
MILLARD COUNTY

APPLICATION FOR GENERAL PLAN AMENDMENT

for

SIGURD TO RED BUTTE NO. 2
345kV TRANSMISSION PROJECT

Submitted by



November 30, 2011

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Millard County

Nature of Request and Project Location

1.0 Introduction and Project Overview

PacifiCorp (doing business as Rocky Mountain Power) proposes to construct, operate, and maintain a single-circuit, 345-kilovolt (kV), alternating-current, overhead transmission line from the Sigurd Substation near Richfield City in Sevier County, Utah, to the Red Butte Substation near the community of Central in Washington County, Utah. The Project is known as the Sigurd to Red Butte No. 2 – 345kV Transmission Project (Project), and is a distance of approximately 175 miles (see Attachment 1 – Project Schematic). Construction of the Project is planned to begin October 2012. The critical in-service date for the Project is June 2014.

The Utilities Element of the Millard County General Plan, states as an objective, the County will “coordinate with all Federal and State Agencies and all utility providers the County’s preferred locations for all utility facilities and utility transmission corridors” (Millard County 2010). An implementation strategy of this objective states “all new ‘Electric Transmission Right-of-Way (Major)’ with an interstate or intrastate purpose shall be located within the ‘West-wide Energy Corridor,’ as identified by Millard County’s Official Map” (Millard County 2010). A further implementation strategy for this objective states “if location within the West-wide Energy Corridor for a new ‘Electric Transmission Right-of-Way (Major)’ is not feasible, as determined by Millard County, the new utility transmission corridor shall be located immediately adjacent to an existing transmission corridor, in compliance with all County Land Use Ordinances. ‘Immediately adjacent’ shall mean located so as to share a common boundary with any right-of-way, easement, parcel, lot, or other recorded instrument” (Millard County 2010).

The Project is not located in the West-wide Energy Corridor nor is it immediately adjacent for its entirety to other transmission lines; therefore the proposed transmission line is not consistent with the Millard County General Plan. However, a further implementation strategy under this objective states “A new ‘Electric Transmission Right-of-Way (Major)’ proposed outside of the West-wide Energy Corridor, or not immediately adjacent to an existing transmission corridor, shall apply for, and shall have approved, a Millard County General Plan and Utilities Corridor Map amendment prior to the approval of any required land use application(s).”

Therefore, Rocky Mountain Power hereby files this General Plan Amendment application for a one-mile-wide utility corridor in the southern portion of the County (See Attachment 2 – Proposed Utility Corridor Map). The one-mile width of the corridor is proposed to provide for possible adjustments to the Project due to potential unanticipated engineering and land use constraints (e.g., Milford Wind Farm Phase IV), or public concerns. The location of and need for the corridor is coincidental with the proposed route and is predicated on the Project description and purpose and need, as discussed in detail in the following text.

Rocky Mountain Power seeks an amendment to the Millard County General Plan, including the Millard County Major Utilities Corridor Map. Rocky Mountain Power has also applied for a Conditional Use Permit (CUP) from Millard County for the Project concurrent to this application. Rocky Mountain Power desires to receive a CUP before the Bureau of Land Management (BLM) issues its Record of Decision (ROD), scheduled to occur in September 2012.

The following information supports Rocky Mountain Power’s Application for a General Plan Amendment pursuant to Appendix D of the Millard County General Plan and addresses the following:

- Section 2.0 – Project description and location
- Section 3.0 – Project need
- Section 4.0 – General plan amendment application form requirements

In addition to this material, detailed maps and illustrations (as referenced throughout the document) are provided to assist in the review of this application.

The BLM, in consultation with cooperating agencies, including the U.S. Forest Service (USFS) and Millard County, prepared a Draft Environmental Impact Statement (EIS) for the Project. The Draft EIS analyzes and discloses the potential impacts of granting a right-of-way/special-use permit to Rocky Mountain Power for the purpose of constructing, operating, and maintaining a single-circuit 345KV transmission line. The Draft EIS was released for public review and comment in May 2011. The Final EIS is anticipated to be completed by May 2012.

In September 2012, it is expected the BLM will issue a ROD and right-of-way grant, and the USFS will issue a special-use permit to Rocky Mountain Power for constructing, operating, and maintaining the proposed Project.

Rocky Mountain Power has also coordinated with First Wind and the BLM to minimize conflicts with Milford Wind Farm Phase III and IV. There have been two coordination meetings (August 23 and August 29, 2011) with First Wind and the BLM, as well as a meeting with Beaver and Millard counties on September 20, 2011. Based on the results of those meetings, Rocky Mountain Power understands that First Wind can accommodate the proposed route alignment through Phase III without conflict. The proposed route, in most instances, would be approximately 2,600 feet from the existing Milford Wind Phase I turbines, and a similar distance from the planned Phase III turbines. However, separation between the project and turbines, existing and or planned will not be less than industry practice. Please note the Millard County staff approved a 1,000 foot relocation provision, which will help ensure Rocky Mountain Power can make appropriate accommodations. The proposed Phase IV Wind Farm is located in Millard County. Rocky Mountain Power and First Wind will continue coordinating to ensure conflicts are minimized between the two projects and that adequate separation for safety is maintained.

2.0 Project Description and Location

After reviewing the scope of the Project, the BLM and USFS determined granting a right-of-way and special-use permit, respectively, for the proposed Project and associated facilities is a major federal action and would require preparation of an EIS in compliance with the requirements of the National Environmental Policy Act of 1969 (NEPA), as amended (United States Code: Title 42, Chapter 55, §4321 et seq. [42 United States Code 4321 et seq.]), and the Council on Environmental Quality regulations for implementing NEPA (Code of Federal Regulations: Title 40, Parts 1500–1508).

The BLM serves as the lead federal agency for preparing the EIS and published a Notice of Intent to prepare the EIS in the *Federal Register* on January 5, 2010. Thirteen agencies, including the USFS and Millard County, are participating as cooperating agencies in preparation of the EIS. The EIS analyzes and discloses the potential impacts of granting a right-of-way/special-use permit to Rocky Mountain Power for the purpose of constructing, operating, and maintaining a single-circuit 345KV transmission line. The Draft EIS was released for public review and comment in May 2011. The Final EIS is anticipated to be completed by May 2012.

Approximately 715 miles of alternative routes, through Sevier, Millard, Beaver, Iron, and Washington counties, were evaluated for the Project. Portions of the proposed transmission line cross land administered by three BLM field offices (the Richfield, Fillmore, and Cedar City Field Offices) and two national forests (the Fishlake and Dixie National Forests). In September 2012, it is expected the BLM will issue a ROD and right-of-way grant, and the USFS will issue a special-use permit to Rocky Mountain Power for constructing, operating, and maintaining the proposed Project (see Attachment 3 – Project Study Area).

The Project enters Millard County from Sevier County approximately 0.5 mile south of Interstate 70 and parallels Interstate 70 southwest where it enters Beaver County. The proposed route then enters Millard County approximately 0.9 miles west of Interstate 15, then turns north for approximately 1.9 miles. The proposed route heads northwest where it begins to parallel Black Rock Road for approximately 7.6 miles.

The proposed route then heads south along the west side of the Antelope Mountains for approximately 4.3 miles before entering Beaver County. The Project will transect approximately 39 privately owned parcels in unincorporated Millard County.

An overview of the Project features follows here:

- A single-circuit 345kV transmission line that connects the existing Sigurd Substation (in Sevier County) to the Red Butte Substation (in Washington County), which would require a 150-foot-wide right-of-way.
- Communication regeneration facilities associated with the transmission line and substations.
- New access roads to all 345kV transmission line structures where there is no existing access.
- Temporary work areas, located on private property to the extent practicable and outside of the Project right-of-way, associated with construction activities. Temporary work areas would serve as field offices, reporting locations, parking, batch plant sites, material storage, fabrication assembly, and stations for equipment maintenance. Temporary work areas will be established during construction of the proposed Project.

The Project in Millard County consists of approximately 24.1 miles of 345kV transmission line. The proposed one-mile utility corridor consists of approximately 15,431.8 acres through Millard County. Based on the origination points of the Project (Sigurd Substation and Red Butte Substation) it is not feasible for the Project to be contiguous and adjacent to the West-wide Energy Corridor in Millard County, which provides the basis for this General Plan Amendment Application.

3.0 Project Need

As a regulated utility, Rocky Mountain Power is responsible for providing its customers with safe, reliable, adequate, efficient, and environmentally responsible transmission capacity to meet short- and long-term projected load growth via connection to generation resources and through access to energy markets. The last major improvement to Rocky Mountain Power's service area occurred approximately 25 years ago. As part of a forward-looking and long-range transmission plan to meet customer requirements, the proposed Project addresses Rocky Mountain Power's need to meet these obligations by adding facilities to its transmission system that would improve reliability and increase the capacity required to serve forecasted loads in Utah.

The proposed Project would support future regional electrical load growth in southwestern Utah by providing a redundant source from the main grid transmission system to the local area transmission systems (46kV to 138kV built and/or operated lines) and the associated distribution substations serving the communities in these areas. This would improve the ability of Rocky Mountain Power's transmission system to transport energy into central Utah, as well as improve the electrical path for future renewable energy sources that may be built in Southwest or Central Utah. Due to the interconnected nature of its transmission system, this Project would benefit Rocky Mountain Power's system in a regional context. See Attachment 4 – Cedar/Dixie Area Conductor and Shieldwire Transmission Lines for Rocky Mountain Power's transmission lines in the Cedar/Dixie Area, which includes Beaver, Iron, and Washington counties.

The electrical needs for Millard County are primarily served by the 230kV line from Sigurd substation (near Richfield City, Utah) to Pavant substation (west of Holden, Utah). The capability and reliability of service to Millard County is dependent on the Sigurd substation. At Pavant, there are 46kV transmission lines that distribute north into the Delta area and south to the Fillmore area. The proposed Project will improve service to the Sigurd substation by providing the ability to import additional renewable and other types of resources by alleviating transmission constraints that currently exist there. Because this is the source for the electrical system serving Millard County, it will also improve service to that area as well.

The Project would allow for potential access to renewable energy resources and other generation sources in the future and would provide increased capacity to export energy in the event of energy surpluses. These factors are summarized below.

3.1 Need to Improve Capacity

The full-rated capacity of the southwestern Utah electrical system, including the existing Sigurd to Red Butte No. 1 – 345kV transmission line, is expected to be exceeded by 2014. At that time, load growth in southwestern Utah will surpass the capability of the existing transmission system. New facilities must be constructed to provide sufficient and reliable capacity for load service.

3.2 Need to Allow Power Sales, Transfers, and Purchases

Rocky Mountain Power proposes to augment the existing transmission system's capacity to meet the projected customer demand for energy in southwestern Utah. In addition, under its Open Access Transmission Tariff, Rocky Mountain Power has transmission-service-contract obligations for firm transmission service into and out of southwestern Utah. The current system supports up to 300 megawatts (MW) of transfers (bi-directional) between Nevada and Utah. Rocky Mountain Power has contractual commitments to deliver 300 MW of firm service from Nevada to Utah beginning 2014. In addition to providing load service to customers in southwest Utah, Rocky Mountain Power also has contract obligations to third parties for 140 MW of firm service delivery to Nevada. In 2014, the system in the area cannot meet both of these firm contract obligations. Therefore, Rocky Mountain Power needs additional transmission capacity between the existing Sigurd and Red Butte substations to meet its contracted transmission obligations by 2014. To meet the demand, Rocky Mountain Power must upgrade the total capacity of the existing transmission path. The proposed transmission line is necessary to increase the rated capacity of the transmission system in southwestern Utah.

3.3 Need to Provide Reliable Transmission

The Western Electricity Coordinating Council (WECC), in conjunction with the National Electric Reliability Corporation (NERC), has established system planning and operating criteria (NERC/WECC Planning Standards, 2005, and WECC Common Corridor and Adjacent Transmission Circuit definitions [TPL-(001 through 004)-WECC-1-CR], 2008) all transmission providers within the Western Interconnection must follow when planning and operating their transmission systems. These standards and criteria require transmission providers to evaluate expected normal and potential abnormal operating conditions, and plan adequate redundancy in the system (e.g., provided through construction of multiple transmission lines; locating multiple lines in wide, geographically diverse transmission corridors) to meet expected system reliability performance. These standards and criteria define both the expected level of event severity (single and multiple lines out) and acceptable system performance requirements. In part, the standards require transmission providers to evaluate multiple adjacent line outages and, when applicable, the outage of all lines in a corridor to ensure the outage does not result in a cascading and uncontrolled loss of generation stations and outages of customer loads. While these standards and criteria exist for performance and reliability, it is the responsibility of the transmission provider, based on operational history and experience, to plan, design, and site transmission projects to meet system performance requirements and manage reliability, risks, and costs.

Without the Project, peak load in southwestern Utah could not be served during line outage contingencies. If designed in a manner that meets Rocky Mountain Power's system planning criteria (developed in response to NERC and WECC standards and criteria and based on history and experience), the proposed Project would provide redundancy to the existing infrastructure (i.e., Sigurd to Red Butte No. 1 transmission line) and substantially improve Rocky Mountain Power's ability to provide reliable electrical service to its customers as mandated by federal and state agencies.

3.4 Service Load

The proposed Project would support future regional electrical load growth in southwestern Utah and would improve the ability of Rocky Mountain Power's transmission system to transport energy into central Utah. Due to the interconnected nature of its transmission system, this Project would benefit Rocky Mountain Power's system in a regional context.

3.5 Access to Potential Renewable Generation Sources

A new transmission line would provide improved access to existing and new generation sources and would provide options to access other energy resources, including renewable resources. While the proposed Project is independent of, and would be built regardless of, any new generation project or other transmission lines, the enhancement of the existing transmission systems' geographic extent and system capacity would allow flexibility to use future generation and transmission facilities.

3.6 Summary

Through the course of meeting its business and regulatory obligations, Rocky Mountain Power has substantiated the need for the proposed Project based on the following factors:

- The current and projected electrical demands in southern Utah and the projected electrical shortfall based on commercial/industrial and population growth, as well as per capita increases in energy demand
- Existing generation resources and the capacity of existing transmission infrastructure to meet these demands
- Projected generation and the capacity of the existing transmission system to accommodate the increased capacity for facilities planned or under construction
- System reliability and flexibility issues associated with the operation of the existing transmission system
- Allowance for economical power sales, transfers, and purchases
- Integration with short-term and long-range planning
- In-service date of June 2014

Construction of the Project in Millard County will begin following the issuance of the ROD. Physical construction and ground disturbance is anticipated to begin October 2012 to help serve the current electrical demand and provide a reliable electrical supply to residents in the future. Rocky Mountain Power recognizes the importance of developing new and future facilities in a proactive and integrated manner with community long-range plans.

In addition to the General Plan Amendment, Rocky Mountain Power will obtain all other required Millard County permits.

4.0 General Plan Amendment Application Requirements

4.1 General Plan Amendment Application Form and Fees

The General Plan Amendment Application Form and property owner affidavit shall provide all required information and be accompanied by payment of all application fees.

Response: See application form provided by Millard County at the front of this application document. The owner affidavits will be provided upon completion of right-of-way acquisition associated with the CUP for the Project. The \$440.10 fee was submitted with this application form.

Rights-of-way for transmission line facilities on non-federal land (state and private) would be obtained in perpetual easements or fee purchases. Every effort would be made to purchase all of the land rights on private land through reasonable negotiations with the present owners. Owner affidavits/authorizations will be obtained from landowners prior to construction and is understood to be a condition of the conditional use permit. Such authorizations will be obtained either through acquisition of easements or by other means afforded by law in the event an agreement with the landowners cannot be reached; Rocky Mountain Power may obtain authorization by its use of eminent domain in accordance with Utah law.

4.2 Parcel Map

Provide a map of the location of property showing all property boundaries on a minimum of eight and one-half (8.5) x eleven (11) inches sheet.

Response: Attachment 5 – Parcel Map, depicts the location of property and all property boundaries on 11-by-17-inch sheets. Attachment 5 – Parcel Map also shows the proposed one-mile-wide utility corridor, existing transmission lines, county boundaries, parcels, township, section, power plants, and the Millard County Major Utilities Corridor, and land jurisdiction.

4.3 Legal Description

Provide a legal description of the subject property.

Response: The proposed one-mile-wide utility corridor crosses private and public parcels. The legal description of the proposed one-mile-wide utility corridor can be found in Attachment 6 – Legal Description.

4.4 Location and Dimensions of Structures

Show the location and dimensions of any structures on the subject property and on adjacent properties.

Response: There are no existing structures on the subject or adjacent property within the proposed one-mile-wide utility corridor.

4.5 Property Owner Mailing List

Provide a list of the names and the mailing addresses for owners of property within 1,000 feet from the outer boundaries of the subject property. Addresses may be obtained at the County Assessor's office in Fillmore. In addition, provide names and addresses of any other interested party or Affected Entity having a material interest in the subject property, such as co-owners, mortgage companies, banks, utilities, special districts, etc. (for map amendments only).

Response: A list of the names and the mailing addresses for property owners located within the proposed one-mile-wide utility corridor and an additional 0.5 mile from the outer boundaries of the one-mile-wide utility corridor is provided as Attachment 7 – Property Owners List, which exceeds the requirement of 1,000 feet. The mailing list was prepared by Paragon Partners (a Rocky Mountain Power contractor) based on records found in the County Recorder's and Assessor's offices.

4.6 General Plan Narrative

Provide a written narrative describing how the proposed amendment will enhance the existing goals, objectives, and policies of the General Plan including, but not limited to, the effect of the proposed

amendment to advance the public health, welfare, and safety of residents of the County, the effect of the proposed amendment on the interests of Millard County and its residents, the compatibility of the proposed uses with nearby and adjoining properties, and identify the county benefit of the proposed amendment.

Objective: Coordinate with all Federal and State Agencies and all utility providers the County's preferred locations for all utility facilities and utility transmission corridors (Utilities Element, page 1).

Implementation Strategy: Unless directly associated with an "Electric Generating Facility" or "Wind Energy System (Major)" located in the County, all new "Electric Transmission Right-of-Way (Major)," "Gas Pipeline Right-of-Way (Major)," and "Petroleum Pipeline Right-of-Way (Major)" with an interstate or intrastate purpose shall be located within the "West-wide Energy Corridor," as identified by Millard County's Official Map, in compliance with all County Land Use Ordinances.

Response: The Project is not located in the West-wide Energy Corridor nor is it immediately adjacent to an existing transmission line. For this reason, as previously discussed, Rocky Mountain Power is filing this General Plan Amendment application for a one-mile-wide utility corridor in the southern portion of the County (See Attachment 2 – Proposed Utility Corridor Map). The location of and need for the corridor is coincidental with the proposed route and is predicated on the Project description and purpose and need, as discussed in detail in Section 2.0 – Project Description and Location and Section 3.0 – Project Need.

Implementation Strategy: If location within the West-wide Energy Corridor for a new "Electric Transmission Right-of-Way (Major)," "Gas Pipeline Right-of-Way (Major)," or "Petroleum Pipeline Right-of-Way (Major)," is not feasible, as determined by Millard County, (and not associated with a "Electric Generating Facility" or "Wind Energy System (Major)" located in the County), the new utility transmission corridor shall be located immediately adjacent to an existing transmission corridor, in compliance with all County Land Use Ordinances. "Immediately adjacent" shall mean located so as to share a common boundary with any right-of-way, easement, parcel, lot, or other recorded instrument.

Response: The Millard County General Plan identifies a requirement that all new "major" utility transmission facilities be located contiguous and adjacent to an existing transmission corridor. Based on the origination points of the Project (Sigurd Substation and Red Butte Substation) it is not feasible for the Project to be contiguous and adjacent to the Intermountain Power Project Transmission Corridor in Millard County, which provides the basis for this General Plan Amendment Application.

Implementation Strategy: A new "Electric Transmission Right-of-Way (Major)," "Electric Substation (Major)," "Gas Pipeline Right-of-Way (Major)," or "Petroleum Pipeline Right-of-Way (Major)," and proposed outside of the West-wide Energy Corridor, or not immediately adjacent to an existing transmission corridor, shall apply for, and shall have approved, a Millard County General Plan and Utilities Corridor Map amendment prior to the approval of any required land use application(s) (Utilities Element, page 2).

Response: As previously discussed, the Project is proposed to be located outside of the West-wide Energy Corridor and is not adjacent to an existing transmission corridor for its entirety. Rocky Mountain Power hereby files this application seeking approval of a General Plan Amendment from Millard County. See Section 1.0 – Introduction and Project Overview, for more information.

Implementation Strategy: A Millard County General Plan Amendment Application and/or a Utilities Corridor Map Amendment Application may, at the discretion of the Millard County Planning Commission, be considered concurrently with a Land Use Application necessary to permit a "Electric Generating Facility," "Wind Energy System (Major)," "Electric Transmission Right-of-Way (Major)," "Gas Pipeline Right-of-Way (Major)," or an "Petroleum Pipeline Right-of-Way (Major)" (Utilities Element, page 2).

Response: Rocky Mountain Power requests the County approve this General Plan Amendment Application in regards to the Project described in Sections 1.0 – Introduction and Project Overview and 2.0 – Project Description and Location. Rocky Mountain Power desires to amend the Millard County General Plan, specifically the Millard County Major Utilities Corridor Map and the implementation strategy

previously mentioned, to apply for and receive a CUP from Millard County. The CUP application was submitted concurrently with this General Plan Amendment application for the County's consideration. Rocky Mountain Power desires to receive a CUP before the BLM issues its ROD, scheduled to occur in September 2012.

Implementation Strategy: *The location and operation of all utility facilities and transmission corridors shall not harm the quality, quantity, and integrity of all surface and groundwater resources. No major utility facilities and transmission corridors shall be permitted in the floodplain or to cross the Sevier River, or any other permanent river, stream, or other surface water of Millard County (Utilities Element, page 2).*

Response: The location and operation of the proposed one-mile-wide utility corridor will have no impact or resulting harm to the quality, quantity, or integrity of any surface or groundwater resources. Rocky Mountain Power has constructed thousands of miles of transmission line structures throughout Idaho, Utah, and Wyoming and is not aware of any instance where a transmission line structure has had any short- or long-term impact to groundwater resources. The proposed one-mile-wide utility corridor will not be located in or cross the floodplain of the Sevier River. The proposed corridor does not cross any other permanent river, stream, or other surface water in Millard County.

Implementation Strategy: *The location and operation of all major utility facilities and transmission corridors located in Millard County shall not harm the viability of any agriculture activities or the agricultural base of Millard County (Utilities Element, page 2).*

Response: As discussed previously, the proposed one-mile-wide utility corridor consists of approximately 15,431.8 acres through Millard County. The corridor is predominantly rural in character with agriculture, specifically livestock grazing and open rangeland, being the primary land use. According to the U.S. Department of Agriculture 2007 Census of Agriculture Report, there are 566,692 acres of farms located in Millard County. The 2007 Census of Agriculture Report defines a farm as "any place from which \$1,000 or more of agricultural products were produced and sold, or normally would have been sold, during the census year." The proposed one-mile-wide utility corridor could include approximately 2.7 percent of the total farms within Millard County; therefore, the location and operation of the proposed one-mile-wide major utility corridor will not harm the viability of agriculture activities or the agricultural base of Millard County.

The location of the proposed major utility corridor would not have substantial long-term impacts on existing land uses; however, short-term displacement of livestock could occur during construction of the Project (see Section 2.0 – Project Description and Location) within the proposed major utility corridor. Every consideration has been given to locate the proposed major utility corridor so as not include irrigated agricultural areas, specifically center pivot, and other similar agricultural operations.

Implementation Strategy: *Coordinate with neighboring Counties, including Juab, Sevier, and Beaver counties on the location of all interstate and intrastate utility facilities and transmission corridors (Utilities Element, page 2).*

Response: Community outreach and public involvement have been essential components of this Project. Rocky Mountain Power has interacted directly with communities in a variety of ways to provide information on the Project and solicit comments. These methods include:

- conducting community leader briefings with each county/municipality involved in the Project area
- conducting eight meetings with a Community Working Group (CWG)
- distributing two Project newsletters
- conducting five landowner public open house meetings
- coordinating with BLM on four public scoping meetings
- coordinating with BLM on four public hearings on the Draft EIS
- establishing a phone information line and email address for the Project
- posting Project information on the Rocky Mountain Power company website (<http://www.pacificpower.net/ed/tp/eg/gsgstrb.html>)

The following provides an overview of (1) community leader briefings, (2) CWG meetings, (3) the Project newsletters distributed, (4) the landowner public open houses, and (5) BLM public open houses.

Community Leader Briefings

Rocky Mountain Power conducted community leader briefings early in the planning process to provide County and City officials and staff with information on the proposed Project and receive input and feedback.

There have been two community leader briefing meetings in Millard County:

- The first briefing meeting occurred on June 15, 2010. The purpose was to update Millard County Commission and staff on the status of the Project.
- The second briefing meeting occurred on March 2, 2011. The purpose was to update Millard County Commission and staff on the status of the Project.

Community Working Group Meetings

Additionally, Rocky Mountain Power held eight meetings with CWGs, four of which included representatives from Millard County.

- The first CWG meeting was held on October 19, 2009, in Cedar City. The purpose of the meeting was to introduce the Project and discuss purpose of and strategy for the CWGs. The CWG consisted of representatives from Rocky Mountain Power; EPG; BLM; USFS; Washington, Iron, and Beaver counties; and the cities of Parowan and St. George.
- The second CWG meeting was held on October 22, 2009, in Richfield City. The purpose of the meeting was to introduce the Project and discuss the purpose of and strategy for the CWGs. The CWG consisted of representatives from Rocky Mountain Power; EPG; BLM; USFS; Sevier and Millard counties; cities of Richfield, Fillmore, and Delta; Six County Association of Governments; Utah Division of Wildlife Resources (Wildlife Association); Sevier Citizens for Clean Air and Water (SCCAW); and the Paiute Indian Tribe.
- The third CWG meeting was held on April 14, 2010, in Fillmore City. The purpose of the meeting was to: (1) discuss agency and public scoping results, (2) review the preliminary alternative routes, (3) review the resource inventory data and results, (4) discuss approach to impact assessment and mitigation planning, and (5) review the screening of alternatives and alternative comparison approach. The CWG consisted of representatives from Rocky Mountain Power; BLM; USFS; EPG; Utah Division of Wildlife Resources (Wildlife Association); cities of Delta, Fillmore, and Richfield; Sevier and Millard counties; Paiute and Fremont Indian tribes; SCCAW; and Six County Association of Governments.
- The fourth CWG meeting was held on April 15, 2010, in the City of St. George. The purpose of the meeting was to: (1) discuss agency and public scoping results, (2) review the preliminary alternative routes, (3) review the resource inventory data and results, (4) discuss approach to impact assessment and mitigation planning, and (5) review the screening of alternatives and alternative comparison approach. The CWG consisted of representatives from Rocky Mountain Power; BLM; USFS; EPG; Beaver County Corporation for Economic Development; Southern Utah Wilderness Alliance; Iron, Washington, and Beaver counties; cities of St. George and Parowan; and the Paiute Indian tribe.
- The fifth CWG meeting was held on January 5, 2011, in Beaver City. The purpose of the meeting was to receive feedback from the participants on various topics and issues. The CWG consisted of representatives from Rocky Mountain Power, BLM, Richfield City, Millard and Sevier Counties, Six County Association of Governments, Utah State Parks, and SCCAW.

- The sixth CWG meeting was held on January 6, 2011, in Richfield City. The purpose of the meeting was to receive feedback from the participants on various topics and issues. The CWG consisted of representatives from Rocky Mountain Power, BLM, USFS, the City of St. George, Iron and Washington counties, and the Paiute Indian tribe.
- The seventh CWG meeting was held on June 28, 2011, in Fillmore City. The purpose of the meeting was to announce the availability of the Draft EIS, discuss the Draft EIS content and issue areas, solicit comments on the Draft EIS, discuss the timing of local permits and right-of-way acquisition, and review the Project schedule. The CWG consisted of representatives from Rocky Mountain Power, BLM, EPG, Missouri Flat, Southern Utah Wilderness Alliance, and SCCAW.
- The eighth CWG meeting was held on June 29, 2011, in Cedar City. The purpose of the meeting was to announce the availability of the Draft EIS, discuss the Draft EIS content and issue areas, solicit comments on the Draft EIS, discuss the timing of local permits and right-of-way acquisition, and review the Project schedule. The CWG consisted of representatives from Rocky Mountain Power, EPG, BLM, USFS, Dixie Escalante Rural Electric Association, Washington, Iron, and Beaver Counties, as well as Cedar City and the City of St. George.

Rocky Mountain Power also met with community leaders in the counties of Sevier, Beaver, Iron, and Millard, as well as Richfield City and Elsinore Town on separate occasions.

Project Newsletters

Thus far, two BLM Project newsletters have been distributed based on the BLM mailing lists. The first newsletter, distributed in January 2010, provided the following:

- An overall Project description
- The Project's purpose and need
- A NEPA overview and public comments for environmental analysis
- A Project timeline
- Information on public involvement opportunities, including announcement of four public scoping meetings in February and telephone and email contacts for comments and inquiries

The second newsletter, distributed in May and June 2011, announced the availability of the Draft EIS. Copies of the newsletters are included in Attachment 8 – Project Newsletters.

Landowner Public Open Houses

Rocky Mountain Power held five landowner public open house meetings to present the Project and solicit comments. The meetings were held at the following locations:

- The City of St. George at the Best Western Abbey Inn on February 2, 2010 (58 in attendance)
- Enterprise City at Enterprise High School on February 3, 2010 (32 in attendance)
- Cedar City at the Crystal Inn on February 4, 2010 (49 in attendance)
- Milford City at the Oak Tree Inn on February 9, 2010 (38 in attendance)
- Richfield City at the Sevier Events Center on February 10, 2010 (136 in attendance)

A mailing list of property owners within one mile of all the alternative routes was prepared from records collected from the County Recorder's and Assessor's offices. A letter was sent to all property owners within one mile of the alternative routes informing them of the landowner open house meetings. A copy of the letter is included in Attachment 9 – Landowner Letter.

BLM Meetings

Public Scoping Meetings

Four BLM public scoping meetings were held to solicit comments. The meetings were held at the following locations:

- The City of St. George at the Best Western Abbey Inn on February 16, 2010 (16 in attendance)
- Milford City at the Oak Tree Inn on February 17, 2010 (23 in attendance)
- Enterprise City at Enterprise High School on February 17, 2010 (17 in attendance)
- Richfield City at the Sevier Valley Center, Snow College Richfield Campus, on February 18, 2010 (21 in attendance)

Public Hearings on the Draft Environmental Impact Statement

Four BLM public hearings were held to provide an overview of the Project and to take public comments on the proposed Project and the Draft EIS. The meetings were held at the following locations:

- Richfield City at the Sevier County Offices on June 27, 2011 (22 in attendance)
- Milford City at the Milford City Offices on June 28, 2011 (3 in attendance)
- Enterprise City at Enterprise High School on June 29, 2011 (21 in attendance)
- The City of St. George at the St. George Library on June 30, 2011 (33 in attendance)

Rocky Mountain Power will continue to coordinate with the neighboring counties of Sevier, Beaver, and Iron throughout the duration of the Project.

Implementation Strategy: *The location of utility facilities and transmission corridors with an interstate or intrastate purpose should be located so as to avoid impacts on privately owned lands located within Millard County (Utilities Element, page 2).*

Response: The proposed one-mile-wide utility corridor will cross 39 parcels of privately owned lands. The total acreage affected by the proposed one-mile-wide utility corridor on private land in Millard County is 2,177.0 acres; the remaining 13,254.8 acres are located on state and federal land. Multiple mitigation measures will be made by Rocky Mountain Power to minimize negative impacts. Key mitigation measures and industry standards will be discussed in the CUP application. More detailed discussions of mitigation measures and best management practices will be outlined in the Plan of Development. The proposed General Plan Amendment would benefit the interests of Millard County, as well as the public health, welfare, and safety of County residents by consolidating future linear utility facilities in an east-west corridor in the southern portion of the County, which is located away from populated areas, tourist attractions (e.g., Cove Fort, Clear Lake Waterfowl Management Area), and sensitive land uses (e.g., residences, airports, etc.). The proposed one-mile-wide utility corridor would allow for the Project to meet the increased energy demands in southern Utah and improve system reliability throughout Rocky Mountain Power's service area, including Millard County. In meeting this increased electrical demand, Rocky Mountain Power is committed to supplying customers this power in a safe, reliable, adequate, efficient, and environmentally responsible way.

Objective: *Continue to ensure the utility needs of the county are met concurrent with County growth and development while mitigating any impacts to residents, businesses, and property owners (Utilities Element, page 3).*

Implementation Strategy: *Minimize as much as practicable, all negative impacts and disruptions to existing uses, including farmlands and prime agricultural lands that may be created by utility facilities and transmission corridors (Utilities Element, page 3).*

Response: Rocky Mountain Power will minimize as practicable, all negative impacts and disruptions to existing uses, including farmlands and prime agricultural lands that may be created by the proposed Project's one-mile-wide utility corridor by implementing the following:

- The right-of-way has been aligned, insofar as is practicable, to avoid impacts on farm operations and agricultural production.
- Fences, gates, and walls would be replaced, repaired, or reclaimed to their original condition as required by the landowner or the land-management agency in the event they are removed, damaged, or destroyed by construction activities. Fences would be braced before cutting. Temporary gates or enclosures would be installed only with the permission of the landowner or the land-management agency and would be removed/reclaimed following construction. Cattle guards or permanent access gates would be installed where new permanent access roads cut through fences on BLM- and USFS-administered lands.
- Construction of the Project will cause a temporary and minimal increase in fugitive dust. To mitigate potential impacts to air quality, the Plan of Development will include an Erosion, Dust Control, and Air Quality Plan, which will outline measures and procedures to limit the amount of fugitive dust resulting from construction of the Project.

Implementation Strategy: *Make all necessary revisions and amendments to the County's Land Use Ordinances to provide for major and minor utilities consistent with the requirements of Federal and State laws, as applicable.*

Response: The proposed Project would be constructed, operated, and maintained in accordance with all applicable federal and state laws. The Plan of Development will outline the key mitigation measures and industry standards used for construction, operation, and maintenance of the Project and will be discussed in the CUP application.

Effect of the proposed amendment to advance the public health, welfare, and safety of residents of the County

Response: The proposed amendment supports the general goal of providing for the public health, safety, general welfare, and convenience of the citizens of Millard County and the State of Utah by providing for increased demands for electrical power. Multiple Project-wide standard mitigation measures and site-specific selective mitigation measures will be applied by Rocky Mountain Power to minimize negative impacts. A detailed discussion of these mitigation measures will be outlined in the Plan of Development.

Effect of the proposed amendment on the interests of Millard County and its residents

Response: The proposed amendment would benefit the interests of Millard County, as well as the public health, welfare, and safety of county residents, as previously discussed, by being located away from populated areas, tourist attractions (e.g., Cove Fort, Clear Lake Waterfowl Management Area), and sensitive land uses (e.g., residences, airports, etc.). The proposed amendment would allow Rocky Mountain Power to meet the increased energy demands in southern Utah and improve system reliability throughout Rocky Mountain Power's service area, including Millard County. In meeting this increased electrical demand, Rocky Mountain Power is committed to supplying customers this power in a safe, reliable, adequate, efficient, and environmentally responsible way.

Compatibility of the proposed uses with nearby and adjoining properties

Response: The proposed amendment is compatible with nearby and adjoining properties, which is predominately rangeland used for livestock grazing. A major utilities corridor will not interfere with the permanent use of the adjoining properties. As was previously discussed, Rocky Mountain Power has also coordinated with First Wind and the BLM to minimize conflicts with Milford Wind Farm Phase III and IV. There have been two coordination meetings (August 23 and August 29, 2011) with First Wind and the BLM, as well as a meeting with Beaver and Millard counties on September 20, 2011. Based on the results

of those meetings, Rocky Mountain Power understands that First Wind can accommodate the proposed route alignment through Phase III without conflict. The proposed route would be approximately 2,600 feet from the existing Milford Wind Phase I turbines, and a similar distance from the planned Phase III turbines. The proposed Phase IV Wind Farm is located in Millard County. Rocky Mountain Power and First Wind will continue coordinating to ensure conflicts are minimized between the two projects and that adequate separation for safety is maintained.

Identify the county benefit of the proposed amendment

Response: As described previously, Rocky Mountain Power has coordinated with Millard County, First Wind, and other affected parties to establish a one-mile-wide utility corridor that accommodates the future wind development occurring in Millard County. The cooperation between these entities will allow both the proposed amendment and proposed wind development to occur. The proposed Project will also support future regional electrical load growth in southwestern Utah by providing a redundant source from the main grid transmission system to the local area transmission systems (46kV to 138kV built and/or operated lines) and the associated distribution substations serving the communities in these areas. This would improve the ability of Rocky Mountain Power's transmission system to transport energy into central Utah as well as improve the electrical path for future renewable energy sources that may be built in Southwest or Central Utah. Due to the interconnected nature of its transmission system, this Project would benefit Rocky Mountain Power's system in a regional context. See Attachment 4 – Cedar/Dixie Area Conductor and Shieldwire Transmission Lines for Rocky Mountain Power's transmission lines in the Cedar/Dixie Area, which includes Beaver, Iron, and Washington counties.

The electrical needs for Millard County are primarily served by the 230kV line from Sigurd substation (near Richfield City, Utah) to Pavant substation (west of Holden, Utah). The capability and reliability of service to Millard County is dependent on the Sigurd substation. At Pavant, there are 46kV transmission lines that distribute north into the Delta area and south to the Fillmore area. The Sigurd to Red Butte No. 2 transmission line will improve service to Sigurd substation by providing the ability to import additional renewable and other types of resources by alleviating transmission constraints that currently exist there. Because this is the source for the electrical system serving Millard County, it will also improve service to that area as well.

The land acquisition, construction, and maintenance of the Project will contribute new tax revenue to the County. The implementation of the Project will also allow several of the General Plan Economic Development goals to be realized. Two specific strategies included in the Economic Development portion of the General Plan (Millard County 1998) will be bolstered by the Project, provided this General Plan Amendment and CUP for the Project are approved. These strategies are:

- “The Millard County Economic Development Office will make the support of its new and existing businesses its highest economic development priority.”
- “Target recruiting efforts on those businesses that complement the County’s economic objective to diversify the economy in a manner consistent with the County’s lifestyle and character.”

5.0 Conclusion

Based on the information presented in this application packet, Rocky Mountain Power respectfully requests the Millard County Planning Commission and County Commission approve this General Plan Amendment.

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