT district office in Laramie to discuss possible road maintenance agreement for WY 225. Access permits will be needed for modifications to access and interchange ramp/crossroad intersections where large radii are required to accommodate turning path for long loads. Assumed peak hour volume percentage in traffic study of 8% would be considered an urban value. A more realistic value for rural setting would be 15% - 18%. Overall volumes are quite low show the results should still be within acceptable parameters. Any location that would disturb or damage any right of way markers for WYDOT right of way must be reference in a physical survey. If any right of way makers are destroyed, they must be replaced by a Professional Land Surveyor. Monuments tied prior to possible damage must be sent to District 1 with their coordinate location.</i></p>	<p>The Applicant will contact the WYDOT district office in Laramie to discuss a possible road maintenance agreement for WY 225. The Applicant will obtain necessary access permits for modifications to access and interchange ramp/crossroad intersections where large radii are required to accommodate equipment hauling.</p> <p>The Applicant's previous response to WYDOT comments for PZ-18-00280 apply here as follows:</p> <p>Through a web search, a document was found that indicates that 15 percent would be an appropriate assumption for a rural highway facility (based on a Nebraska report). Given the existing counts on WYO 225, an increase from 8 to 15 percent for the background peak hour volumes would not impact the traffic operations enough to decrease the A/B Levels of Service (LOS) to an undesirable LOS (i.e., LOS E or F) for the background conditions in any of the three analysis scenarios. The volumes generated by the construction and operations of the Project are independent of and not affected by the assumption of the background peak hour volume percentage. The total projected traffic operating conditions with the Project-generated volumes added to the background volumes are LOS A/B for all three analysis scenarios. Like the background LOS estimates, an increase in the percentage of peak hour background volumes would likely not cause a decrease to undesirable LOS conditions in any of the three analysis scenarios. We agree that the results would still be within acceptable parameters with background peak hour volumes representing 15 percent of the Average Daily Traffic. Should Project construction disturb or damage any WYDOT right-of-way markers, the Applicant will reference the markers in a survey and replace the markers by a Professional Land Surveyor.</p>
County Planning and Development Office	<ol style="list-style-type: none"> <i>1. Application is dependent on approval of the Roundhouse Wind Energy Project Site Plan (PZ-18-00280).</i> <i>2. Prior to issuance of a Wind Energy Permit, a Site Plan showing the final layout of the project, including the transmission line will be required.</i> <i>3. LCLUR Regulation 2-2-127 is governing the requirements for this project.</i> <i>4. Upon approval by the Board, the Line Route Map showing the final location will need to be submitted to the Planning and Development office for review. Once reviewed and approved, the Line Route Map is to be submitted to the Clerk's office in order to be recorded along with the resolution.</i> 	<p>The Applicant demonstrates compliance with the applicable Laramie County Land Use Regulations (LUR) for high power transmission lines under Section 2-2-127, in Section 3 of the application narrative. The Applicant acknowledges that approval of the proposed HPTL under PZ-19-00009 is dependent on approval of the Applicant's Wind Energy Site Plan application. The Applicant will submit a Site Plan showing the final layout of the project, including the transmission line, with the Wind Energy Permit application to the County Planning and Development office for review and approval.</p> <p>The Applicant acknowledges that upon approval by the Board, the HPTL Line Route Map showing the final location will need to be submitted to the Planning and Development office for review. Once reviewed and approved, the Line Route Map will be submitted to the County Clerk's office in order to be recorded along with the resolution.</p>

Table 1. Agency Comment Responses to PZ-19-00009

Roundhouse Wind Energy Project - Laramie County High Power Transmission Line Application

Agency/Department	Comment	Applicant Response
Notes:		
<u>Agencies with No Comments:</u>		
Black Hills Energy		
County Assessor		
County Engineer		
County Public Works Department		
Fire District No. 1		
<u>Agencies with No Response:</u>		
Cheyenne Regional Airport		
County Attorney		
County Real Estate Office		
County Treasurer		
County Conservation District		
Environmental Health Department		
Department of Energy (WAPA)		
Wyoming DEQ		
Wyoming Game & Fish		
Combined Communications Center		
Emergency Management		
Fire District No. 10		
Sheriff's Office		
Rockies Express Pipeline		
Building Dept.		
Laramie County Weed & Pest		

Attachment 1
Original Agency Comments

**PZ-19-00009 ROUNDHOUSE WIND ENERGY HIGH POWER TRANSMISSION LINE BOARD
APPROVAL**

WYDOT: Randy Griesbach COMMENTS ATTACHED 02/01/2019

Comments same as for overall Roundhouse Wind Energy Project: Road use agreement needed with WYDOT to ensure any damage cause by development to the highway system is addressed. WYDOT access permit needed for any modifications to access points to the highway system.

12/28/2018 – WYDOT Comments for PZ-18-00280

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Assumed peak hour volume percentage in traffic study of 8% would be considered an urban value. A more realistic value for rural setting would be 15% - 18%. Overall volumes are quite low show the results should still be within acceptable parameters.

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Planners: Bryan Nicholas COMMENTS ATTACHED 01/31/2019

1. Application is dependent on approval of the Roundhouse Wind Energy Project Site Plan (PZ-18-00280).
2. Prior to issuance of a Wind Energy Permit, a Site Plan showing the final layout of the project, including the transmission line will be required.
3. LCLUR Regulation 2-2-127 is governing the requirements for this project.
4. Upon approval by the Board, the Line Route Map showing the final location will need to be submitted to the Planning and Development office for review. Once reviewed and approved, the Line Route Map is to be submitted to the Clerk's office in order to be recorded along with the resolution.

AGENCIES WITH NO COMMENTS:

County Assessor
County Engineer
County Public Works Department
Fire District No. 1

AGENCIES WITH NO RESPONSE:

Cheyenne Regional Airport
County Attorney
County Real Estate Office
County Treasurer
Black Hills Energy
County Conservation District
Environmental Health Department
Department of Energy (WAPA)
Wyoming DEQ
Wyoming Game & Fish
Combined Communications Center
Emergency Management
Fire District No. 10
Sheriff's Office
Rockies Express Pipeline
Building Dept.
Laramie County Weed & Pest

RESOLUTION NO. _____

**A RESOLUTION TO APPROVE A HIGH POWER TRANSMISSION LINE FOR THE
ROUNDHOUSE WIND ENERGY PROJECT, LOCATED IN PORTIONS OF LANDS IN
TOWNSHIPS 12 AND 13 NORTH, RANGES 68, 69, AND 70 WEST, OF THE 6TH PM,
LARAMIE COUNTY, WY.**

WHEREAS, Wyoming State Statutes §18-5-201 to 18-5-208; §18-5-301 to 18-5-315 authorize Laramie County, in promoting the public health, safety, morals and general welfare of the county, to regulate the use of land through zoning in unincorporated Laramie County; and

WHEREAS, the Laramie County Board of Commissioners adopted the Laramie County Land Use Regulations; and

WHEREAS, this application meets the criteria for a Board Approval pursuant to section 1-2-100 of the Laramie County Land Use Regulations; and

WHEREAS, the proposed transmission line is in accordance with section 2-2-127 of the Laramie County Land Use Regulations.

NOW THEREFORE BE IT RESOLVED BY THE GOVERNING BODY OF LARAMIE COUNTY, WYOMING, as follows:

The Laramie County Board of Commissioners finds that:

- a. This application is in conformance with section 1-2-100 of the Laramie County Land Use Regulations.
- b. This application meets the criteria for High-power Transmission Lines pursuant to section 2-2-127 of the Laramie County Land Use Regulations.

And the Board approves the Board Approval application for the Roundhouse Wind Energy Transmission Line, Laramie County, WY, as shown on attached Exhibit 'A'.

PRESENTED, READ AND ADOPTED THIS _____ DAY OF _____, 2019.

LARAMIE COUNTY BOARD OF COMMISSIONERS

Linda Heath, Chairman

ATTEST:

Debra K. Lee, Laramie County Clerk

Reviewed and approved as to form:

 FOR

Mark T. Voss, Laramie County Attorney

EXHIBIT 'A'

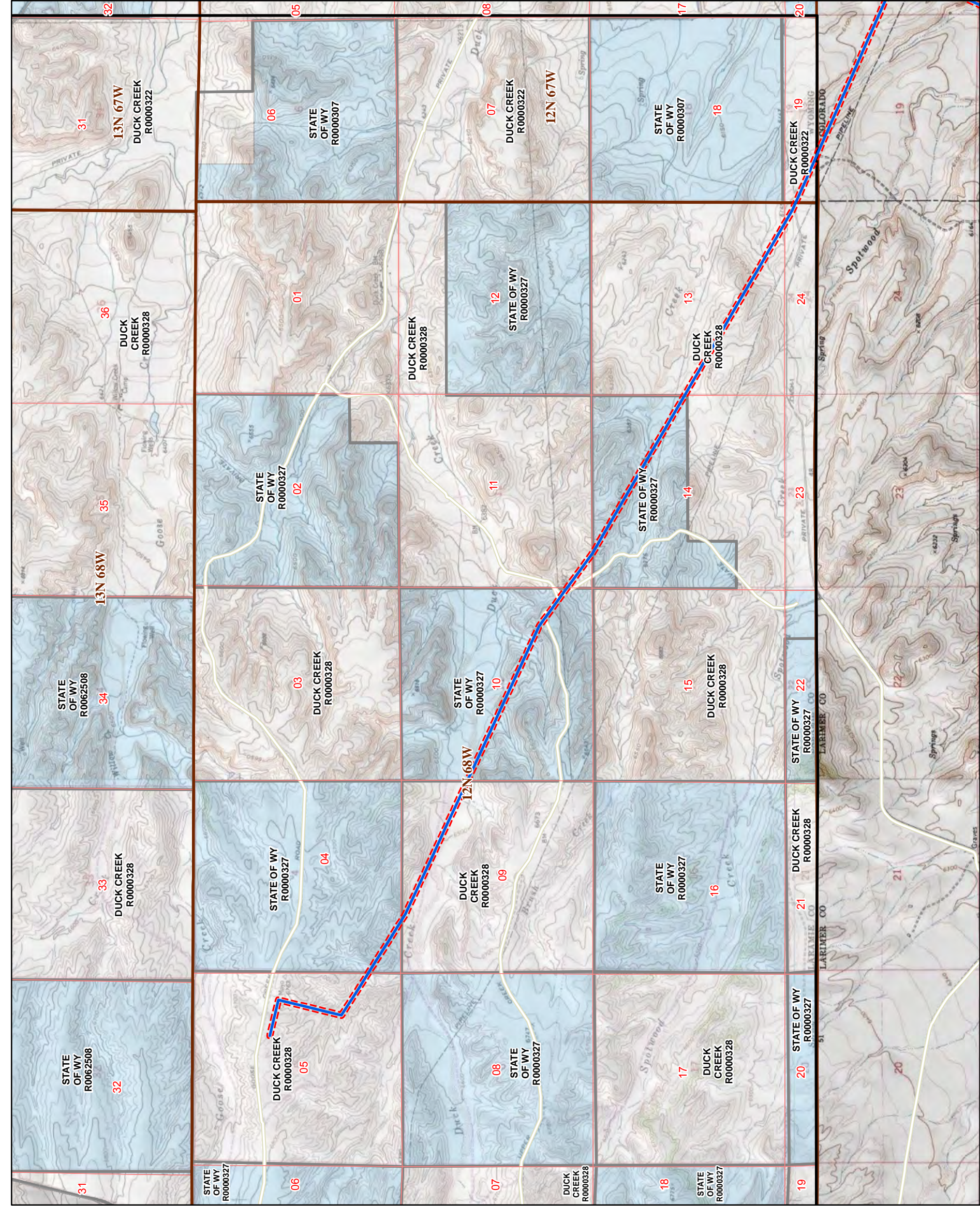


FIGURE 3
Preliminary High-Power Transmission Line Route
Roundhouse Wind Energy Project
Laramie County, Wyoming