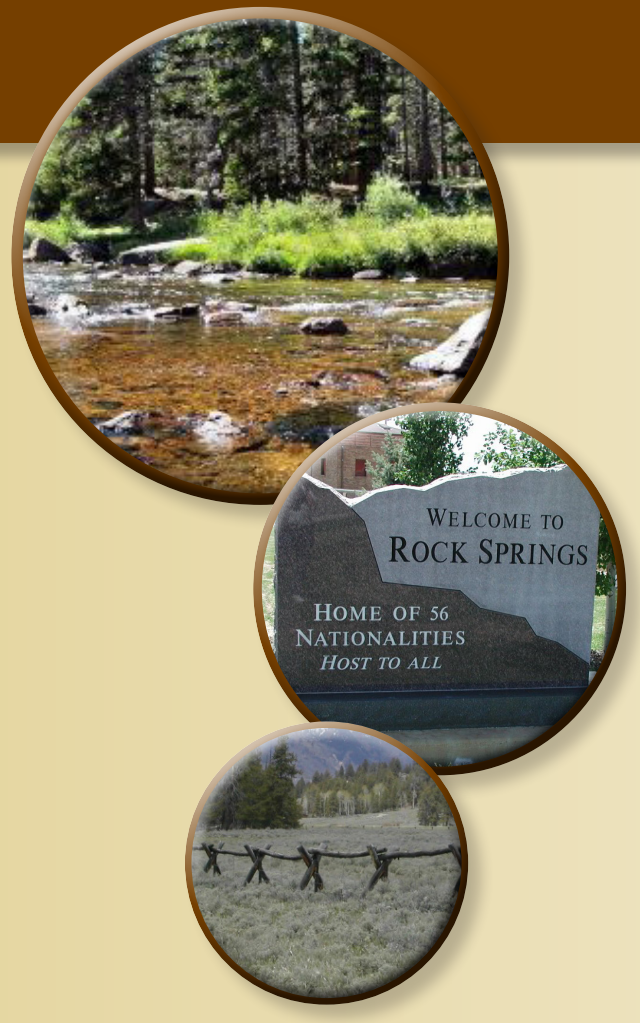
Wyoming Industrial Development Information and Siting Act



Section 109 Permit Application
Simplot Phosphates, LLC
Rock Springs Ammonia Facility Project

Submitted by
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, WY 82901

Prepared by
CH2MHILL®

March 2014

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Acronyms and Abbreviations

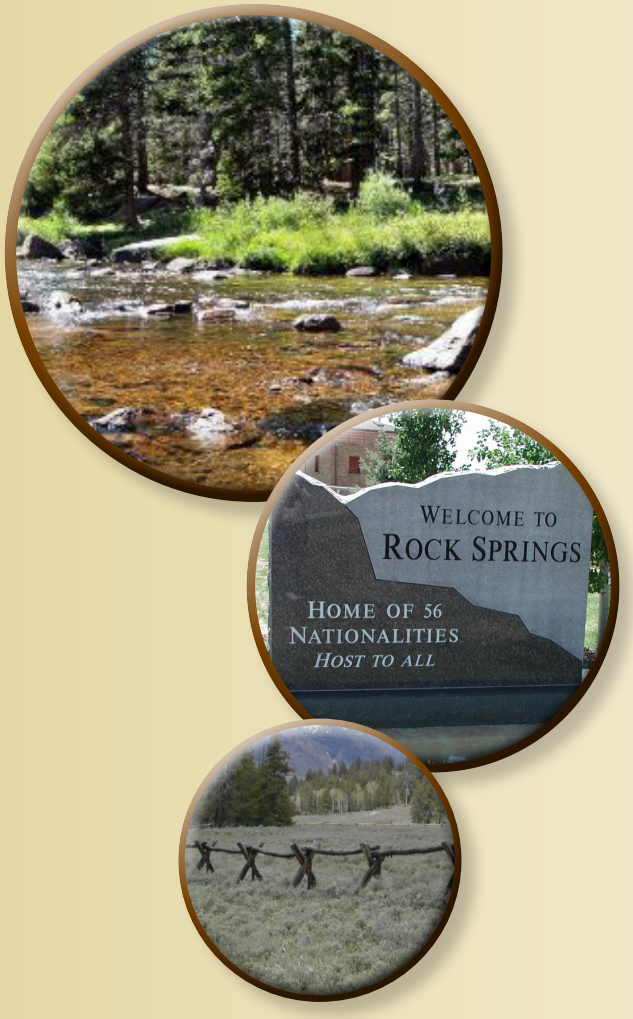
AASHTO	American Association of State Highway and Transportation Officials
ac-ft	acre-feet
ACHP	Advisory Council on Historic Preservation
ACS	American Community Survey
ADA	Americans with Disabilities Act
ANSI	American National Standards Institute
AOI	area of influence
AQD	Air Quality Division
ASME	American Society of Mechanical Engineers
ASU	air separation unit
AWWA	American Water Works Association
BACT	best available control technology
BEA	U.S. Bureau of Economic Analysis
BEC	basic emergency care
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BLS	Bureau of Labor Statistics
BMP	best management practice
BP	British Petroleum
BVEA	Bridger Valley Electric Association
CCSM	Chokecherry and Sierra Madre
CD-C	Continental Divide-Creston Natural Gas Development Project
CDP	Census-Designated Place
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2	carbon dioxide
CRHD	Castle Rock Hospital District
CWA	Clean Water Act
CWIP	Construction Work in Progress
CWSRF	Clean Water State Revolving Fund

dBA	decibel (A-weighted scale)
DFS	Department of Family Services
EHS	Environmental, Health, and Safety
EIS	environmental impact statement
EMS	emergency medical services
EMT	emergency medical technician
EPA	U.S. Environmental Protection Agency
EPC	Engineering, Procurement, and Construction
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FC4H	First Call for Help
FEIS	final environmental impact statement
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
FMV	fair market value
FTE	full-time equivalent
FY	fiscal year
GHG	greenhouse gas
GVWR	gross vehicle weight rating
H2	liquid hydrogen
hp	horsepower
I-80	Interstate 80
IMPLAN	Impact Analysis for Planning
I-O	input-output
ISA	Industrial Development Information and Siting Act
ISC	Industrial Siting Council
ISD	Industrial Siting Division
IUP	Intended Use Plan
kV	kilovolts
LOS	level of service
MBTA	Migratory Bird Treaty Act
MG	million gallons

mgd	million gallons per day
MHSC	Memorial Hospital of Sweetwater County
MIG, Inc.	Minnesota IMPLAN Group
mph	miles per hour
MSW	municipal solid waste
MVT	motor vehicle theft
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NEPA	National Environmental Policy Act
NFIRS	National Fire Incident Reporting System
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NHSFR	National High School Finals Rodeo
NIOSH	National Institute for Occupational Safety and Health
NO_2	nitrogen dioxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NTP	Notice to Proceed
O&M	operation and maintenance
OES	Occupational Employment Statistics
OSHA	Occupational Safety and Health Administration
P.L.	Public Law
P_2O_5	phosphorus pentoxide
PCE	personal consumption expenditure
PCP	primary care physician
PHRC	public health response coordinators
PM	particulate matter
proposed Project	Rock Springs Ammonia Plant
PSA	pressure swing adsorption
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
R&P	Research and Planning

REIS	Regional Economic Information System
REMI	Regional Economic Models, Inc.
RERT	Regional Emergency Response Team
RES	Renewable Energy Systems
RIMS	Regional Industrial Multiplier System II
RMP	Rocky Mountain Power
RN	registered nurse
ROW	right-of-way
RSFD	Rock Springs Fire Department
RV	recreational vehicle
SAM	social accounting matrix
SCSD1	Sweetwater County School District No. 1
SCSD2	Sweetwater County School District No. 2
SDWA	Safe Drinking Water Act
SHPO	State Historic Preservation Office
SHPO	State Historic Preservation Office
Simplot	Simplot Phosphates, LLC
SO_2	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasures
SW WRAP	Southwest Wyoming Recovery Access Programs
SWAP	State Wildlife Action Plan
SWPPP	Stormwater Pollution Prevention Plan
UI	unemployment insurance
UPRR	Union Pacific Railroad
US 191	U.S. Route 191
USC	United States Code
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
UV	ultraviolet
W.S.	Wyoming Statute
WAAQS	Wyoming Ambient Air Quality Standards
WBI	Wyoming Behavioral Institute
WCDA	Wyoming Community Development Authority

WDAI	Wyoming Department of Administration and Information
WDEQ	Wyoming Department of Environmental Quality
WDH	Wyoming Department of Health
WDOR	Wyoming Department of Revenue
WGFD	Wyoming Game & Fish Department
WHP	Wyoming Highway Patrol
WISDOM	Wyoming Interagency Spatial Database & Online Management
WQD	Water Quality Division
WTP	water treatment plant
WWDC	Wyoming Water Development Commission
WWTP	wastewater treatment plant
WY EAD	Wyoming Economic Analysis Division
WYDOT	Wyoming Department of Transportation
yd^3	cubic yards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Executive Summary

On March 17, 2014, Simplot Phosphates, LLC (Simplot), is submitting this Section 109 Permit Application pursuant to Wyoming Statute (W.S.) § 35-12-109 of the Industrial Development Information and Siting Act (ISA). The permit is for the construction and operation of the Ammonia Facility Project (proposed Project) at the Simplot Phosphates Rock Springs Fertilizer Complex near Rock Springs, Wyoming. Plans call for the proposed Project to be constructed in a single phase.

Simplot proposes to own, construct, and operate the proposed Project on private lands located in Sweetwater County. The proposed Project will include engineering, procurement, and construction of all equipment and facilities necessary for the 600-ton-per-day (tpd) ammonia production facility.

The application includes all the information required by W.S. 35-12-109, including all applicable ISA implementing rules and regulations. The data and analyses are included here in Sections 1 through 8 and corresponding appendices. In addition, the signature letter was submitted under separate cover to the Wyoming Department of Environmental Quality (WDEQ) Industrial Siting Division (ISD). Simplot requests issuance of a Section 109 Permit pursuant to W.S. § 35-12-109 that covers construction and operation of the proposed Project.

Industrial Siting Act Statute and Cost

A meeting was held with WDEQ's ISD on April 23, 2013, in which the ISD staff determined that the estimated capital cost of Project construction meets or exceeds the current statutory jurisdictional capital construction cost threshold of $193.8 million (W.S. § 35-12-102).

Location

The proposed Project site is located in Sweetwater County, Wyoming, approximately 5 miles south of Rock Springs. The proposed Project site will be accessed using State Highway 430 to reach the existing Rock Springs facility that lies adjacent to the highway.

Land Use

The proposed Project site is located in Sweetwater County, Wyoming, on lands entirely owned by Simplot. The parcel is currently the location of Simplot Phosphates, LLC Rock Springs facility, a plant that has been in operation since 1986. The surrounding landscape is a checkerboard of privately owned acreage and Bureau of Land Management (BLM) lands managed by the Rock Springs Field Offices, along with some parcels of state lands. Surrounding land use of private, state, and BLM-managed lands is primarily grazing.

Components

Linde Engineering North America will be constructing the 600-tpd ammonia facility. Equipment to be constructed will include storage tanks, process equipment, pumps, compressors, stationary equipment, rotating equipment, process piping and instrumentation, electric control centers, and control rooms and buildings. New connections to utilities will be required to support the proposed Project. The gas pipeline and transmission interconnect are non-jurisdictional components and are not subject to the ISA regulations. Questar is planning to install 2.5 miles of new 8-inch-diameter pipe for additional natural gas supply. A connection is also planned to Rocky Mountain Power's electrical supply. The 8-mile transmission line would extend from the existing Firehole Substation, south of Rock Springs, Wyoming, to the planned substation, located within the existing Simplot facility footprint.

Project Schedule

Permitting is under way for the proposed Project. The Prevention of Significant Deterioration (PSD) air construction modification permit application was submitted to WDEQ in July 2013. This ISA permit application has been submitted in March 2014 with a public hearing planned for June 2014. The preliminary engineering design is expected to be completed in May 2014. Mobilization and initial site preparation will begin after permits are in place in June/July 2014. A 25-month construction period is anticipated to commence in August 2014. Completion of mechanical construction is expected in August 2016 with operation anticipated by October 2016.

Construction and Operations Workforce

Construction Workforce

Site preparation and clearing would begin in June/July2014. Construction activities and the corresponding workforce will ramp up over the following several months. The construction workforce is estimated to peak at approximately 460 during the height of construction activities in the first quarter of 2016. The average construction workforce is estimated at 311 for the 25-month construction duration.

Operations Workforce

During the operations phase, an estimated additional workforce of approximately 27 full-time positions will be needed to fully staff the ammonia production facility.

Transportation

The proposed Project is expected to generate additional personnel and equipment traffic during both the construction and operations stages. The major roadway corridors within the study area are Interstate 80 (I-80), WY 430, U.S. Route 191 (US 191 or Elk Street), Dewar Drive (US 30), and South Side Belt Route (WY 376). I-80 will be the primary route to the site from the west while US 191 will provide site access from the north. The proposed Project is contained within the current Simplot Rock Springs Fertilizer Complex; therefore, the traffic will all be routed on the existing roadway network. A separate entrance and access road for the Project has already been constructed and permitted through the Wyoming Department of Transportation (WYDOT).

All deliveries will be trucked directly to the proposed Project site using semi-tractor trailers. It is anticipated that the truck deliveries to the site will be scheduled during the off-peak periods. Transportation routes associated with oversized loads will be finalized with WYDOT.

A study has been completed that analyzed the potential impacts of construction and operation traffic on local roadway systems. The study evaluated both worker traffic and construction delivery truck traffic. Impacts are expected to be minor with only slight changes in level of service during the peak construction period.

Water Use

The additional water supply needed for the ammonia facility operation, approximately 150 gallons per minute (gpm), will be within the currently permitted level for the Simplot Phosphates Rock Springs Fertilizer Complex.

Public Involvement

Through a number of informational meetings and presentations, Simplot representatives have actively sought out municipalities, counties, state agencies, and other stakeholders. The objective of this outreach has been to discuss potential environmental, social, and economic issues and identify mitigation recommendations and solutions to incorporate into the planning and design of the proposed Project. The proposed Project area of study, as identified by ISD staff during the Jurisdictional Meeting, determined the local governments where informational meetings were held.

Simplot staff has met with elected government officials in Sweetwater County and the cities of Rock Springs and Green River as part of the pre-application filing process to inform them of the proposed Project, receive comments and input, and address concerns.

A public open house meeting was held to provide the public the opportunity to discuss the proposed Project and any concerns. The meeting was held in Rock Springs on February 6, 2014.

Socioeconomic Impacts

A detailed analysis of social and economic impacts has been submitted as part of the ISA permit application to evaluate the benefits and impacts to the social and economic resources in the area of study and primary area of site influence. To measure potential impacts, the socioeconomic analysis compares the expected future conditions in the area of study with and without the proposed Project. The counties included in the area of study were determined in consultation with ISD staff, and were defined as Sweetwater and Uinta counties.

Both local communities and the state will realize benefits from the proposed Project. Wyoming will gain economic benefits including permanent job creation and tax revenues. Locally, the proposed Project may result in allocation and distribution of impact assistance payment funds, local spending on goods and services, additional local economic activity, and tax revenues.

Construction of the proposed Project is expected to place minimal demands on water, sewer, roads, electrical lines, or other local infrastructure. Therefore, construction and operation of the proposed Project is not expected to significantly affect the various public and nonpublic facilities and municipal services as a result of in-migration of workers for non-basic employment opportunities.

Environmental Resources

Simplot has reviewed the data and reports from independent consultants that indicate there would be no significant environmental impacts as a result of the proposed Project. All baseline resource information will be used to design Project components to avoid or minimize the potential for environmental and natural resource impacts. Because of the proposed Project's location within the present Simplot-owned parcel and the overall disturbed nature of the area, minimal environmental impacts are expected. It is anticipated operation of the proposed Project will be indiscernible from current facility operations.


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1.0 Purpose and Benefits

1.1 Purpose

Simplot Phosphates, LLC (Simplot) operates a fertilizer complex outside of Rock Springs Wyoming. The Rock Springs facility location is the northwest quarter of Section 15, Township 18 North, Range 104 West (NW ¼, Sec. 15, T.18N, R.104W), in Sweetwater County. This facility produces about 400,000 tons of phosphorus pentoxide (P_2O_5) annually, which is used to produce liquid super phosphoric acid and solid ammonium phosphate fertilizers. A fluorosilicic acid solution is produced as a byproduct of these operations. Simplot operates two sulfuric acid plants at the Rock Springs complex. While some of the sulfuric acid produced is exported or sold, most is used in the production of fertilizer products (primarily the P_2O_5 intermediate). The Rock Springs facility also has two natural gas-fired steam generators that produce steam for use in the fertilizer manufacturing process. In addition, the fertilizer complex includes various ancillary operations, including product storage and loadout operations, cooling towers, emergency generators, and other similar support operations.

One of the major raw materials consumed in the Rock Springs facility is anhydrous ammonia. Simplot currently purchases ammonia from an outside source and it is normally delivered in rail cars. Due to various issues, including escalating transportation costs, Simplot has determined that onsite ammonia production will provide for a more economical operation of the Rock Springs complex.

Simplot is proposing to construct an anhydrous ammonia production plant at its Rock Springs complex, the Rock Springs Ammonia Plant (the proposed Project). The proposed Project will be constructed on Simplot-owned property already developed adjacent to the existing fertilizer production operations. Maps and drawings in **Appendix A** show the proposed location of the proposed Project and layout relative to the existing facility.

1.2 Benefits

The proposed new ammonia production plant at the Rock Springs Fertilizer Complex will have the following benefits for Simplot:

- Reduced fertilizer production cost long-term;
- Reduced reliance on rail resulting in reliable raw material supply;
- Production of ammonia for other Simplot facilities; and
- Ability to increase fertilizer production to meet rising demand.

1.2.1 Regional Benefits

A typical concern with the location of new industries is that demand for services such as schools, roads, water supply, and waste disposal will realize a greater increase as a result of the population influx than the tax base that the new industry brings. While providing positive benefits to the local economy, the proposed Project will have minimal impacts on communities and their infrastructure. Local communities will be able to plan for and accommodate the incremental changes resulting from the in-migration of the temporary construction workforce. Development of the proposed Project carries significant economic benefits, including creation of new jobs, increased *ad valorem* taxes, and new dollars supporting the local economy.

Though the construction schedule spans 25 months, there is no extreme peak in workforce numbers that would put a strain on local resources. Likewise, the operations workforce will add 27 permanent jobs to the community. This is certainly a benefit to the community, but one that will not place unreasonable demands on water, sewer, roads, electrical lines, or other local infrastructure. In addition, there would be little measurable increase in non-basic employment, as these jobs are generated from ongoing employment of the existing base of construction workers and would be maintained through the continued employment of both local and non-local construction and operation workers. Therefore, construction and operation of the proposed Project is not expected to significantly affect the various public and non-public facilities and services.

The proposed Project will generate distinct and positive economic impacts during both construction and operation phases. Specifically, development and construction will result in a short-term surge in economic spending activity, while operation will produce long-term economic benefits to local communities. Both sources of regional economic stimuli will result in increased economic output, income, and employment, primarily in Sweetwater County.

Implementation of the proposed Project is expected to have beneficial effects on employment, earnings, and tax revenues. A major facet of the socioeconomic impact of large capital infrastructure projects is the total economic impact on specific local economic sectors and various positive effects on the local economy. The increases in employment or economic output often occur locally as a result of new business locations and community events, and such changes have positive implications for other parts of the local economy.

The proposed Project's economic benefits to both local communities and the state of Wyoming include the following:

- Additional *ad valorem* taxes
- Increased need for and expenditures on local goods and services
- Potential allocation and distribution of Impact Assistance Fund payments over the construction period
- Increased use of the local service industry
- Creation of jobs and stable employment
  - Peak monthly average of 460 temporary construction jobs in the first quarter of 2016
  - Average construction workforce of 311 jobs over 25 month period
  - Addition of 27 permanent full-time jobs.
- Increased sales and use tax revenues from temporary and permanent employees purchasing goods and services during construction and operation of the proposed Project
- Additional property taxes paid by new employees moving into the area
- State sales tax revenues from the plant's components

1.2.2 Regional Economy

The primary local economic impacts associated with the introduction of new business activity are increased employee compensation (wages and salaries exclusive of withholdings), purchases made by the new business, and taxes paid to local governments. The more local businesses are able to supply the needs of the employees and the new business, the greater the local economic impact of the new business.

Economic multipliers are often used to estimate the total economic impacts of a project or new business activity. The concept is that employee wages and business purchases have a "ripple effect" in an economy. The new business will purchase some of its required materials, supplies, and services in the local economy, and those local businesses in turn will hire some new employees, creating indirect effects. Employees at the new business or project will likewise spend a portion of their wages at local stores and businesses, creating induced effects. In this way, the economic impact of the new business or project spreads in the local economy. In order to estimate the total economic impacts, economic multipliers are used in conjunction with the direct employment, wages, business purchases, and taxes paid. The direct impacts are multiplied by the economic multiplier to yield an estimate of the overall economic impact of the new business or project. Multipliers are generated by economic input-output models that account for linkages between sectors in an economy.

In addition to providing a stimulus to the local economy in the form of expenditures on materials and supplies (referred to as procurements), the proposed Project would employ construction workers who are expected to spend a portion of their income (referred to as personal consumption expenditure [PCE]) in the study area, thus stimulating additional output in the various sectors that provide consumer goods and services. As a result of both Project procurements and PCE by both local and non-local construction workers, the proposed Project is expected to result in a temporary increase in employment and income within the study area during the construction period.

1.2.3 Direct and Secondary (Indirect and Induced) Effects

Based on knowledge of the local economy and local sources, it is possible to identify the elements that have a direct effect on the local economy:

- A direct effect arises from the first round of buying and selling. In general, this is the purchase of some inputs, such as fuel; the spending of income earned by workers; annual landowner revenues; and the income effects of tax changes. These direct effects can be used to identify additional rounds of buying and selling for other sectors and to identify the effect on rounds of spending by local households.
- An indirect effect is the increase in sales of other industry sectors in the county, which includes further round-by-round sales.
- An induced effect is the increased household income expenditures generated by the direct and indirect output effects.

The total economic effect is the sum of the direct, indirect, and induced effects.

During the construction phase of the proposed Project, it is anticipated that 22 percent of the onsite workforce would be composed of persons already residing in the local area. During the construction period of 25 months, the proposed Project would employ as many as 100 local workers. The average monthly local employment would number 70 jobs. The proposed Project would generate 27 permanent full-time jobs.

During construction, it is estimated that expenditures in the local economy for equipment, materials, and services would total $ 49 million.

1.2.4 Secondary Benefits

Construction of the proposed Project would result in secondary economic impacts (indirect and induced impacts) within the study area. These benefits would be temporary. Indirect and induced employment effects include the purchase of goods and services by firms involved with construction. Induced employment effects include construction workers spending their income within the study

area. In addition to these secondary employment impacts, there are indirect and induced income effects arising from construction.

Over the construction period and on an average annual basis, the proposed Project would contribute about 128 direct jobs to the region. The additional secondary jobs result from Project-related procurements in the study area, as well as local and non-local construction worker PCE. PCE would consist mostly of accommodations, food services, recreation, entertainment, and transportation. **Table 1-1** provides a summary of employment effects as a result of the proposed Project.

TABLE 1-1
Direct and Secondary Employment in the Local Economy

Year	Direct Jobs Created	Secondary Job Creation	Total Jobs Created
2014	90	47	137
2015	200	57	257
2016	94	22	116

Source: Developed by CH2M HILL (2014).

Following completion of the Project, it is anticipated that operation and maintenance (O&M) and operation of the newly installed equipment would require 27 new permanent, full-time positions. These positions would all be filled by local workers or new residents who permanently relocate to the area.

1.3 Local Benefits

The primary local benefits attributable to the proposed Project as described below include the following:

- Potential distribution of Impact Assistance Fund payments
- Increased local spending
- Increased local professional job opportunities
- Land lease revenue payments
- Tax effects

1.3.1 Distribution of Impact Assistance Funds

The proposed costs of the proposed Project were reviewed by the Industrial Siting Division (ISD) and determined to exceed the statutory threshold construction cost amount of $193.8 million. Therefore, the proposed Project is subject to Industrial Development Information and Siting Act (ISA) review, whereby local governments are eligible to receive Impact Assistance Fund payments.

Impact Assistance Fund Calculations

The amount of Impact Assistance Fund payments is based on the growth of sales and use taxes during the previous 12-month period. The calculation uses an average of all the sales and use taxes in the Project county for the preceding 12-month period and is based on the growth of sales and use taxes after construction is initiated. The Wyoming Department of Revenue (WDOR) is responsible for calculating the prior 12 months of sales and use taxes to establish a baseline total. The corresponding construction month's sales and use tax is then compared to the monthly baseline total to determine that month's Impact Assistance Fund payment. The difference, the growth in sales and use taxes during the construction month, is the amount to be distributed in the Impact Assistance Fund payment. It is important to note that only sales and use taxes are used for the

calculation. Lastly, the actual Impact Assistance Fund payments are issued by the WDOR and come from Wyoming's General Fund, rather than from the Project proponent.

Appendix B provides an estimate of the amount of Impact Assistance Fund payments that could be expected as a result of the Project expenditures and increased sale and use taxes. A review of Appendix B shows that the monthly average of Impact Assistance Fund payments is estimated to be $383,502.

1.3.2 Increased Local Spending

Spending on construction and operation of the proposed Project will positively affect the local economy directly, through the purchase of local goods and services, and indirectly as those purchases generate purchases of intermediate goods and services from other related sectors of the economy. In addition, direct and indirect increases in employment and income will enhance overall local purchasing power, thereby inducing further spending on goods and services. This cycle is expected to continue until the dollars spent eventually leak out of the local economy as a result of taxes, savings, or purchases of non-locally produced goods and services.

1.3.3 Increased Local Economic Activity

The proposed Project will be a moderate source of new local professional job opportunities in the region. Specifically, permanent O&M positions will provide new local wage jobs (i.e., jobs above entry level and providing industry-scale income), most requiring specialized backgrounds such as process engineers and technicians. These positions may also add to the local economy through the employee purchase of residential homes, thereby increasing the local tax base.

1.3.4 Tax Effects

Tax effects are an important consideration and a significant benefit of the proposed Project. The biggest tax benefit and source of new tax revenue would be associated with the *ad valorem* taxes collected over life of the proposed Project. In conjunction with associated ancillary activities, state and local tax revenues also would be generated during the construction and life of operation of the proposed facility. Although some of these tax revenues will be distributed on a local level, the state controls such distribution.

Ad Valorem Taxes

As shown in **Table 1-2,** for the period 2015 through 2019, the estimated total *ad valorem* tax revenue generated in the first 5 years would be approximately $7.69 million.

TABLE 1-2
Estimate of Ad Valorem Taxes Paid Per Year

2015	2016	2017	2018	2019	5-Year Total
$120,000	$670,000	$1,280,000	$2,840,000	$2,780,000	$7,690,000

Source: Simplot, 2014.

Sales, Use, and Lodging Taxes

Local tax revenues would also accrue from the sale of goods and services. These purchases would be mostly for local procurements to support constructions, as well as meals, recreation, entertainment, gasoline and automotive service, and lodging. It is estimated that local tax revenues totaling $11 million for the period 2014 through 2016 would accrue within the region with most of the revenues going to Sweetwater County.

Lodging tax revenues could accrue to the counties in which Project-related construction workers temporarily reside, and estimates are included in the local tax revenues reported above. However, it should be noted that: 1) the actual distribution of construction workers is not known at this time; and 2) the durations of their stays are not known and lodging taxes are levied only on sleeping accommodations for guests staying less than 30 days.


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2.0 Applicant and Project Description

The following sections provide information relevant to Wyoming Statute (W.S.) 35-12-109 and detailed Project-specific information relating to the intention of Simplot to construct and operate an ammonia plant near Rock Springs.

2.1 Applicant Information

Applicant:

Martin Hunt
General Manager, Rock Springs Fertilizer Complex
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, Wyoming 82901

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

Darin Howe
Environmental Manager
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, Wyoming 82901
(307) 382-1519
Darin.Howe@Simplot.com

The following manager has been designated by Simplot to be responsible for constructing the proposed Project:

Mike Prevedel
Project Manager
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, Wyoming 82901
(307) 382-1947
Mike.Prevedel@Simplot.com

Simplot Phosphates, LLC produces high-quality phosphate fertilizer, while maintaining its status as a low-cost leader in the fertilizer industry. Phosphate ore is mined 12 miles north of Vernal, Utah, where it is crushed, washed, finely ground, and concentrated. The ore is then mixed with water to form a slurry, and then shipped 96 miles through a pressurized pipeline to the manufacturing plant 5 miles south of Rock Springs.

With this ore, two other key raw ingredients are used in the production of fertilizer: sulfur (a byproduct from Wyoming oil fields) and ammonia (made from natural gas). The ammonia is delivered to the Rock Springs manufacturing plant by rail. This offsite production and delivery of ammonia is the component that would be replaced by the proposed onsite ammonia plant.

2.2 Point of Delivery – Goods and Services

Construction and operation of the proposed Project will result in the purchase of goods and services, both for the Project itself and for the needs of the associated construction and operations workforce. Goods and services procured for construction activities will be obtained from various local, regional, and national vendors. Simplot anticipates that all of the proposed Project's components will be trucked to the Project site or delivered by the existing rail. Sweetwater County will be the primary point of delivery for components associated with the proposed Project.

2.3 Site Selection

The proposed Project site, shown in **Appendix A**, **Figure A-2**, was selected for the following reasons: 1) locating the ammonia plant adjacent to the fertilizer plant minimizes costs and resources expended to supply raw materials to the fertilizer plant; 2) the new facilities will be installed within an existing disturbed industrial area, thereby minimizing resource impacts; and 3) Simplot is the property owner, so no additional landowners will be affected by the proposed Project.

2.4 Nature and Location of the Facility

The proposed Project site is located in Sweetwater County, Wyoming, approximately 5 miles south of Rock Springs, as shown in **Appendix A**, **Figure A-1**. The proposed Project site will be accessed using State Highway 430 to reach the existing Rock Springs facility that lies adjacent to the highway. The nature of the facility is to produce ammonia to be used as a raw material for the production of fertilizer products.

Local topography is nearly level at the proposed Project site with an elevation of approximately 6,800 feet above mean sea level. The proposed Project area itself is approximately 20 acres located adjacent to an industrial complex, the Rock Springs fertilizer plant. The area surrounding the facility contains Wyoming big sagebrush and short to mid-grass prairie communities.

2.5 Preliminary Site Plan

Simplot has completed a preliminary site plan layout for the proposed Project that minimizes environmental impacts to the most detailed extent practical. See **Appendix A**, **Figure A-3** for the preliminary site plan.

2.6 Land Ownership

The proposed Project is located on private lands owned by Simplot. **Table 2-1** provides the legal description of the Project's location.

TABLE 2-1
Site Legal Description

Section	Location	Township	Range
15	N ½	18N	104W

2.7 Project Phase Descriptions and Future Modifications

Simplot requests issuance of a Section 109 Permit, pursuant to the Wyoming ISA, for the Rock Springs Ammonia Plant. The ammonia plant is expected to be in service for 25 years. Regular maintenance is expected, but no additional phases or expansions are envisioned at this time.

It should be noted that Simplot is currently in construction of a project at the existing Rock Springs fertilizer plant to increase the annual production of Phosphoric Acid (P_2O_5) from a baseline level of 400,000 tons/year to a design capacity of 440,000 tons/year. Construction of the expansion is expected to be completed in July 2014. The expansion project includes the 1) addition of a third P_2O_5/gypsum filter table, 2) replacement/rebuild of one of the existing filter tables, 3) addition of new phosphate rock storage tank, 4) addition of new phosphoric acid clarifier and storage tank, 5) addition of new vacuum system, and 6) the addition of a new filter feed tank. This project was determined not to be jurisdictional under the Wyoming ISA. It is possible that future projects to upgrade, modify, or expand the Rock Springs facility could develop. Each project will be assessed for the applicability of state, local, and federal permits, including the Wyoming ISA.

2.8 Project Description

This description is intended to provide a general overview of the Ammonia Project as it is currently conceived. Engineering design work for the project is ongoing so certain features could change as this work is completed.

Simplot plans to construct a new anhydrous ammonia plant at its Rock Springs fertilizer complex. The ammonia plant will have a nominal production capacity of 600 tons per day. It will utilize pipeline-quality natural gas as its primary fuel and raw material.

Figure A-4 (in **Appendix A**) is a block flow diagram of the Rock Springs ammonia plant. Natural gas is used as feedstock for hydrogen production and as supplementary fuel for the Ammonia Plant Reformer. The first step in the process is feed desulfurization which entails removal of trace sulfur compounds from the natural gas feed stock. The natural gas feed stock is mixed with a small amount of hydrogen, compressed, and then heated with waste heat from the reformer flue gas. This stream is routed to the desulfurization reactors. The desulfurization reactors contain a catalyst which converts trace sulfur compounds in the natural gas into H_2S, hydrogenates any unsaturated hydrocarbons that may be present, and simultaneously removes the H_2S. Two desulfurization reactors are arranged in series. As soon as any H_2S is detected downstream of the first reactor, that reactor is isolated and refilled with fresh catalyst while the plant remains on-stream using only the second reactor. Once the catalyst is replaced in the first reactor, it is returned to service and now operates as the second reactor in series. This catalyst replacement process is repeated as necessary.

Downstream of the desulfurization reactors, steam is added to the preheated, desulfurized natural gas feed stock to obtain the correct steam-to-feed ratio required for the reforming reactions. This mixture of natural gas feed and steam is further heated and then flows through the reformer catalyst in the Ammonia Plant Reformer. As it passes through the reforming catalyst, the feed methane/steam mixture converts to hydrogen and carbon oxides according to the following reactions:

(1) $CH_4 + H_2O \leftrightarrow 3H_2 + CO$

(2) $CO + H_2O \leftrightarrow CO_2 + H_2$

After passing through the reforming catalyst, the reformed gas composition approaches equilibrium at about 1,600°F. Corresponding to this temperature, most of the methane reacts to form carbon monoxide (CO) and liquid hydrogen (H_2).

Because the overall heat balance for the reformer is endothermic, the required energy has to be supplied externally. This energy is supplied by burning a mixture of pipeline natural gas and pressure swing adsorption (PSA) purge gas in the Ammonia Plant Reformer's furnace.

The reformed gas exiting the reforming catalyst is cooled to recover heat and to attain the proper temperature before flowing to the Isothermal Shift Reactor. At the lower reformed gas temperature, and in the presence of a different catalyst in the Isothermal Shift Reactor, the equilibrium of Reaction 2 is shifted such that nearly all of the CO is converted into carbon dioxide (CO_2) and the hydrogen concentration is increased. The temperature of the Isothermal Shift Reactor catalyst is controlled by a heat exchanger that cools the catalyst and results in the production of process steam. The converted gas leaving the Isothermal Shift Reactor is further cooled in a series of heat-recovery heat exchangers before being routed to the PSA unit.

After separation of process condensates, which are fed to the Deaerator for recycle to the process, the hydrogen-rich process gas enters the PSA Unit. The pressure swing adsorption process is based on physical adsorption, where highly volatile compounds with low polarity like hydrogen are practically non-adsorbable compared to molecules such as CO_2, CO, N_2, and other hydrocarbons. As a result, impurities in the hydrogen-rich gas stream from the Isothermal Shift Reactor can be selectively adsorbed to further increase the hydrogen content of this gas stream.

The pressure swing adsorption process operates between two pressure levels: 1) Adsorption of impurities is carried out at high pressure to increase the partial pressure and, therefore, the loading of the impurities on the adsorbent material; and 2) Desorption of impurities (i.e., regeneration of the adsorbent) takes place at low pressure to reduce the residual loading of the impurities.

The PSA unit produces two gas streams. The first is a high-purity hydrogen stream that is routed to the ammonia synthesis reactor. The second is a purge gas stream containing the separated impurities and some hydrogen, which is routed to the Ammonia Plant Reformer furnace where it is used as fuel in to energize the reforming reactions.

The second reactant needed to produce ammonia is pure nitrogen. This nitrogen stream is derived from an electrically powered air separation unit (ASU) which has no direct emissions.

Hydrogen from the PSA Unit and nitrogen from the ASU are mixed at about 400 pounds per square inch absolute (psia) at a molar ratio of 3-to-1. This nitrogen-hydrogen mixture is further compressed and preheated before being routed to the ammonia synthesis reactor. In the synthesis reactor, in the presence of a catalyst, the formation of ammonia from gaseous hydrogen and nitrogen results from the following exothermic reaction:

$$(3) \qquad N_2 + 3H_2 \leftrightarrow 2NH_3$$

The product gas from the ammonia synthesis reactor has an expected ammonia content of about 21 percent. This gas is subsequently routed to a heat exchanger to recover the heat of reaction and to produce steam. Further energy is recovered from the converted gas by preheating boiler feed water and synthesis reactor's feed gas.

Ammonia product is condensed in several steps such that condensed ammonia product is separated from unreacted H_2 and N_2 (i.e., recycle gas). The recycle gas is reheated, compressed, and then

mixed with the fresh feed and then rerouted to the ammonia synthesis reactor. The ammonia product is pressurized and then sent to storage for use onsite or shipment offsite.

2.9 Additional Project Features

New connections to utilities will be required to support the proposed Project. Though not subject to ISA review, those utilities are presented to provide a complete Project description.

2.9.1 Natural Gas Supply

Questar currently supplies natural gas to Simplot Phosphates Fertilizer Complex. However, the current supply does not provide the necessary quantity or pressure for the addition of the proposed ammonia plant. The ammonia plant will utilize natural gas both as a fuel and as a raw feedstock for the ammonia manufacturing process. Questar is planning to install 2.5 miles of new 8-inch-diameter pipe for additional natural gas supply.

Natural gas pipeline construction is anticipated to begin in 2015 when all permits and right-of-way (ROW) have been secured and Notices to Proceed (NTPs) have been issued by the Bureau of Land Management (BLM) and Federal Energy Regulatory Commission (FERC). Construction is expected to commence in summer of 2015 and take approximately 8 weeks to complete. Questar will conduct all activities related to the construction and operation of the new pipeline. Questar anticipates that approximately 40 construction personnel will be required to construct the project, as shown in **Table 2-2**. It is expected that the majority of the personnel required would be from the local area. No incremental permanent employees will be needed for operations and maintenance of the natural gas pipeline.

TABLE 2-2
Estimated Workforce for Natural Gas Pipeline Construction

Activity	Workforce
Surveying and Staking	
Clearing and Topsoil Salvage	
Grading and Trenching	
Pipe Stringing, Bending, Welding and Coating	
Backfilling and Erosion Control	
Hydrostatic Testing	
Cleanup and Reclamation	
Total	**40**

Source: Questar, 2013.

2.9.2 Electrical Supply

A connection is planned to Rocky Mountain Power's electrical supply. The 8-mile transmission line would extend from the existing Firehole Substation, located in Section 17 of Township 18 North, Range 105 West, south of Rock Springs, Wyoming, to the planned substation, located within the existing Simplot facility footprint located in Section 15 of Township 18 North, Range 104 West. The new transmission line would be a single-circuit 230-kilovolt (kV) line typically utilizing wood H-frame structures. The structures would generally be 75 to 105 feet tall (above ground line) and placed approximately 700 to 900 feet apart, or about six structures per mile.

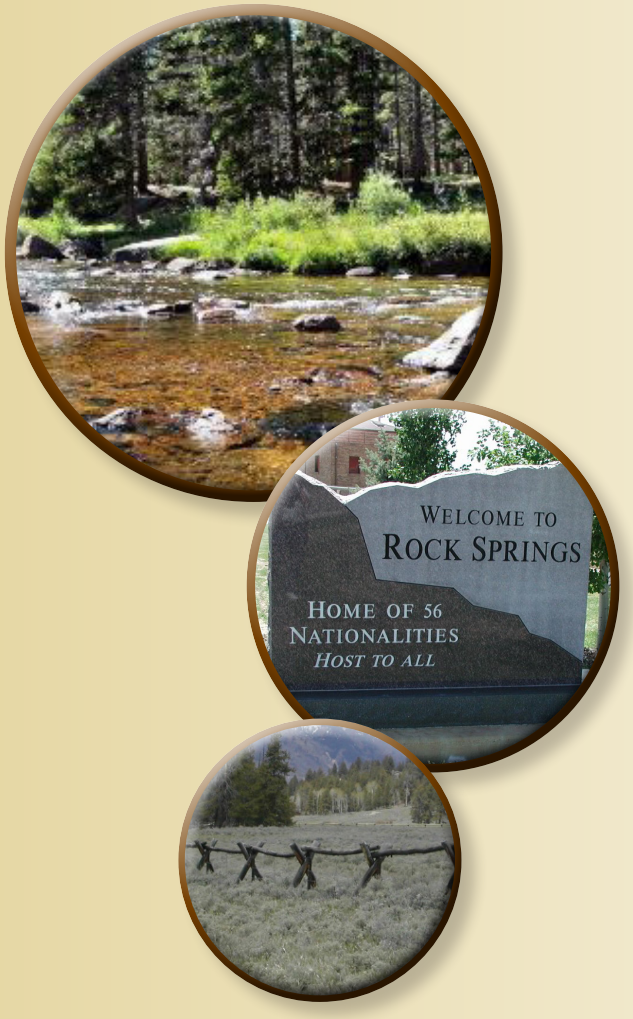
The ROW being requested for the proposed transmission line is 150 feet in width. Rocky Mountain Power hopes to have a ROW permit for construction of the new system in the June to September 2014 timeframe with construction beginning after that, working around anticipated wildlife timing stipulations. Construction is expected to take 6 to 8 months.

Transmission line construction will employ approximately 51 construction personnel as shown in **Table 2-3**. In many instances, the same workers would be conducting the various construction activities; therefore, the number of workers presented in the table is not additive. It is expected that the majority of the personnel required would be from the local area. No incremental permanent employees will be needed for operation and maintenance of the transmission line.

TABLE 2-3
Estimated Workforce for Transmission Line Construction

Activity	Workforce
Survey	2
Road Construction	2 - 4
Pole Excavation	3
Pole/Material Haul	4 – 6
Structure Assembly	8
Structure Erection	6 - 8
Wire Installation	12 - 14
Cleanup	4
Road Rehabilitation	4
Total	**51**

Source: Rocky Mountain Power, 2013.


WELCOME TO
ROCK SPRINGS
HOME OF 56
NATIONALITIES
HOST TO ALL

3.0 Construction and Operations

This section provides information on the construction, operations, and decommissioning of the proposed Project. In addition to presenting general construction and operations procedures, schedules, and workforce estimates, this section also provides details on the required permits, health and safety issues, and site decommissioning.

3.1 Commencement and Duration of Construction

Contingent upon obtaining approval from the Industrial Siting Council (ISC) and securing all other required permits, formal commencement of construction of the proposed Project is planned for third quarter 2014. The construction schedule will last approximately 25 months.

3.2 Construction Schedule

Construction activities are planned to commence in the third quarter of 2014. The primary engineering, procurement and construction activities include:

- Process Design and Engineering
- Permitting
- Procurement and Fabrication
- Mobilization and Erection of Temporary Facilities
- Construction
- Commissioning
- Operation

A detailed description of the planned construction activities is in Section 3.6. The planned project construction schedule is shown in **Table 3-1**. Construction is expected to be completed by August 2016 with commissioning activities and operation to follow.

TABLE 3-1
Project Construction Schedule

Task	Anticipated Completion Date
Received Proposals from Bidders	March 2013
Jurisdictional Meeting with WDEQ-ISD	April 2013
Submitted Air Permit Application to WDEQ-AQD	July 2013
Initiated Preliminary Engineering	September 2013
Submit ISA Permit Application	March 2014
Complete Preliminary Engineering Design	May 2014
Environmental Permits In Place for Construction	June 2014
Commence Site Prep/Earthwork	June 2014
Commence Plant Construction	August 2014
Plant Mechanically Complete	August 2016
Commissioning, Start-Up, Performance Testing Complete	October 2016

Source: Simplot and CH2M HILL, 2014.

3.3 Construction Workforce Estimate

The estimated number of construction workers by month is shown in **Figure 3-1**. Simplot anticipates that the onsite construction workforce will vary from a low of 48 in August 2014 during initial construction activities to a high of 460 during the peak of construction activities in March 2016. Over the 25 month construction period, there would be an average of approximately 311 workers onsite. **Figure 3-2** presents the construction workforce by month and craft graphically.

3.3.1 Local In-State Contractor Hiring

Simplot (and its EPC Contractor, Linde Engineering North America) will solicit local contractors for screening and sourcing by the general contractor and requires its general contractor to use local workers to the extent practicable. Through its long-standing operation and ongoing construction activities, Simplot is aware of the local workforce's capability. At the time equipment/construction packages are issued for bids, Simplot will engage local suppliers and contractors to supply quotes if they are deemed qualified and financially and technically competitive. Simplot will advise all contractors, during pre-bid meetings, that there are local suppliers, representatives, vendors as well as labor in the local community. Additionally, employment opportunities for local workforce during both construction and operations will be posted in the local Wyoming Department of Workforce Services, Employment Services offices in Rock Springs and Green River. Though there may be economic advantages to using local workers, the technical proficiency required to install and commission the various Project components is the prime factor in selecting a contractor.

3.3.2 Local Workforce

Based on past project experience, it is assumed that the proportion of local workers filling job openings will vary by trade and skill level. Overall, Simplot estimates 22 percent of local construction workforce may be employed by the proposed Project for the following trades: painters, insulators, boilermakers, electricians, millwrights, pipefitters, truck drivers, ironworkers, carpenters, operators, laborers, and indirect labor staff to include, supervisors, engineers, and general office support staff.

Based on these workforce assumptions, during the construction period of 25 months, the proposed Project would employ as many as 100 local workers and the average monthly local employment over the construction period would number 70 jobs. **Figure 3-3** presents an estimate of the local construction workforce that may be potentially employed at the proposed Project.

3.3.3 Non-Local Workforce

Based on the type of labor required to complete construction contracts on facility, the majority of the resulting construction workers are likely to be non-local and enter the region. **Figure 3-4** provides an estimate of the peak non-local construction workforce.

FIGURE 3-1
Construction Workforce by Month

Construction Workforce Breakdown by Month

		2014					2015												2016							
Occupational Code	**Skill**	**August**	**September**	**October**	**November**	**December**	**January**	**February**	**March**	**April**	**May**	**June**	**July**	**August**	**September**	**October**	**November**	**December**	**January**	**February**	**March**	**April**	**May**	**June**	**July**	**August**
		Aug-14	**Sep-14**	**Oct-14**	**Nov-14**	**Dec-14**	**Jan-15**	**Feb-15**	**Mar-15**	**Apr-15**	**May-15**	**Jun-15**	**Jul-15**	**Aug-15**	**Sep-15**	**Oct-15**	**Nov-15**	**Dec-15**	**Jan-16**	**Feb-16**	**Mar-16**	**Apr-16**	**May-16**	**Jun-16**	**Jul-16**	**Aug-16**
47-2061	Laborers	10	24	32	50	64	64	64	64	64	32	20	20	20	20	20	20	20	20	20	20	20	26	26	18	18
47-2073	Operators	4	8	10	16	16	16	16	20	16	10	8	16	20	24	24	24	28	28	24	22	20	18	18	4	4
47-2031	Carpenters	7	20	26	56	70	70	70	70	70	35	24	24	28	28	28	28	28	28	28	28	28	24	16	8	0
47-2221	Ironworkers		6	10	20	28	28	28	50	68	68	12	24	24	30	30	30	30	30	30	30	24	20	6	0	0
53-3032	Truck Drivers	1	4	6	10	10	10	10	10	10	6	6	8	8	8	8	8	8	8	8	10	10	8	4	2	2
49-9044	Millwrights											4	8	8	8	8	8	24	24	24	24	24	24	12	4	0
47-2111	Electricians	8	8	8	16	24	24	24	24	24	12	4	4	4	4	4	10	16	16	32	48	70	80	72	12	0
47-2152	Pipe Fitters	4	8	8	24	40	40	40	40	40	12	40	60	80	100	100	100	100	100	100	100	80	60	40	6	0
47-2011	Boilermakers/ Mech Equip.								12	24	24	36	60	80	80	80	80	70	60	50	50	50	50	12	4	0
47-2130	Insulators																10	24	24	24	24	24	24	24	12	0
47-2140	Painters													2	4	4	6	4	4	4	4	4	6	6	2	0
47-1011	Craft Supervision	4	10	15	18	28	28	28	34	34	20	22	28	32	32	32	34	34	34	36	36	36	36	36	12	2
	Indirect	10	20	22	30	30	30	30	36	36	36	50	52	58	58	58	60	60	62	64	64	64	64	64	50	12
	Total workforce	**48**	**108**	**137**	**240**	**310**	**310**	**310**	**366**	**386**	**255**	**228**	**304**	**364**	**396**	**396**	**418**	**446**	**438**	**444**	**460**	**454**	**440**	**336**	**134**	**38**
	Non-local workforce	**8**	**58**	**73**	**170**	**216**	**216**	**216**	**266**	**290**	**195**	**168**	**244**	**296**	**326**	**326**	**346**	**370**	**362**	**368**	**384**	**378**	**364**	**252**	**114**	**18**
	Local workforce	**40**	**50**	**64**	**70**	**94**	**94**	**94**	**100**	**96**	**60**	**60**	**60**	**68**	**70**	**70**	**72**	**76**	**76**	**76**	**76**	**76**	**76**	**84**	**20**	**20**
	% Local Workforce	**83%**	**46%**	**47%**	**29%**	**30%**	**30%**	**30%**	**27%**	**25%**	**24%**	**26%**	**20%**	**19%**	**18%**	**18%**	**17%**	**17%**	**17%**	**17%**	**17%**	**17%**	**17%**	**25%**	**15%**	**53%**

Notes: **Indirect staff consists of LENA, contractor's staff, construction managers (11-9020); Engineers (17-2000), and other indirects.**

Source: **The Workforce data and schedule were provided by the Applicant's contractor, Linde, in January, 2014.**

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FIGURE 3-2
Construction Phase Workforce by Month and Trade Type

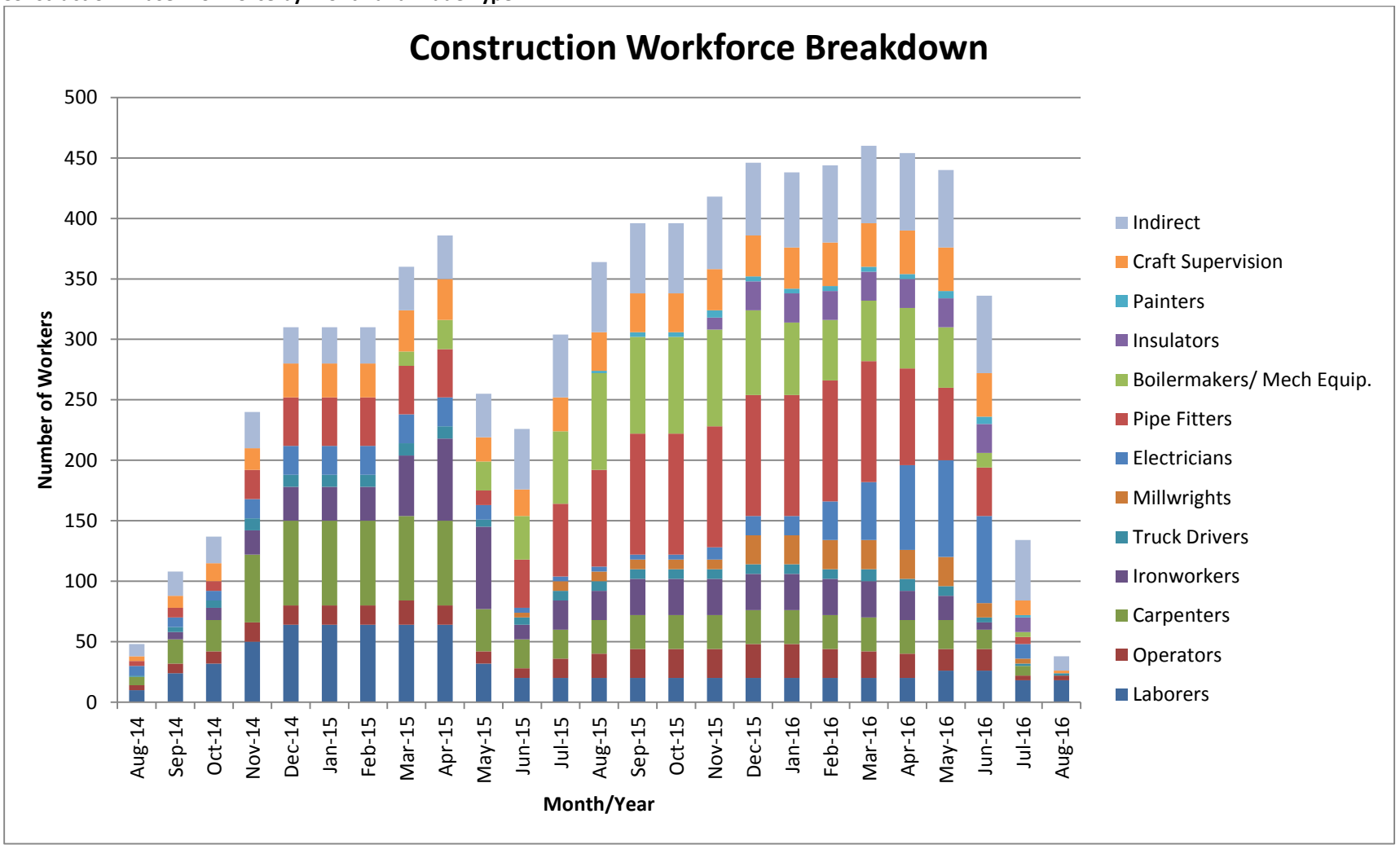


FIGURE 3-3
Local Construction Workforce

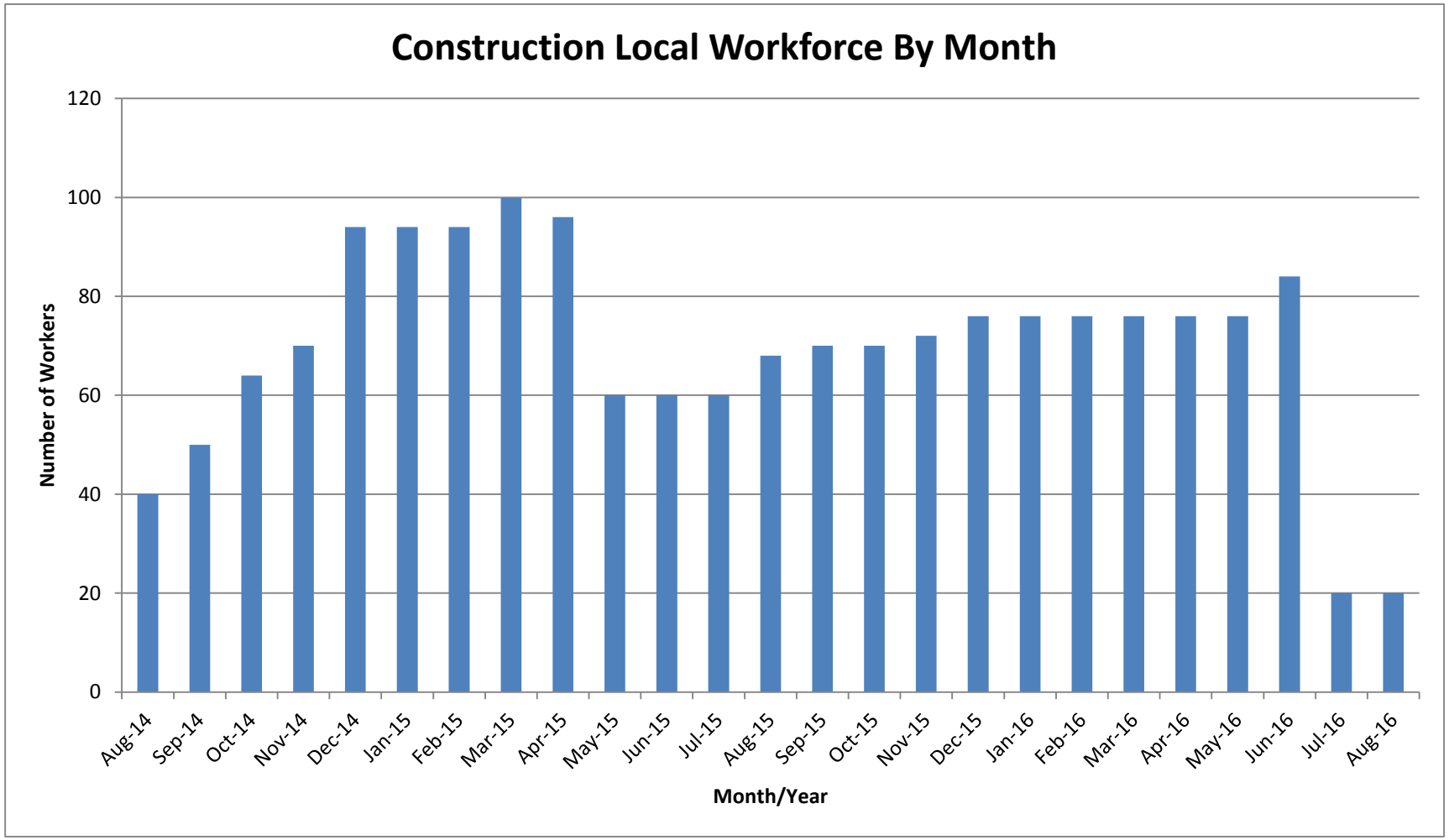
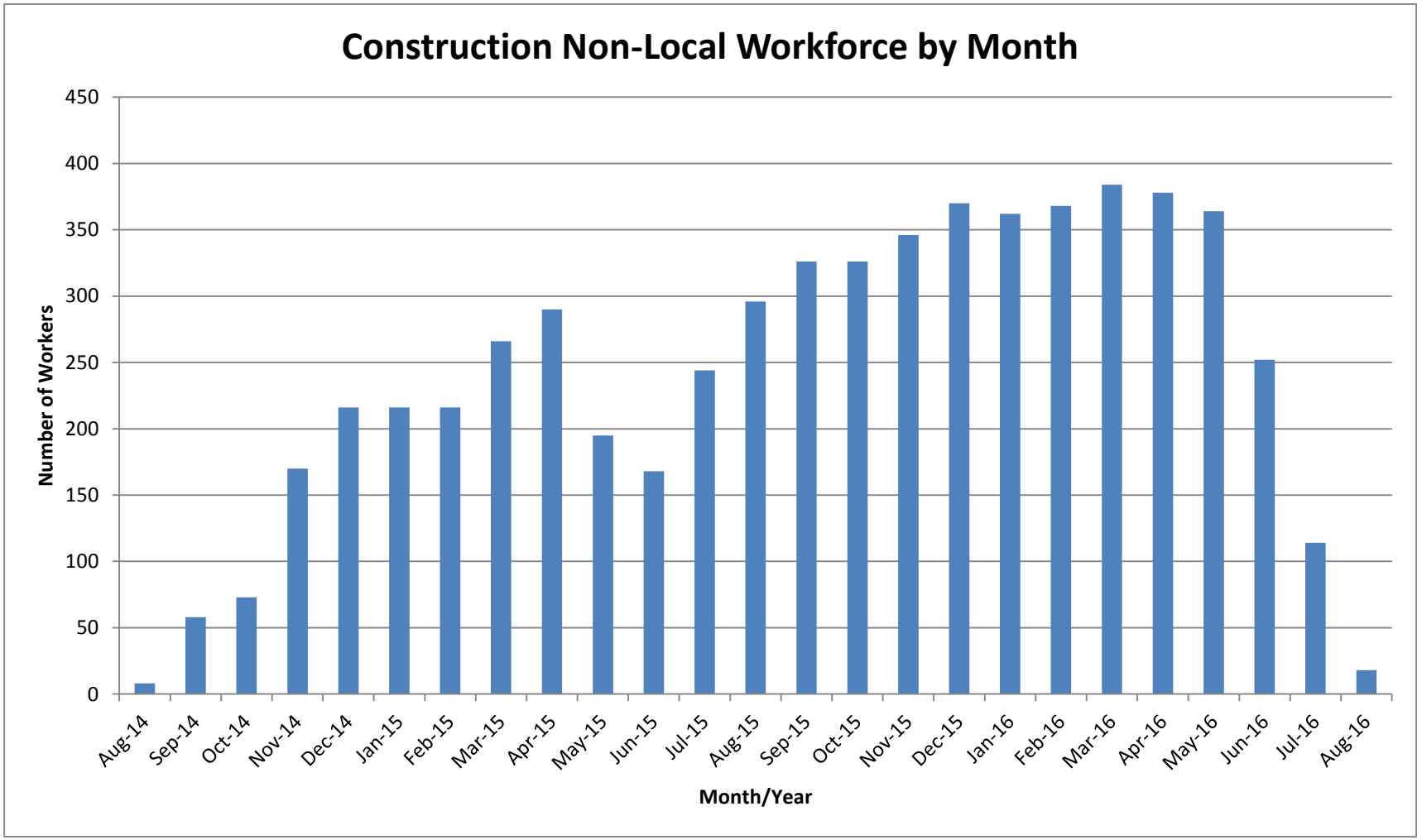


FIGURE 3-4
Non-Local Construction Workforce



3.4 Operations Workforce Employment

A long-term benefit of the proposed Project comes from the permanent employees who will operate and maintain the facility. Upon completion, operation of the proposed Project will require approximately 27 full-time employees. The full-time job classifications and estimated number of personnel are displayed in **Table 3-2**.

It is anticipated that the proposed Project will have an initial operations workforce in place in mid-2016. Employees will be full-time over the calendar year for the life of the proposed Project.

TABLE 3-2
Estimated Operations Workforce Summary by Job Classification

Job Classification	Number of Personnel
Operations	12
Maintenance	5
Maintenance Supervisor	1
Operations Supervisor	4
Plant Superintendant	1
Training Coordinator	1
Safety/PSM Specialist	1
Process Control IT Tech	1
Process Engineer	1
Total	**27**

Source: Simplot, 2014.

3.5 Permits Required for Construction

It is expected that all permits required for construction will be obtained prior to the initiation of construction activities in third quarter 2014. The anticipated permits required for construction are listed by regulatory agency in **Table 3-3**.

TABLE 3-3
List of Potential Permits for Construction and Operation of Project

Agency	Permit/Decision	Status	Anticipated Permit Date
Federal			
U.S. Environmental Protection Agency (EPA)	Spill Prevention Control and Countermeasure (SPCC) Plan – for operations	Update existing plan for operating facility. Amendment necessary to address new facilities and processes.	
Federal Aviation Administration (FAA)	Form 7460-1 Obstruction Evaluation – clearance for temporary crane over 200 feet tall		
State of Wyoming			
Wyoming Department of Environmental Quality (WDEQ)	Wyoming Industrial Development Information and Siting Act / Industrial Siting Permit	Submitted March 17, 2014	July 2014

TABLE 3-3
List of Potential Permits for Construction and Operation of Project

Agency	Permit/Decision	Status	Anticipated Permit Date
	PSD Modification Air Construction Permit (GHG and Criteria Air Pollutants)	Application submitted July 2013.	July 2014
	Wyoming Pollutant Discharge Elimination System (WYPDES)—Large Construction General Permit (WYR10-0000)	Submit application plus Stormwater Pollution Prevention Plan (SWPPP) 30 days prior to construction	April 2014
Wyoming Department of Transportation (WYDOT)	Permit for Oversized / Overweight Loads	Permit will be obtained by the trucking contractors prior to delivery.	
Local			
Sweetwater County – Planning and Zoning	Construction Permit	The applicant is in discussion with the Planning and Zoning Department about applicability of permit requirement.	July 2014

Source: Simplot and CH2M HILL, 2014.

3.6 Construction Procedures

The general construction contractor and subcontractors would prepare the construction site and complete site civil work, including site grading, excavations, foundations, tank and equipment installation, steel work, and building construction. **Table 3-4** details the general equipment that is likely to be used for the proposed Project.

TABLE 3-4
List of General Construction Equipment

Equipment	Construction Use
Bulldozers	Road and pad construction
Motor Graders	Road and pad construction
Gravel Truck Haulers / Bottom Dump	Hauling and placement of road aggregate
Water Trucks	Compaction, erosion, and dust control
Roller/Compactors	Road and pad compaction
Backhoe/Trenching Machines	Excavating foundations; trenches for underground utilities
18-Wheel Semi-Tractors	Component delivery
Truck-Mounted Drill Rigs	Drilling soil test bore holes
Concrete Trucks and Pumps	Pouring foundations
Conventional and Small Cranes	Offloading equipment onsite
Heavy and Intermediate Cranes	Offloading equipment onsite
Cement Trucks	Hauling Cement Material
Pickup Trucks	General use by construction personnel
Small Hydraulic Cranes/Forklifts	Loading and unloading minor project equipment

TABLE 3-4
List of General Construction Equipment

Equipment	Construction Use
All-Terrain Vehicles	Site access
Rough-terrain Forklift	Lifting equipment
Tank-Erection Scaffold	Tank placement and erection
Manlifts	Construction personnel access to elevated work areas

Source: Simplot, 2014.

3.6.1 Site Civil and Preparation Work

Prior to breaking ground, the construction work area will be surveyed and clearly demarcated with stakes and flagging. Site preparation work will include grading, clearing, and grubbing the site, and, where necessary, stripping and stockpiling topsoil. Base material will placed to accommodate the installation of construction parking and construction laydown areas and temporary construction facilities, to include a lunch area and an orientation training center. Construction activities will use existing facility onsite stormwater controls for erosion and sediment control.

Facility grading work will include shaping the natural grade as required to accommodate both construction facilities and permanent facility equipment. Grading will be carried out in a manner that will minimize earthwork while obtaining proper cross section, longitudinal slopes, and curvature at roads.

Temporary security fencing and security guard house will be installed at the south entrance of the plant to support construction activities and delivery of materials. Permanent security fencing currently exists around the perimeter of the site and will remain unchanged and intact.

3.6.2 Earthwork, Excavation, and Fill

A geotechnical investigation has been performed at the proposed Project site. The investigation determined the suitability of site soils for use as compacted fill, and their ability to achieve the desired compaction requirements with the proper moisture treatment.

Fill materials will be suitable for the intended purpose and will not include materials hazardous to health, material susceptible to attack by ground or groundwater chemicals, material susceptible to swelling or shrinkage under changes in moisture content, highly organic or chemically contaminated materials, or any other unacceptable materials.

Compaction of fill materials will be carried out as soon as practicable after deposition of fill materials. Fill will be compacted to the densities appropriate to the design requirements, fill type, and depth of layers.

3.6.3 Foundations

Site geotechnical exploration and analysis has determined drilled piers to be the most suitable foundation system. Foundation analysis for major equipment will include the evaluation of total and differential settlement. Dynamic foundation analysis and design will be performed when recommended by the equipment manufacturer. Foundations will meet all manufacturer requirements.

Aboveground tanks, equipment skids, pumps, and supports will be installed on raised slabs or pads for corrosion protection.

3.6.4 Temporary Facilities

Temporary facilities will be erected to support construction activities and workforce and will include lunch areas, a construction orientation and training center, a warehouse, badging turnstile, and approximately 15 construction contractor trailers. Erection and development of temporary facilities will occur once the site has been prepared and base materials are laid in place. The trailers will serve as offices for the construction management staff. The trailers will not be equipped with running water. A temporary power distribution system will be installed. A warehouse structure and laydown area will be erected for the storage of procured items necessary for facilities construction. Temporary laydown areas will also be developed for the storage of items too large to be stored in the temporary warehouse area. For security purposes, the perimeter of the laydown areas will be fenced and locked. In order to control delivery access, a pre-fabricated temporary guard shack, approximately 6 feet by 8 feet, will be placed at the entrance on the construction access road. At the termination of construction activities, all temporary facilities will be removed and the area returned to use as needed for operations.

3.6.5 Parking

The Craft Parking Area, comprised of base material, will be developed and lighting installed to accommodate approximately 400 parking spaces. The parking area will be fenced and an earthen/ gravel walkway will be developed leading from the parking area to a temporary badging turnstile.

3.6.6 Construction of Ammonia Plant Equipment

Linde Engineering North America will be constructing the 600 ton/day ammonia facility. Equipment to be constructed will include storage tanks, process equipment, pumps, compressors, stationary equipment, rotating equipment, process piping and instrumentation, electric control centers, and control rooms and buildings. Tasks will include civil, concrete, structural steel, mechanical, piping, electrical, instrumentation, insulation, and painting/coatings. The ammonia plant construction is expected to commence in August 2014 and be mechanically complete by August 2016.

3.6.7 Commissioning, Start-up, Performance Testing

After mechanical construction is complete, commissioning activities including initial start-up of major equipment and performance testing is expected to occur for approximately two months. Operation of the plant is anticipated in October 2016.

3.6.8 Cleanup and Reclamation

After construction, temporarily disturbed areas (e.g., laydown areas) will be restored similar to pre-construction conditions. Disturbed areas will be contoured and seeded with a designated reclamation seed mixture, in consultation with the reclamation contractor.

3.7 Operation and Maintenance Procedures

3.7.1 Anticipated Operation Life

The economic life of the proposed Project is anticipated to be 25 years, but may be extended depending on market conditions and overall condition of infrastructure.

3.7.2 Facility Operations

After construction is complete, onsite personnel will operate and maintain all components of the proposed Project. The facility is designed to produce about 600 tons of anhydrous ammonia per day. During normal operations, the facility will use approximately 18 million standard cubic feet per day (MMSCF/day) of natural gas, 15 megawatts (MW) of electrical energy and 150 gallons per minute

(gpm) of municipal water. Questar Pipeline Company will supply the natural gas (to be used as a fuel and a feedstock for ammonia production), and electrical power will be purchased from PacifiCorp (Rocky Mountain Power).

3.8 Worker, Environmental, and Facility Protection

Pursuant to ISD requirements, Simplot will develop a Written Compliance Plan to effectively meet the Section 109 Permit Conditions and to ensure compliance with voluntary commitments made by Simplot in the permit application, during testimony, and via agreements with local governments. The Plan will support the construction and operation of a safe, environmentally compliant Project that is constructed and operated in compliance with federal, state, and local regulations and in accordance with the ISA permit conditions. This Plan will provide a comprehensive framework for site-specific environmental procedures and requirements. Throughout the duration of construction and operation of the proposed Project, this Plan will be reviewed and revised for implementation, effectiveness, and applicability.

3.8.1 Environmental, Health, and Safety

Simplot will prepare a site Environmental, Health, and Safety (EHS) Plan that outlines overall expectations for EHS performance on the proposed Project site for all employees, contractors, and subcontractors.

Construction

The EHS Plan will require that the general construction contractor and subcontractors prepare specific plans and procedures to be approved by Simplot and put in place prior to the start of construction. The EHS Plan will cover all work to be performed by the construction subcontractors, building and material suppliers, and all additional site subcontractors during construction, operation, and decommissioning of the proposed Project. In addition, all site personnel will comply with all safety requirements of the Occupational Safety and Health Administration (OSHA), State of Wyoming, and local ordinances, as applicable.

Each construction subcontractor will be required to maintain adequate first aid facilities throughout the construction period. Specifically, prior to construction, each subcontractor will provide and maintain, for the protection of their employees, such safety equipment, guarding, and personal protective apparel as prescribed for safety practices or as required by any law, ordinance, rule, or the exercise of ordinary prudence for the type of work being performed. Lastly, a Simplot construction management representative will oversee the construction phase to monitor the health and safety performance of the general construction contractor

Operations

Upon reaching commercial operation, the proposed Project will be subject to Simplot's EHS requirements. These policies will be deployed and implemented to ensure that EHS Plan expectations, roles, and responsibilities are well documented and understood by site employees, contractors, and visitors. Components of the EHS Plan include emergency response, training, environmental requirements, contractor management, and comprehensive safety programs, severe weather, confined space entry, lockout tagout, electrical safety, and other site- and equipment-specific requirements. Simplot EHS professionals will provide comprehensive support for the site, including oversight of any post-construction avian and other biological monitoring programs. It is Simplot's intent that all facilities implement the appropriate programs, procedures, and training that result in a sustained zero injury and illness culture.

The Simplot EHS Plan will cover all work to be performed by all site contractors and Simplot employees during operation of the proposed Project. A Simplot Site Manager will oversee the operations phase to monitor the health and safety performance of subcontractors and Simplot employees.

3.8.2 Non-Hazardous Waste

Construction

A variety of non-hazardous, inert construction wastes are typically generated during construction. The major solid waste types are wood, concrete, plastics, metal, glass, insulation, and paper products. Concrete accumulating in the washout area, or any other materials not suitable to be left in place, will be allowed to harden and then placed in containers for disposal. Additional wastes could include erosion control materials, such as straw bales and silt fencing, and electrical equipment. The waste is typically accumulated onsite in dumpsters and/or drop boxes until hauled away to a landfill. As practicable, salvageable metals will be stored in appropriate bins and recycled.

Operations

Solid waste generation during Project operations will be minimal, on the order of one 40-cubic-yard dumpster per week. Currently, approximately one dump truck load of garbage is disposed of at the Rock Springs landfill. This amount of waste is not expected to change appreciably. The only other source of solid waste will be incidental waste from repair, maintenance, and replacement of equipment, as necessary. Disposal of materials onsite will be conducted in accordance with all applicable regulations.

3.8.3 Hazardous Wastes and Materials

Hazardous substances and wastes are subject to strict handling, storage, disposal, and transportation laws at the federal, state, and local levels. It is the intention of Simplot to properly manage all hazardous materials and waste streams associated with the proposed Project in accordance with those laws and other waste management and hazardous material requirements. The sections below describe hazardous materials and wastes anticipated at the site and best practices for properly managing those materials.

Construction, operation, and maintenance of the proposed Project will result in the temporary use and storage of small amounts of hazardous materials, such as paints and minor volumes of fuels, lubricants, and hydraulic fluids associated with construction equipment

Construction

Small amounts of hazardous waste will be generated during Project construction. Potential hazardous waste streams would be associated with spent aerosol cans and other construction-related solvent use. It is estimated that this generation will be small quantities of aerosol cans and solvent waste. Even with these hazardous waste streams, the proposed Project is anticipated to continue to be a small quantity hazardous waste generator. These wastes will be transported for disposal at an offsite permitted hazardous waste disposal facility.

No underground storage tanks are currently located onsite or proposed for the proposed Project. The proposed Project is subject to National Pollutant Discharge Elimination System (NPDES) requirements for the protection of surface water quality. Management practices regarding discharges are described within the existing/revised Stormwater Pollution Prevention Plan (SWPPP).

Operation

Operation of the proposed Project will not result in the generation of regulated quantities of hazardous wastes. The primary type of waste generated by operation of the proposed Project will be solid waste generated at the facility consisting of typical office wastes (e.g., paper, cardboard, food waste, etc.). This waste will be stored in a dumpster until it is hauled to a landfill. In addition, small amounts of waste associated with site maintenance will be generated, including wood pallets, oily debris, etc. These wastes will be managed according to regulatory and requirements of the operating plant.

There are no suspected or known hazardous waste contamination sites within or adjacent to the proposed Project area. Given the history and current characteristics of the Project site, it is unlikely that any contamination would be encountered. Therefore, no significant impact from former activities at the property should occur.

3.8.4 Spill Prevention, Control, and Countermeasure Plans

The Applicant is required to establish and maintain a Spill Prevention Control and Countermeasure (SPCC) Plan for construction and operations under the recently revised regulations pertaining to 40 CFR 112. Under this Plan, a procedure and the required equipment would be provided and maintained by the owner or contractor to respond in the event of a spill. All use of hazardous materials, including storage and disposal, would be in compliance with site procedures. Therefore, impacts relative to the release of hazardous substances as a result of Project construction and operations should be insignificant.

Several petroleum products will be used in the construction and operation of the facility. During transport, handling, and use, there is a possibility of a spill. Potential sources for a spill are the fuel and lubricating oils from construction vehicles and equipment. The construction contractor will be responsible for training its personnel in spill prevention and control and, if an incident occurs, will be responsible for containment and cleanup subject to approval by Simplot.

The types of products to be used, as well as the SPCC Plan that will be implemented, are described below.

Construction

During construction, fuel trucks will be used for refueling of vehicles, fuel storage tanks, and equipment onsite. The fuel trucks will be properly licensed and will incorporate features in equipment and operation, such as automatic shut-off devices, to prevent accidental spills. Fueling of large, heavy construction equipment such as cranes and earthmoving equipment will occur onsite where the equipment is located. The fuel truck will drive to the equipment. Some construction vehicles, such as pickup trucks, may be fueled in town at gas stations. Any spills will be addressed in accordance with the existing SPCC Plan covering operations at the Rock Springs Fertilizer facility.

Fuel deliveries will be on existing paved roads. Potential risks will be further reduced by using dedicated fuel-delivery trucks driven by professional, appropriately licensed drivers and by ensuring adherence to the Project site speed limits. A fuel tanker accident would trigger activation of the SWPPP. This Plan will include a description of procedures that will be followed in the event of a fuel tanker spill and will contain a list of equipment that will be maintained onsite for spill response emergencies.

Lubricating oils used during construction will mostly be contained in the vehicles and equipment for which they are used. Small quantities of lubricating oils may also be stored in appropriate containers at the construction staging area located at the site of the facility. The details of storage and

containment of lubricating oils and other materials at the construction staging area will be addressed in the SPCC Plan. Appropriate measures will be taken to ensure these materials are not spilled. If a spill does occur, it will be promptly cleaned up and reported as required to the proper agencies.

Operation

Operation of the Project will require the use of fuel that could cause a spill or other accidental release. Project operations will use existing permanent fuel storage tanks. These tanks supply fuel for vehicles, emergency fuel for generators, boiler startup, and other uses. The existing operational SPCC addresses potential spills from these tanks, and will be adequate following the Project.

3.8.5 Stormwater Pollution Prevention

Construction

There will be a certain amount of disturbance of surface soils and minor excavation into weak bedrock associated with construction of the facilities. Therefore, best management practices (BMPs) will be implemented by the contractor during construction of the proposed Project to ensure that erosion will be minimized and other adverse impacts on area soils will not occur. Other BMPs are presented in more detail under Section 7. Lastly, the proposed Project will be designed with proper erosion protection and culverts in order to minimize or eliminate the potential for downstream sedimentation that could affect downstream aquatic resources. The proposed Project footprint will be graded flat, but the surrounding lands drain southwest towards the existing Rock Springs facility and Highway 430. Stormwater management at these locations will further aid in controlling runoff from construction.

Operation

During operation of the proposed Project, regular compliance monitoring and maintenance activities will be implemented by a designated and qualified member of the environmental staff. Inspections and maintenance activities during operations will ensure that erosion, stream sedimentation, or impacts to or from soil resources or geologic hazards are prevented or addressed immediately if they occur.

3.8.6 Security

Construction

Security is primarily a function of controlled access to the proposed Project area and lockout provisions to major equipment and controls. Site access will be controlled, and all onsite construction staff and visitors will be required to carry an identification pass.

Simplot will work with a security contractor to develop a plan to effectively monitor the overall site during construction, including an access gate, drive-around security, and specific checkpoints.

Operation

The proposed Project area will require security during the operations phase. Site visitors, including vendor equipment personnel, maintenance contractors, material suppliers, and all other third parties, will require permission for access from authorized Project staff prior to entrance. The Plant Operations Manager, or designee, will grant access to any critical areas of the site on an as-needed basis. Site access will be controlled and all visitors or contractors on the site will be required to carry an identification pass.

3.8.7 Emergency and Law Enforcement Services

Access to the proposed Project will occur directly from Highway 430 for the construction period and operational life of the proposed Project. In the event of an emergency, personnel can be transported from the proposed Project to the Sweetwater County Hospital. Life flight services will be utilized in the event that rapid advanced medical services are required. If necessary, fire and ambulance crews from Sweetwater County departing from Rock Springs will be activated. See Section 5.4.4 for more detail on emergency response capabilities.

Simplot participates in the Local Emergency Planning Commission with various stakeholders in Sweetwater County and has plans to share details with the Commission prior to Project construction in order to communicate the potential emergency needs. The facility regularly works with the Sweetwater County Fire District on emergency services.

Fire Protection and Rescue Services

Each building (existing or Project-related) is equipped with fire suppression systems (e.g., sprinklers, fire extinguishers, fire hydrants, and hoses) built to code and standards. In addition, industrial fire suppression systems are active on select equipment. The Simplot Rock Springs Fertilizer Complex has an on-site emergency rescue team and will work with the local ambulance service as needed.

Should additional fire and rescue services be needed, there are nine fire departments or districts within Sweetwater County, with 11 fire stations, 50 full-time employees, and 129 volunteers (WSFM, 2011). Simplot will be working directly with the Sweetwater County Fire District Number 1 department for fire support on the Project. The Rock Springs Fire Department (RSFD), located 5 miles north of the proposed Project, is the closest all-hazard Fire Department, with three stations, 35 full-time paid firefighters, and emergency medical services (EMS). RSFD is also the host agency for the Wyoming Regional Emergency Response Team (RERT) #4, which is responsible for responding to and assisting with mitigation of weapons of mass destruction and hazardous materials events in Sweetwater, Uinta, and Lincoln counties.

Law Enforcement

Law enforcement in the study area is provided primarily by the Sweetwater County Sherriff, which has offices in Rock Springs and Green River, as well as the County Detention Center located on 50140 Highway 191 South in Rock Springs (SCSO, 2012). The police departments of Rock Springs and Green River provide law enforcement within their jurisdictions while District #3 of the Wyoming Highway Patrol (WHP) patrols the highways in Sweetwater, Uinta, and Lincoln counties. District #3 is based in Rock Springs.

3.9 Financial Capability of Applicant

Simplot Phosphates, LLC is firmly committed to the success of the Rock Springs Ammonia Facility Project. The AgriBusiness Group is part of the J.R. Simplot Company, a privately held agribusiness company. With facilities throughout the western United States and in Canada, the AgriBusiness Group is focused on meeting the needs of its customers through the environmentally conscious extraction of natural resources, the manufacturing of fertilizers and the distribution of the highest-quality agricultural products.

3.10 Site Decommissioning

Decommissioning is a step-by-step, systematic deconstruction process that involves removing and disposing of the infrastructure and appurtenant facilities associated with the proposed Project at

the end of its useful life. With some exceptions, site decommissioning would involve the reverse of site development.

Disturbed land areas covered in rock or gravel, or building and facility footprints, would be restored to approximate original grade (which would include adjusting soil compaction that might have resulted from previous uses) and seeded or planted with native vegetation. Reclamation procedures would be based on site-specific requirements and techniques commonly employed at the time the area is to be reclaimed and may include grading, adding topsoil, and vegetation of all disturbed areas.

Decommissioning activities would be accompanied by inspection for the presence of industrial contamination from minor spills or leaks and decontamination, as necessary. Lastly, demolition or removal of equipment and facilities will meet applicable environmental and health regulations, and every attempt will be made to salvage economically recoverable materials.

The potential fire risks during Project decommissioning and construction are similar in nature but lower than those described during construction and operation. Fire prevention measures during decommissioning would be substantially similar to those described for Project construction.

Simplot Phosphates, LLC is financially capable and responsible to ensure the proper decommissioning of all facilities at the end of their useful life.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4.0 Public Involvement

As stated in the ISA rules and regulations, a local government primarily affected by the proposed industrial facility means any defined geographical area or unit of local government or special district in which the construction and operation of the industrial facility may significantly affect the environment, population, level of economic wellbeing, or level of social services, or may threaten the health, safety, or welfare of present or expected inhabitants. Any such local government body or special district is within the area of site influence.

Based on the statute definition of the area of site influence presented above, the Applicant recommends that local governments primarily affected by the proposed industrial facility would include the following:

- Sweetwater County and the incorporated cities of Rock Springs and Green River

Large areas of Sweetwater and Uinta counties would remain outside the area of site influence due to excessive commuting distance and lack of appropriate accommodations. Therefore, the Applicant also recommends that a number of communities located within the recommended area of site influence would not experience Project-related impacts. Additionally, other urban areas that could contain industries potentially affected by the proposed Project are relatively distant. It is recommended that counties (and communities contained within them) other than Sweetwater County be excluded from the area of site influence because of excessive commuting distance from the proposed Project site.

4.1 Meeting Activities

Simplot aims to maximize the benefits of the proposed Project to the local communities in the area of site influence while minimizing adverse impacts as much as possible. Therefore, Simplot sent project information letters to state and local agencies, conducted a series of meetings with local governmental agencies, and held a public open house. These activities are presented below, and additional details are provided in **Appendix C** and **Appendix E**.

Table 4-1 summarizes the public involvement activities to date.

TABLE 4-1
Local Government, State Agency, and Community Meetings

Organization	Date	General Discussion
Wyoming Department of Environmental Quality (WDEQ) – Industrial Siting Division (ISD)	April 23, 2013	Jurisdictional Meeting – provided overview of proposed Project and ISA process, project workforce and operation requirements, construction schedule and costs.
Sweetwater County Planning and Zoning Department	August 6, 2013	Meeting to discuss proposed project
Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office (SHPO)	November 5, 2013	Simplot met with representatives of BLM, SHPO, Questar Pipeline and Western Archeological Services on site to look at proposed gas pipeline route in relation to Brown's Park Road.
Wyoming Department of Environmental Quality (WDEQ) – Industrial Siting Division (ISD)	November 19, 2013	Follow-up meeting with ISD to discuss proposed Project status and preliminary application submittal schedule.

TABLE 4-1
Local Government, State Agency, and Community Meetings

Organization	Date	General Discussion
Rock Springs City Council	January 7, 2014	Presented proposed Project details regarding workforce and operation requirements, construction schedule and costs, local agency consultation, and public/agency involvement. Provided project handout. Simplot representatives responded to questions and addressed issues and concerns. Council provided verbal support and letter of support was requested.
Green River City Council	January 14, 2014	Presented details regarding proposed Project workforce and operation requirements, construction schedule and costs, local agency consultation, and public/agency involvement. Provided Project handout. Simplot representatives responded to questions and addressed issues and concerns. Council provided verbal support and letter of support was requested.
Sweetwater County Commissioners	January 21, 2014	Presented details regarding proposed Project workforce and operation requirements, construction schedule and costs, local agency consultation, and public/agency involvement. Provided Project handout. Simplot representatives responded to questions and addressed issues and concerns. Commissioners provided verbal support and letter of support was requested.
Wyoming State Agencies	January 21, 2014	Information letter sent by certified mail to 24 Wyoming state departments/ divisions providing notice of the proposed Project and inviting questions, comments, and input for topics to address in the permit application. The contact list and letter are shown in **Appendices E-1** and **E-3.**
Local Governmental Agencies and Joint Powers Boards	January 21, 2014	Information letter sent by certified mail to 66 local governmental agencies and joint power boards in Sweetwater and Uinta counties providing notice of the proposed and inviting questions, comments, and input for topics to address in the permit application. The contact list and letter are shown in **Appendices E-2** and **E-3.**
Wyoming Game and Fish Department (WGFD)	February 5, 2014	Letter sent from WGFD with questions on the proposed Project (reference **Appendix E-4**).
Public Open House, Sweetwater County Fire District No. 1, Rock Springs	February 6, 2014	Held open house in large public meeting room with display posters on proposed Project location, site plan, process flow diagram, schedule, construction and operations workforce, Project description and community benefits, and environment and ISA process. Provided two-page project handout. Simplot representatives responded to questions and addressed issues and concerns (reference **Appendix C**).
Wyoming State Engineers Office (WSEO)	February 11, 2014	Letter sent from WSEO with questions on the proposed Project (reference **Appendix E-6**).
Wyoming Game and Fish Department (WGFD)	February 18, 2014	Response to WGFD regarding its questions on the proposed Project (reference **Appendix E-5**).
Wyoming Department of Environmental Quality (WDEQ) – Industrial Siting Division (ISD)	February 19, 2014	Pre-Application Filing Meeting.

TABLE 4-1
Local Government, State Agency, and Community Meetings

Organization	Date	General Discussion
Wyoming State Engineers Office (WSEO)	February 21, 2014	Response to WSEO regarding its questions on the proposed Project (reference **Appendix E-7**).
Sweetwater County Commissioners	March 4, 2014	Provided update of proposed project and status of ISA application
Wyoming Industrial Siting Council, Quarterly Meeting, Cheyenne	March 7, 2014	Simplot provided an update on the status of ISA application submittal planned for March 17, 2014.
Sweetwater County Planning and Zoning Department	March 13, 2014	Planned meeting to discuss applicability of county permit

Source: Simplot and CH2M HILL, 2014.

4.1.1 Meeting Format and Information Provided

As presented in **Table 4-1**, the information provided to the state and local agencies and provided at the public open house was generally the same. The format and information consisted of the following:

- Large display boards were prepared for the community open house held in Rock Springs. The boards were also put on display for Simplot employees at the Rock Springs Fertilizer Complex. Displays included:
  - Welcome and Sign-In Board
  - Project Location Map
  - Facility Site Plan
  - Ammonia Plant Process Flow Diagram
  - Project Schedule
  - Construction and Operation Workforce
  - Project Description and Community Benefits
  - Environment and ISA Process
- A two-page factsheet describing the proposed Project was provided at the local commissioner/council meetings as well as to attendees at the public open houses.
- Simplot made a formal presentation at each of the local commissioner/council meetings and answered questions after each presentation.

4.1.2 Meeting Notices and Public Notification

The state agencies specified by statute in the ISA permit regulations were each notified of the proposed Project via letters and asked for input. Information letters and meetings were held with local governmental agencies concerning the proposed Project.

Newspaper advertisements announcing the open houses were placed in the *Rocket Miner* and the *Green River Star* on January 29, 2014, and in the *Sweetwater County Guide* the same week. These are the primary local news sources serving residents of surrounding communities. The advertisements invited the public to attend the public meetings to learn more about the proposed Project and ask questions of Simplot representatives. **Appendix C** contains a copy of the

advertisement, list of attendees at the open house, poster displays and handouts, and newspaper articles.

4.2 Community Response

Overall, the proposed Project has been well received, and letters have been submitted in support of the Project. The letters of support are presented in **Appendix F.**


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5.0 Socioeconomic Baseline and Impacts

5.1 Introduction

Section 5.0 is organized into six major subsections that address the following topics:

- Regulatory jurisdiction, which describes the statutory background germane to treatment of socioeconomic resources
- Methodology, which addresses the following topics:
  - Recommended area of site influence, Study Area, and local governments primarily affected by the proposed industrial facility
  - Construction and operations workforce estimates
  - Impact analysis methodology
- Inventory and evaluation of social and economic conditions and impact assessment, which addresses existing conditions and Simplot Phosphates Project (proposed Project)-induced impacts occurring during both the construction and operations phases. This subsection is further divided on a resource-specific basis as follows:
  - Population
  - Economic and fiscal conditions
  - Housing
  - Public education
  - Public safety
    - Fire protection services
    - Law enforcement services
    - Crime
  - Health care
  - Municipal services
    - Wastewater treatment facilities
    - Water distribution and treatment facilities
    - Non-hazardous waste collection and disposal
    - Electricity service
    - Natural gas service
  - Human Service Facilities
- Cumulative impacts
- Trade-off analysis
- Mitigation measures

5.2 Regulatory Jurisdiction

Title 35 − Public Health and Safety, Chapter 12 − Industrial Development and Siting of the Statutes of the State of Wyoming provides guidance relative to the socioeconomic topics of concern that will be addressed during the permit application process. A number of aspects of the socioeconomic environment could experience benefits or adverse impacts associated with construction and operation of the proposed facility. These aspects are addressed in this report and include economic base, housing, transportation, sewer and water facilities, solid waste facilities, police and fire facilities, educational facilities, and health and hospital facilities.

> *According to the statute, the Wyoming Industrial Siting Council (ISC) will grant a permit, either as proposed or as modified by the Council, if it finds and determines that the facility will not pose a threat of serious injury to the environment, the social and economic condition, or inhabitants or expected inhabitants in the affected areas and will not substantially impair the health, safety, or welfare of the inhabitants. For the purposes of the permit application, the definitions of "health," "safety," and "welfare" provided in the statutes are as follows:*
>
> - *Health will mean the state of being sound in body or mind and includes psychological as well as physical well-being.*
> - *Safety will mean freedom from fear of injury or threat of injury. Such injury or threat of injury may be premised on crime rates, traffic accident rates, dangers of industrial accidents or mishaps, or other similar considerations.*
> - *Welfare will mean considerations of public convenience, public well-being, and general prosperity. The term also properly covers those subjects encompassed under health and safety.*

Guidance is provided in the Wyoming statutes and ISC Rules regarding information that should be included in the permit application. The ISC Rules require that Renewable Energy Systems (RES) identify what it deems to be the "area of site influence" and to recommend the local governments primarily affected by the Facility.[1] The immediately adjoining areas and local governments must also be identified with a statement of reasons they were excluded from the list of areas or local governments primarily affected by the proposed industrial facility.[2] Next, RES must perform an evaluation of the social and economic conditions for the area of site influence.[3] The ISC Rules define the "area of site influence" as the "areas which may be affected environmentally, socially, or economically, in any significant degree, by the location of the Facility at the proposed site."[4] However, under the ISC Rules, a separate "area of influence" may be considered for each of the resources identified in Section 9(i) of the ISC Rules. Therefore, an overall area of site influence for the proposed Project is recommended; however, where appropriate for a specific resource, a separate "area of influence" is defined.[5]

[1] ISC Rules, Ch. 1, Sect. 9(g).

[2] ISC Rules, Ch. 1, Sect. 9(g).

[3] ISC Rules, Ch. 1, Sect. 9(i).

[4] ISC Rules, Ch. 1, Sect. 2(c).

[5] ISC Rules, Ch. 1, Sect. 2(c).

5.2.1 Definitions

The following terms, established by statute and defined by either the Industrial Siting Division (ISD) or RES, are used for the Industrial Development Information and Siting Act (ISA) socioeconomic analysis:

- **Study Area -** The Study Area is the "geographic and political boundary, as designated by the administrator for the required governmental, social, and economic studies required for applications."[6]
- **Area of Site Influence -** The area of site influence "means the areas which may be affected environmentally, socially, or economically, in any significant degree, by the location of the industrial facility at the proposed site." A separate "area of influence" may be considered for each resource identified in Section 9(i) of these rules.[7]
- **Area or local government primarily affected -** The area or local government primarily affected by the proposed facility means:
  - Any defined geographical area in which the construction or operation of the industrial facility may significantly affect the environment, population, level of economic well-being, level of social services, or may threaten the health, safety, or welfare of present or expected inhabitants.
  - Any such county, incorporated municipality, school district, or combination thereof under the Wyoming Joint Powers Act within the defined geographical area above.[8]
- **Area substantially affected –** Those local governments in the Area Primarily Affected who did not become parties to the ISC proceeding, but are entitled by statute within 10 days from the date of the council's decision to receive a copy of the findings and the council's decision.[9]

5.3 Methodology and Analysis

The purpose of the following analysis is to identify the area of site influence from within the Study Area described below for the proposed Project site located in central Sweetwater County, approximately 5 miles southeast of the City of Rock Springs. This screening is initially informed by looking at the current commuting patterns to and from Sweetwater County and then by the distances and drive times from the site entrances to the communities in the seven-county Study Area described initially. Population and temporary housing supplies are then examined to further narrow this broader Study Area to the overall area of site influence for the proposed Project.

5.3.1 Study Area

The Study Area provides a well-defined geographic boundary within which socioeconomic impacts across all resources areas might occur. However, depending on the specific socioeconomic resource under consideration, actual impacts are expected to occur within a much smaller sub-region of the broader Study Area. With the exception of significant tax revenues to be received by the county and the State of Wyoming, socioeconomic impacts outside the Study Area will be dispersed and

[6] ISC Rules, Ch. 1, Sect. 2(af).

[7] ISC Rules, Ch. 1, Sect. 2(c).

[8] ISC Rules, Ch. 1, Sect. 2(b)(i)(ii).

[9] W.S. 35-12-113(f).

insignificant. For instance, both the local workforce and temporary housing for non-local workers are expected to come from the Study Area. As a result, any stress on existing community services that may be caused by an influx of temporary workers or on local infrastructure to accommodate constructing and operating the proposed Project will also occur within the Study Area.

The socioeconomic impact analysis methodology involves a description of existing (i.e., baseline) conditions for a geographical area that is expected to be broader than the area ultimately recommended for the area of site influence. This conservatively large area is referred to as the Study Area. The data gathered on existing conditions for the Study Area are intended to support a determination of which areas and governments within the broader area to include or omit from the area of site influence. The counties comprising the Study Area were identified early in the analysis and in consultation with the ISD at the Jurisdictional Meeting held April 23, 2013 (and in a follow-up meeting held on November 19, 2013). They include the county where the proposed Project will be located − Sweetwater County − and its neighboring county of Uinta to the southwest. It is anticipated that most of the direct and secondary economic impacts associated with the construction and operation of the proposed Project would occur within the Study Area, and that any remaining economic impacts would be dispersed and not significant.

5.3.2 Commuting Patterns to and from Sweetwater County

Commuting patterns were considered because the large majority of persons working in any county typically reside in the same county. Commuter flows also relate directly to the number of job opportunities at specific destinations and the driving time required getting to those destinations from a place of residence. **Table 5-1** summarizes the distribution by county of incoming (inflow) and departing (outflow) commuters for Sweetwater County as well as the State of Colorado for the third quarter of 2011. Of the 7,462 commuters entering Sweetwater County, 54 percent were from an unknown origin, 17 percent traveled from Uinta County (the other county in the Study Area), 8 percent were from Carbon County, and between 3 and 4 percent were from Fremont, Lincoln, or Sublette counties. Of those Sweetwater County residents leaving the county for work, a quarter of the people were destined for either Natrona County (15 percent), including the City of Casper, or Uinta County (10 percent).

TABLE 5-1
Inter-County Commuter Flows for Sweetwater County (Third Quarter 2011)

County (or State) of Origin or Destination	Share of Inflow to Sweetwater County	Share of Outflow from Sweetwater County
Albany	2%	4%
Big Horn	0%	2%
Campbell	1%	6%
Carbon	8%	6%
Converse	0%	1%
Crook	0%	0%
Fremont	3%	5%
Goshen	0%	0%
Hot Springs	0%	0%
Johnson	0%	0%
Laramie	2%	7%
Lincoln	4%	4%

TABLE 5-1
Inter-County Commuter Flows for Sweetwater County (Third Quarter 2011)

County (or State) of Origin or Destination	Share of Inflow to Sweetwater County	Share of Outflow from Sweetwater County
Natrona	2%	15%
Niobrara	0%	0%
Park	0%	2%
Platte	0%	0%
Sheridan	0%	2%
Sublette	4%	8%
Teton	1%	5%
Uinta	17%	10%
Washakie	0%	0%
Weston	0%	1%
Colorado	0%	0%
Undetermined Wyoming Location	0%	23%
Undetermined Location	54%	0%
Total Commuters	7,462	-2,532

Source: Wyoming Department of Employment (WY DOE), 2012.

Information published by the U.S. Census Bureau regarding commuting patterns for residents of Sweetwater County and persons who worked in Sweetwater County in 2011 is presented in **Table 5-2**. Approximately 68 percent of the people who were employed in Sweetwater County also lived in the county, and nearly 5 percent resided in Uinta County. Little evidence exists of a strong link to any other community / county outside the Study Area with the possible exception of the City of Rawlins in Carbon County and the City of Casper in Natrona County, where 2 and 3 percent of Sweetwater County residents work, respectively. Approximately 78 percent of Sweetwater County residents remained in the county for their employment in 2011, while just over 2 percent traveled to communities in Uinta County to work. Due to Rock Springs' prominence as a regional employment center, approximately 6,356 persons, or 28 percent, of those working in Sweetwater County live in communities outside of the Study Area. The place of residence of these workers is widely distributed across other counties and other states, including Colorado, Utah, and Montana.

TABLE 5-2
Work Places of Sweetwater County Residents and Places of Residence of Persons Working in Sweetwater County, 2011

	Places of Work of Persons Residing in Sweetwater County		Places of Residence of Persons Working in Sweetwater County	
	Count	**Share**	**Count**	**Share**
Total Primary Jobs	**19,990**	**100.00%**	**23,086**	**100.0%**
Sweetwater County				
Rock Springs City, WY	9,378	46.9%	8,713	37.7%
Green River City, WY	4,289	21.5%	4,738	20.5%
North Rock Springs CDP, WY	773	3.9%	975	4.2%
Reliance CDP, WY	288	1.4%	233	1.0%

TABLE 5-2
Work Places of Sweetwater County Residents and Places of Residence of Persons Working in Sweetwater County, 2011

	Places of Work of Persons Residing in Sweetwater County		Places of Residence of Persons Working in Sweetwater County	
	Count	Share	Count	Share
Clearview Acres CDP, WY	241	1.2%	345	1.5%
Wamsutter Town, WY	229	1.1%	57	0.2%
Arrowhead Springs CDP, WY	132	0.7%	ND	ND
Eden CDP, WY	128	0.6%	45	0.2%
Farson CDP, WY	11	0.1%	66	0.3%
Granger Town, WY	ND	ND	40	0.2%
James Town CDP, WY	79	0.4%	184	0.8%
Little America CDP, WY	ND	ND	25	0.1%
Purple Sage CDP, WY	76	0.4%	177	0.8%
Superior Town, WY	17	0.1%	44	0.2%
Uinta County				
Evanston City, WY	350	1.8%	440	1.9%
Lyman Town, WY	53	0.3%	317	1.4%
Mountain View Town, WY	33	0.2%	227	1.0%
Urie CDP, WY	ND	ND	45	0.2%
Fort Bridger CDP, WY	ND	ND	59	0.3%
Other				
Other Wyoming Communities	1,889	9.4%	2,381	10.3%
Out-of-State Communities	285	1.4%	202	0.9%
All Other Locations	1,739	8.7%	3,773	16.3%

Notes:
ND = No data
Source: U.S. Census Bureau, 2011.

5.3.3 Area of Site Influence

As noted previously, an area of site influence contains locations that may be affected environmentally, socially, or economically, in any significant degree, by the proposed location of the industrial facility. A local government primarily affected by the proposed industrial facility means any defined geographical area or unit of local government or special district in which the construction and operation of the industrial facility may significantly affect the environment, population, level of economic wellbeing, or level of social services, or may threaten the health, safety, or welfare of present or expected inhabitants. Any such local government body or special district is within the area of site influence. Pursuant to statute, Simplot evaluated the potential area of site influence and local governments primarily affected by the proposed Project. Primary criteria that factored into the area of site influence recommendation are as follows:

1. Within a commuting distance of approximately 60 miles or less from the work site;
2. Within a daily one-way commute time of approximately 1 hour or less from the work site;
3. Supply of temporary housing units; and

4. Size of population (i.e., as an indicator for labor supply and urban amenities).

These four criteria were used in identifying communities likely to capture 1 percent or more of allocated workers.

1. Commuting Distance of 60 Miles or Less from the Proposed Project

Commuting distance can come into play in two ways when defining the area of site influence. First, members of the local workforce residing in communities within commuting distance may choose to commute to the proposed Project site to take advantage of the employment opportunities offered by the proposed Project. And, second, non-local workers may decide to relocate to communities within driving distance of the proposed Project. The proposed Project, named the Rock Springs Ammonia Facility Project at the Simplot Phosphates, LLC (Simplot) fertilizer complex, is located off Wyoming Highway 430 (515 South Highway 430) in the northwest quarter of Section 15, Township 18 North, Range 104 West (NW ¼, Sec. 15, T.18N, R.104W), Sweetwater County (RTP, 2013), about 5 miles southeast of the City of Rock Springs. The ammonia plant will be constructed on property owned and already developed by Simplot adjacent to its existing fertilizer production operations (see **Figure 5-1**). Driving distances to communities in the Study Area summarized in **Table 5-3** were computed from the physical address of the existing fertilizer complex.

FIGURE 5-1
Location Map for the Simplot Phosphates Fertilizer Complex

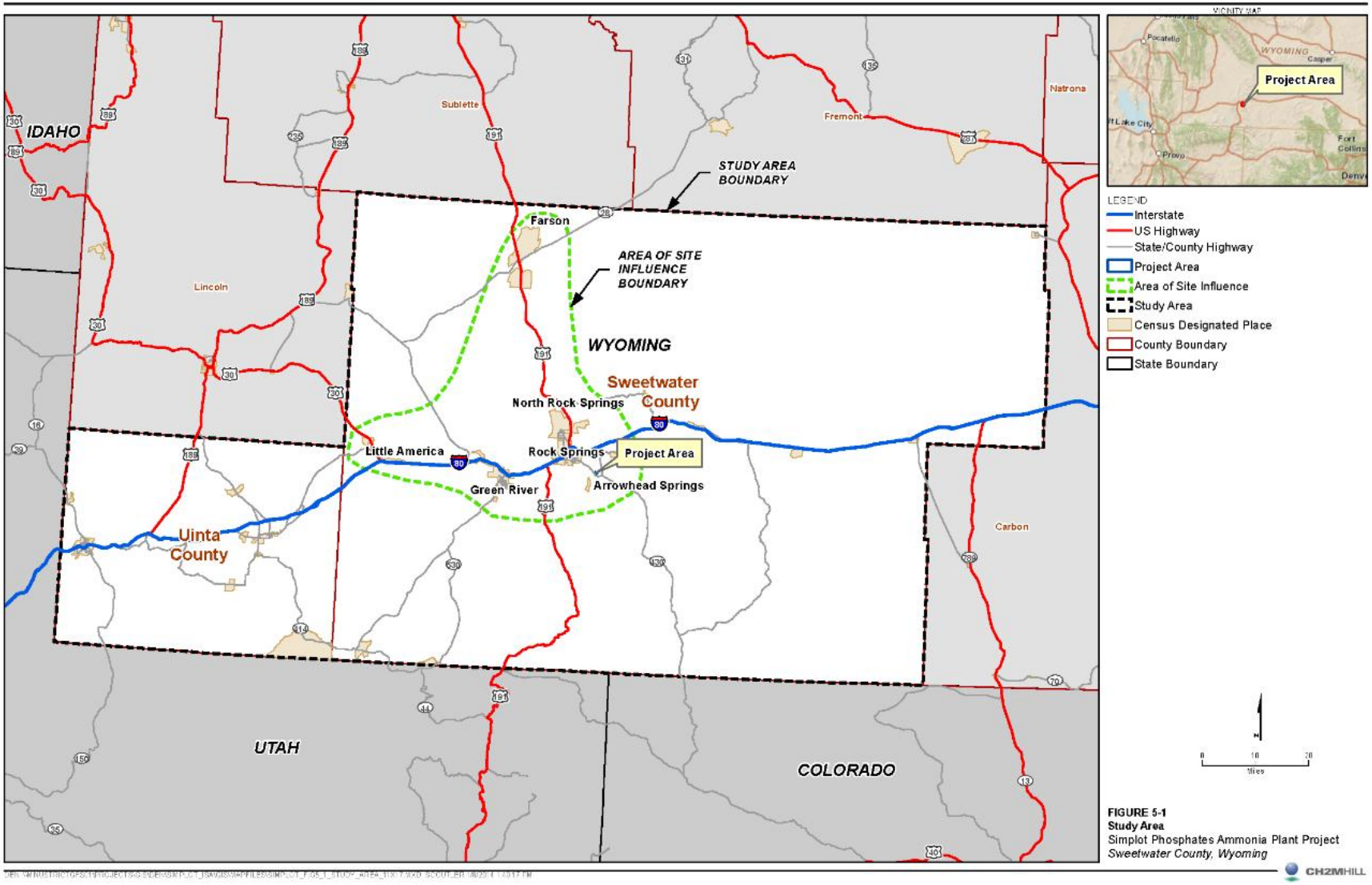

Table 5-3 illustrates the distance in miles (Column C) separating the proposed Project site from a number of communities in Sweetwater County and in adjacent Uinta County. No communities in Uinta County, however, meet the commuting distance criterion. Conversely, with the exception of the towns of Bairoil and Wamsutter, all of the following communities in Sweetwater County meet the commuting distance criterion of 60 miles or less from the proposed Project: Arrowhead Springs Census-Designated Place (CDP), Clearview Acres CDP, Eden CDP, Farson CDP, Town of Granger, City of Green River, James Town CDP, Little America CDP, North Rock Springs CDP, Purple Sage CDP, Reliance CDP, City of Rock Springs, and the Town of Superior. Arrowhead Springs CDP is the closest community to the proposed Project, located 3 miles, or approximately 8 minutes, to the south.

2. Daily One-Way Commute of Approximately 1 Hour or Less

It is reasonable to assume that non-local workers will not spend any more of their workdays commuting than is necessary, especially when suitable accommodations can be found relatively close to the proposed Project site. Column D shows the one-way commuting times for the communities in the Study Area. The list of communities with a daily one-way commute of approximately 60 minutes or less is identical to the list of communities within a 60-mile driving distance.

3. Supply of Temporary Housing Units

The supply of temporary housing units is one of the primary factors that can constrain worker location choices. It is reasonable to assume that any workers who temporarily relocate in order to work on the proposed Project will prefer suitable accommodations and urban amenities near the proposed Project site. This will minimize their daily commute and provide access to shopping, restaurants, leisure activities, and other entertainment. Approximately 2,195 hotel and motel rooms (Column F in **Table 5-3**) are located in Sweetwater County (including bed-and-breakfast accommodations) in addition to 340 recreational vehicle (RV) sites (Column G) (Wyoming Tourism, 2013). Combined, these two sources provide sufficient capacity to meet the average proposed Project need for temporary housing. Lack of temporary housing eliminates the following communities from likely use by non-local workers:

- Sweetwater County: Arrowhead Springs, Bairoil, Clearview Acres, Eden, Granger, James Town, North Rock Springs, Purple Sage, Reliance, and Superior.
- Uinta County: Bear River and Urie.

4. Size of Population

The size of the resident population of each of the communities (Column E) is also shown in **Table 5-3**. Approximately 66,292 persons live in the two-county Study Area, of which 45,267, or 69 percent, reside in Sweetwater County. Rock Springs, located 6 miles or less than 10 minutes northwest of the proposed Project, is the largest population center in the Study Area, with an estimated 24,047 residents in 2012 according to the U.S. Census Bureau (2013a). The City of Green River, located 20 miles from the proposed Project, is the second largest population center with an estimated 2012 population of 12,801. In contrast, the Sweetwater County communities of Arrowhead Springs, Granger, and Little America are each within commuting distance of the proposed Project, but their very small population sizes make them unlikely candidates to supply a sizeable number of workers or, with the exception of Little America, provide substantial temporary housing.

5. Recommended Area of Site Influence and Area Primarily Affected

The data presented in **Table 5-3** suggest recommending the area of primary influence to include select communities in Sweetwater County. All of these Wyoming communities are either adjacent or in close proximity to the proposed Project; within commuting distance; have a sufficient population size to contribute at least 1 percent toward the supply of the construction workforce; and/or supply temporary housing to accommodate at least 1 percent of the construction workforce. The communities of Arrowhead Springs CDP and North Rock Springs CDP are very close to the proposed Project and, thus, could be affected environmentally or socially; therefore, both are included in the area of site influence despite their lack of accommodations for the temporary workforce. Factoring in all four criteria for accommodating the temporary workforce, it is estimated that the temporary residence choices made by the proposed Project's non-local workforce would be limited to the cities of Rock Springs and Green River as well as the CDPs of Farson and Little America, all in Sweetwater County, due to their close proximity to the proposed Project and large supply of available housing. CDPs are the statistical counterparts of incorporated places, and are delineated to provide data for settled concentrations of population that are identifiable by name but are not legally incorporated in Wyoming or do not have officials elected to serve traditional municipal functions (U.S. Census Bureau, 2013b). As a result, while CDPs are included in the area of site influence, they are not included in the discussion of local governments below. The area of site influence, as recommended by the Applicant, is illustrated in **Figure 5-1**.

TABLE 5-3
Communities Identified as within the Study Area and Select Housing Statistics[1]

County	Community	Distance (miles) from Simplot[2]	Distance (minutes) from Simplot[2]	Population (2010 Census or 2012 Estimates)[4]	Number of Rooms	Number of RV Sites	% of Non-Local Workers
A	B	C	D	E	F	G	H
Sweetwater County							
	Arrowhead Springs CDP[3]	3	8	63	0	0	*
	Bairoil, Town of	151	144	106	0	0	
	Clearview Acres CDP[3]	9	18	795	0	0	
	Eden CDP[3]	42	48	281	0	0	
	Farson CDP	47	52	313	10	27	1%
	Granger, Town of	50	51	139	0	0	
	Green River, City of	20	25	12,515	402	89	23%
	James Town CDP[3]	23	28	536	0	0	
	Little America CDP	41	43	68	140	0	1%
	North Rock Springs CDP[3]	11	21	2,207	0	0	*
	Purple Sage CDP[3]	12	20	535	0	0	
	Reliance CDP3	13	24	714	0	0	
	Rock Springs, City of	6	9	24,047	1,635	224	75%
	Superior, Town of	29	34	336	0	0	
	Wamsutter, Town of	73	68	451	8	0	
Sweetwater County Total				*45,267*	*2,195*	*340*	
Uinta County							
	Bear River, Town of	115	110	518	0	0	
	Evanston, City of	105	98	12,359	961	128	
	Fort Bridger, CDP	76	73	345	38	38	
	Lyman, Town of	70	66	2,115	28	70	

TABLE 5-3
Communities Identified as within the Study Area and Select Housing Statistics[1]

County	Community	Distance (miles) from Simplot[2]	Distance (minutes) from Simplot[2]	Population (2010 Census or 2012 Estimates)[4]	Number of Rooms	Number of RV Sites	% of Non-Local Workers
	Mountain View, Town of	76	76	1,286	21	0	
	Urie, CDP[3]	73	69	262	0	0	
Uinta County Total				*21,025*	*1,048*	*236*	
Study Area Totals				***66,292***	***3,243***	***576***	

Notes:
[1] 60 miles or less one-way commuting distance; 60 minutes or less one-way commuting time.
[2] Distances measured to the existing Simplot facility address: 515 Wyoming Highway 430, Rock Springs, WY 82901.
[3] These CDPs are not expected to house non-local workers due to their lack of temporary housing; however, they are included in the area of site influence due to their close proximity to the proposed Project.
[4] 2012 ACS estimates were not available for Arrowhead Springs CDP, Farson CDP, Little America CDP, or North Rock Springs CDP and, thus, the 2010 Census counts were used. The county totals include residents located outside of the communities listed and, therefore, the total population of the communities in county will not equal the county population.
NA – Not Available
Source: CH2M HILL, 2013.

Given the availability of housing alternatives, permanent workforce, and urban amenities relatively close to the proposed Project site, all the counties and communities beyond a 60-minute drive have been eliminated from the list of likely residence communities. Additionally, the more distant and smaller communities have also been eliminated from the list of likely residence communities due to the number of housing units in close proximity to the proposed Project site. The majority of construction and operations workers are expected to reside within this recommended area of site influence and its communities; therefore, the Applicant has concentrated its efforts on securing housing commitments for non-local workers in this area.

Local Governments Primarily Affected by the Proposed Project

A local government primarily affected by the proposed industrial facility includes any defined geographical area, unit of local government, or special district in which construction and operation of the industrial facility may significantly affect the environment, population, level of economic wellbeing, or level of social services, or may threaten the health, safety, or welfare of present or expected inhabitants. Any such local government body or special district is within the area of site influence. It is generally accepted that the principal concern is the drain that temporary workers can place on local public services and quality of life.

Local Governments Primarily Affected by the Proposed Industrial Facility. Based on the recommended delineation of the area of site influence presented previously, the Applicant recommends that local governments primarily affected by a temporary workforce associated with the proposed industrial facility would include Sweetwater County and the cities of Rock Springs and Green River.

Local Governments Primarily Unaffected by the Proposed Industrial Facility. From **Table 5-3**, it is recommended that Uinta County, and the communities contained within it, be excluded from the area of site influence due to their relatively lengthy commuting times. Within Sweetwater County, the following local governments are not expected to be affected by the proposed Project due to their relative lack of temporary housing and urban amenities: the towns of Bairoil, Granger, Superior, and Wamsutter.

5.3.4 Construction and Operations Workforce Estimates

It is required that the applicant, its contractors, and its subcontractors provide estimates of the number of employees needed to complete construction and operation of the facility. These estimates must include job classifications by calendar quarter; seasonal fluctuations and peak employment during both construction and operation; annual payroll; and expected benefits, if any, including housing allowance, transportation allowances, and per diem allowances.

Construction Workforce Estimate

Potential impacts to socioeconomic resources are directly and indirectly attributable to 1) the influx of non-local workers, and 2) expenditures made in the local economy for equipment, materials, and services required for constructing and operating the proposed Project.

The estimated total number of onsite construction workers (both local and non-local) by type is illustrated in **Figure 5-2** and detailed in **Table 5-4**. **Table 5-4** also provides the number of workers by craft, occupational code, month and year. Simplot anticipates construction workers will be onsite for 25 months, with construction scheduled to begin in August 2014 and be completed by end by August 2016.

FIGURE 5-2
Estimated Number and Type of Construction Workers by Month

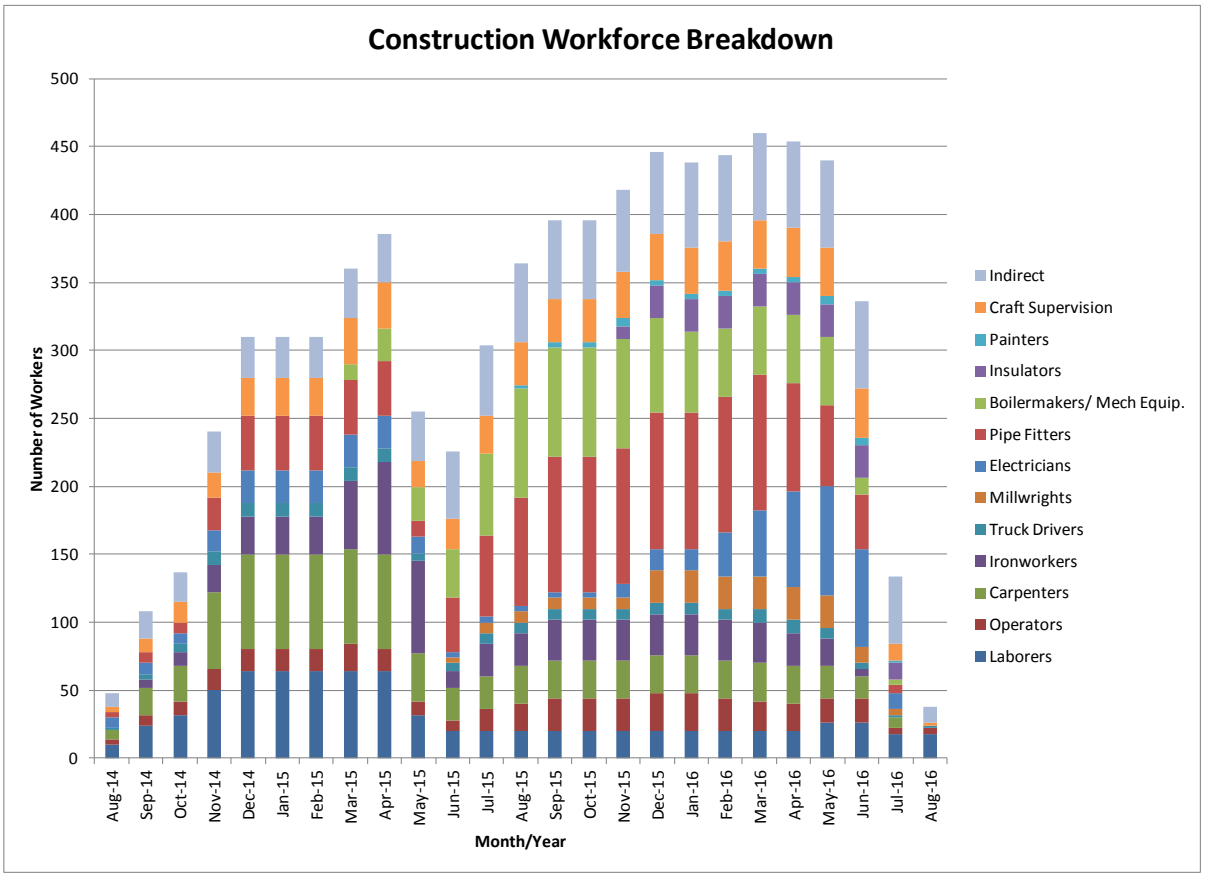

TABLE 5-4
Simplot Rock Springs Ammonia Plant Project Construction Workforce

		2014										2015														2016	
Skill	**Occupational Code**	**August**	**September**	**October**	**November**	**December**	**January**	**February**	**March**	**April**	**May**	**June**	**July**	**August**	**September**	**October**	**November**	**December**	**January**	**February**	**March**	**April**	**May**	**June**	**July**	**August**	
Laborers	47-2061	10	24	32	50	64	64	64	64	64	32	20	20	20	20	20	20	20	20	20	20	20	26	26	18	18	
Operators	47-2073	4	8	10	16	16	16	16	20	16	10	8	16	20	24	24	24	28	28	24	22	20	18	18	4	4	
Carpenters	47-2031	7	20	26	56	70	70	70	70	70	35	24	24	28	28	28	28	28	28	28	28	28	24	16	8	0	
Ironworkers	47-2221		6	10	20	28	28	28	50	68	68	12	24	24	30	30	30	30	30	30	30	24	20	6	0	0	
Truck Drivers	53-3032	1	4	6	10	10	10	10	10	10	6	6	8	8	8	8	8	8	8	8	10	10	8	4	2	2	
Millwrights	49-9044											4	8	8	8	8	8	24	24	24	24	24	24	12	4	0	
Electricians	47-2111	8	8	8	16	24	24	24	24	24	12	4	4	4	4	4	10	16	16	32	48	70	80	72	12	0	
Pipe Fitters	47-2152	4	8	8	24	40	40	40	40	40	12	40	60	80	100	100	100	100	100	100	100	80	60	40	6	0	
Boilermakers/ Mech Equip.	47-2011								12	24	24	36	60	80	80	80	80	70	60	50	50	50	50	12	4	0	
Insulators	47-2130																10	24	24	24	24	24	24	24	12	0	
Painters	47-2140													2	4	4	6	4	4	4	4	4	6	6	2	0	
Craft Supervision	47-1011	4	10	15	18	28	28	28	34	34	20	22	28	32	32	32	34	34	34	36	36	36	36	36	12	2	
Indirect		10	20	22	30	30	30	30	36	36	36	50	52	58	58	58	60	60	62	64	64	64	64	64	50	12	
Total workforce		**48**	**108**	**137**	**240**	**310**	**310**	**310**	**366**	**386**	**255**	**228**	**304**	**364**	**396**	**396**	**418**	**446**	**438**	**444**	**460**	**454**	**440**	**336**	**134**	**38**	
Non-local workforce		**8**	**58**	**73**	**170**	**216**	**216**	**216**	**266**	**290**	**195**	**168**	**244**	**296**	**326**	**326**	**346**	**370**	**362**	**368**	**384**	**378**	**364**	**252**	**114**	**18**	
Local workforce		**40**	**50**	**64**	**70**	**94**	**94**	**94**	**100**	**96**	**60**	**60**	**60**	**68**	**70**	**70**	**72**	**76**	**76**	**76**	**76**	**76**	**76**	**84**	**20**	**20**	
% Local Workforce		**83%**	**46%**	**47%**	**29%**	**30%**	**30%**	**30%**	**27%**	**25%**	**24%**	**26%**	**20%**	**19%**	**18%**	**18%**	**17%**	**17%**	**17%**	**17%**	**17%**	**17%**	**17%**	**25%**	**15%**	**53%**	

Source: Simplot, 2014.

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Figure 5-2 and **Table 5-4** illustrate that the initial workforce will be comprised largely of laborers (47-2061), carpenters (47-2031), ironworkers (47-2221), and pipe fitters (47-2152). Beginning in June 2015, the emphasis of the workforce will shift to pipe fitters and boilermakers / mechanical equipment (47-2011) before adding a sizable number of electricians (47-2111) in March 2016. The total construction workforce will average 311 onsite employees for the 25 months of construction while non-local workers will average 241 over the same period. Between 20 and 100 local workers will be employed onsite, averaging 22 percent of the total construction workforce. With the exception of a decline over the summer of 2015, **Figure 5-2** shows that the workforce will generally be above these averages for 14 of the 25 months of construction, or 56 percent of the time.

Table 5-5 summarizes the project workforce statistics, including the peak non-local workforce assumptions utilized to assess the potential construction impacts in this section. At the proposed Project's peak in March 2016, 384 of the 460 total workers will be non-local and in need of either temporary housing, such as hotel / motel rooms or RVs, or vacant permanent housing units that are available for rent.

Single Workers and Workers with Families. Based on the type of labor required to complete construction, the majority of the workforce is expected to be single or will likely be unaccompanied by their spouses and children during the period of construction. However, because select skillsets will be needed for the duration of the proposed Project, such as craft supervisors, laborers, carpenters, ironworkers and pipefitters (see **Table 5-4**), it was conservatively assumed that 5 percent of the non-local workforce would be accompanied by their families. As a result, up to 19 non-local workers are projected to bring their family, while the remaining 365 peak non-local workers will arrive unaccompanied. The 2010 Census calculated that the average family size in Sweetwater County was 2.96, consisting of a householder and one or more other people related to the householder by birth, marriage, or adoption. This figure, therefore, was used to calculate the potential impacts to resources affected by family size or the types of services provided (U.S. Census, 2010).

TABLE 5-5
Simplot Construction Workforce Statistics

Construction Duration (Months)	25
Duration of Peak Period (Months that Non-Local Workforce > Average)	14
Average Total Workforce	311
Average Non-Local Workforce	241
Average Local Workforce	70
Peak Total Workforce (March 2016)	460
Peak Non-Local Workforce (March 2016)	384
Peak Non-Local Workers Bringing Families (5 percent)	19
Peak Non-Local Single Workers	365
Peak Local Workforce (March 2015)	100

TABLE 5-5
Simplot Construction Workforce Statistics

Estimated Number of Non-Local Construction Workers by Month and Year

Year	January	February	March	April	May	June	July	August	September	October	November	December	Average for Year	Maximum / Peak for Year
2014								8	58	73	170	216	105	216
2015	216	216	266	290	195	168	244	296	326	326	346	370	272	370
2016	362	368	**384**	378	364	252	114	18					280	384

Local to Non-Local Workforce Ratio. Based upon its knowledge of the local labor market conditions and the skills needed, Simplot estimates that approximately 78 percent of the construction workforce will be comprised of non-local workers, with local workers making up the remaining 22 percent. This estimated distribution of non-local workers is shown in **Table 5-5** and follows the same pattern as the overall construction workforce. The local construction workforce payroll is approximately $29 million, including pre-construction site preparation activities.

Operations Workforce Estimate

The annual workforce associated with the proposed Project during its operations phase would total approximately 27 workers. As shown in **Table 5-6**, the operations workforce would be comprised of a plant superintendent, training coordinator, maintenance supervisor, five maintenance workers, and 12 operations positions, with an estimated total annual payroll of about $3.949 million. These workers would likely originate as non-local personnel and permanently relocate to the area.

TABLE 5-6
Simplot Operations Workforce and Payroll

Position Title	Number in Position	Occupational Code	Base Salary	Salary & Fringe per Employee	Total
Operations	12	51-9011	$80,000	$136,000	$1,632,000
Maintenance	5	49-9041	$80,000	$136,000	$680,000
Maintenance Supervisor	1	51-1011	$90,000	$162,000	$162,000
Operations Supervisor	4	51-1011	$90,000	$162,000	$648,000
Plant Superintendent	1	11-1021	$100,000	$190,000	$190,000
Training Coordinator	1	13-1151	$85,000	$148,750	$148,750
Safety/PSM Specialist	1	17-3026	$90,000	$162,000	$162,000
Process Control IT Tech	1	17-3023	$80,000	$136,000	$136,000
Process Engineer	1	17-2041	$100,000	$190,000	$190,000
Total Operations Staff	27		Total Operations Payroll		$3,948,750

Source: Simplot, January 2014.

5.3.5 Impact Analysis Methodology

Potential impacts associated with the proposed Project are driven by a number of factors, including direct construction and operations workers currently residing in the area; direct workers newly entering the region for a limited time; additional service workers required to support these direct workers; and the local purchase of equipment, supplies, materials, and services necessary for construction and operation of the facility.

Where appropriate, level of service (LOS) ratios are calculated for resources, and comparisons are made with statewide, national, and local ratios to provide a perspective for impact assessment. LOS ratios express the quantity of a service (e.g., the number of firefighters or law enforcement officers in a service area) in relation to the population in the respective service area (e.g., per 10,000 residents). These ratios provide a means of comparing service levels across service areas and over time or against target or standard levels. LOS ratios are used to estimate the number of additional service personnel required to meet the demands of new residents while maintaining existing service levels. If it appears that the resources are unlikely to be able to accommodate the new demands of the proposed Project, then mitigation measures are recommended.

Regional Economic Analysis

The economic impacts occurring in a local economy associated with the introduction of new business activity are based primarily on employee compensation, purchases made by the new business, and taxes paid to local governments. Thus, the positive economic impact on local businesses is expected to be consistent with the degree to which local businesses are able to supply the needs of new businesses and their employees. Conversely, if local businesses cannot meet the needs of new businesses or their employees, or cannot do so in a cost-competitive manner, then purchases may occur outside of the local economy. Purchases made outside of the local area represent leakages of money out of the local economy. Profits of the new business also leak out of the local economy if the owners or stockholders reside outside the local area. To measure local economic impacts, this report focuses on projected wages and salaries, business purchases, and taxes collected by local municipal and county governments.

To estimate the total economic impacts of a project or new business activity, the analysis takes into account the concept that employee wages and business purchases have a “ripple effect” in an economy. The new business will purchase some of its required materials, supplies, and services in the local economy, and local businesses will hire some new employees and purchase materials and services from other businesses to meet demand, creating what are known as indirect effects. Likewise, employees at the new business or project will spend a portion of their wages at local stores and businesses, creating “induced effects.” In this way, the economic impact of the new business or project spreads in the local economy. The portions of employee wages and business purchases that are made outside of the local economy result in leakages out of the local economy. Collectively, indirect and induced effects are referred to as “secondary impacts.” In their entirety, all of the previously discussed changes (direct and secondary) are referred to as “total economic impacts.” By their nature, total impacts are greater than initial changes because of secondary effects. The magnitude of the increase is what is popularly termed a “multiplier effect.” To estimate the total economic impacts due to this ripple effect, economic multipliers are used in conjunction with the direct employment, wages, business purchases, and taxes paid. The direct impacts are multiplied by the economic multiplier to yield an estimate of the overall economic impact of the new business or project. Multipliers are generated by economic input-output (I-O) models that account for linkages between sectors in an economy.

An I-O analysis estimates the dollar value of change in regional economic activity associated with economic linkages and leakages. The economic system, consisting of producers and consumers, is divided into various sectors that are defined in terms of the resources they require as inputs and what they produce as outputs. The quantities of inputs and outputs for a given period, usually expressed in monetary terms, are entered into an I-O matrix to enable the analysis of impacts within and across various sectors of an economy where growth and decline take place, as well as what effects various policies may have.

A number of regional economic analysis modeling systems (consisting of data and analytical software) are available for use in regional economic analysis. An I-O approach is used here for estimating the secondary effects of the proposed Project. A number of I-O models exist, including Impact Analysis for Planning (IMPLAN), Regional Economic Models, Inc. (REMI), and Regional Industrial Multiplier System II (RIMS). These modeling systems all contain computer databases used to create I-O models for any combination of U.S. counties. For the proposed Project, IMPLAN was used to estimate the indirect and induced impacts associated with Project implementation.

Impact Analysis for Planning Model

IMPLAN was originally developed by the U.S. Forest Service (USFS) in cooperation with the Federal Emergency Management Agency (FEMA) and the Bureau of Land Management (BLM) to assist in land and resource management planning. The IMPLAN package includes 1) estimates of final demands and final payments for counties developed from government data; 2) a national average matrix of technical coefficients; 3) mathematical tools that help the user build the I O model; and 4) tools that allow the user to change data, conduct impact analysis, and generate reports.

5.4 Inventory, Evaluation, and Impact Assessment by Social and Economic Resource Areas

Social and economic conditions in the geographical area likely to experience impacts associated with construction and operation of the industrial facility are inventoried and evaluated as they currently exist, projected as they would exist in the future without the proposed Project, and as they would exist with the facility. Following this evaluation, an assessment is presented of the potential Project-induced impacts during both the construction and operation phases.

The following resources are addressed:

- **Population –** Historical trends, density and distribution, age, race and ethnicity, poverty status, migration, and projections;
- **Economic and Fiscal Conditions –** Employment and unemployment, employment by industrial sector, earnings and income, commuting and housing-jobs balance, construction industry, government revenues and finances (property values, sales taxes, use taxes, lodging taxes, impact assistance funds), finances (revenues and expenditures), and future conditions by sector;
- **Housing –** Permanent housing (housing stock characteristics, construction activity, home values and rental housing costs, rental housing vacancies, housing needs) and temporary housing (hotel, motels, and RV spaces);
- **Public Education –** Educational facilities, student enrollment, and student-teacher ratios;
- **Public Safety –** Fire protection services, law enforcement services, and crime;

- **Health Care –** Location and characteristics of personnel and facilities, and health needs of existing population;
- **Municipal Services –** Wastewater treatment, water treatment and distribution, non-hazardous waste collection and disposal, electricity service, and natural gas service; and,
- **Human Service Facilities** - Family services, including child support enforcement, family assistance, and, social services.

5.4.1 Population

Based on the recommended area of site influence, Sweetwater County is the area to be analyzed in this subsection. This subsection describes past, present, and future characteristics of the population in the county. These characteristics include historical trends within the county; age composition; racial and ethnic composition; and migration patterns within the county.

Population characteristics that are important in determining the location and availability of the local labor force include the location of population centers and the age distribution of the population (i.e., the identification of areas where persons of working age reside).

Existing Conditions

Historical Population Trends. Sweetwater County and the area of site influence are summarized in **Table 5-7**, while **Table 5-8** shows the decade-to-decade population change.

The cities of Green River and Rock Springs are the primary communities within Sweetwater County adjacent to the proposed Project. Four additional communities in Sweetwater County − Arrowhead Springs CDP, Farson CDP, Little America CDP, and North Rock Springs CDP − are within commuting distance of the proposed Project. In contrast to the population of the individual counties and cities, which reflects the boom-and-bust cycle common in Wyoming in the 20th century, the overall population of the area of site influence has increased nearly every decade since the 1940s with the exception of the 1960s and 2000s (Wyoming Economic Analysis Division [WY EAD], 2013a).

Table 5-7 also provides estimates of the population in the county, area of site influence, and State of Wyoming for 2011 and 2012. It is estimated that the population of the area of site influence decreased by 1,354 persons between 2010 and 2012 to 36,848, while the number of people residing in Sweetwater County overall increased by 1,461 during that same period to a total of 45,267 (WY EAD, 2013a).

TABLE 5-7
Population Trends in the Area of Site Influence

Area	2012 Estimate	2011 Estimate	2010	2000	1990	1980	1970	1960	1950	1940
Sweetwater County	**45,267**	**44,078**	**43,806**	**37,613**	**38,823**	**41,723**	**18,391**	**17,920**	**22,017**	**19,407**
Green River, City of	12,801	12,622	12,515	11,808	12,711	12,807	4,196	3,497	3,187	2,640
Rock Springs, City of	24,047	23,229	23,036	18,708	19,050	19,458	11,657	10,371	10,857	9,827
Arrowhead Springs CDP	NA	40	63	68	NA	NA	NA	NA	NA	NA
Farson CDP	NA	529	313	242	NA	NA	NA	NA	NA	NA

TABLE 5-7
Population Trends in the Area of Site Influence

Area	2012 Estimate	2011 Estimate	2010	2000	1990	1980	1970	1960	1950	1940
Little America CDP	NA	15	68	56	NA	NA	NA	NA	NA	NA
North Rock Springs CDP	NA	2,878	2,207	1,974	2,471	NA	NA	NA	NA	NA
Area of Site Influence	**36,848**	**39,313**	**38,202**	**32,856**	**34,232**	**32,265**	**15,853**	**13,868**	**14,044**	**12,467**
Wyoming	576,412	567,356	563,626	493,782	453,588	469,557	332,416	330,066	290,529	250,742
Area of Site Influence as Percent of State	6%	6%	6%	7%	7%	7%	5%	4%	5%	5%

NA – Not Available
Source: Wyoming Economic Analysis Division (WY EAD), 2013a; U.S. Census Bureau, 2013c, 2013d, and 2013e

TABLE 5-8
Decade-to-Decade Percent Population Change in the Area of Site Influence

Area	1940-1950	1950-1960	1960-1970	1970-1980	1980-1990	1990-2000	2000-2010
Sweetwater County	**13**	**-19**	**3**	**127**	**-7**	**-3**	**16**
Green River, City of	21	10	20	205	-1	-7	6
Rock Springs, City of	10	-4	12	67	-2	-2	23
Area of Site Influence	31	6	32	272	-3	-9	29
Wyoming	**16**	14	1	41	-3	9	14

Note: Data were not available for Arrowhead Springs CDP, Farson CDP, Little America CDP, or North Rock Springs CDP.
Source: Wyoming Economic Analysis Division (WY EAD), 2013a.

Table 5-7 illustrates the population trends for Sweetwater County, select cities within the county, the area of site influence, and the state as a whole between 1940 and 2012. It shows the overall "boom-bust" cycle experienced in the state historically, and demonstrates that Sweetwater County can be significantly impacted by shifts in population. Those fluctuations are further illustrated in **Table 5-8**, which presents the percentage change in population for those same areas over the past seven decades. As shown in **Table 5-8**, population gains were recorded in Sweetwater County (including Green River and Rock Springs), the area of site influence, and all of Wyoming during the past 10 years, this following two decades (1980s and 1990s) marked largely by population decreases. This was preceded by multiple triple-digit percentage gains in population in the 1970s, which saw the population of the cities of Green River and Rock Springs climb by 205 and 67 percent, respectively, and the number of residents in the area of site influence jump by 272 percent.

Population Density and Distribution. Table 5-9 summarizes the 2012 population estimate, land area, population density, and percent of the population of the area of site influence. Sweetwater County covers 10,427 square miles, and its 2012 population of 45,267 equates to a population density of 4.3 persons per square mile. Of the estimated 45,267 people living in Sweetwater County,

81 percent reside in the cities of Green River and Rock Springs, which together accounted for 6 percent of Wyoming's estimated 2012 population.

TABLE 5-9
Population Density and Distribution

Area	2012 Population Estimate	Land Area (square miles)	Population Density	Percent of Area of Site Influence Population
Sweetwater County	**45,267**	**10,427**	**4.3**	**--**
Green River, City of	12,801	14	914.3	35
Rock Springs, City of	24,047	19	1,265.6	65
Area of Site Influence	**36,848**	**33**	**1,116.6**	**--**
Wyoming	576,412	97,093	5.9	--

Note: Data were not available for Arrowhead Springs CDP, Farson CDP, Little America CDP, or North Rock Springs CDP.
Source: U.S. Census Bureau, 2013f.

The population densities in the cities of Green River and Rock Springs appear to be relatively high, with 914 and 1,266 persons per square mile, respectively. This compares to an average statewide population density of six persons per square mile, the second lowest population density among all states. This large difference in population densities could be attributed to the large amount of public land in both Wyoming and Sweetwater County.

Age and Gender of the Population. The age distribution of the population is an important factor in assessing the size of the local labor force. **Table 5-10** compares the existing population estimate, by age, in the State of Wyoming and Sweetwater County as of July 1, 2012. The age cohorts from 25 to 44 and from 45 to 64 offer the greatest possible contribution of the expected labor force. These two cohorts encompass 53 percent of the population of the State of Wyoming. The characteristics of Sweetwater County are similar, with 55 percent of its population between the ages of 25 and 64.

TABLE 5-10
Estimated Population in Wyoming and Sweetwater County by Age and Age Cohort Percent of the Total as of July 1, 2012

		Age								
Area	**Total**	**Under 5**	**5 to 13**	**14 to 17**	**18 to 24**	**25 to 44**	**45 to 64**	**65 +**	**18 +**	**Median**
Sweetwater County	45,267	3,572	6,173	2,471	4,377	13,007	11,692	3,975	33,051	33.1
Percent of Total		8%	14%	5%	10%	29%	26%	9%	73%	
Male	23,615	1,808	3,187	1,268	2,360	6,912	6,181	1,899	17,352	33.1
Female	21,652	1,764	2,986	1,203	2,017	6,095	5,511	2,076	15,699	33.2
Wyoming	576,412	38,592	67,861	29,037	58,144	149,367	157,903	75,508	440,922	36.9
Percent of Total		7%	12%	5%	10%	26%	27%	13%	76%	
Male	294,281	19,455	35,086	14,874	30,725	78,370	80,347	35,424	224,866	36.2
Female	282,131	19,137	32,775	14,163	27,419	70,997	77,556	40,084	216,056	37.7

Source: Wyoming Economic Analysis Division (WY EAD), 2013b, 2013c, and 2013d.

Population Migration. Population change in an area is attributable to births, deaths, and net migration. Population migration in Wyoming is tracked by the U.S. Census Bureau as well as the Wyoming Department of Transportation (WYDOT), which tracks drivers who exchange licenses from

other states when they move to Wyoming as well as those who surrender their licenses to other states when they move from Wyoming (WCDA, 2013a). **Table 5-11** summarizes the net change between incoming and outgoing persons with licenses for Wyoming and Sweetwater County based on the WYDOT data. It illustrates that net migration to Sweetwater County has been increasing since 2005 as well as its proportion of Wyoming's overall net migration. Approximately 4,000 new residents moved to the area between 2005 and the first half of 2013, representing 9 percent of the state's net migration during this period. Since 2005, Wyoming's net influx in population has increased steadily, with 2011 showing the greatest level of net in-migration in the state for the entire 9-year data period (WCDA, 2013a).

TABLE 5-11
Net Migration Trends in Sweetwater County and the State of Wyoming

Area	2005	2006	2007	2008	2009	2010	2011	2012	2013-First half	Total (2005 – 2013*)
Sweetwater County	243	711	631	735	294	567	565	227	30	4,003
Wyoming	3,387	5,810	6,002	7,112	6,431	7,495	3,136	2,250	2,555	44,178
Area of Site Influence as Percentage of the State	7%	12%	11%	10%	5%	8%	18%	10%	1%	9%

Note:
*First-half of 2013.
Source: WCDA, 2013a.

Population Projections. As shown in **Table 5-12**, forecasts by the Wyoming Department of Administration and Information's (WDAI) Economic Analysis Division (WY EAD) estimate that the population of the area of site influence will increase by 4,443 residents by 2020 and by an additional 2,175 persons by 2030 (WY EAD, 2010).

TABLE 5-12
Population Forecasts

Area	2010 Census	2015 Forecast	2020 Forecast	2025 Forecast	2030 Forecast
Sweetwater County	**43,806**	**46,430**	**49,280**	**50,820**	**51,960**
Green River, City of	12,515	13,265	14,079	14,519	14,845
Rock Springs, City of	23,036	24,416	25,915	26,724	27,324
Wyoming	563,626	594,710	622,360	644,050	668,830
Area of Site Influence	**35,551**	**37,681**	**39,994**	**41,243**	**42,169**
Percent of Wyoming	6%	6%	6%	6%	6%

Note: 2010 state, county, and municipality populations are 2010 U.S. Census data; 2011 to 2030 state and county population forecasts were developed based on trends of demographic and economic variables; municipality population forecasts were simply calculated by applying the place/county ratios to the appropriate county population forecasts.

Source: Wyoming Economic Analysis Division (WY EAD), 2010.

Population, Race, and Ethnicity. Overall, the results of the 2010 U.S. Census in Wyoming indicate that significant change has occurred in racial and ethnic composition. The white population increased at the slowest rate (12.5 percent) over the 2000 through 2010 period, while the Asian population grew more quickly than any other race, at 59.7 percent (WY EAD, 2011). **Table 5-13** summarizes the racial and ethnic composition of Green River, Rock Springs, Arrowhead Springs CDP, Farson CDP, Little America CDP, North Rock Springs CDP, and Sweetwater County compared to

Wyoming and the United States based on the 2010 U.S. Census. Similar to Wyoming and the rest of the nation, Sweetwater County is predominately white, representing more than 85 percent of the county's total population. Those identifying themselves as Hispanic or Latino accounted for 13.4 percent of all Green River residents and 16.4 percent of the population of Rock Springs, compared to 8.9 percent in the State of Wyoming and 16.3 percent in the United States. Little America CDP has by far the highest percentage of Hispanic population, at 45.6 percent. The percentage of minority population in the area of site influence is lower than the national percentage and comparable to the state percentage.

TABLE 5-13
Population Composition by Race and Ethnicity (2010 U.S. Census)

	Population by Race									
Area	White Alone	Black or African American Alone	American Indian and Alaska Native Alone	Asian Alone	Native Hawaiian and Other Pacific Islander Alone	Some other Race Alone	Two or More Races	Hispanic or Latino Origin	Percent Minority Population	Percent Hispanic Population
Green River, City of	11,521	53	106	61	8	518	248	1,682	7.9%	13.4%
Rock Springs, City of	19,907	323	189	248	29	1,734	606	3,771	13.6%	16.4%
Arrowhead Springs CDP	63	0	0	0	0	0	0	0	0%	0%
Farson CDP	297	0	7	0	0	5	4	16	5.1%	5.1%
Little America CDP	51	3	0	0	0	14	0	31	25%	45.6%
North Rock Springs CDP	2,039	10	33	2	1	85	37	232	7.6%	10.5%
Sweetwater County	38,748	438	423	336	42	2,799	1,020	6,689	11.5%	15.3%
Wyoming	551,265	4,748	13,336	4,426	427	17,049	12,361	50,231	9.2%	8.9%
U.S.	223,553,265	38,929,319	2,932,248	14,674,252	540,013	19,107,368	9,009,073	50,477,594	27.6%	16.3%

Note:
Racial minorities include all persons identifying themselves in the census as a non-white race, which includes "Black or African American," "American Indian and Alaska Native," "Asian," "Native Hawaiian and other Pacific Islander," "Some other race alone," and "Two or more races." Ethnic minorities include persons identifying themselves as "Hispanic or Latino." Persons of "Hispanic or Latino" origin are an ethnic minority. The racial group of "White" does not include persons of "Hispanic or Latino" origin.

Source: U.S. Census Bureau, 2010b.

Population Poverty Status. According to U.S. Census Bureau, the American Community Survey (ACS) estimated the following proportions of the population were earning below the poverty level in the area of site influence between 2007 and 2011: 10.1 percent for the State of Wyoming, 9.3 percent for Sweetwater County, 8.8 percent for the City of Green River, 9.8 percent for the City of Rock Springs, 6.8 percent for North Rock Springs CDP, and 0.0 percent for Arrowhead Springs CDP, Farson CDP, and Little America CDP (U.S. Census Bureau, 2013g).

Construction Impacts

Construction for the proposed Project is expected to begin August 2014 and be completed in August 2016. For those months with active construction, the average total monthly workforce is estimated at 311 for the 25-month construction duration. The peak total workforce is estimated at 460 onsite workers during March 2016.

It is estimated that an average of 78 percent of the total workforce will be non-local over the duration of the Project. The number of non-local temporary workers likely to enter the area of site influence during the construction months could peak at 384 in March 2016. It is assumed that 5 percent or less of the non-local workers would be accompanied by family members due to the tendency of the construction workforce to return home on the weekends; therefore, impacts to population would be negligible.

Operations Impacts

During operations of the proposed Project, it is estimated that 27 full-time employees would be hired and relocate to the local region. This small number of employees is expected to have a negligible impact on the local area population.

5.4.2 Economic and Fiscal Conditions

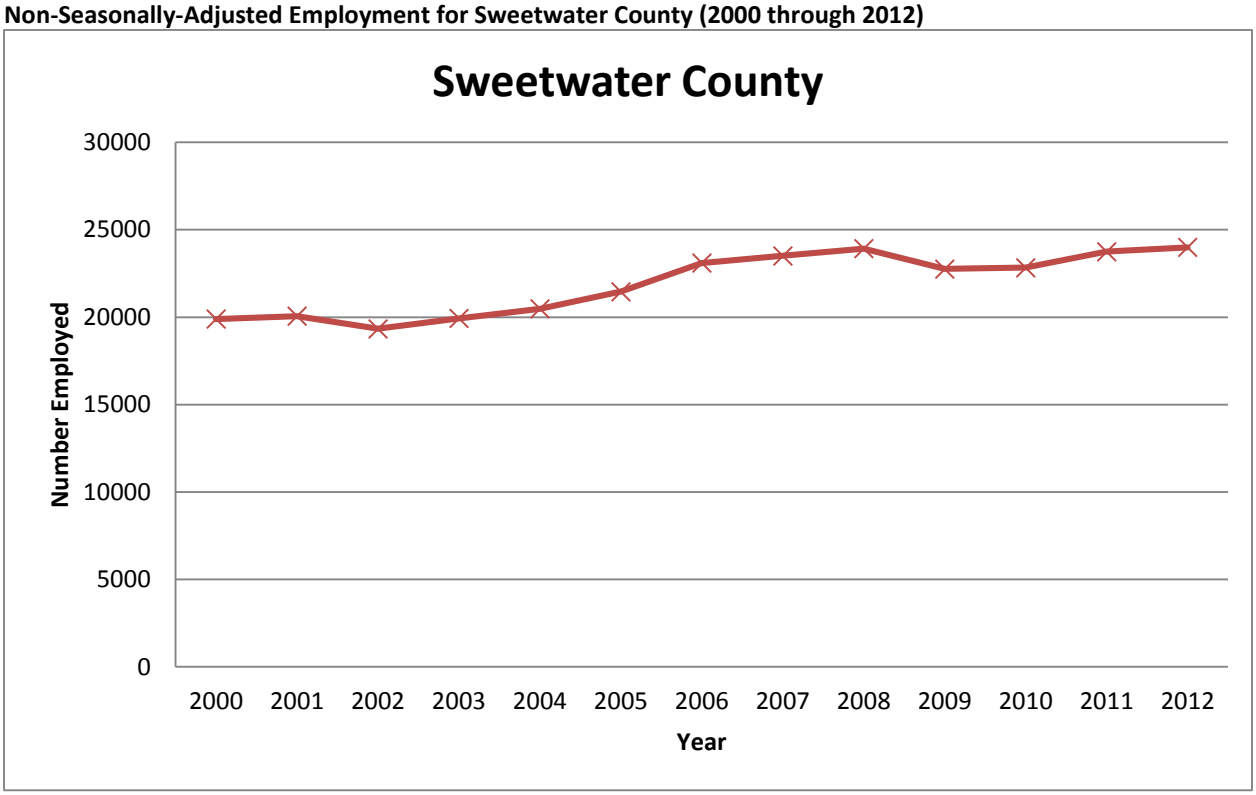
This section addresses past, present, and future economic conditions (labor force, employment, and unemployment); income and earnings by industrial sector; work centers; existing labor characteristics and availability; and government revenues (property, sales, use, and lodging taxes and residential property values). The county-level discussion of existing economic and fiscal conditions presented below pertains only to Sweetwater County because it is the only county included in the area of site influence.

Existing Conditions

Employment, Unemployment and Labor Force.

Sweetwater County employment during the period 2000 through 2012 is shown in **Figure 5-3** and reported in **Table 5-14**. Employment remained steady at approximately 20,000 during the first half of the decade, and gradually approached 25,000 by 2008. The county saw a slight decline in employment in 2009 and 2010, before rebounding again in 2011 and 2012.

FIGURE 5-3
Non-Seasonally-Adjusted Employment for Sweetwater County (2000 through 2012)



Source: Wyoming Department of Workforce Services, Research and Planning, 2013a.

Table 5-14 also shows the size of the labor force, unemployment, and the unemployment rate for the State of Wyoming and Sweetwater County over the period 2000 to 2012. Sweetwater County accounts for approximately 8 percent of the state's jobs. The unemployment rate for the county is consistent with the average unemployment rate for the state. Unemployment remained relatively stable at about 4 percent during the first part of the decade, reached a low of just over 2 percent in 2007, spiked suddenly to its peak of 6.7 percent in 2010, and then settled back to 5.1 percent in 2011 and 4.6 percent by 2012. As shown in **Figure 5-4**, both Sweetwater County and the state as a whole fared well in comparison to the nation, where unemployment rates were consistently higher during the same period. Even by 2012, the national unemployment rate continued to hover above 8 percent, significantly higher than the 4.6 and 5.4 percent rates of unemployment enjoyed in Sweetwater County and the state, respectively.

TABLE 5-14
2000–2012 Benchmark Labor Force Estimates—Annual Averages for Wyoming and Sweetwater County

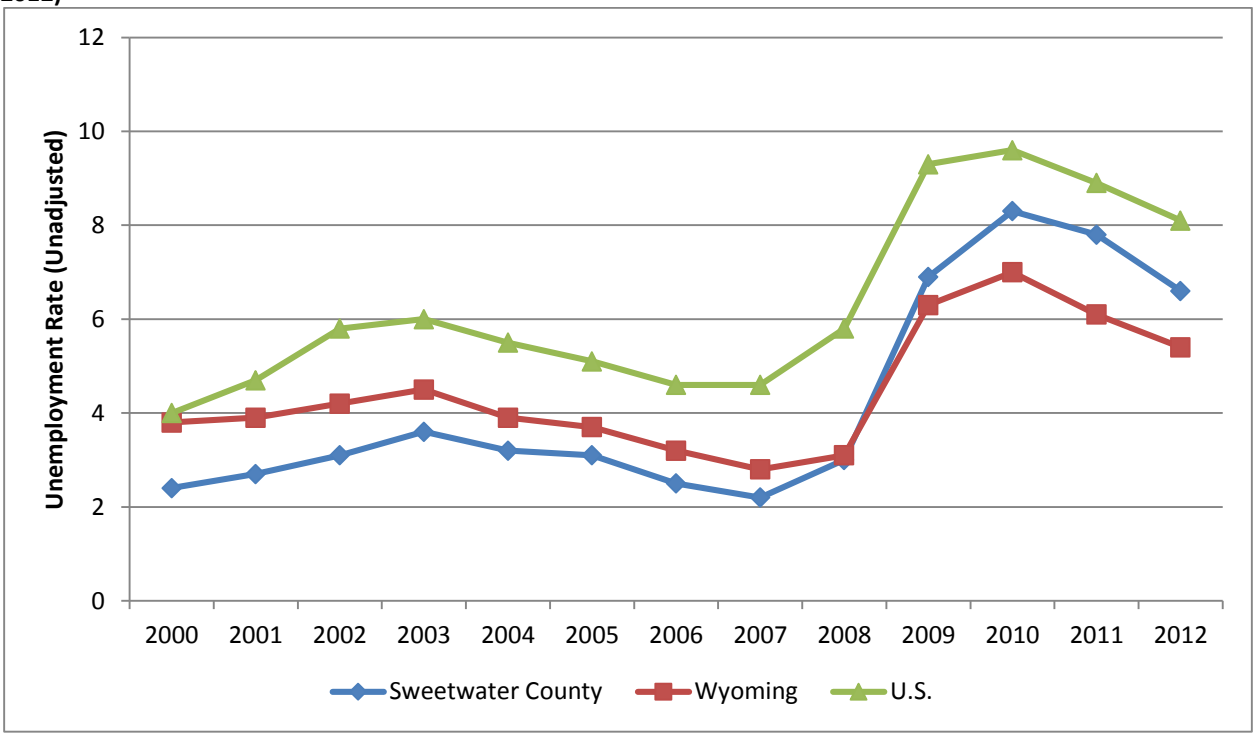
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Wyoming													
Labor Force	266,882	269,985	269,654	271,607	273,091	278,183	285,958	290,580	296,341	300,641	303,215	304,242	306,064
Employment	256,685	259,508	258,462	259,489	262,358	267,927	276,882	282,417	287,181	281,659	281,995	286,131	289,621
Unemployment	10,197	10,477	11,192	12,118	10,733	10,256	9,076	8,163	9,160	18,982	21,220	18,111	16,443
Unemployment Rate	3.8	3.9	4.2	4.5	3.9	3.7	3.2	2.8	3.1	6.3	7	6	5.4

TABLE 5-14
2000–2012 Benchmark Labor Force Estimates—Annual Averages for Wyoming and Sweetwater County

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Sweetwater County													
Labor Force	20,716	20,892	20,184	20,791	21,190	22,128	23,690	24,044	24,525	24,369	24,576	25,138	25,142
Employment	19,897	20,064	19,336	19,933	20,480	21,464	23,099	23,511	23,936	22,806	22,921	23,867	23,997
Unemployment	819	828	848	858	710	664	591	533	589	1,563	1,655	1,271	1,145
Unemployment Rate	4	4	4.2	4.1	3.4	3	2.5	2.2	2.4	6.4	6.7	5.1	4.6

Note: Benchmark Run Date 04/2013.
Source: Wyoming Department of Workforce Services, Research and Planning, 2013a.

FIGURE 5-4
Non-Seasonally-Adjusted Unemployment Rate for Sweetwater County, State, and Nation (2000 through 2012)

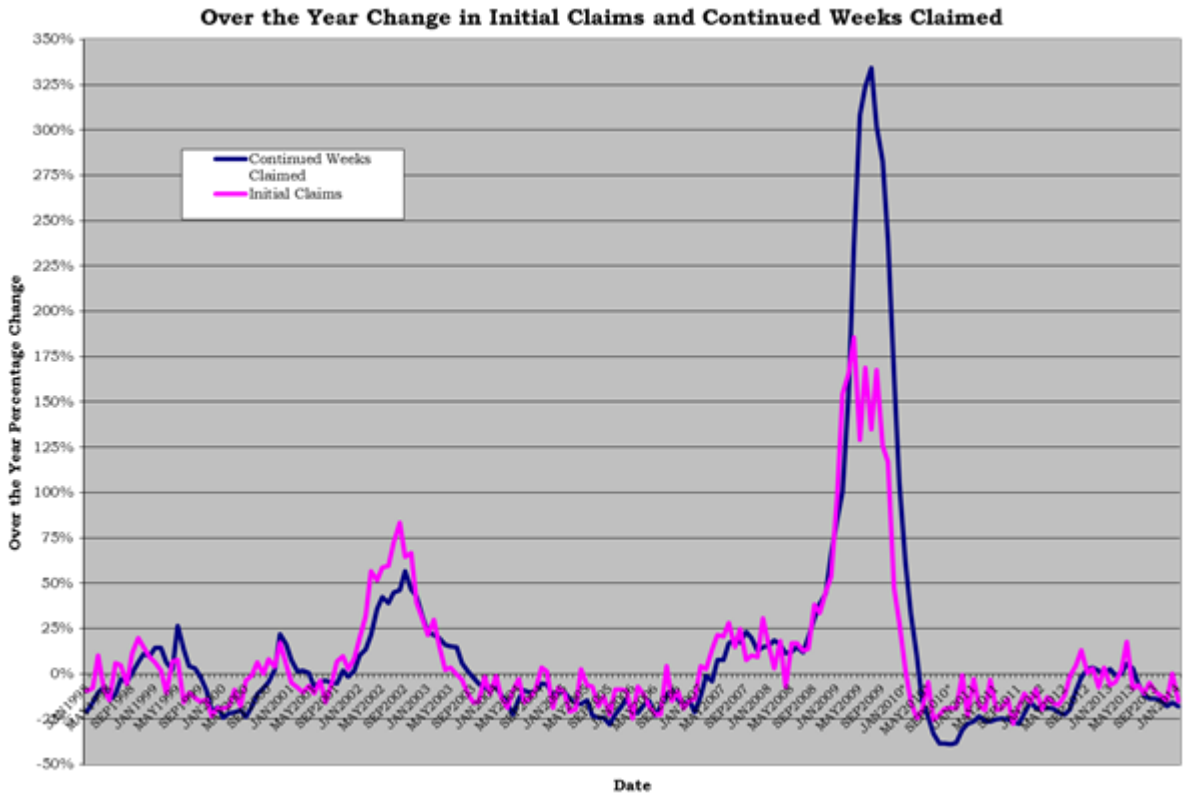


Note: Benchmark Run Date 04/2013.
Source: Wyoming Department of Workforce Services, Research and Planning, 2013b.

Figure 5-5 illustrates how monthly claims for unemployment benefits compare to the same month in the preceding year from January 1998 to January 2014. The period between September 2001 and May 2003 was one of increasingly deteriorating employment. Prior to this time, the area experienced a steady and sustained improvement in employment. Another period of stable and continued growth occurred between June 2003 and December 2007. However, 2007 saw the start of a trend of increasing claims for unemployment benefits, with the number climbing rapidly in the fourth quarter of 2008 and reaching historical highs during the first half of 2009. In March 2009, the number of unemployment claims was more than 150 percent higher than in the corresponding month in 2008. By 2011, however, monthly unemployment claims decreased relative to the preceding year, and held stable in both 2012 and 2013.

The information presented in **Figure 5-6** illustrates how the number of claims for unemployment benefits at the state level varies throughout and between years. Year 2009 began with a historical high in monthly claims relative to preceding years, and remained high for the duration of the year. Year 2010, however, showed improvement, and economic gains continued in 2011, 2012, and 2013, but had not yet returned to the pre-2009 levels. These numbers suggest the state's economy is in recovery. However, it remains to be seen whether the recovery will be strong enough to achieve the low levels of unemployment enjoyed in the early 2000s (see **Figure 5-6**).

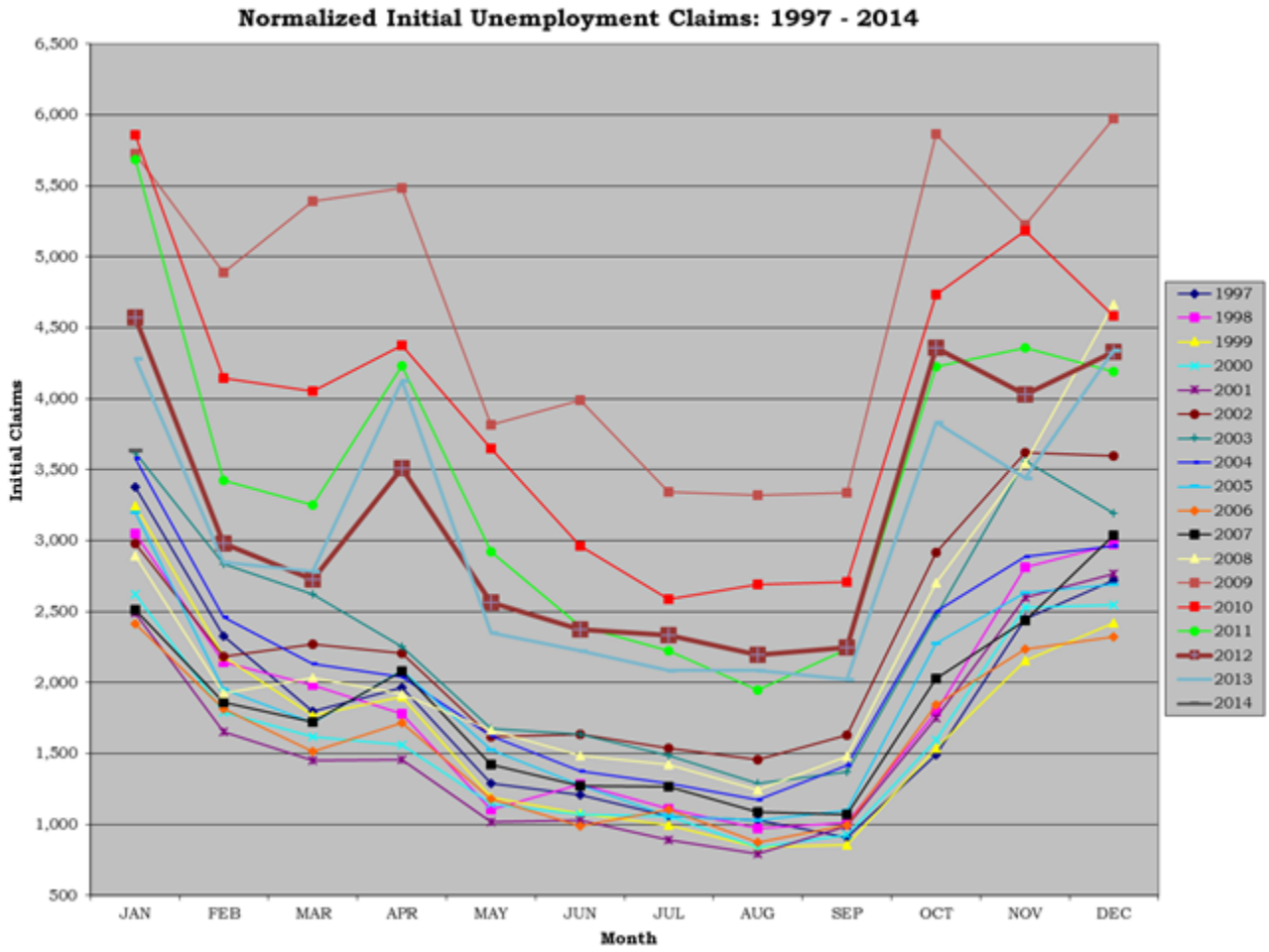
FIGURE 5-5
Monthly Initial Claims for Unemployment in the State, Year to Previous Year (January 1998 through January 2014)



Source: Wyoming Department of Employment, 2013a. Statewide Normalized Initial Claims by Industry in NAICS. Updated October 2013. Available at http://doe.state.wy.us/lmi/ui/NAICS_Statewide_Initial.htm.

FIGURE 5-6

Initial Claims for Unemployment by Month and Year in Wyoming (1997 through January 2014) Showing Seasonality of Workforce Requirements throughout the Year



Source: Wyoming Department of Employment, 2013b. UI -Tables – Initial Claims Chart. Updated October 2013. Available at http://doe.state.wy.us/lmi/ui/NAICS_Statewide_Initial.htm.

Employment by Industrial Sector. As shown in **Table 5-15**, employment in Sweetwater County averaged 24,430 in the first quarter of 2013, up a modest 23 jobs from the 24,407 workers reported in the first quarter of 2012. As shown in **Table 5-15**, which also includes the breakdown in employment by North American Industry Classification System (NAICS) sectors, the largest numerical increase in employment in the county during the first quarter of 2013 was in the construction sector, where the number of workers climbed by 198, or 13.9 percent, to an average of 1,619, or 7 percent of the county total. The real estate sector also posted a sizeable increase in employment in the first quarter of 2013, with its 529 employees marking a 33.2 percent jump from an average of 397 workers in first quarter 2012. By contrast, the largest numerical loss came in the mining sector, where employment in Sweetwater County fell by 403 jobs (6.4 percent) quarter to quarter to an average of 5,850. Despite the decrease, the mining sector still accounted for nearly one-fourth of all employment in the county in the first quarter of 2013. Employment in local government in Sweetwater County in the opening quarter of 2013 averaged 4,150, or 17 percent of the state total, down from 4,176 a year earlier, while employment in the retail trade sector averaged 2,267 in the first quarter of 2013 (9 percent of the county's employment), off slightly from

2,278 workers a year previously. Accommodations and food services employment, meanwhile, averaged 2,290 in the first quarter of 2013, up 3.2 percent from an average of 2,219 workers in the opening quarter of 2012.

The average weekly wages by sector are also reported in **Table 5-15**. The management sector, with an average weekly wage of $1,950, tops the list of the state's top wage earners, followed by mining ($1,864), manufacturing ($1,777), real estate ($1,160), federal government ($1,147), wholesale trade ($1,091), and transportation and warehousing ($1,086). By contrast, workers in educational services ($230), arts ($277), and accommodations and food services ($289) sectors were among the lowest weekly wage earners in the state during the first quarter of 2013. These data at the sector level are useful for understanding how the proposed Project may rely upon and contribute to specific sectors in the local economy and the state as a whole. In all, these data on the labor force, unemployment rates, and sector employment suggest that Sweetwater County has a viable workforce for contributing local labor to support the proposed Project. The construction, transportation and warehousing, wholesale trade and, accommodations sectors will likely be relied upon more than the other sectors.

TABLE 5-15
Employment and Wages by NAICS Sectors, Comparison between First Quarter 2012 and First Quarter 2013

	1Q 2012 Average Monthly Employment	1Q 2013 Average Monthly Employment	Change in First Quarter Employment (2012–2013)	1Q 2013 Share of Total Employment	1Q 2013 Average Weekly Wage
Total, Sweetwater County	**24,407**	**24,430**	**23**		**$1,090**
Total, Private	19,748	19,799	51	0.81	$1,153
Agriculture, Forestry, Fishing, & Hunting					
Mining, Quarrying, and Oil & Gas Extraction	6,253	5,850	(403)	0.24	$1,864
Utilities				-	
Construction	1,421	1,619	198	0.07	$1,001
Manufacturing	1,338	1,386	48	0.06	$1,777
Wholesale Trade	800	829	29	0.03	$1,091
Retail Trade	2,278	2,267	(11)	0.09	$535
Transportation & Warehousing	1,310	1,312	2	0.05	$1,086
Information	192	182	(10)	0.01	$581
Finance & Insurance	354	356	2	0.01	$835
Real Estate & Rental & Leasing	397	529	132	0.02	$1,160
Professional & Technical Services	557	539	(18)	0.02	$989
Management of Companies & Enterprises	74	133	59	0.01	$1,950
Administrative & Waste Services	513	396	(117)	0.02	$616
Educational Services	32	39	7	0.00	$230
Health Care & Social Assistance	1,208	1,112	(96)	0.05	$635

TABLE 5-15
Employment and Wages by NAICS Sectors, Comparison between First Quarter 2012 and First Quarter 2013

	1Q 2012 Average Monthly Employment	1Q 2013 Average Monthly Employment	Change in First Quarter Employment (2012–2013)	1Q 2013 Share of Total Employment	1Q 2013 Average Weekly Wage
Arts, Entertainment, & Recreation	61	53	(8)	0.00	$277
Accommodation & Food Services	2,219	2,290	71	0.09	$289
Other Services, Except Public Administration	501	485	(16)	0.02	$612
Total Government	**4,658**	**4,631**	(27)	0.19	$819
Federal Government	227	226	(1)	0.01	1,147
State Government	256	255	(1)	0.01	1,013
Local Government	4,176	4,150	(26)	0.17	789

Source:
Wyoming Department of Workforce Services, 2013c. Research & Planning, QCEW EXPO (Second Run: October 2013). Prepared November 5, 2013, by Nancy Brennan. Preliminary and subject to revision.

TABLE 5-16
Top Ten Employers in Rock Springs, Sweetwater County, Wyoming (2013)

Enterprise	Number of Employees
Public	
Sweetwater County School District No. 1	578
Private	
FMC Industrial Chemicals	888
Halliburton	720
General Chemical Company	520
Bridger Coal	443
OCI	430
Solvay Minerals	426
PacifiCorp	426
Schlumberger Pumping and Well Service	335
Memorial Hospital	322

Source: Livability.com, 2013. http://livability.com/rock-springs/wy/business/top-employers-rock-springs-wy. Updated June 2013.

As can be seen from the list of major employers presented in **Table 5-16**, enterprises associated with education and mining are important employers in the local area. The leading employers in the private sector are all associated with the mining industry, including FMC Industrial Chemicals with 888 employees; Halliburton, 720; General Chemical Company, 520; Bridger Coal, 443; OCI, 430; and Solvay Chemical, Inc., with 426 workers. Other top 10 employers include Sweetwater County School District #1 with 578 employees; PacifiCorp, 426; Schlumberger Pumping and Well Service, 335; and Memorial Hospital, with 322 employees.

Construction Labor Characteristics. Employment in the construction industry in Sweetwater County totaled 1,619 workers in the first quarter of 2013. According to the Wyoming Department of Workforce Services (2013a and 2013b), the state and regional economies have enjoyed a sustained recovery, but the rate of job growth has recently slowed before achieving the levels of employment experienced in 2008. This means there is a labor force that is ready and willing to occupy new jobs.

The average hourly wage for persons in construction and extraction occupations in Sweetwater County as of September 2013 was $25.03, or $52,062 annually based on 2,080 work hours per year. For production occupations, the corresponding figure was $30.73/hour. The mean wage for other occupations ranged from a low of $9.06/hour in the food preparation industry to a high of $43.70/ hour in management occupations (http://doe.state.wy.us/lmi/EDSupdatedtoSept2013ECI/ PAGE0494.HTM). Benefits are not included in these compensation figures (http:// doe.state.wy.us/lmi/EDSupdatedtoSept2013ECI/intro.htm).

Research of the BLM NEPA hot sheet was completed and inquiries were made with the ISD, Rock Springs BLM Field Office, and Sweetwater County Planning and Zoning Department to identify other sizable construction projects in the area of site influence that, in combination with the proposed Project, could cumulatively cause local labor and / or temporary housing shortages during Simplot's projected construction period from August 2014 through August 2016. As discussed further in Section 5.6, other than the Continental Divide/Wamsutter II natural gas play, the Energy Gateway West Transmission Project, the FMC Granger Project, and upgrades at the PacifiCorp Jim Bridger Power Plant, all of which were considered for the cumulative housing analysis, there are no other large upcoming construction projects considered outside the ordinary for the region.

Earnings and Income. Total aggregate personal income for the state and for Sweetwater County over the period from 2001 through 2012 is shown in **Table 5-17**. The trend shows rising personal income from 2001 through 2008, with a dip in 2009 and 2010 coincident with the national economic downturn. Personal income at the state and county level rebounded in 2011. At the state level, aggregate personal income reached $27.3 billion in 2011, with Sweetwater County accounting for $2.3 billion or 8.4 percent of the state total. The upward trend continued in 2012 with aggregate personal income reaching $29.1 billion at the state level, of which approximately $2.7 billion or 9.3 percent was in Sweetwater County.

TABLE 5-17
Aggregate Personal Income (thousands of dollars) 2001 through 2012

Year	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Wyoming State Total	15,441,258	15,945,633	16,933,024	18,238,847	19,969,216	22,911,824	24,219,501	27,016,369	26,289,062	25,600,835	27,213,688	29,147,161
Sweet-water County	1,156,395	1,167,436	1,250,197	1,322,024	1,432,263	1,691,797	1,823,105	2,034,970	1,900,370	2,139,024	2,290,895	2,663,661

Note:
All state and local area dollar estimates are in current dollars (not adjusted for inflation).
Source: Bureau of Economic Analysis, 2013; Developed by CH2M HILL (2013).

Sweetwater County's per capita personal income increased from $31,625 in 2001 to $50,948 in 2008 before declining to $46,096 in 2009, as shown in **Table 5-18**. By 2011, at $51,860, per capita income had recovered in Sweetwater County and, in 2012, it climbed an additional 3.1 percent to $58,843. Over the decade from 2002 to 2012, the county experienced a compound annual growth rate of 6.7 percent. This compares with 4.9 percent for the state as a whole and 3.2 percent nationally.

TABLE 5-18
Per Capita Personal Income (dollars) for the State and Sweetwater County 2001–2012

Year	2001	2002	2003	2004	2005	2006	2006	2008	2009	2010	2011	2012
Wyoming State Total	31,322	32,079	33,921	36,261	39,446	44,676	46,272	50,689	48,302	45,358	47,898	50,567
Sweetwater County	31,625	31,697	34,197	35,872	38,434	44,582	46,366	50,948	46,096	47,974	51,860	58,843

Notes:
Per capita personal income was computed by BEA using mid-year population estimates.
All state and local area dollar estimates are in current dollars (not adjusted for inflation).
Source: Bureau of Economic Analysis, 2013; Developed by CH2M HILL (2013).

Governmental Revenues and Finances

Assessed. The assessed value of real property is the major source of *ad valorem* taxes. Properties are assessed at both the state and local (county) levels; the state assesses the value of utility and mineral properties, and the counties assess residential, agricultural, commercial, and industrial land and improvements.

The total assessed value of real property in 2012 for Sweetwater County was $2.85 billion, as shown in **Table 5-19**. The locally assessed valuation was highest for industrial property with $359 million in assessed value followed by residential land with $202 million. The valuation of the state-assessed property at $2.2 billion was considerable larger in magnitude than the locally assessed valuation. In total, the property in Sweetwater County accounts for 11 percent of the assessed value of all real property in Wyoming. In 2013, the assessed value of real property for Sweetwater County fell by more than $150 million, and at the state level, the value of real property dropped by more than $2.4 billion, thereby maintaining Sweetwater County's share of the state total at over 11 percent.

TABLE 5-19
State and Local Assessed Valuation (2012 and 2013)

	Locally Assessed Valuation				State Assessed	
Sweetwater County	Agricultural Land	Residential Land, Improvements, and Personal Property	Commercial Land, Improvements, and Personal Property	Industrial Property	Minerals and Non-Minerals (Utilities, Railroads, and Airlines)	Total
2012	$5,573,208	$202,005,392	$78,908,473	$358,678,308	$2,208,033,300	$2,853,198,681
2013	$5,441,287	$211,585,645	$82,798,075	$378,629,432	$2,024,621,539	$2,703,075,978
2013 - 2012	-$131,921	$9,580,253	$3,889,602	$19,951,124	-$183,411,761	-$150,122,703

TABLE 5-19
State and Local Assessed Valuation (2012 and 2013)

	Locally Assessed Valuation				State Assessed	
Sweetwater County	Agricultural Land	Residential Land, Improvements, and Personal Property	Commercial Land, Improvements, and Personal Property	Industrial Property	Minerals and Non-Minerals (Utilities, Railroads, and Airlines)	Total
State Total						
2012	$245,913,632	$4,197,594,410	$1,146,893,447	$2,049,831,362	$17,602,411,727	$25,242,644,578
2013	$253,014,175	$4,292,823,158	$1,198,642,514	$2,162,592,241	$14,890,022,247	$22,797,094,335
2013 – 2012	$7,100,543	$95,228,748	$51,749,067	$112,760,879	-$2,712,389,480	-$2,445,550,243

Sources: Wyoming Department of Revenue, 2012. "2012 Annual Report." Accessed at http://revenue.wyo.gov/dor-annual-reports, June 2013.

Wyoming Department of Revenue, 2013. "2013 Annual Report." Accessed at http://revenue.wyo.gov/dor-annual-reports, accessed December 2013.

Ad valorem taxes (calculated by applying county- and use-specific mill rates to the assessed value of property) support a number of county and municipal operations, including airports, fire protection, hospitals, libraries, museums, public health, recreational systems, special districts, and education. **Table 5-20** presents the major beneficiaries of *ad valorem* taxes at the state level.

TABLE 5-20
Beneficiaries of Ad Valorem Taxes in Wyoming (2013)

Beneficiary	Percent of Total
Schools	54.12
Counties	18.11
Foundation Program	18.69
Special Districts	7.47
Municipalities	1.61

Source: Wyoming Department of Revenue, 2013.

Sales, Use, and Lodging Taxes. Sales and use tax collections are two principal sources of revenue for state and local governments. Local governments can also impose a lodging tax. The rates for each of these taxes for Sweetwater County are shown in **Table 5-21**.

TABLE 5-21
Sweetwater County, Wyoming Sales, Use, and Lodging Tax Rates
(Effective January 1, 2013)

County	State Tax Rate	General Purpose Option	Specific Purpose Option	Economic Development Option	Total Sales and Use Tax Rate	Local Government	Lodging Tax Rate	Total Tax Rate
Sweewater	4%	1%			5%	Sweetwater	2%	7%

Source: Wyoming Economic Analysis Division (WY EAD), 2013. Wyoming Sales, Use, and Lodging Tax Revenue Report, 2013, page 9. Available at http://eadiv.state.wy.us/s&utax/Report_FY13.pdf. Accessed December 2013.

Sales Tax. The state-imposed sales tax rate is 4 percent and revenues collected are divided 69 percent to the state and 31 percent to the counties. Sweetwater County imposes a 1 percent general-purpose optional sales tax, as shown in **Table 5-21**. Revenue derived from the optional sales tax, less administrative costs, is returned by the state to the county of origin. Total sales tax collections for fiscal year (FY) 2011 through FY 2013 for the county and the state are presented in **Table 5-22**. Sales tax revenue can vary from year to year and is tied to the level of economic activity. In FY 2011, sales tax collections were relatively low for the county and the state. Collections peaked in FY 2012, and in 2013, fell 21.3 percent at the county level and 4.2 percent for the state as a whole. Sweetwater County collected more than $78 million in total sales taxes in FY 2013.

TABLE 5-22
Sales and Use Tax Collections Sweetwater County and State (2011-2013)

Total Sales Tax Collections by Sweetwater County and State				
County/State	**FY 2011**	**FY 2012**	**FY 2013**	**Percent Change FY 2012 to FY 2013**
	Total Taxes	Total Taxes	Total Taxes	
Sweetwater County	$76,423,904	$99,227,313	$78,049,680	-21.3
State of Wyoming	$748,364,960	$857,780,696	$821,835,699	-4.2
Total Use Tax Collections by County				
County/State	**FY 2011**	**FY 2012**	**FY 2013**	**Percent Change FY 2012 to FY 2013**
	Total Taxes	Total Taxes	Total Taxes	
Sweetwater County	$15,623,091	$19,639,439	$18,521,599	-5.7
State of Wyoming	$105,223,085	$112,184,724	$104,163,194	-7.2

Source: Wyoming Economic Analysis Division (WY EAD), Wyoming Sales, Use, and Lodging Tax Revenue Report, 2013, pages 17 and 50 accessed from http://eadiv.state.wy.us/s&utax/Report_FY13.pdf, December 2013.

Use Tax. A state use tax is imposed on purchases made outside a taxing jurisdiction for first time, storage, or other consumption within that jurisdiction, thus preventing sales tax avoidance. Use tax is a complement to sales tax. Effective January 1, 1981, adoption of an optional sales tax required a change in the use tax rate of equal amount. The state-imposed tax rate is 4 percent. State use tax collections are shared between state government and the county of origin on the same distribution basis as sales tax. Use tax collections for the state totaled less than 13 percent of the sales tax revenues in 2013. Use tax collections by year are shown for Sweetwater County and the state in **Table 5-22**.

Lodging Tax. Cities, towns, and counties may impose an excise tax of up to 4 percent on all sleeping accommodations for guests staying less than 30 days. All tax collections, less state administrative costs, are distributed to the taxing jurisdiction. At least 90 percent of the tax distributions must be used to promote travel and tourism. The tax collections for Sweetwater County and the cities and towns in the county are shown in **Table 5-23**. Total collections show an upward trend from FY 2002 through FY 2008, when they peaked. Collections dipped slightly in FY 2009 and declined sharply in FY 2010, before climbing again in FY 2011. By FY 2013, however, collections had still not returned to their 2008 high.

TABLE 5-23
Lodging Tax Collections by County and Local Entity

Area	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013
Sweet-water County	$44,229	$42,437	$46,443	$39,528	$44,028	$58,535	$66,381	$59,926	$29,751	$33,503	$48,821	$39,390
Green River	$24,215	$26,669	$33,193	$34,590	$38,299	$46,786	$57,052	$68,126	$60,608	$65,484	$75,378	$75,498
Rock Springs	$253,932	$253,385	$310,402	$362,543	$465,365	$581,963	$615,355	$572,909	$422,411	$419,386	$523,078	$510,018
Wam-sutter	$1,438	$2,334	$3,526	$3,947	$3,517	$3,853	$3,414	$3,270	$3,281	$2,213	$2,788	$1,597
Total	$323,814	$324,825	$393,564	$440,609	$551,210	$691,137	$742,202	$704,231	$516,051	$520,586	$650,065	$626,502

Source: Wyoming Economic Analysis Division (WY EAD), Wyoming Sales, Use, and Lodging Tax Revenue Report, 2013, p. 68. Accessed from http://eadiv.state.wy.us/s&utax/Report_FY13.pdf, December 2013

Industrial Siting Impact Assistance Funds. Another important source of revenues for local governments is the payment of impact assistance funds when a major industrial project is built. The program is intended to assist cities, towns, or counties in deflecting the impact a major industrial project may have on community resources. The program measures the increase in tax revenue caused by the industrial project and matches that increase with additional monies from the state general fund to help communities respond to project-related impacts. The distribution of impact assistance funds is accomplished by transferring the funds from the state general fund, via the office of the state treasurer, directly to county treasurers' offices.

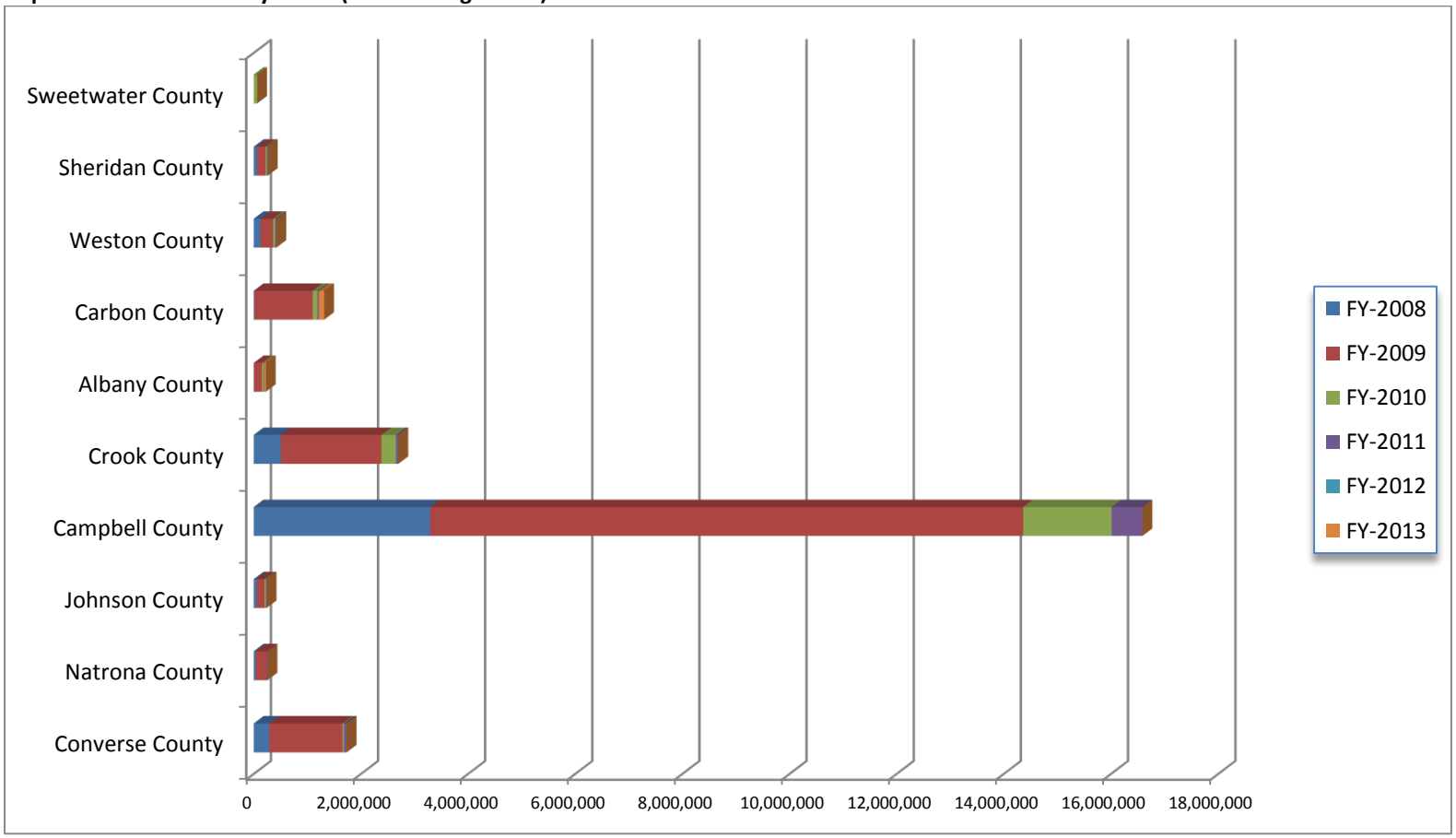
Under the Industrial Development Information and Siting Act,[10] a county or town may qualify to receive industrial impact assistance payments. The impact assistance payments are made to the county in which the facility is located, as well as adjoining counties provided that: 1) the commissioners of the adjoining county or counties have made a request; and 2) the ISC has determined that the social and economic impacts from construction of the facility upon the adjoining counties are significant. The payments are made based on a ratio established by the ISC during a public hearing held in accordance with W.S. 35-12-110, as certified to the state treasurer. The ISC regularly reviews the distribution ratio for facilities under construction and makes appropriate adjustments. A governing body that is primarily affected by the facility, or any person issued a permit pursuant to W.S. 35-12-106, may petition the ISC for review and adjustment of the distribution ratio upon a showing of good cause.

The impact assistance payments are in addition to all the other tax revenues discussed above. However, no impact assistance payments are made for any period in which the county or counties are not imposing at least a 1 percent tax authorized by W.S. 39-15-204(a)(i) and 39-16-204(a)(i), or at least a total of a 2 percent sales tax authorized under W.S. 39-15-204(a)(i), (iii), and (vi), and at least a total of a 2 percent use tax authorized under W.S. 39-16-204(a)(i), (ii) and (v).

[10] W.S. 35-12-101 through 35-12-109

Figure 5-7 illustrates the impact assistance payments received from FY 2008 through FY 2013 by Wyoming counties. These payments were made in direct proportion to any increase in other tax revenues to mitigate project-related impacts. Over the period 2008 through 2013, Campbell County received the most impact assistance funds, followed by Crook, Converse, and Carbon counties at a distant second, third, and fourth, respectively. By comparison, the remaining counties of Sweetwater, Sheridan, Weston, Natrona, Albany, and Johnson each received modest impact assistance funds. Platte, Laramie, and Goshen counties did not receive any impact assistance over this period.

FIGURE 5-7
Impact Assessment Tax Payments (2008 through 2013)



Source: Wyoming Department of Revenue (WDOR), 2013. *Wyoming State Government Annual Report 2013*.
Available at http://revenue.wyo.gov/.

Table 5-24 presents the impact assistance funds in tabular form covering the period from FY 2009 to FY 2013. Sweetwater County received income assistance funds only once during the 2009-2013 period, that coming in FY 2010, when it received payments totaling $65,364.45.

TABLE 5-24
Distribution of Impact Assistance Funds FY 2009 – FY 2013

Entity	Sales Tax	Use Tax	Total
FY-2099			
Carbon County	$1,087,114.34	0.00	$1,087,114.34
Albany County	$150,558.51	0.00	$150,558.51
Converse County	$1,252,801.51	$116,384.88	$1,369,186.39
Natrona County	$192,575.18	$15,445.96	$208,021.14
Campbell County	$9,502,831.94	$1,564,746.31	$11,067,578.25
Weston County	$199,235.37	$35,591.41	$234,826.78
Crook County	$1,621,844.45	$256,516.41	$1,878,360.86
Johnson County	$123,849.01	$22,124.39	$145,973.40
Sheridan County	$134,618.47	$24,048.26	$158,666.73
Totals	**$14,265,428.78**	**$2,034,857.62**	**$16,300,286.40**
FY-2010			
Albany County	$24,033.47	$7,836.16	$31,869.63
Campbell County	$124,406.07	$1,527,377.69	$1,651,783.76
Carbon County	$8,011.16	$80,905.74	$88,916.90
Converse County	$170.84	$30,013.12	$30,183.96
Crook County	$29,934.12	$241,783.92	$271,718.04
Johnson County	$130.98	$23,010.06	$23,141.04
Sheridan County	$142.36	$25,010.92	$25,153.28
Sweetwater County	**-**	**$65,364.45**	**$65,364.45**
Weston County	$210.69	$37,016.19	$37,226.88
Totals	**$187,039.69**	**$2,038,318.25**	**$2,225,357.94**
FY-2011			
Albany County	$7,586.84	$1,663.87	$9,250.71
Campbell County	0.00	$574,600.04	$574,600.04
Carbon County	$22,760.52	$4,991.61	$27,752.13
Converse County	$28,263.34	$21,021.95	$49,285.29
Crook County	0.00	$45,547.56	$45,547.56
Johnson County	0.00	$16,116.83	$16,116.83
Natrona County	$14,559.90	0.00	$14,559.90
Sheridan County		$17,518.29	$17,518.29
Weston County		$25,927.07	$25,927.07
Totals	**$73,170.60**	**$707,387.22**	**$780,557.82**
FY-2012	**NA**	**NA**	**NA**

TABLE 5-24
Distribution of Impact Assistance Funds FY 2009 – FY 2013

Entity	Sales Tax	Use Tax	Total
FY-2013			
Albany County	32,213.48	810.01	33,023.49
Carbon County	96,740.43	2,457.01	99,197.44
Totals	**128,953.91**	**3,267.02**	**132,220.93**

Source: Wyoming Department of Revenue (WDOR), 2013. *Wyoming State Government Annual Report 2013*, page 19-20. Available at http://revenue.wyo.gov/dor-annual-reports. Accessed December 2013.

Future Economic Conditions

This section addresses economic projections without Simplot's proposed Project. The description of potential future economic conditions in Wyoming is primarily derived from the report entitled Wyoming Occupational Projections 2012 to 2022, prepared by the Wyoming Department of Workforce Services.[11] Forecasts such as these are intended to capture the long-term trends in employment rather than year-to-year variations, which are particularly susceptible to unanticipated events. While the projections are based upon recent trends (the past 120 months), the last 36 months are given more weight.[12] As a result, these projections do not attempt to predict the effects of structural changes, such as those that could result from a recession, major national investments in energy efficiency, or health care.

Overall, the study found that there were a total of 280,772 jobs in Wyoming in Base Year 2012, and the projected number of total jobs for 2022 is 334,772, a net growth in jobs of 54,005. This equates to an 18 percent increase over the 10-year period, or an average increase in jobs of 1.8 percent per year.

The top five fastest-growing employment sectors were mining (40 percent growth); educational services (33.2 percent); management of companies and enterprises (32.4 percent); wholesale trade (31.1 percent); and other services except public administration (28.3 percent). Only one employment sector, information, predicts a small (0.9 percent) decrease in employment over the 10-year period. Employment in the construction sector is expected to grow 7.5 percent; transportation and warehousing by 22.7 percent, and utilities by 12.4 percent. More detail on certain job sectors is provided following the table.

Table 5-25 below summarizes the report's forecast. For each job category description, the table sets out 1) the number of jobs for Base Year 2012; 2) the number of jobs projected in 2014; 3) the resulting net growth from 2012 to 2014; 4) the number of jobs projected in 2022; 5) the resulting net growth from 2012 to 2022; and 6) the overall percentage growth from 2012 to 2022. Finally, the table sets out the totals in each of these categories for all occupations.

[11] Wyoming Department of Workforce Services, Research and Planning. 2013d. *Wyoming Occupational Projections 2021 to 2022*. Available at http://doe.state.wy.us/lmi/projections/WY_Occ_Proj_2012_2022.pdf. Accessed January 2014.

[12] Glover, T. 2011. *Wyoming's Industry and Occupational Projections Methodology 2011 to 2021.* Draft document prepared by the Wyoming Department of Workforce Services Research and Planning. November.

TABLE 5-25
Wyoming Employment Projections 2012 – 2022

	Base Year 2012	Projected Year 2014	Net Growth 2012 to 2014	% Growth 2012 to 2014	Projected Employment 2022	Net Growth 2012 to 2022	% Growth 2012 to 2022
Agriculture, Forestry, Fishing, and Hunting							
Total All Occupations	2,603	2,736	134	5.1	3,271	668	25.7
Mining, Quarrying, and Oil and Gas Extraction							
Total All Occupations	28,055	30,301	2,246	8.0	39,285	11,230	40.0
Utilities							
Total All Occupations	2,482	2,543	61	2.5	2,788	307	12.4
Construction							
Total All Occupations	22,827	23,171	345	1.5	24,549	1,723	7.5
Manufacturing							
Total All Occupations	9,468	9,586	118	1.2	10,059	591	6.2
Wholesale Trade							
Total All Occupations	9,068	9,631	564	6.2	11,887	2,819	31.1
Retail Trade							
Total All Occupations	29,338	29,521	184	0.6	30,255	918	3.1
Transportation and Warehousing							
Total All Occupations	10,582	11,061	479	4.5	12,979	2,397	22.7
Information							
Total All Occupations	3,872	3,865	-7	-0.2	3,838	-34	-0.9
Finance and Insurance							
Total All Occupations	6,667	6,714	48	0.7	6,906	239	3.6
Real Estate and Rental and Leasing							
Total All Occupations	4,015	4,165	150	3.7	4,767	752	18.7
Professional, Scientific, and Technical Services							
Total All Occupations	9,124	9,486	363	4.0	10,938	1,814	19.9
Management of Companies and Enterprises							
Total All Occupations	889	947	58	6.5	1,177	288	32.4
Administrative and Support and Waste Management and Remediation Services							
Total All Occupations	8,171	8,412	241	3.0	9,376	1,206	14.8
Educational Services							
Total All Occupations	30,006	31,998	1,992	6.6	39,968	9,962	33.2
Health Care and Social Assistance							
Total All Occupations	30,836	32,192	1,356	4.4	37,616	6,781	22.0
Arts, Entertainment and Recreation							
Total All Occupations	2,794	2,935	141	5.0	3,499	705	25.2
Accommodation and Food Services							
Total All Occupations	30,098	31,002	904	3.0	34,619	4,521	15.0
Other Services (Except Public Administration)							
Total All Occupations	8,482	8,962	480	5.7	10,884	2,402	28.3

TABLE 5-25
Wyoming Employment Projections 2012 – 2022

	Base Year 2012	Projected Year 2014	Net Growth 2012 to 2014	% Growth 2012 to 2014	Projected Employment 2022	Net Growth 2012 to 2022	% Growth 2012 to 2022
Public Administration							
Total All Occupations	31,395	32,338	943	3.0	36,111	4,716	15.0
Totals for all Occupations							
Total	**280,772**	**291,566**	**10800**	**3.8**	**334,772**	**54,005**	**18.8**

Source: Wyoming Department of Workforce Services, Research and Planning, 2013e. *Occupational Projections 2012 to 2022.* Available at https://doe.state.wy.us/lmi/projections/ind-occ-prj-2012-2022/full.pdf. Accessed January 2014.

Wyoming's economy is largely driven by natural resources. Of the state's natural resource industries, including oil and gas, mining, and wind generation, the mining sector has been the greatest contributor of economic and revenue activity in Wyoming's recent history.

Mining Industry.

The mining sector demonstrated strong growth from 2000 to 2009. For example, in 2005, the mining industry contributed approximately one-third of both the state's total earnings growth and job growth. The energy-driven growth continued through 2009, as low industrial diversity tied the state's fortunes to mining extraction, most recently dominated by natural gas production. In 2009, mining jobs hit a historical high of more than 33,000, but were back down to 28,055 in 2012. As set out in **Table 5-25**, mining sector jobs are projected to grow to 30,301 jobs by 2014 and to 39,285 by 2022, which will be the new historical high for this industry. This constitutes a forecasted 40 percent growth from 2012 to 2022.

The projected increased national demand for Wyoming's natural resources will help provide a steady source of mining jobs and revenues for the state. Outside of the mining industry, however, the state's future prospects will be somewhat limited by a job market that fails to attract high-growth job opportunities, and many younger workers will move to other states with more versatile job opportunities. Wyoming is the least diversified state in the nation in terms of employment distribution across industries.

Service Sector Categories.

Wyoming's economy is shifting more toward a service orientation than one that is goods-driven. Much like the rest of the country, the service industries have continually grown even during recessions. For example, in 2001 and 2002, despite the economic slowdown, total employment for various service industries still increased 2.5 and 2.2 percent, respectively, before climbing 1.6 percent in 2003 and 2.1 percent in 2004. Over the next 10 years (2011 to 2022), the service sector categories include several of the fastest-growing sectors—both in terms of growth rate and total number of new jobs. The main drivers will be health care and social assistance (22 percent growth); educational services (33.2 percent growth); management of companies and enterprises (32.4 percent growth); transportation and warehousing (22.7 percent growth), along with professional, scientific, and technical services (19.9 percent growth); and finance and insurance (3.6 percent growth). The service sector categories were and will continue to be Wyoming's fastest-growing sector as the state continues to undergo a structural shift from a goods-producing economy to a service-producing economy.

Government.

The government jobs sector is Wyoming's largest employment sector. Government employment serves as a significant stabilizer for Wyoming's overall economy, particularly in the southeast region.

The proportion of full-time state and local government employees in Wyoming was the highest in the country in 2003, at 869 per 10,000 people, compared to the national average of 542 employees per 10,000 people. One explanation for the high proportion of government employees is that Wyoming's population is sparsely distributed, requiring state and local governments to hire a relatively large number of employees to provide residents with services ranging from public schools and fire districts, to road maintenance and health care. Other states with higher-than-average state/local government employee rates were also states with large land areas and low population, such as Alaska, New Mexico, and Nebraska. By contrast, states with high population density have lower proportions of government employment.

In 2004, the 64,590 jobs in the government sector in Wyoming accounted for one-fourth of the state's total jobs. From 1990 to 2000, 5,500 government jobs were added, for an annual growth rate of 1 percent in this sector, compared with an overall growth rate of 1.9 percent for the state as a whole. Nearly all of the newly added jobs were in local government, which includes K–12 education and hospitals. Since 2000, state government jobs increased 3.1 percent annually because of the accelerating revenues from mineral production. Over the forecast period 2012 through 2022, jobs in public administration are projected to grow from 31,395 in 2012 to 36,111 in 2022, an increase of 15 percent. While government jobs are not among the five fastest-growing employment sectors, they will remain a consistent and steady source of new jobs in the future.

Retail Trade.

Although the retail trade sector experienced fast job growth in Wyoming in the first half of the 1990s, averaging nearly 2 percent each year, it then slowed to only about 1 percent annually up until 2007, largely because of out-migration from the state. Much like the nation, the real concern for many retailers in the state is how to continue competing with remote sellers who do not have to charge sales tax. In 2012, jobs in the retail trade sector totaled 29,338. The projected future trend in this industry is decreasing jobs, with the projected 30,255 jobs in 2022 marking an increase of only 3 percent over the 10-year period.

Accommodation and Food Service (Tourism).

Wyoming's travel and tourism industry is an important part of the overall economy, particularly in the northwest region of the state, with more than $1 billion in direct expenditures and 28,000 jobs. The primary tourist destinations are Yellowstone National Park and the Grand Teton National Park, which are visited annually by millions of people from all over the world. Tourism is not classified as an independent or separate economic sector; instead, it is mainly included in the accommodation and food services sector. The economic effect of tourism crosses many retail trade- and services-related sectors, such as gasoline stations, general merchandise stores, arts, entertainment, and recreation services. Unfortunately, most jobs directly connected with tourism tend to be lower skilled and lower paying by nature. Long term, employment in Wyoming's travel and tourism industry is not expected to deviate substantially from the past trend. The accommodations and food services industry is projected to grow a respectable 15 percent from 2012 to 2022.

Construction.

The real estate and housing industries were strong until 2007 when Wyoming, along with much of the rest of the nation, experienced a slowdown in this sector. Until then, Wyoming's residential

construction boom resulted in substantial job growth in the general building and specialty trades subsectors. In general, the direct effects from housing are through construction activity, real estate transactions, and mortgage finance. The multiplier benefits are substantial, such as demand for numerous supply industries, and the income earned from construction-related industries drives spending elsewhere in the economy.

As the fastest-growing sector in the 1990s, the construction industry in Wyoming added 7,100 jobs during that decade at an annual average rate of 5.2 percent. Continuing this trend, the construction sector remained the strongest industry in the state in 2002, expanding by 1.9 percent because of historically low interest rates. From 1992 to 2002, total residential home permits averaged nearly 1,800 units per year, increasing to 2,877 in 2003 and 3,318 in 2004.

Subsequently, consistent with the national downturn in housing starts, in 2008, the state saw the number of annual housing units fall to 2,669, the lowest level in years. Statewide, however, due to the "boom" years, housing units increased by 17 percent between 2000 and 2010 compared to an increase of 10 percent between 1990 and 2000.

Long term, it is anticipated that residential construction will once again be closely tied to population growth. Construction industry employment in 2012 was recorded at 22,827 jobs and is projected to increase by 7.5 percent from 2012 to 2022. The projected increase of 1,723 jobs will bring the total construction jobs to 24,549 in 2022. (see **Table 5-25**).

Table 5-26 below provides another view of construction employment in Wyoming from 1990 through 2018, providing total construction employment numbers, but also historical employment and projected employment in three divisions of construction: 1) construction of buildings; 2) heavy and civil engineering construction; and 3) special trade contractors.

According to **Table 5-26**, total construction jobs in 2018 will reach 30,408, growing at a rate of 0.79 percent per year from 2008 to 2018. This is a higher total number of jobs than the 24,549 forecasted in **Table 5-25** for 2022. The difference in total jobs and projected growth rates can be explained by the fact that the statistics in **Table 5-26** include a broader set of construction occupations than those in **Table 5-25** and cover a shorter period. The data in **Table 5-26** are useful, however, because they confirm conservative forecasted growth in the construction industry over the next few years.

TABLE 5-26
Construction Employment in Wyoming 1990, 2000, 2008, and 2018

					Change		Average Annual Change	
	1990	2000	2008	2018 Projected	1990 to 2008	2008 to 2018	1990 to 2008	2008 to 2018
Construction of Buildings	2,099	4,285	5,007	5,300	2,908	293	7.7%	0.59%
Heavy and Civil Engineering Construction	3,866	5,301	9,660	10,450	5,794	790	8.33%	0.82%
Special Trade Contractors	4,815	8,085	13,518	14,658	8,703	1,140	10.04%	0.84%
Total Construction	**10,780**	**17,671**	28,185	30,408	17,405	2,223	8.97%	0.79%

Source: Wyoming Department of Workforce Services, Research and Planning, 2010. *Wyoming Statewide Long-Term Employment Projections by Industry: 2008-2013*. April. Available at http://doe.state. wy.us/LMI/ projections08_18/LTI_08_18.pdf.

In a recent report, WY EAD noted that the state's economy rebounded in 2010 and 2011 after the slowdown in 2009, but the recovery slowed in 2012 and early 2013, primarily due to falling natural gas prices. However, by third quarter 2013, the economy appeared to be growing again as natural gas prices stabilized and both oil exploration and coal production increased. In addition, construction activity was rising primarily due to the housing market recovery (WY EAD, 2013e). The report concluded the 2014 outlook was positive and anticipated continued moderate growth in oil exploration and stable natural gas prices. The heavy reliance of the state's economy on the mining sector means that the positive directions in this sector will be beneficial to the other sectors of the economy in the near future. The other two sectors that will drive growth in 2014 are residential construction and tourism, the latter of which is especially benefitting from the national recovery (WY EAD, 2013e).

Future Personal Income. Between 2002 and 2006, real personal income in Wyoming increased by nearly $3.5 million, or an average annual rate of 5.4 percent. The 2007 WY EAD report projects that real personal income in the state will increase at an annual rate of 6.4 percent during the period 2006 to 2016 (**Table 5-27**).[13] The projected 1.3 percent rate of growth in the civilian labor force between 2006 and 2016 will be slightly lower than the 1.4 percent growth rate experienced between 2002 and 2006.

TABLE 5-27
Wyoming Personal Income, Wage and Salary Earnings, Labor Force, Employment, and Unemployment (2002, 2006, 2016)

	2002	2006	2016
Total Personal Income (Then-year $)	$15,463,330	$20,948,050	$34,481,470
Real Personal Income (2000-year $)	$14,995,590	$18,472,030	$34,481,470
Per Capita Personal Income (Then-year $)	$30,991	$40,676	$61,236
Per Capita Personal Income (2000-year $)	$30,053	$35,868	$44,372
Median Household Income (Then-year $)	$39,963	$48,351	$65,626
Wages and Salaries	$7,568,720	$10,497.020	$17,237,250
Civilian Labor Force	269,650	284,690	324,630
Number Employed	258,460	275,620	315,210
Number Unemployed	11,190	9,070	9,430
Unemployment Rate (Percent)	4.2	3.2	2.9

Source: Wyoming Economic Analysis Division (WY EAD), 2007.

Construction Impacts

A variety of tools are available to estimate regional economic impacts, but by far the most widely used today are I-O models combined with social accounting matrices (SAMs). Referred to as I-O/SAM models, these tools form the basis for estimating economic impacts for industry (manufacturing, mining, construction), commercial business activity (restaurants, hotels), and agriculture (irrigation and livestock water uses).

[13] Wyoming Economic Analysis Division (WY EAD), 2007. *10-Year Outlook Wyoming Economic and Demographic Forecast 2007 to 2016*. Prepared by the WY EAD.

The I-O/SAM model is an accounting framework that traces spending and consumption among various economic sectors, including businesses, households, government, and "foreign" economies in the form of exports and imports. "Direct effects" represent the response (e.g., change in value-added or employment) for a given industry's expenditures of final demand for that same industry. Value-added refers to the additional value of a commodity produced by that industry over the cost of commodities used to produce it from the previous stage of production. It is the *net* measure of the economic contribution of an industry to the regional economy less the intermediate goods and services used. "Indirect effects" represent the response by all local industries caused by the iteration of purchasing for a given industry. "Induced effects" represent the response by all local industries caused by the expenditures of new household income generated by the direct and indirect spending.

Collectively, indirect and induced effects are referred to as "secondary impacts." In their entirety, all of the previously discussed changes (direct and secondary) are referred to as "total economic impacts." By their nature, total impacts are greater than initial changes because of secondary effects. The magnitude of the increase is what is popularly termed a "multiplier effect." I-O models generate numerical multipliers that estimate indirect and induced effects. The I-O/SAM models are run using propriety software known as IMPLAN PRO (Input Output Model for Planning Analysis). IMPLAN is a modeling system originally developed by the USFS in the late 1970s. Today, the Minnesota IMPLAN Group (MIG, Inc.) owns the copyright and distributes data and software. It is probably the most widely used economic impact model available. IMPLAN comes with databases containing the most recently available economic data from a variety of sources.

Using IMPLAN software and data for 2012, the most current model year, transaction tables were estimated for Sweetwater County, Wyoming. Most of the local economic impacts are expected to be felt in Sweetwater County; whereas other economic impacts are expected to be distributed throughout the state, the nation and perhaps internationally

Each transaction table in IMPLAN contains 509 economic sectors and allows users to estimate a variety of economic statistics. The most relevant measures for the purpose of understanding the economic impacts to the region due construction of Simplot's proposed Project are value-added and employment. For perspective, current economic conditions for Sweetwater County in terms of employment, output, value-added, and labor income are derived from data compiled by the IMPLAN, which uses the information provided by the U.S. Bureau of Economic Analysis (BEA), BEA's Regional Economic Information System (REIS), Bureau of Labor Statistics (BLS), the Census of Agriculture, the U.S. Census Bureau, the U.S. Census Bureau's Economic Census, the U.S. Census Bureau's Annual Survey of Manufacturers, and the Internal Revenue Service Quarterly Payroll File (FICA). The latest available data are for 2012 and appear in **Table 5-28**.

The top 10 industries in terms of their employment contribution to the region-wide economy are shown. The region produces more than $5.018 billion in annual value-added per year and employs more than 30,000 people. Output (Column 3 in **Table 5-28**) is a measure of the total goods and services used and produced by a given industry and is closely related to sales. The top industry for employment and labor income is industrial sector 29, which supports activities for oil and gas operations. This sector employs 3,230 workers who receive more than $309 million in labor income. In terms of output, the top-ranking industry is sector 20, the extraction of oil and natural gas, with output valued at more than $2.242 billion. Other top-ranking sectors include state and local government education and non-education, followed by food services and drinking places, mining and quarrying other non-metallic minerals, transport by truck, wholesale trade businesses, private household operations and retail establishments.

TABLE 5-28
Top 10 Industries by Employment in Sweetwater County (2012 Data)

Sector	Description	Employment	Labor Income	Output
29	Support activities for oil and gas operations	3,230	$309,070,800	$623,477,500
20	Extraction of oil and natural gas	2,779	$278,854,000	$2,242,381,000
438	Employment and payroll only (state and local government, education)	2,305	$121,336,300	$139,133,600
437	Employment and payroll only (state and local government, non-education)	1,899	$100,453,100	$115,571,200
413	Food services and drinking places	1,783	$35,150,210	$94,400,860
27	Mining and quarrying other non-metallic minerals	1,558	$250,761,800	$755,660,700
335	Transport by truck	910	$72,903,500	$156,860,800
319	Wholesale trade businesses	843	$62,680,240	$183,522,600
426	Private household operations	837	$1,537,802	$1,537,802
360	Real estate establishments	732	$11,396,460	$86,158,570

Source: IMPLAN Data for 2012.

Simplot Construction Impacts on Employment and Value Added

The estimate of economic impacts from Simplot construction activities on Sweetwater County is measured in terms of employment and value added. These figures depend upon the local share of direct costs to construct the proposed Project. To develop a construction cost model and estimate labor requirements for the Simplot Project, Simplot worked with Linde Engineering, the industry leader in constructing ammonia plants. The estimate for the local share of the workforce was based upon this experience and Simplot's knowledge of the local labor market based upon previous projects. Local construction costs for the proposed Project and local expenditures on accommodations and food by the non-local workforce are estimated as shown in **Table 5-29**. While it is assumed that members of the outside labor force would send their payroll remittances to their home origins, they do contribute to the local economy through their expenditures on food and housing. Members of the local labor force would spend their payroll within the local economy similar to other local households. Most local construction expenditures would be for procurements in the wholesale trade and non-residential construction sectors. The expenditures are reported annually and by IMPLAN sector to show the inputs to the IMPLAN model. At the time of preparing this application, the most current IMPLAN model was built using economic data for 2012. Thus, the local Simplot construction costs were converted to 2012 dollars using the GDP deflator to run the

model and then converted back to 2013 dollars for reporting results. Regional price coefficients were set to 1 for each model run as only local expenditures were included as inputs.

The local share of material costs was based upon the availability of local purveyors to support the relevant procurements and services within the Study Area. These local expenditures account for about 10 percent of the total costs for materials. The per diems for accommodations ($83/day for 20 days per month or 240 days/year) and food ($46/day) for the non-local workforce are based on the GSA rates for Wyoming as set out at http://www.gsa.gov/portal/category/100120 accessed on February 13, 2014.

In 2014, the first year of construction, total local expenditures come to $22.7 million. Expenditures increase to $32.1 million in 2015 and fall to $10.2 million in 2016, the last year of construction.

TABLE 5-29
IMPLAN Inputs for Construction Phase

IMPLAN Sector Input ($2013)	2014	2015	2016
36 - Non-Residential Construction	$11,960,000	$13,570,000	$2,480,000
319 - Wholesale and Trade Businesses	$8,350,000	$10,170,000	$1,990,000
369 - Engineering	$1,000,000		
411-Accommodations	$871,500	$5,409,940	$3,718.400
413 - Food	$483,000	$2,998,280	$2,060,800
Total	$22,664,500	$32,148,220	$10,249,200

Sources: Linde Engineering, 2014; CH2M HILL, 2014.

Table 5-30 shows the summary results of the analysis for years 2014 through 2016. The IMPLAN model uses the BLS growth model to convert nominal dollars into 2013 dollars. Local construction costs are estimated at $22.6 million in 2014. This creates 90 jobs directly involved with the proposed Project as well as 47 secondary jobs, for a total of 137 jobs in Sweetwater County. Total value added is estimated at $10.8 million. Total sales volume as measured by total output is $20.20 million.

TABLE 5-30
Local Expenditures ($2013 million) and Economic Impacts 2014 through 2016

Year	Costs Total	Total Value-Added	Total Output (sales volume)	Direct Jobs Created	Secondary Job Creation	Total Jobs Created
2014	$22.60	$10.80	$20.20	90	47	137
2015	$32.10	$15.90	$30.50	200	57	257
2016	$10.20	$5.80	$11.10	94	22	116

Source: Developed by CH2M HILL (2014).

The economic impact of the proposed Project increases in 2015, with $32.1 million in direct expenditures, $15.9 million in value added, and $30.5 million in total output, while creating 200 direct jobs, 57 secondary jobs, and 257 jobs overall. In 2016, local expenditures fall to

$10.2 million, generating value added of $5.8 million and output of $11.1 million. In 2016, the proposed Project creates 94 direct jobs and 22 secondary jobs, raising total employment in the county by 116 jobs. On an average annual basis, the proposed Project contributes about 128 direct jobs to the region. Relative to the 1,619 construction industry jobs in Sweetwater County, this represents a contribution of about 8 percent.

Wage and Benefits for Construction and Operations. The Research and Planning section of the Wyoming Department of Employment, in cooperation with the BLS, conducts an Occupational Employment Statistics (OES) Wage Survey. The OES program estimates occupational employment and wages. Data obtained from polled establishments are used to estimate occupational employment and wage rates for unemployment insurance (UI) covered wage and salary jobs in non-farm establishments. Wages for the OES Wage Survey include base pay rates, cost-of-living allowances, guaranteed pay, hazard pay, incentive pay, commissions, piece rates and production bonuses, length-of-service allowances, on-call pay, and portal-to-portal pay. The hourly wage estimates are calculated using a year-round, full-time figure of 2,080 hours per year (52 weeks times 40 hours).

Employee Wage Estimates. As mentioned above, the workforce estimate was developed by Simplot's construction consultant, Linde Engineering. This workforce is classified by 13 primary disciplines defined by the Wyoming Department of Workforce Services for construction projects in Wyoming. Information compiled by the Department of Employment on annual and hourly wages is presented in **Table 5-31** for skilled labor categories that are expected to be present throughout the construction phase. Similar data for the operations phase are presented in **Table 5-32**. Construction managers are at the high end of the pay scale, earning nearly $84,000 per year on average. Supervisors, boilermakers, and millwrights each draw approximately $60,000 per year, while electricians earn more than $50,000 annually. Operators, carpenters, ironworkers, pipefitters, truck drivers, and insulators earn between $40,000 and $50,000 on average per year, and construction laborers are paid about $30,000 annually.

TABLE 5-31
Average Wages (Annual and Hourly) Per Construction Occupations, Wyoming, 2013

Occupation/Occupational Code	Estimated Employment	Mean Wage Annual & Hourly ($)	10th percentile ($)	25th percentile ($)	Median Wage ($)	75th percentile ($)	90th percentile ($)
Laborers/47-2060	3,120	**30784**	**20404.8**	**25313.6**	**30284.8**	**35942.4**	**40643.2**
		14.80	9.81	12.17	14.56	17.28	19.54
Operators/47-2073	5,500	**48193.6**	**35401.6**	**41142.4**	**46841.6**	**55723.2**	**62067.2**
		23.17	17.02	19.78	22.52	26.79	29.84
Carpenters/47-2031	2,530	**42265.6**	**26811.2**	**33571.2**	**39020.8**	**50876.8**	**61651.2**
		20.32	12.89	16.14	18.76	24.46	29.64
Ironworkers/47-2221	280	**40331.2**	**26582.4**	**32198.4**	**41225.6**	**47028.8**	**55016**
		19.39	12.78	15.48	19.82	22.61	26.45
Truck Drivers/53-3032	6,610	**46675.2**	**31449.6**	**36628.8**	**44824**	**55057.6**	**65124.8**
		22.44	15.12	17.61	21.55	26.47	31.31
Millwrights/49-9044	220	**59696**	**43617.6**	**52478.4**	**59904**	**70012.8**	**77480**
		28.7	20.97	25.23	28.8	33.66	37.25

TABLE 5-31
Average Wages (Annual and Hourly) Per Construction Occupations, Wyoming, 2013

Occupation/Occupational Code	Estimated Employment	Mean Wage Annual & Hourly ($)	10th percentile ($)	25th percentile ($)	Median Wage ($)	75th percentile ($)	90th percentile ($)
Electricians/47-2111	2,580	**55224**	**34590.4**	**44553.6**	**55016**	**64854.4**	**75795.2**
		26.55	16.63	21.42	26.45	31.18	36.44
Pipefitters/47-2152	1,010	**45177.6**	**25896**	**33592**	**44241.6**	**55515.2**	**65395.2**
		21.72	12.45	16.15	21.27	26.69	31.44
Boilermakers/Mechanical Equipment 47-2011	150	**59654.4**	**48984**	**53560**	**61172.8**	**68972.8**	**73632**
		28.68	23.55	25.75	29.41	33.16	35.4
Insulators/47-2130	220	**44324.8**	**28912**	**33321.6**	**37897.6**	**50377.6**	**74089.6**
		21.31	13.9	16.02	18.22	24.22	35.62
Painters/47-2140	670	**38001.6**	**25521.6**	**31283.2**	**36816**	**45635.2**	**53955.2**
		18.27	12.27	15.04	17.7	21.94	25.94
Craft Supervision/47-1011	3,290	**65769.6**	**41288**	**49296**	**61068.8**	**77209.6**	**97427.2**
		31.62	19.85	23.7	29.36	37.12	46.84
Construction Management/11-9020	430	**83720**	**51126.4**	**64792**	**81390.4**	**95700.8**	**124176**
		40.25	24.58	31.15	39.13	46.01	59.70

Source: Wyoming Department of Workforce Services, Research and Planning, 2013f. *Occupational Employment and Wages September 2013.* Available at http://doe.state.wy.us/lmi/EDSupdatedtoSept2013ECI/PAGE0021.HTM. Accessed February, 2014

Similar data for the operations phase are presented in **Table 5-32**, where the plant superintendent earns about $92,000 per year on average in Wyoming. The average annual wages are $85,000 for process engineers, $72,000 for supervisors, $65,000 for process control and operations, $59,000 for training coordinators, and $57,000 for maintenance workers.

TABLE 5-32
Average Wages (Annual and Hourly) Occupations, Wyoming, 2013

Occupation/ Occupational Code	Estimated Employment	Mean Wage Annual & Hourly ($)	10th percentile ($)	25th percentile ($)	Median Wage ($)	75th percentile ($)	90th percentile ($)
Operations/51-9011	80	64937.6	32635.2	60985.6	70220.8	77521.6	87672
		31.22	15.69	29.32	33.76	37.27	42.15
Supervisor/51-1011	1,320	72030.4	39915.2	52312	72321.6	91436.8	107952
		34.63	19.19	25.15	34.77	43.96	51.9
Maintenance/49-9041	2,310	57179.2	35089.6	42452.8	57366.4	70990.4	79393.6
		27.49	16.87	20.41	27.58	34.13	38.17
Plant Superintendent/ 11-1021	5250	92164.8	42244.8	57304	80225.6	112569.6	153358.4
		44.31	20.31	27.55	38.57	54.12	73.73

TABLE 5-32

Average Wages (Annual and Hourly) Occupations, Wyoming, 2013

Occupation/ Occupational Code	Estimated Employment	Mean Wage Annual & Hourly ($)	10th percentile ($)	25th percentile ($)	Median Wage ($)	75th percentile ($)	90th percentile ($)
Training Coordinator/ 13-1151	470	59404.8	37544	46945.6	57928	71739.2	85571.2
		28.56	18.05	22.57	27.85	34.49	41.14
Safety/PSM Specialist/17-3026	40	73673.6	49275.2	61110.4	73673.6	87630.4	107057.6
		35.42	23.69	29.38	35.42	42.13	51.47
Process Control IT Tech/17-3023	120	64521.6	43430.4	57158.4	64771.2	74547.2	84676.8
		31.02	20.88	27.48	31.14	35.84	40.71
Process Engineer/17-2041	100	85155.2	53685	67954	81432	106517	120099
		40.94	25.81	32.67	39.15	51.21	57.74

Source: Wyoming Department of Workforce Services, Research and Planning, 2013f. *Occupational Employment and Wages September 2013.* Available at http://doe.state.wy.us/lmi/EDSupdatedtoSept2013ECI/PAGE0021.HTM. Accessed February, 2014

Employee Benefits Estimates. Total employee compensation includes wages and salaries as well as benefits, such as health insurance and retirement plans. In 2011, wages and salaries comprised 83.3 percent of Wyoming compensation costs, while medical, dental, and vision insurance contributions came to 10.6 percent and retirement contributions made up the remaining 6 percent.[14] These percentages are expected to apply to the proposed Project.

Tax Revenue from the Simplot Project

During the construction phase, the proposed Project would contribute to state and local revenue through *ad valorem* and sales and use taxes. The *ad valorem* tax receipts are described first followed by the sales and use taxes.

Ad Valorem Taxes During Project Construction

Ad valorem taxes support a variety of county and municipal operations, including airports, fire protection, hospitals, libraries, museums, public health, recreational systems, special districts, and education. Assessed property values are the basis for *ad valorem* taxes. Property values related to the proposed Project are determined annually on a centralized basis by the Wyoming Department of Revenue (WDOR).

It is the WDOR's role to estimate the fair market value (FMV) of the industrial facility, including the value of the land and improvements. It is the owner's responsibility to provide WDOR with all necessary information to enable the department to make this determination. The owner provides WDOR will all property located in the state on the lien date, which is January 1 of each calendar year. Developments or Construction Work in Progress (CWIP) are taxable prior to their completion and operation, especially in the case of multi-year construction schedules. Under such

[14] Wyoming Department of Workforce Services, Research and Planning, 2013g. *Wyoming Benefits Survey 2012*. March. Available at http://doe.state.wy.us/LMI/benefits2012/benefits2012.pdf. Accessed June 10, 2013.

circumstances, the owner provides WDOR with cumulative construction costs that are then incorporated into its appraisal.

After WDOR determines the FMV of the industrial facility, the assessed value is stated as 11.5 percent of this value. The assessed value is then allocated to the county within which the Project is located. This county then applies the property tax levy (for the tax district within which each Project is located) to calculate the annual property taxes due. The proposed site is located in Sweetwater County, where the average 2012 tax levy is 67.637 mills. Thus, for every $1,000 of assessed value of real property (land and improvements), Sweetwater County will levy property taxes of $67.64 annually. The property tax revenues received by the county are distributed across a number of taxing entities, as shown in **Table 5-34**, with the majority supporting public education. With construction beginning in 2014, improvement values from that year are reportable in 2015. Simplot estimated the value of facility improvements, by year, and calculated the assessed value using the 11.5 percent assessment rate assigned by WDOR. The assessed value was then multiplied by the Rock Springs Tax District 0100, Sweetwater County mill levy rate 67.637. The facility improvements were depreciated to 21 percent of their initial value by the end of the 25-year operating term. As shown in **Table 5-33**, Simplot estimates that $120,000 in *ad valorem taxes* will be paid to Sweetwater County in 2015 following the first year of construction. Payments rise to $670,000 in 2016 and $1,280,000 in 2017. Total receipts for Sweetwater County during the construction phase amount to more than $2.07 million. This means that the average annual payment over 3 years is about $0.69 million.

TABLE 5-33
Simplot Estimated *Ad Valorem* Taxes During Construction Phase

Year	*Ad Valorem* Tax Payments
2015	$120,000
2016	$670,000
2017	$1,280,000
Total	$2,070,000

Source: Simplot 2014

In 2013, Sweetwater County collected nearly $182 million in *ad valorem* taxes. Thus, during the construction phase, the proposed Project would contribute about 0.4 percent additional revenue annually to the county. The current mill levy for Tax District 0101 outside of Rock Springs and how it is distributed among the taxing entities in this jurisdiction are shown in **Table 5-34**. Schools will be the primary beneficiaries of the increase in revenue. Other beneficiaries include the county, special districts, the college, solid waste, and the county fire department.

TABLE 5-34
Millage by Taxing Entity, Rock Springs Area Tax District 0101, Sweetwater County (2013)

Taxing Entity	Millage
General County Levy	12
Weed and Pest	.289
College	5.225
Schools	44.7
Solid Waste #1	2.423
County Fire #1	3.00
Total	67.637

Source: http://www.sweet.wy.us/index.aspx?NID=145.

Sales, Use, and Lodging Taxes from Constructing the Simplot Project

The State of Wyoming levies a state sales tax of 4 percent on an array of goods and services purchased within the state. The use tax is a companion to the sales tax and is imposed upon goods purchased tax free outside Wyoming for use in Wyoming. Collected taxes are shared between the state (69 percent) and counties (31 percent). Counties can levy the following additional sales and use taxes: general-purpose option tax of 1 percent, specific-purpose option tax of 1 percent, and lodging tax of up to 4 percent on hotel and motel room charges for stays under 30 days.

The sales and use taxes that will accrue to the state and area as a direct result of constructing the Simplot Project are estimated as the product of the non-labor construction expenditures and the 6 percent sales and use tax rate that applies to three of the five counties in the area. Sweetwater County's tax rate is 5 percent. Based upon the construction schedule, in 2014, the payments relate only to the fourth quarter. In 2015, they will be collected all four quarters and in 2016, sales taxes will be paid over the first three quarters.

In addition to expenditures to construct the proposed Project, local tax revenues would accrue from the sale of goods and services to non-local workers. The sources of these potential tax revenues are shown in **Table 5-35** and the estimated annual sales and use tax revenue are reported in **Table 5-36.**

TABLE 5-35
Sources of Potential Tax Revenues

Source of Tax Revenue	2014	2015	2016
Construction	$78,000,000	$102,600,000	$23,600,000
Accommodations and food	$1,354,500	$8,408,220	$5,779,200
Total	$79,354,500	$111,008,220	$29,379,200

Sources: Simplot, 2014; CH2M HILL, 2014.

TABLE 5-36
Estimate of Tax Revenues Accruing to Local Governments from Purchases and from Non-Local Worker Expenditures in Sweetwater County

Type of Tax	Tax Rate	2014	2015	2016	Total
State	4%	$3,174,180	$4,440,329	$1,175,168	$8,789,677
General Purpose Option	1%	$793,545	$1,110,082	$293,792	$2,197,419
Total	**5%**	**$3,967,725**	**$5,550,411**	**$1,468,960**	**$10,987,096**

Source: Simplot, 2014; CH2M HILL, 2014.

The estimated sales and use tax revenues totaling approximately $11 million will accrue over the construction period to the state general fund, the area counties, and their communities. Tax revenue receipts from the state's 4 percent tax account for approximately $8.8 million of this total. Of this $8.8 million, 69 percent or $6.1 million accrues to the state general fund. The remaining $2.7 million, less a small administrative fee, will be returned to the local jurisdictions. Sweetwater County will also receive revenue from the 1 percent general purpose tax exceeding $2 million. This brings the county share to about $4.7 million in all or about $1.6 million on an average annual basis over the 3 years that sales and use taxes would be collected.

As shown in **Table 5-22,** Sweetwater County collected about $78 million from sales tax revenue and an additional $18.5 million in use tax revenue for a combined total of $96.5 million in 2013. A $1.6 million boost to sales and use taxes from construction of the proposed Project would represent a 1.6 percent increase measured relative to Sweetwater County's recent tax receipts.

Lodging tax revenues could accrue to the counties in which Project-related construction workers temporarily reside. Estimates of these potential tax revenues are not presented in **Table 5-37**. This is because lodging taxes are levied only on sleeping accommodations for guests staying less than 30 days. In general, the non-local workers are expected to remain longer than 30 days.

Impact Assistance Payments

The Industrial Siting Division provided Simplot with an estimate of Impact Assistance Payments (summarized in **Table 5-37**). The document received from ISD is attached as **Appendix B**.

TABLE 5-37
Forecast of Impact Assistance Payments

Serial No.	Month	SLR	Base Period	Impact Assistance
115	Jan 2014	*1,919,381*	1,904,363	**15,018**
116	Feb 2014	*1,921,526*	1,904,363	**17,163**
117	Mar 2014	*1,923,672*	1,904,363	**19,308**
118	Apr 2014	*1,925,817*	1,904,363	**21,454**
119	May 2014	*1,927,962*	1,904,363	**23,599**
120	June 2014	*1,930,108*	1,904,363	**25,744**
121	Jul 2014	*1,932,253*	1,904,363	**27,890**
122	Aug 2014	*1,934,398*	1,904,363	**30,035**

TABLE 5-37
Forecast of Impact Assistance Payments

Serial No.	Month	SLR	Base Period	Impact Assistance
123	Sep 2014	*1,936,544*	1,904,363	**32,180**
124	Oct 2014	*1,938,689*	1,904,363	**34,326**
125	Nov 2014	*1,940,834*	1,904,363	**36,471**
126	Dec 2014	*1,942,980*	1,904,363	**38,616**

The forecasted average monthly impact assistance payment is $26,817, and the forecasted yearly impact assistance payment is $321,804. The forecasted growth rate in sales and use tax is 1.0124 percent. With the proposed Project, the average monthly impact assistance is estimated to increase to $383,205 for 2014 and to $540,840 in 2015 before decreasing to $226,243 in 2016. Thus, the proposed Project will substantially increase the average monthly impact assistance payments over the Project's construction phase.

Operation Impacts

SIMPLOT Operations Impacts on Employment and Value Added

Following completion of the proposed Project, it is anticipated that annual operation and maintenance (O&M) of the newly installed equipment would require up to 27 new positions, which would be filled entirely by workers resettling to the area on a permanent basis. Total compensation is estimated at $3.95 million per year. Simplot estimates that annual local procurements for the operations phase will average approximately $32 million, with the largest share for the purchase of natural gas. Thus, the combined total for annual local O&M is $35.92 million. These direct local expenditures generate $10.3 million in total value added and $43.9 million in local output. In addition to the 27 new jobs onsite, the operations phase will generate 39 secondary jobs for a total new job creation of 66 permanent workers.

The results of the analysis of the total economic impacts for Sweetwater County are shown in **Table 5-38**.

TABLE 5-38
Annual Economic Impacts of Simplot O&M ($2013)

IMPLAN Sector	Local O&M Costs Per Year	Total Value Added	Total Output	Direct Jobs Created	Total Jobs Created
130 Fertilizer Industry	$35.92 million	$10.3 million	$43.9 million	27	66

Source: Minnesota IMPLAN Group, 2014; CH2MHILL (2014)

The top 10 industries in the region affected in terms of employment are shown in **Table 5-39**. The fertilizer manufacturing industry will add 27 new jobs, the trucking transport industry will gain nearly seven FTEs, and food services will pick up not quite four FTEs. Six industries will each gain approximately two FTEs each. These are the wholesale trade businesses, maintenance and repair of non-residential structures industry, employment services, automotive repair and maintenance, services to buildings and dwellings, and private household operations. Finally, employment in the natural gas distribution industry will increase by 1.4 FTEs

TABLE 5-39
Top 10 Industries Experiencing Job Creation Due to the O&M Phase of the Simplot Project ($2013)

Sector	Description	Total Employment	Total Labor Income ($)	Total Value Added ($)	Total Output ($)
130	Fertilizer manufacturing	27.2	3,279,646.0	6,083,896.8	36,381,887.4
335	Transport by truck	6.7	545,454.4	667,915.4	1,167,991.4
413	Food services and drinking places	3.7	73,736.1	104,937.7	198,554.3
319	Wholesale trade businesses	2.4	178,860.8	350,555.8	516,991.7
39	Maintenance and repair construction of non-residential structures	2.0	165,517.4	162,012.5	312,933.4
382	Employment services	1.6	74,371.4	81,210.5	91,511.9
414	Automotive repair and maintenance, except car washes	1.5	74,868.7	86,142.8	129,517.8
388	Services to buildings and dwellings	1.5	28,928.6	37,205.6	74,387.3
426	Private household operations	1.5	2,788.4	2,788.4	2,796.4
32	Natural gas distribution	1.4	170,911.0	350,876.0	1,421,247.5

Source: Minnesota IMPLAN Group, 2014; CH2M HILL, 2014.

Ad Valorem Taxes during SIMPLOT Project Operations

Ad valorem tax revenues that would accrue to Sweetwater County during the operations phase were estimated in a similar manner, as described above in the section *Ad Val*orem Taxes during Construction. In sum, Simplot estimated the depreciated value of the new facility each year over the operations phase and calculated the assessed value using the 11.5 percent assessment rate assigned by WDOR. The mill levy of 67.637 for Tax District 0101, where the project would be located, was then applied to the assessed value. The facility improvements were depreciated to 20 percent of their initial value by the end of the 25-year operating term. The estimated annual revenue due to the proposed Project over the operations phase is shown in **Table 5-40**. The property tax revenues received by the county and local jurisdictions are distributed across a number of taxing entities, as shown in **Table 5-36,** with the majority supporting public education.

The post-construction operations phase of the proposed Project begins in 2017 and continues until 2041. Total payments come to more than $40.8 million over this period, or approximately $1.6 million a year on average. This figure is additive to the $2 million paid during construction, bringing the total contribution to $42.8 million overall. The proposed Project's average annual contribution of about $1.6 million to Sweetwater County's current $181.8 million will raise annual property taxes by nearly 1 percent.

TABLE 5-40
Estimate of *Ad Valorem* Taxes Paid Per Year and in Total during the Operations Phase

Year	*Ad Valorem* Taxes
2018	2,840,000
2019	2,780,000
2020	2,710,000
2021	2,640,000
2022	2,530,000

TABLE 5-40
Estimate of *Ad Valorem* Taxes Paid Per Year and in Total during the Operations Phase

Year	*Ad Valorem* Taxes
2023	2,400,000
2024	2,310,000
2025	2,170,000
2026	1,980,000
2027	1,820,000
2028	1,640,000
2029	1,460,000
2030	1,260,000
2031	1,090,000
2032	990,000
2033	930,000
2034	910,000
2035	940,000
2036	970,000
2037	1,000,000
2038	1,030,000
2039	1,060,000
2040	1,090,000
2041	1,120,000
2042	1,160,000
Total	$40,800,000

5.4.3 Housing and Housing Availability Analysis

This section addresses the following six major topics: 1) composition of the existing housing, 2) housing inventory and residential construction trends, 3) home value and rental housing costs, 4) rental housing vacancies, 5) housing needs, and 6) temporary accommodations. As noted in Section 5.3, Uinta County and its communities were excluded from the area of site influence based on their relatively lengthy commuting times; none of the communities is within a 60-mile or 60-minute drive of the proposed Project. As a result, while this section does characterize housing conditions across the two-county Study Area, it focuses primarily on the temporary housing resources of Sweetwater County and the cities of Rock Springs and Green River as well as the unincorporated communities of Arrowhead Springs, Little America, Farson, and North Rock Springs.

Existing Conditions

Housing Stock. Statewide, housing units in Wyoming rose by 18 percent between 2000 and 2012, similar to the 16 percent increase in the Study Area. However, when comparing the two counties within the Study Area, housing in Sweetwater County grew much more quickly than in Uinta County during this period, at a rate of 19 percent versus 9 percent, respectively. The total number of housing units in the two-county area increased by 3,778 units between 2000 and 2012, with 80 percent of the new units (3,040 units) being added in Sweetwater County (see **Table 5-41**). After

the dramatic slowdown in the U.S. housing market in 2007, Wyoming's housing market turned around in the third quarter of 2011, ahead of the upturn in the overall U.S. housing market in 2012. However, the state's prices appeared to be rebounding more slowly, experiencing an annual growth rate of 2.7 percent in the second quarter of 2013 (WY EAD, 2013f).

TABLE 5-41
2000 – 2012 Changes in Housing Units for Wyoming and Study Area Counties

	Number of Units			
Area	**2000**	**2010**	**2012 Estimate**	**2000 – 2012 % change**
Wyoming	223,854	261,868	265,162	18%
Sweetwater County	15,921	18,735	18,961	19%
Uinta County	8,011	8,713	8,749	9%
Study Area Total	**23,932**	**27,448**	**27,710**	**16%**

Source: U.S. Census Bureau, 2010a. *Census 2010*. Accessed December 22, 2013.

Table 5-42 summarizes the occupied versus vacant housing units in the Study Area as well as those that are renter occupied. In 2010, there were a total of 22,234 occupied housing units and 3,305 vacant units in the two-county Study Area. Renter-occupied housing represented 24 percent of the total housing stock in the Study Area and 25-26 percent in the area of site influence. Vacant units represented 12 percent of the housing stock in each county. Of these vacant housing units, 68 percent, or 2,260 units, were in Sweetwater County and 32 percent, or 1,045 units, were in Uinta County. Within the area of interest, there were 16,136 total housing units, of which 14,374, or 89 percent, were occupied in 2010 and 1,762 units were vacant. Of the occupied housing units in the area of interest, 4,168 were renter occupied, which represents 26 percent of the total units.

TABLE 5-42
2010 Housing Unit Characteristics (Occupied, Vacant, and Renter Occupied) for the Study Area

	Total Housing Units	**Occupied Housing Units**		**Vacant Housing Units**		**Renter-Occupied Units[1]**	
Area Name	**Number**	**Number**	**Percent of Total Area Housing Units**	**Number**	**Percent of Total Area Housing Units**	**Number**	**Percent of Total Area Housing Units**
Wyoming	**261,868**	**226,879**	**87**	**34,989**	**13**	**69,802**	**27%**
Sweetwater County	**18,735**	**16,475**	**88**	**2,260**	**12**	**4,603**	**25%**
Arrowhead Springs CDP	23	22	96	1	4	2	9%
Bairoil	68	49	72	19	28	11	16%
Farson CDP	150	126	84	24	16	45	30%
Granger	72	57	79	15	21	14	19%
Green River	5,002	4,642	93	360	7	1,188	24%
Little America CDP	42	22	52	20	48	21	50%
North Rock Springs CDP	849	800	94	49	6	102	12%
Rock Springs	10,070	8,762	87	1,308	13	2,810	28%
Superior	181	131	72	50	28	11	6%
Wamsutter	286	189	66.	97	34	91	32%

TABLE 5-42
2010 Housing Unit Characteristics (Occupied, Vacant, and Renter Occupied) for the Study Area

	Total Housing Units	Occupied Housing Units		Vacant Housing Units		Renter-Occupied Units[1]	
Area Name	Number	Number	Percent of Total Area Housing Units	Number	Percent of Total Area Housing Units	Number	Percent of Total Area Housing Units
Uinta County	**8,713**	**5,759**	**66**	**1,045**	**12**	**1,909**	**22%**
Evanston	5,111	4,540	89	571	11	1,415	28%
Lyman	802	744	93	58	7	140	17%
Mountain View	506	468	92	38	8	116	23%
Study Area	**27,448**	**22,234**	**81%**	**3,305**	**12%**	**6,512**	**24%**
Area of Site Influence	**16,136**	**14,374**	**89%**	**1,762**	**11%**	**4,168**	**26%**

Notes:

[1] Total Housing Units = Occupied Housing Units + Vacant Housing Units; Renter Occupied Units are a subset of the Occupied Housing Units; however, the percent is a proportion of the Total Housing Units.
Source: U.S. Census Bureau, 2010. *Census 2010*. Prepared by the Wyoming Economic Analysis Division (WY EAD), 2011.

The American Community Survey (ACS), an official U.S. Census Bureau survey that is part of the Decennial Census Program, is sent to a small percentage of U.S. households monthly. The data are used to assess the demand for housing, to identify housing turnover within areas, and to better understand the population within the housing market over time. The monthly sample becomes a basis for the ACS data collection, preparation, and processing, including weighting and estimation. The 5-year ACS creates a rolling average for a 5-year period and the results are available for much smaller areas. The data presented in this section are from the 5-year rolling average, 2008 to 2012, because many of the potentially affected communities are small. The U.S. Census Bureau estimates the number of housing units for each year between decennial censuses by using data on building permits, estimates of non-permitted construction, mobile home shipments, and estimates of housing loss to estimate change in the housing stock (U.S. Census, 2013h). Using this methodology, the Study Area has added an estimated 262 housing units since 2010, of which 86 percent, or 226 units, are in Sweetwater County, as shown in **Table 5-43**.

TABLE 5-43
Annual Estimates of Housing Units for Counties in Wyoming, April 1, 2010, to July 1, 2012

	Census April 1, 2010		ACS Estimate (as of July 1)			Change (April 2010 – July 2012)	
Geographic Area	Census	Estimates Base	2010	2011	2012	Number	Percent
Wyoming	261,868	261,868	262,250	263,769	265,162	3,294	1.3
Sweetwater County	18,735	18,735	18,807	18,894	18,961	226	1.2
Uinta County	8,713	8,713	8,720	8,738	8,749	36	0.4
Study Area	**27,448**	**27,448**	**27,527**	**27,632**	**27,710**	**262**	**1.6**

Note: The estimates are based on the 2010 Census and reflect changes to the April 1, 2010, housing units due to the Count Question Resolution program and geographic program revisions. All geographic boundaries for the 2012 housing unit estimates series are defined as of January 1, 2012. For the housing unit estimates methodology statement, seehttp://www.census.gov/popest/methodology/index.html.

Vacant Housing Stock. The U.S. Census Bureau also collects data on vacancy status as part of the ACS that can be used to assess the demand for housing, to identify housing turnover within areas, and to better understand the population within the housing market over time. Vacant units are subdivided by the U.S. Census Bureau according to their housing market classification, as follows:

- **For Rent –** These are vacant units offered "for rent," and vacant units offered either "for rent" or "for sale."
- **Rented, Not Occupied** – These are vacant units rented but not yet occupied, including units where money has been paid or agreed upon, but the renter has not yet moved in.
- **For Sale Only –** These are vacant units being offered "for sale only," including units in cooperatives and condominium projects if the individual units are offered "for sale only." If units are offered either "for rent" or "for sale" they are included in the "for rent" classification.
- **Sold, Not Occupied** – These are vacant units sold but not yet occupied, including units that have been sold recently, but the new owner has not yet moved in.
- **For Seasonal, Recreational, or Occasional Use –** These are vacant units used or intended for use only in certain seasons or for weekends or other occasional use throughout the year. Seasonal units include those used for summer or winter sports or recreation, such as beach cottages and hunting cabins. Seasonal units also may include quarters for such workers as herders and loggers. Interval ownership units, sometimes called shared-ownership or time-sharing condominiums, also are included here.
- **For Migrant Workers –** These include vacant units intended for occupancy by migratory workers employed in farm work during the crop season. (Work in a cannery, freezer plant, or food-processing plant is not farm work.)
- **Other Vacant –** If a vacant unit does not fall into any of the categories specified above, it is classified as "Other vacant." For example, this category includes units held for occupancy by a caretaker or janitor, and units held for personal reasons of the owner.

Table 5-44 summarizes these categories of vacant permanent housing units by county for the Study Area and by community for the area of interest. Approximately 20 percent of the total supply of vacant permanent housing units in the area of interest are in transition to being occupied and are classified as rented or sold, not occupied. Fourteen percent of the total supply are seasonal, recreational, or occasional use units that are used or intended for use only in certain seasons or for weekends or other occasional use throughout the year. While some of the 209 vacant seasonal, recreational, or occasional use housing units available in 2012 would be unavailable to workers due to overlapping seasonal use or location, it still represents another realistic supply of housing that would be accessible to the Simplot workforce.

Those total units either for sale or for rent are provided to assess the potential housing supply available either to those families that chose to temporarily relocate during construction or those incoming operations workers and their families. A total of 3,558 vacant units were estimated in Sweetwater and Uinta counties, of which 1,163 units, or 33 percent, were for sale or for rent in 2012. Of the 1,521 total vacant units in the communities within the area of interest (Arrowhead Springs CDP, Farson CDP, City of Green River, Little America CDP, North Rock Springs CDP and the City of Rock Springs), 523 were available for rent or sale.

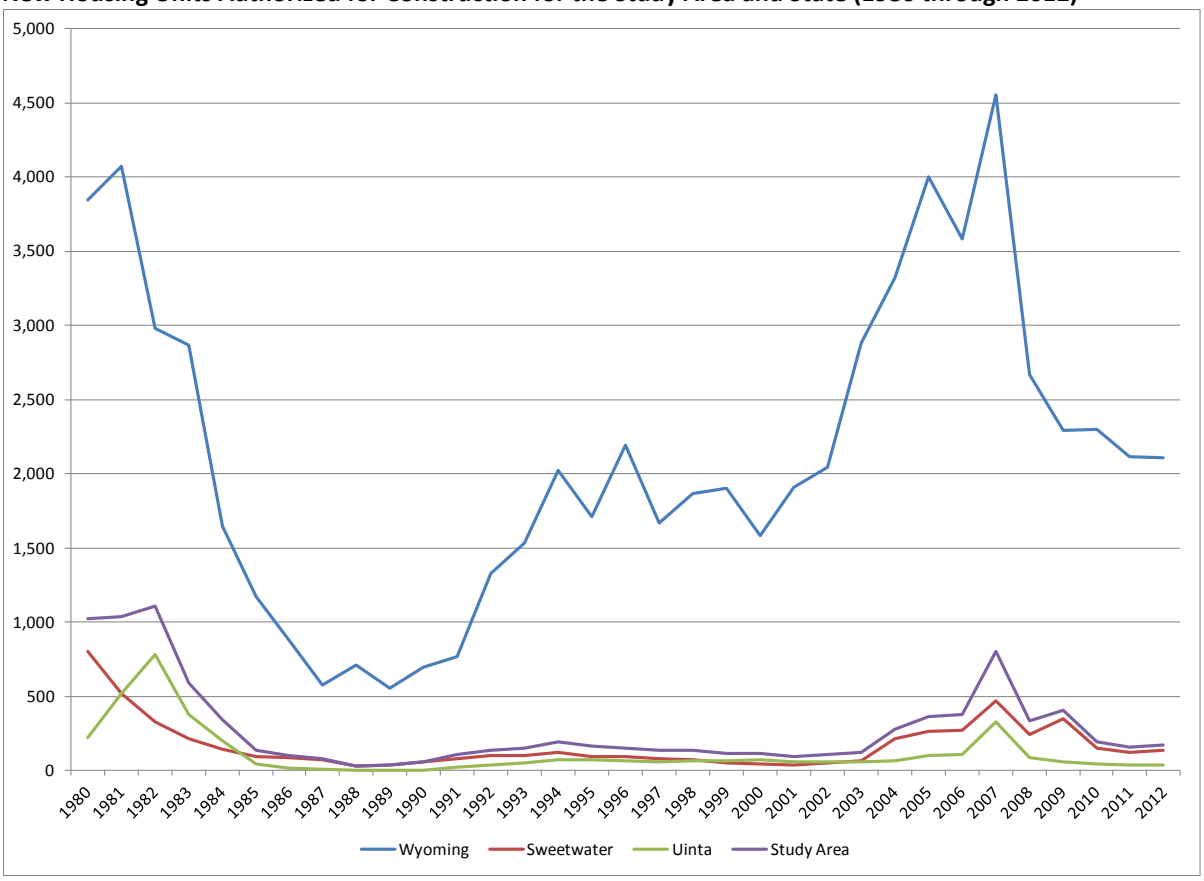
TABLE 5-44
Vacant Permanent Housing Units by Vacancy Type - 2012 ACS

Wyoming	Total For Rent or For Sale	Total Vacant Units	For rent	Rented, not occupied	For sale only	Sold, not occupied	For seasonal, recreational, or occasional use	For migrant workers	Other vacant
Sweetwater County	**587**	**2,089**	**417**	**208**	**170**	**111**	**433**	**23**	**727**
Arrowhead Springs CDP	0	0	0	0	0	0	0	0	0
Bairoil	0	21	0	0	0	4	4	0	13
Farson CDP	34	34	34	0	0	0	0	0	0
Granger	0	42	0	0	0	0	22	0	20
Green River	126	299	102	27	24	20	48	0	78
Little America CDP	0	0	0	0	0	0	0	0	0
North Rock Springs CDP	0	51	0	0	51	0	0	0	0
Rock Springs	363	1,188	217	167	146	32	161	23	442
Superior	4	78	4	0	0	4	0	0	70
Wamsutter	28	61	28	14	0	0	12	0	7
Uinta County	**576**	**1469**	**483**	**129**	**93**	**33**	**363**	**0**	**368**
Evanston	405	750	364	98	41	51	0	0	196
Lyman	28	104	17	10	11	0	15	0	51
Mountain View	0	40	0	16	0	9	8	0	7
Study Area	**1163**	**3558**	**900**	**337**	**263**	**144**	**796**	**23**	**1095**
Area of Site Influence	**523**	**1521**	**353**	**194**	**170**	**103**	**209**	**23**	**520**
Percent of AOI Total Vacant Units	**34%**		**23%**	**13%**	**11%**	**7%**	**14%**	**2%**	**34%**

Housing Construction Activity. The past decade has seen shifts in Wyoming's historic migration patterns as new residents targeted specific areas of the state with solid job opportunities in some cases causing severe housing shortages, particularly of affordable housing. **Figure 5-8** illustrates the number of housing units authorized annually for construction in Wyoming, Sweetwater County, Uinta County, and the two-county Study Area between 1980 and 2012. While the growth and contraction of the new housing market in the Study Area has generally reflected that of the state historically overall, it did not experience the same growth in construction activity in the 1990s. After witnessing steady growth in construction authorizations between 2001 (96 permits) and 2007 (800 permits), the Study Area saw only 156 new units permitted in 2011 and 170 in 2012. The contribution that residential construction activity in the Study Area has made to that of the state has varied substantially from lows of approximately 4 percent in 2003 to highs of about 37 percent in 1982 and 18 percent in 2009 (WCDA, 2013a). On average, approximately 70 percent of the new housing authorized for construction in the Study Area over the past decade has been in Sweetwater County.

FIGURE 5-8

New Housing Units Authorized for Construction for the Study Area and State (1980 through 2012)

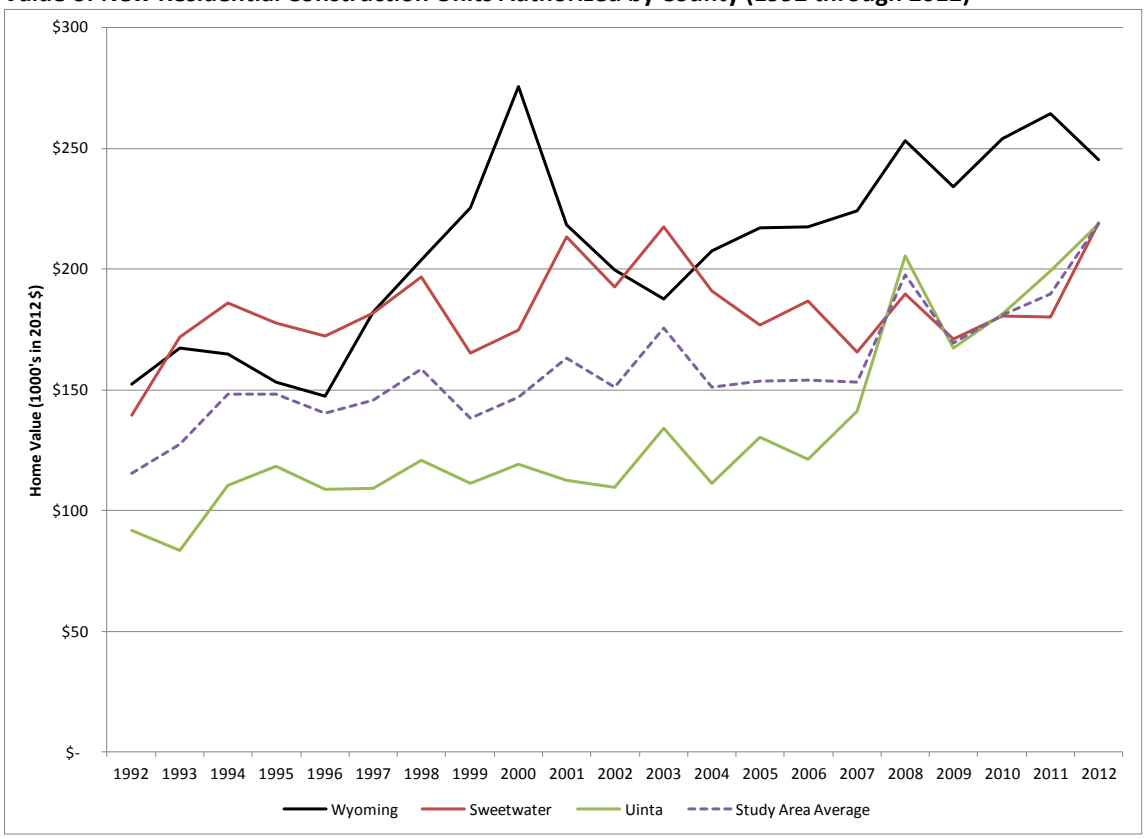


Source: Wyoming Economic Analysis Division (WY EAD) from U.S. Census Bureau, 2013h.

Home Value and Rental Housing Costs

Home Values. Home prices have varied significantly from county to county and year to year throughout Wyoming, as illustrated by **Figure 5-9** (Census Data) and **Figure 5-10** (County Tax Assessor Data). According to U.S. Census Bureau permit data, the value of new single-family home in Wyoming decreased 7.2 percent between 2011 and 2012, from $264,168 to $245,212. By contrast, however, home values in Sweetwater and Uinta counties increased 22 and 10 percent, respectively, in 2012 to identical totals of $219,000, as shown in **Figure 5-9**. Historically, prices in Sweetwater County have been significantly higher ($101,000 greater in 2001, for example) than those in Uinta County just to the southwest. However, prices began to converge in 2007 and have been generally similar since that time.

FIGURE 5-9
Value of New Residential Construction Units Authorized by County (1992 through 2012)



Source: U.S. Census Bureau, 2013h.

Each spring, the Wyoming Housing Database Partnership requests data on the average sales price of existing, detached, single-family homes on 10 acres or less sold during the previous calendar year; these data are provided by the WDOR upon approval by each county assessor (WCDA, 2013). Note that prior to 2008, the Partnership requested these data from each county individually; however, after 2008, a uniform methodology for extracting and computing average residential sales prices was implemented. **Table 5-45** summarizes the home sales prices and the number of sales in the Study Area from 2006 to 2012, while **Figure 5-10** illustrates the change in average home values.

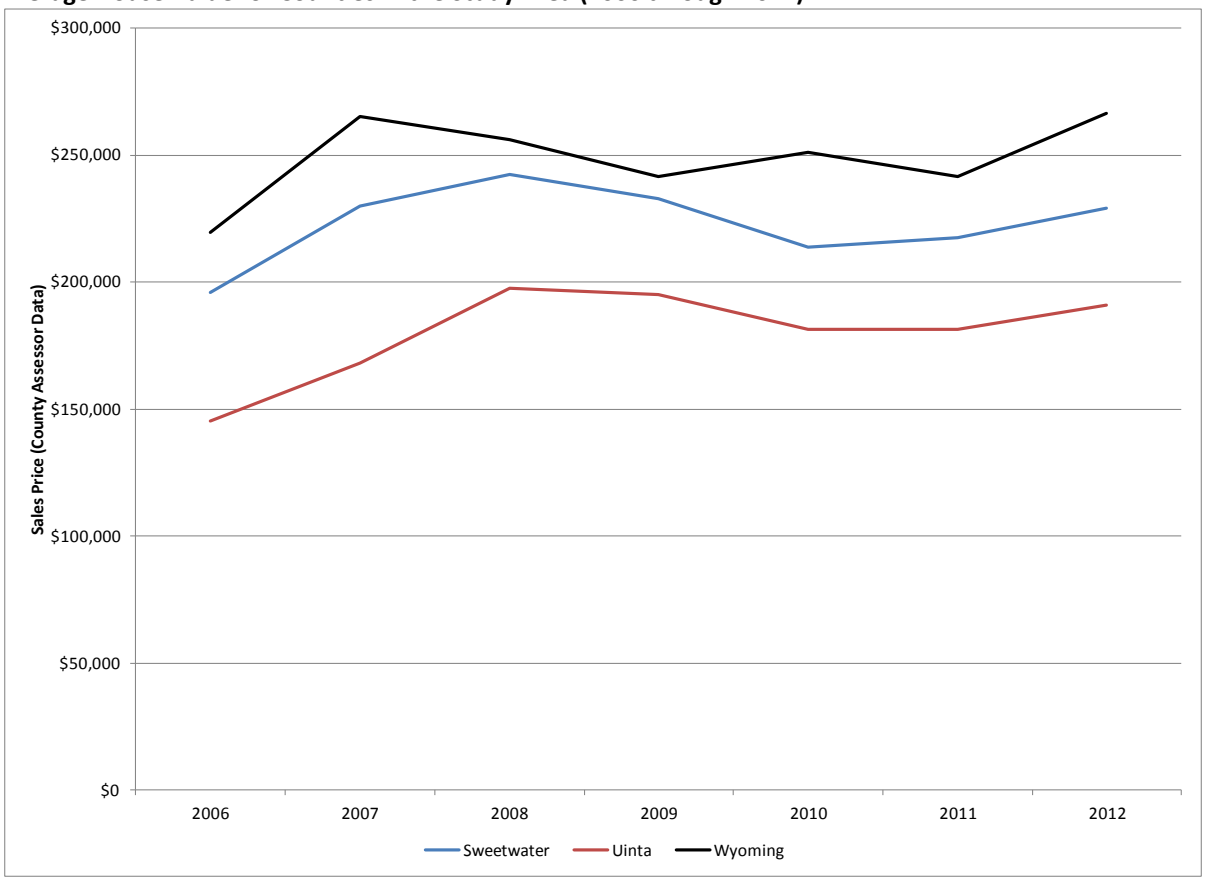
TABLE 5-45
Home Sales in the Study Area from 2006 through 2012 (Assessor Data: Nominal Dollars and Annual Percent Change)

County	2006	2007	2008	2009	2010	2011	2012	# Sales 2012	2011-2012 % Change
Sweetwater	195,981	230,063	242,470	232,959	213,689	217,245	229,003	329	5.4
Uinta	145,243	168,204	197,390	194,928	181,269	181,429	191,065	71	5.3
Simple Average	170,612	199,134	219,930	213,944	197,479	199,337	210,034		
Weighted	Average						222,269		

Source: Wyoming Community Development Authority (WCDA), 2013a. *The 2012 Wyoming Profile of Demographics, Economics, and Housing*. Volume 1. Final report issued September 5, 2013.

Both counties posted increasing sales prices through 2008, followed by noticeable declines in 2009 and 2010. Sale prices, however, recorded modest gains in 2011 and increased again in 2012 by more than 5 percent. The simple average home sale price in the Study Area in 2012 was $210,034, while the weighted average, integrating the number of home sales, was $222,269. Of the total homes sold in the Study Area in 2012, the majority, 329 or 82 percent, were in Sweetwater County. Uinta County, by comparison, recorded a total of 71 home sales that same year.

FIGURE 5-10
Average House Value for Counties in the Study Area (2006 through 2012)



Source: Wyoming Community Development Authority (WCDA), 2013a.

Rental Housing Costs. For workers seeking temporary relocation to an area, housing rental rates for apartments, houses, and mobile home lots are generally more relevant than home sale prices. The Wyoming Economic Analysis Division has conducted a semiannual study since 1986, in which it estimates a cost of living index for geographic areas throughout Wyoming. There is a housing component to this index; rental housing costs are reported separately for houses, apartments, and mobile homes plus a lot. The most recent rental rate data cover the annual period from the fourth quarter of 2011 to the fourth quarter of 2012, as presented in **Table 5-46.** Rental rates were substantially higher in Sweetwater County than in Uinta County and the state as a whole, with apartments and mobile homes costing approximately 32 percent and 68 percent more, respectively, in Sweetwater County at the end of 2012.

With the exception of rental rates for houses in Uinta County, which increased 12 percent, and apartment rates, which decreased by 5 percent, there was little overall change in rates between 2011 and 2012. The average monthly apartment rental rates in 2012 ranged from a low of $574 in Uinta County to a high of $760 in Sweetwater County. Rental rates for mobile homes plus a lot were higher in Sweetwater County ($803) than the statewide monthly rental rate ($672), and lower in Uinta County ($479). Rental rates for single-family homes were $837 a month in Uinta County and $1,040 per month for homes in Sweetwater County, as shown in **Table 5-46**. For all housing types, average rents were highest in Sweetwater County (markedly higher than rents statewide) and lowest in Uinta County. While renters can do somewhat better in Uinta County, any savings in rent would need to be balanced against the time and out-of-pocket costs associated with a longer commute (WY EAD, 2012).

TABLE 5-46
Average Apartment, Mobile Home Lot, and House Rental Rates for Counties in the Study Area

	Apartment [1]			Mobile Home [2]			House [3]		
	4Q12	4Q11	Percent Change	4Q12	4Q11	Percent Change	4Q12	4Q11	Percent Change
Wyoming	$666	$666	0%	$672	$628	7%	$984	$966	2%
Sweetwater County	$760	$720	6%	$803	$799	1%	$1,040	$1,019	2%
Uinta County	$574	$603	-5%	$479	$473	1%	$837	$749	12%
Rate Difference	32%	19%		68%	69%		24%	36%	
Study Area Average	$667	$662	0%	$641	$636	1%	$939	$884	7%

Notes:
[1] Two-bedroom units, unfurnished, excluding gas and electric.
[2] This price reflects total monthly rental expense, including lot rent.
[3] Two or three bedroom, single-family, excluding gas and electric.
NA - Too few observations were available to report the data.
Source: Wyoming Community Development Authority (WCDA), 2013a.

Temporary Accommodations

Temporary accommodations, for purposes of this report, are defined as hotel and motel rooms and sites for RVs. This information was collected to assist with identifying the area primarily affected by non-local workers and to obtain housing commitments for the temporary non-local workforce and, thus, is focused on units in Sweetwater County. In years when facilities close to a project site have low vacancy rates (due, for example, to multiple projects), alternatives more distant from the project become more viable. However, it is reasonable to assume that workers will choose housing opportunities that are more convenient to their work in Rock Springs when such opportunities are available, affordable, and suitable. **Table 5-47** compiles a listing of hotels, motels, and RV parks within an hour of the proposed Project site as well as their corresponding number of rooms. At least 2,539 temporary lodging units are found at 32 hotels and six RV parks within the area of site influence in Sweetwater County, more than three-quarters of which are located in the City of Rock Springs.

TABLE 5-47
Hotel and Motel Rooms and RV Sites by Community (2013)

Community	Name	Type	Room / Site Count
Farson	Sitzman's Motel	Hotel	10
	Farson Subtotal		***10***
Green River	Coachman Inn	Hotel	18
Green River	Flaming Gorge Motel	Hotel	17
Green River	Hampton Inn & Suites	Hotel	106
Green River	Mustang Motel	Hotel	23
Green River	Oak Tree Inn	Hotel	191
Green River	Super 8	Hotel	31
Green River	Sweet Dreams Inn	Hotel	27
Green River	Walker's Motel	Hotel	9
Green River	Western Motel Inn	Hotel	31
Green River	Buckboard Crossing Campground (Seasonal)	RV Sites	45
Green River	Tex's Travel Camp	RV Sites	78
	Green River Subtotal		***453***
Little America	Little America Hotel	Hotel	140
	Little America Subtotal		***140***
Rock Springs	America's Best Value Inn & Suites	Hotel	147
Rock Springs	Best Western Outlaw Inn	Hotel	100
Rock Springs	Budget Host Inn	Hotel	32
Rock Springs	Cody Motel	Hotel	39
Rock Springs	Comfort Inn & Suites	Hotel	57
Rock Springs	Days Inn	Hotel	110
Rock Springs	Econo Lodge	Hotel	98
Rock Springs	Economy Guest Village	Hotel	70
Rock Springs	Elk Motel	Hotel	18
Rock Springs	Hampton Inn & Suites	Hotel	70
Rock Springs	Holiday Inn	Hotel	170
Rock Springs	Holiday Inn Express	Hotel	79
Rock Springs	Homewood Suites	Hotel	84
Rock Springs	La Quinta Inn	Hotel	129
Rock Springs	Motel 6	Hotel	99
Rock Springs	Motel 8	Hotel	96
Rock Springs	Quality Inn	Hotel	103
Rock Springs	Rocky Mountain Motel	Hotel	10
Rock Springs	Sands Inn	Hotel	20
Rock Springs	Springs Motel	Hotel	23
Rock Springs	Springhill Suites	Hotel	109
Rock Springs	Super 8 Motel	Hotel	49
Rock Springs	Firehole Canyon Campground (Seasonal)	RV Sites	37

TABLE 5-47
Hotel and Motel Rooms and RV Sites by Community (2013)

Community	Name	Type	Room / Site Count
Rock Springs	Rock Springs/Green River KOA	RV Sites	85
Rock Springs	Skyline Village (RV)	RV Sites	23
Rock Springs	High Desert Storage and RV Park	RV Sites	26
	Rock Springs Subtotal		***1,813***
	Area of Site Influence Total		**2,539**

Source: Smith Reports and Wyoming Tourism Website, December 2013.

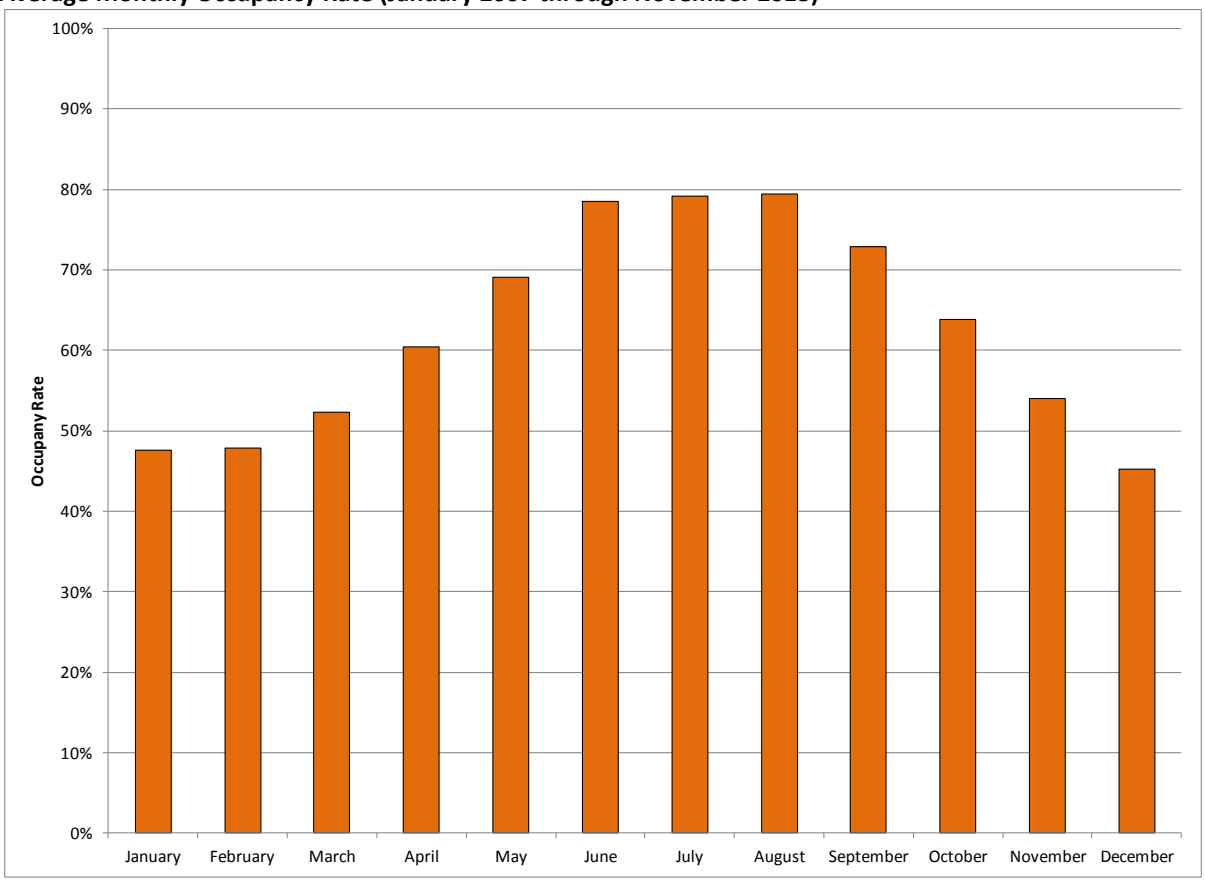
Hotels and Motels. The Rock Springs – Green River area has approximately 2,245 rooms at 32 hotels and motels, including 10 facilities with more than 100 rooms each (**Table 5-47)**. Hotel and motel occupancy rates for the period from January 2007 to November 2013 are presented in **Table 5-48** and **Figure 5-11** based on information from Smith Travel Research. The Budget Host Inn, with 32 rooms, is the closest hotel to the proposed Project, located in Rock Springs approximately 5.5 miles northwest of the Project site. In all, there are 12 hotels with 1,642 rooms in Rock Springs within a 10-minute drive from the proposed Project and another 453 rooms in Green River, an approximately 25-minute drive to the southwest. The average monthly occupancy rate between 2007 and 2013 was lowest in December at 45 percent and highest in July and August at 79 percent. The corresponding vacancy rate is also highly seasonal, ranging from highs of 52-55 percent in December through February to lows of approximately 21 percent in July and August.

TABLE 5-48
Average Monthly Hotel and Motel Occupancy Rates for the Rock Springs – Green River Area, Wyoming, January 2007 to November 2013

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Average	48%	48%	52%	60%	69%	78%	79%	79%	73%	64%	54%	45%

Source: Smith Travel Research, 2013.

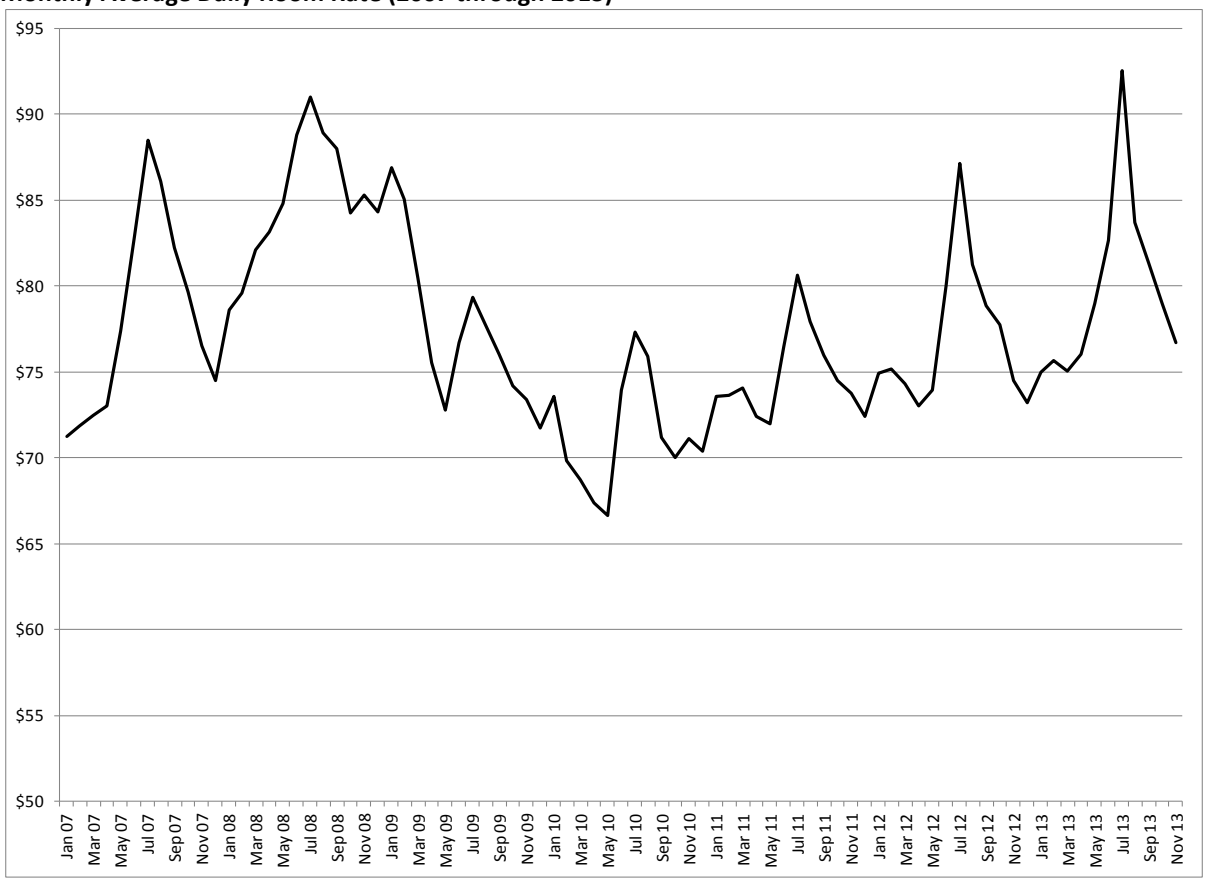
FIGURE 5-11
Average Monthly Occupancy Rate (January 2007 through November 2013)



Source: Smith Travel Research, 2013.

The average daily room rate fluctuates depending on the month, as can be seen from the information presented in **Figure 5-12**. Room rates are generally highest in the summer from June until August and peak each year in July. Average annual rates for a hotel or motel near the proposed Project site grew steadily through the summer of 2008, peaking at a daily rate of $85; since then, however, rates have moderated, with an average daily rate of $77.68 in 2013. The 7-year average of daily room rates during the peak month of July was $85.29 compared to a daily room rate in July 2013 of $92.52.

FIGURE 5-12
Monthly Average Daily Room Rate (2007 through 2013)



Source: Smith Travel Research, 2013.

Recreational Vehicle Sites. Six RV parks or campgrounds with 294 sites in the Rock Springs - Green River area can provide accommodations for visits with durations of weeks or months, as shown in **Table 5-47.** Skyline Village, located off Interstate 80 (I-80) in Rock Springs, has 23 sites and is the nearest RV park to proposed Project site. The Rock Springs / Green River KOA, located further west approximately 8 miles from the proposed Project, is the largest RV campground in the area, with a total of 85 sites.

Number of Units Required

Estimates of selected characteristics of the peak-month (March 2016) workforce are shown in **Table 5-49**. It is estimated that an average of 78 percent of the total construction workforce will be non-local over the duration of the proposed Project. This percentage climbs to about 83 percent during the Project's peak month, indicating that 384 non-local workers, including up to 19 workers with their families, would need to secure temporary accommodations for the duration of their involvement in the proposed Project. It was assumed that 5 percent or less of the non-local workers would be accompanied by family members due to the tendency of the construction workforce to return home on the weekends given the long duration of some of the workforce assignments. While RV slots and camping sites are available in the area of site influence, Simplot's recent construction experiences have indicated that only a negligible number of workers will choose this option due to the large number of readily available hotel and motel rooms in the area.

TABLE 5-49
Estimate of Local and Non-local Construction Worker Breakdown: March 2016 Peak

Average Peak Quarterly Workforce	Number of Workers
Total Peak Workforce	460
Local Workers	76
Non-Local Workers	384
Non-Local Workers Bringing Families	19
Non-Local Single Workers	365
Housing Requirement	**Number of Rooms**
Temporary Accommodation Units by Type	
Houses, Apartments, and Rental Mobile Homes	19
Hotel and Motel Rooms	319
Temporary Accommodation Units by Occupancy	**Number of Type**
Single-Occupancy	274
Double-Occupancy	46

Source: Linde North America, 2013.

The estimated housing requirements shown in **Table 5-49** are based on the assumption that 25 percent of the single, non-local workers will share temporary accommodation units, such as hotel/motel rooms (i.e., double-occupancy). The remaining 75 percent would occupy units singly. The aggregate demand for accommodations created by the non-local workers could total 338 units (19 houses, apartments, or rental homes plus 319 hotel / motel rooms). Due to the variety of the housing options and locations within commuting distance of the site, the housing analysis suggests there will be sufficient housing for the non-local workforce during the construction period from August 2014 to August 2016. In the peak construction month of March 2016, Project workers will access only 32 percent of the available supply of hotel / motel rooms in the area of site influence, assuming the continuation of historical vacancy trends. During the area's peak occupancy months of July and August, temporary housing needs for Project workers would represent, at most, 30 to 34 percent of the local hotel / motel supply. **Table 5-50** provides a breakdown of the housing vacancies by type.

TABLE 5-50
Potentially Available Temporary Accommodations

Type of Rental Housing	Number of Accommodation Units Required by Project During Peak Month (Demand)	Number of Accommodation Units in Area of Site Influence	Number of Available Accommodation Units in Area of Site Influence (Supply)	Housing Gap (Supply minus Demand)
Hotel/Motel Rooms	319	2,539	846	+527
Apartments, Mobile Homes and Rental Houses	19	16,136	523	+504
TOTAL	**338**	**30,249**	**1,516**	**+1,178**

Notes:
[1] The vacancy rate for hotel/motel rooms is based on the average occupancy for the peak month of March over the period January 2007 to November 2013.
+ indicates a surplus of housing units.

Source: Smith Travel Research, 2013; CH2M HILL, 2013.

The aggregate sum of rooms available for use by members of the construction workforce during the peak construction workforce month of March 2016 is 846, including commitments received by Simplot to date (see **Appendix D**), and assuming that historical vacancy rates continue for the balance of the sites. The potential supply in Rock Springs alone, 622 units in March 2016, exceeds demand; this excess supply of temporary housing is sufficient to accommodate the proposed Project. The increase in demand for local rental housing for non-local workers accompanied by their families is expected to peak at 19 units; after accommodating this reduction in supply, the region will have an excess capacity of 674 units. Should additional temporary housing be needed, there are also 284 RV sites that were not accessed for the proposed Project's housing analysis due to Simplot's recent construction workforce housing experiences.

Effects on Vacancies of Local Motel/Hotels, Recreational Vehicles, and Apartments

The supply of temporary accommodations in the area of site influence in Sweetwater County includes hotel and motel rooms, apartments, single-family rental housing units, rental mobile homes, and RV spaces located in RV parks. Estimates of the available supply of each type of accommodation are shown in **Table 5-50**, along with the demand generated by the non-local workers associated with the proposed Project. The number of potentially available units is derived by applying the vacancy rates shown to the total number of each type of unit. More than adequate housing is available to meet the needs of the non-local workers as well as any temporary peaks due to the National High School Finals Rodeo (NHSFR) each July (through 2015) in Rock Springs.

Implementation of the proposed Project would slightly reduce temporary housing vacancy rates as the demand absorbs a fraction of the available units. Simplot received responses from 15 of the hotels (representing 1,515 total rooms) it contacted, all of which are located within area of site influence, to obtain housing commitment letters. This resulted in between 418 and 498 rooms being committed to the Project workforce depending on the month. If no specific commitment was provided by a facility, it was assumed that it could commit no more than its total number of rooms times the corresponding vacancy rate for that month. Given 1) the commitment letters to provide accommodations secured by Simplot regarding available hotel/motel rooms, and 2) the available supply of other types of temporary accommodations in the Rock Springs-Green River area, the likely demand for 319 hotel/motel units would be satisfied.

Operations Impacts

During operation of the proposed Project, it is estimated there would be 27 full-time employees. **Table 5-44,** Vacant Permanent Housing Units by Vacancy Type - 2012 ACS, summarizes the estimated number of vacant for sale or for rent housing units available in the area of site influence in 2012. Based on the approximate number of vacant units available in Sweetwater County in 2012 (583 units), no impacts to housing resources are expected as a result of the operations workforce.

5.4.4 Public Education

The major topics addressed in this section are location and characteristics of educational facilities, current and historical school enrollment, and student-teacher ratios for Sweetwater County. As noted in Section 5.3, it is anticipated that the majority of the non-local workers will temporarily relocate to the Green River–Rock Springs area in Sweetwater County.

Location and Characteristics of Educational Facilities

Sweetwater County contains two school districts. Sweetwater County School District No. 1 (SCSD1) is the larger of the two districts in geographic size and enrollment, with a total of 5,514 students enrolled during the fall 2012-2013 school year at 17 schools in Rock Springs, Farson-Eden, and Wamsutter. Sweetwater County School District No. 2 (SCSD2), meanwhile, serves the southwestern third of the county, including the communities of Green River and Little America, and has a total of 11 schools with a fall 2012-2013 enrollment of 2,653 students (WDE, 2013a). SCSD1 includes 11 elementary schools, one junior high, two middle schools, and three high schools, including Rock Springs High School, while SCSD2 operates Green River High School (grades 9-12), Expedition Academy Alternative High School (grades 10-12), Lincoln Middle School (grades 7-8), and Monroe Intermediate School (grades 5-6). SCSD2 also maintains four elementary schools within the city limits (Harrison, Jackson, Truman, and Washington) and three rural schools (Granger, McKinnon, and Thoman Ranch) (WDE, 2013b).

The school districts in the proposed Project area are illustrated in **Figure 5-13**. **Table 5-51**, meanwhile, shows the type and number of schools by district and selected district-wide characteristics.

TABLE 5-51
Selected Characteristics of Sweetwater County School Districts (2012-2013)

	Sweetwater County School District No. 1	**Sweetwater County School District No. 2**
Coincides with AOI	Yes	Yes
Elementary Schools	11	4
Secondary Schools	6	4
Rural Schools	0	3
Enrollment (Fall Enrollment 2012-2013)		
Kindergarten	520	226
Grade 1	494	199
Grade 2	478	237
Grade 3	446	178
Grade 4	447	220
Grade 5	455	203
Grade 6	404	214

TABLE 5-51
Selected Characteristics of Sweetwater County School Districts (2012-2013)

	Sweetwater County School District No. 1	Sweetwater County School District No. 2
Grade 7	417	206
Grade 8	412	199
Grade 9	413	193
Grade 10	373	218
Grade 11	340	194
Grade 12	315	166
Total	**5,514**	**2,653**
Staff (Full-Time Equivalent [FTE]) (2012-2013)		
Staff	840	465
Teachers	357	200
Teacher Assistants (instructional aides)	129	58
Instructional Coordinators	20	12
Student - Teacher Ratio	15.4	13.3
Revenue Source (Percent) (2010 – 2011)		
Local	49.47%	59.34%
County	14.67%	14.39%
State	35.71%	26.05%
Federal	0.15%	0.22%
Total	**$66,919,630**	**$36,911,999**
Revenue per Student	**$12,136**	**$13,913**

Source: Wyoming Department of Education (WDE), 2012, 2013a, and 2013b; Teacher Salary Info, 2013a and 2013b.

FIGURE 5-13
Sweetwater County Public School District Boundaries

Source: CH2M HILL, 2014, adapted from http://nces.ed.gov/surveys/sdds/ed/index.asp.

Student-Teacher Ratios

A commonly used measure of overall school quality is the student-teacher ratio (i.e., the ratio of total student enrollment in a school, school district, or other unit to the number full-time employee [FTE] certified teachers). This ratio provides a means of comparing different educational units, such as school districts, to a state or national parameter, and can be used as an indicator of school quality. As a whole, the student-teacher ratios within the proposed Project area compare favorably to the national standard. Implementation of the 16:1 student-teacher ratio is mandated by House Enrolled Act 98 of 2011, specifically W.S. § 21-13-307(a)(iv). During the 2012-2013 school year, the student-teacher ratios for SCSD1 and SCSD2 were similar at 15.4 and 13.3, respectively (**Table 5-52**), slightly above the State of Wyoming's student-teacher ratio of 13.1 (Teacher Salary Info, 2013c) but below the 16.0 ratio for the nation as a whole (2012).

School Revenue

While the overall revenue to each school district in Sweetwater County varies due to size, the revenues per student for 2010-2011 were similar, with SCSD1 reporting revenues per student of $12,136 and SCSD2 recording per-student revenues of $13,913. The revenue per student for the State of Wyoming was slightly higher at $14,009. The distribution of revenue sources varied between the two Sweetwater County school districts, with local sources (county and municipal

governments) representing approximately 64 percent of the overall revenue for SCSD1 and 74 percent of the SCSD2 revenue, as shown in **Table 5-51**. The State of Wyoming provided approximately 36 percent of the SCSD1 revenue and 26 percent of the revenue of SCSD2. The federal government, meanwhile, contributed less than 1 percent of the revenue of both SCSD1 and SCSD2.

Student Enrollment

Student enrollment as of October 1, 2012 (2012-2013 school year), totaled 5,514 in SCSD1 and 2,653 in SCSD2. Between 2003 and 2012, SCSD1 enrollment increased by 1,321 students (32 percent), while enrollment in SCSD2 rose by only a modest 0.1 percent (three students), as shown in **Table 5-52**. Enrollment in SCSD1 has steadily increased by a 2 percent annual average since 2006, and experienced a sizeable 7 percent jump between the 2006 and 2007 school years. Enrollment in SCSD2 during the 2003-2012 period has been sporadic, peaking at 2,671 students in 2008.

TABLE 5-52
School District Enrollment (2003-2013) (as of October 1 each year)

	Sweetwater County School District No. 1	Sweetwater County School District No. 2
2003	4,193	2,650
2004	4,197	2,620
2005	4,240	2,582
2006	4,413	2,552
2007	4,742	2,599
2008	4,957	2,671
2009	5,033	2,601
2010	5,159	2,635
2011	5,296	2,641
2012	5,514	2,653
Numeric Change 2003-2012	**1,321**	**3**
Percent Change 2003-2012	**32%**	**0.1%**
Annual Average	**2%**	**0%**

Source: Wyoming Department of Education (WDE), 2013c.

Construction Impacts

The number of non-local workers likely to enter the study are during peak onsite employment would total 384. Based on historical data, a conservative estimate of 5 percent of these non-local workers (19 persons) would be accompanied by family members. A conservative estimate of 1.88 school-aged children per family in the State of Wyoming would mean approximately 36 children entering the study area during the construction phase (U.S. Census Bureau, 2013). Thus, negligible impacts to public education in Sweetwater County is anticipated.

Operations Impacts

The permanent workforce of 27 full- time employees is expected in association with the operation of the proposed Project. Based on the percentage of households with families in Sweetwater County, a conservative estimate of 25 percent of the full-time employees would be accompanied by family members (7 persons). Again, a conservative estimate of 1.88 school–aged children per family

in the State of Wyoming would mean approximately 13 children entering the study area during the operations phase (U.S. Census, 2013). Thus, negligible impact to public education in Sweetwater County is anticipated.

5.4.5 Public Safety

This section addresses the availability of fire protection and law enforcement services in Sweetwater County as well as a summary of the county's crime levels. It is anticipated the majority of the non-local workers will relocate to the Green River–Rock Springs area. However, this section includes the other communities in the area of site influence as well.

Fire Protection and Rescue Services

Should fire and rescue services be needed, eight fire departments or districts are available in Sweetwater County with a total of 13 fire stations, 95 full-time employees, and 139 volunteers, as presented in **Table 5-53** (WSFM, 2013a). As evidenced by the numbers, most of the fire districts are staffed by volunteers and support each other in the event of a large fire or catastrophic event. The Rock Springs Fire Department (RSFD) headquarters, located approximately 7.3 miles (13 minutes) northwest of the proposed Project site, is the closest all-hazard fire department, with four stations, 34 full-time paid firefighters, and 29 emergency medical services (EMS) personnel.

TABLE 5-53
Fire Departments in Sweetwater County by City

Fire Departments	Number of Stations	Number of Firefighters		Emergency Medical Services (EMS)	Basic Emergency Medical Technicians (EMTs)	Advanced EMTs
		Full-Time Paid	Volunteer			
Bairoil, Town of	1					
Bairoil Fire Department		0	8	No	0	0
Farson CDP	1					
Eden-Farson Fire Control District Training Unit		0	15	Yes	1	3
Granger, Town of	1					
Granger Volunteer Fire Department		0	8	No	0	0
Green River, City of	3					
FMC Fire Brigade		44	0	No	0	0
General Chemical Corp Emergency Response Team		0	11	Yes	1	1
Green River Fire Department		3	32	No	0	0
Little America CDP	1					
Little America Holdings Fire Department		0	12	No	0	0
Rock Springs, City of	4					
Rock Springs Fire Department		34	0	Yes	11	18
Rock Springs Sweetwater County Airport Fire Department		8	0	Yes	1	0
Sweetwater County Fire Department		2	0	No	0	0

TABLE 5-53
Fire Departments in Sweetwater County by City

Fire Departments	Number of Stations	Number of Firefighters		Emergency Medical Services (EMS)	Basic Emergency Medical Technicians (EMTs)	Advanced EMTs
		Full-Time Paid	Volunteer			
Sweetwater County Fire District #1		4	36	Yes	7	2
Superior, Town of	1					
Superior Volunteer Fire and EMS		0	9	No	3	0
Wamsutter, Town of	1					
Wamsutter Volunteer Fire Department		0	8	No	0	2

Sources: FireDepartment.net, 2013; Wyoming State Fire Marshal, 2013a.

Table 5-54 summarizes the call volume experienced in 2011 by RSFD as well as the entire State of Wyoming (RSFD, 2012; WSFM, 2013b). Nearly 70 percent, or 1,329, of the 1,938 total calls received by RSFD in 2011 were for rescue and EMS. Similarly, the majority (64 percent) of the total calls received within the State of Wyoming in 2011 were rescue and EMS-related.

TABLE 5-54
Rock Springs Fire Department Call Volume Compared to State of Wyoming (2011)

Call Type	Rock Springs		State of Wyoming	
	Number of Calls	% of Total Calls	Number of Calls	% of Total Calls
Total Calls	**1,938**		**35,473**	
Rescue and Emergency Medical	1,329	69%	22,567	64%
Fires (All Types)	48	2%	2,985	8.3%
False Alarm and False Calls	177	9%	2,626	7.3%
Good Intent Calls	80	4%	3,579	10%
Service Calls	205	11%	1,688	4.7%
Hazardous Conditions	94	5%	1,867	5.3%
Special Incident Types	4	<1%	64	0.2%
Ruptures, Explosions, Overheats	1	<1%	48	0.1%
Severe Weather and Natural Disaster	0	0	49	0.1%

Source: RSFD, 2012; WSFM, 2013b.

Wyoming participates in the National Fire Incident Reporting System (NFIRS). With its partnership with the Wyoming State Forestry Division, software and computers are provided to the fire departments throughout the state, and incident reports are managed electronically. This allows demands on time and resources to be effectively recorded and managed by all fire departments.

Table 5-55 summarizes the fire response and rescue incidents for the departments within Sweetwater County for 2010. Overall, the county recorded a total of 2,443 incidents that year, of which 5 percent were fire-related and 63 percent were EMS/rescue-related calls, as shown in **Table 5-55** (WSFM, 2013b). RSFD recorded the largest number of total incidents in the county in 2010 with 1,973, followed by Sweetwater County Fire District #1 with 236 and Green River Fire Department with 209.

TABLE 5-55
Sweetwater County Fire Department / District Fire Incidents (2010)

Department	Total Incidents	Fire Calls	% of Total Incidents	EMS Rescue Calls	% of Total Incidents
Bairoil, Town of					
Bairoil Fire Department	2	1	50%	1	50%
Farson CDP					
Eden-Farson Fire Control District Training Unit			No records		
Granger, Town of					
Granger Volunteer Fire Department			No records		
Green River, City of					
Green River Fire Department	209	31	15%	69	33%
Rock Springs, City of					
Rock Springs Fire Department	1,973	47	2%	1,328	67%
Rock Springs Sweetwater County Airport Fire Department			No records		
Sweetwater County Fire Department			No records		
Sweetwater County Fire District #1	236	45	19%	123	52%
Superior, Town of					
Superior Volunteer Fire and EMS			No records		
Wamsutter, Town of					
Wamsutter Fire Department	23	1	4%	17	74%
Sweetwater Total	**2,443**	**125**	**5%**	**1,538**	**63%**

Source: WSFM, 2013b.

For other types of incidents, the Wyoming Emergency Response Act (35-9-151) established seven Regional Emergency Response Teams (RERTs) under the authority of the director, Wyoming Office of Homeland Security. Members of these teams are specially trained and available to respond to incidents involving hazardous materials and weapons of mass destruction. Each county in Wyoming has a coordinator responsible for mitigation and preparedness activities to protect against and prepare for disasters. This involves planning, training, exercising, procuring/maintaining equipment, and designating facilities for shelter and other purposes.

Law Enforcement Services

Law enforcement in the area of the proposed Project is provided primarily by the Sweetwater County Sherriff, which has offices in Rock Springs and Green River, as well as the County Detention Center located at 50140 Highway 191 South in Rock Springs (SCSO, 2013). The police departments of Rock Springs and Green River provide law enforcement within their jurisdictions, while District #3 of the Wyoming Highway Patrol (WHP), based in Rock Springs, patrols the highways in Sweetwater,

Uinta, and Lincoln counties, as shown in **Table 5-56**. The WHP Port of Entry program, with nearby locations in Cheyenne, Kemmerer, and Evanston, ensures highway safety by monitoring commercial vehicle and driver compliance with state and federal laws, issuing permits for allowable variances in statutes, and writing warnings and citations when necessary (WHP, 2013).

TABLE 5-56
Law Enforcement in Sweetwater County

Name	Address	Phone	City
Wyoming Highway Patrol District #3	P.O. Box 1260 3200 Elk Street Rock Springs, Wyoming 82902	(307) 352-3108	Rock Springs
Sweetwater County Sherriff's Office	80 W. Flaming Gorge Way Green River, Wyoming 82935	(307) 872-3870	Green River
	731 C Street Rock Springs, Wyoming 82901	(307) 922-5321	Rock Springs
Green River Police Department	50 E 2nd N Street Green River, Wyoming 82935	(307) 872-0555	Green River
Rock Springs Police Department	221 C Street Rock Springs, Wyoming 82901	(307) 352-1575	Rock Springs

Sources: Wyoming Office of Attorney General, 2013; USA Cops, 2013.

Local law enforcement agencies in Sweetwater County, which employ both officers and civilians, had a total of 150 police officers in 2011. Of those, 66 officers (44 percent) were employed by the Rock Springs Police Department, and 46 officers (31 percent) served with the Sweetwater County Sheriff's Office (**Table 5-57**). The number of officers per 1,000 residents (2.7) in Sweetwater County is slightly higher than the statewide average of 2.3, but the index of crimes per officer (150) is dramatically higher than the Wyoming average of 2.6. This is primarily due to the predominately rural nature of Sweetwater County relative to that of the balance of Wyoming (Wyoming Office of Attorney General, 2012).

TABLE 5-57
Law Enforcement Personnel in Sweetwater County (2011)

Location	Total Employees	Officers		Civilians		Officers per 1,000 Population	Index Crimes per Officer
		Male	Female	Male	Female		
Sweetwater County	**150**	**102**	**12**	**5**	**31**	**2.7**	**150**
Sheriff	46	38	3	0	5	5.0	46
Green River	38	24	4	0	10	8.0	38
Rock Springs	66	40	5	0	16	2.1	66
Wyoming	1,814	1,183	122	98	411	2.3	2.6

Note: Data on law enforcement personnel were not presented in the *2012 Crime in Wyoming Annual Report*; therefore, numbers are reported as presented in the *2011 Crime in Wyoming Annual Report*.

Source: Wyoming Division of Criminal Investigation, 2012.

Crime

Reported crimes (i.e., crimes known to law enforcement) are categorized into the more serious Part 1 crimes and less serious Part 2 crimes. Part 1 crimes (also referred to as index crimes) are further subdivided into violent crimes against persons (murder, forcible rape, robbery, and aggravated assault) and crimes against property (burglary, larceny, and motor vehicle theft [MVT]).

The number of reported crimes is directly related to the number of residents and, thus, most crimes occur in the largest community—the City of Rock Springs. This is evident from the information presented in **Table 5-58**. However, for comparative purposes, the most relevant statistic is the crime rate per 1,000 inhabitants because this statistic adjusts for the size of the population. In 2012, this crime rate index ranged from a low of 20.0 per 1,000 inhabitants served by the Sweetwater County Sheriff's Office to a high of 32.8 for those residents served by the Rock Springs Police Department. Overall, a rate of 26.9 was observed for Sweetwater County in 2012, which is somewhat higher than the statewide average of 24.1. In 2012, the majority (951 or 83 percent) of the 1,147 crimes in Sweetwater County were classified as crimes against property (burglary, larceny-theft, and MVT), while the remaining 17 percent were crimes involving the element of personal confrontation between the perpetrator and the victim, and entailed the use or threat of force or violence.

TABLE 5-58
Number of Reported Part 1 Crime Events (2012)

Location	Murder	Rape	Robbery	Aggravated Assault	Burglary	Larceny	MVT	2012 Total	2011 Total	% Change	2012 Population Coverage	Crime Rate per 1,000 Inhabitants
Sweetwater County	**3**	**18**	**5**	**170**	**119**	**794**	**38**	**1,147**	**1,228**	**-6.6%**	**42,675**	**26.9**
Sheriff	1	2	3	27	20	97	14	164	181	-9.4%	8,193	20.0
Green River	0	1	1	72	39	151	8	272	320	-15.0%	12,793	21.3
Rock Springs	2	15	1	71	60	546	16	711	727	-2.2%	21,689	32.8

Source: Wyoming Division of Criminal Investigation, 2013.

Part 2 crimes are considered less serious in nature than Part 1 crimes, but they are significantly more numerous and often of an antisocial nature, with the majority related to alcohol and drug abuse. Part 2 crimes are classified into the following groups: manslaughter by negligence; arson; other assault; forgery and counterfeiting; fraud; embezzlement; buying, receiving, or possessing stolen property; vandalism; carrying or possessing weapons; prostitution and commercial vice; sex offenses (except rape and prostitution); drug abuse – sale and manufacture; drug abuse – possession; gambling; offenses against family and children; driving under the influence; liquor laws; drunkenness; disorderly conduct; vagrancy; and all other (except traffic). Information regarding Part 2 crimes is available only in the form of statewide arrest data, as shown in **Table 5-59**. As the numbers reflect, drug- and alcohol-related arrests and other assaults top the list of offenses that result in arrests.

TABLE 5-59
Number of Part 2 Crime Arrests by Type of Crime (2011 and 2012)

Classification of Offenses	Sex	2012 Wyoming Totals		2011 Wyoming Totals	
		Adult	Juvenile	Adult	Juvenile
Manslaughter by Negligence	M	2	0	4	2
	F	2	0	4	0
Arson	M	11	12	18	6
	F	4	1	7	0
Other Assaults	M	1,744	301	1,764	346
	F	634	155	626	165
Forgery and Counterfeiting	M	30	1	51	3
	F	23	0	29	1
Fraud	M	115	3	132	6
	F	69	1	55	2
Embezzlement	M	2	0	0	1
	F	2	0	2	0
Stolen Property: Buy, Receive, Possess	M	31	4	43	9
	F	19	0	4	0
Vandalism	M	376	144	364	163
	F	96	29	95	44
Weapons: Carry Possess, etc.	M	57	31	80	29
	F	2	0	0	6
Prostitution and Commercialized Vice	M	8	0	9	0
	F	9	0	4	0
Sex Offenses	M	97	20	132	14
(Except Rape and Prostitution)	F	8	4	6	0
Drug Abuse Violations Total	**M**	**1,962**	**459**	**1,979**	**436**
	F	**662**	**160**	**678**	**133**
1) Sale Manufacture Subtotal	M	174	20	238	31
	F	54	4	83	5
2) Possession Subtotal	M	1,788	439	1,741	405
	F	608	156	595	128
Gambling Offenses	M	0	1	7	0
	F	0	1	1	0
Offenses Against Family and Children	M	142	3	147	7
	F	64	2	83	2

TABLE 5-59
Number of Part 2 Crime Arrests by Type of Crime (2011 and 2012)

Classification of Offenses	Sex	2012 Wyoming Totals		2011 Wyoming Totals	
		Adult	Juvenile	Adult	Juvenile
Driving Under the Influence	M	3,374	33	3,786	47
	F	1,060	12	1,198	10
Liquor Laws	M	1,754	416	1,757	394
	F	817	310	843	308
Drunkenness	M	2,367	9	2,234	3
	F	482	2	431	3
Disorderly Conduct	M	691	102	743	145
	F	229	35	271	69
Vagrancy	M	30	15	184	13
	F	10	1	81	5
All Other Offenses (Except Traffic)	M	6,518	722	6,620	861
	F	2,469	287	2,526	323
Suspicion	M	8	0	6	5
	F	3	0	3	1
Curfew and Loitering Law Violations	M	NA	198	NA	193
	F	NA	117	NA	124
Runaways	M	NA	139	NA	147
	F	NA	124	NA	154
Total Male		20,915	3,067	21,653	3,337
Total Female		7,580	1,548	7,823	1,639
Total		**28,495**	**4,615**	**29,476**	**4,976**

NA – not available
Source: Wyoming Division of Criminal Investigation, 2012.

Construction Impacts

Fire Protection

The temporary influx of a peak number of 384 non-local onsite workers associated with the construction phase of the proposed project would have negligible effect on the quality of service provided by fire protection agencies. Due to its location, the proposed project will be served by Sweetwater County Fire District #1, while Rock Springs Fire Department will be available for additional support if necessary. The peak number of onsite workers could generate demand for less than one full-time paid employee, or 0.84 percent of the current fire protection workforce in Sweetwater County. Simplot will proactively coordinate with the fire department to minimize fire safety hazards, coordinate response efforts, and effectively train Simplot and subcontracting personnel in the fire safety issues. In addition, Simplot will have at least one Basic Emergency Care (BEC) certified EMT onsite at all times for assistance. If an incident were to occur at Simplot that impacted property offsite, Simplot will follow its crisis management plan and notify neighboring

communities, including Arrowhead Springs. Because Simplot EMT will be the first responder to any medical attention needed at the facility, and additional assistance will come from offsite, the proposed Project is anticipated to have negligible effect on public EMT services.

Law Enforcement

The temporary influx of a peak number of 384 non-local onsite workers associated with the construction phase of the proposed project would have negligible effect on the quality of service provided by law enforcement. Law enforcement services would be provided to the Project site by Sweetwater County. As shown in **Table 5-57**, the current level of service ranges from about 2.1 (Rock Springs) to 8.0 (Green River) officers per 1,000 in population. Thus, the temporary increase in persons attributable to construction of the proposed project would equate to an increase in demand addressed by one additional law enforcement officer. However, this increase in demand would last for a short period and would not justify the hiring of additional personnel.

With an index crime rate of about 26.9 per 1,000 residents in Sweetwater County, the additional construction workers could account for an increase of approximately 10 crimes annually, assuming the average of the crime rate index would hold for the population of construction workers and the peak monthly non-local workforce of 384 would settle in Sweetwater County. However, unlike the general population, the construction population has additional incentive to reduce criminal incidences because workers could lose their jobs as a result.

Operations Impacts

The permanent workforce of 27 associated with the operation of the proposed facility would represent a negligible increase in the demand for fire protection and law enforcement personnel.

5.4.6 Health Care

This section discusses the location and characteristics of health care facilities in Sweetwater County, including the number and type of facilities, availability of EMS, and the health needs of the existing population. As with the other community services, it is anticipated that most of the demand for health services would be in Sweetwater County where the new workers are employed and where most of the non-local work force will reside. Any other demands are expected to be dispersed and incidental.

Location and Characteristics of Health Care Facilities

The area of site influence is primarily served by the Memorial Hospital of Sweetwater County (MHSC), a 58-bed general medical and surgical hospital in Rock Springs, located approximately 5 miles northwest of the proposed Project (MHSC, 2013) (see **Figure 5-14**). In Green River, approximately 20 miles west of the proposed Project, the Castle Rock Medical Center –Castle Rock Hospital District (CRHD) provides onsite laboratory services, radiology, physical therapy, occupational therapy, and speech pathology (CRHD, 2013). Selected summary statistics for MHSC from an American Health Association Survey of more than 5,000 hospitals across the nation related to patient volume are provided in **Table 5-60**. These data were extracted from the *U.S. News & World Report* website, which maintains a searchable directory (*U.S. News & World Report*, 2013).

TABLE 5-60
Hospital Nearest the Proposed Project: Selected Statistics

Memorial Hospital of Sweetwater County (MHSC)	
Beds	58
Admissions	2,200
Inpatient Surgeries	555
Outpatient Visits	97,638
Emergency Room Visits	20,258
Births	490

Source: *U.S. News & World Report*, 2013.

MHSC employees 15 full-time physicians and dentists, as well as 101 registered nurses (RNs), 62 of whom are full-time (*U.S. News & World Report*, 2013). CRHD includes a medical center with two family practice physicians, one pediatrician, three physician assistants, and one nurse practitioner as well as a 59-bed convalescence center and 24-bed independent senior living facility (CRHD, 2013).

In addition to these health care resources, Sweetwater County also provides a variety of human service facilities and programs to meet the current demands and needs of the population in the area of site influence. These include two public health nursing offices providing services in Rock Springs and Green River. The Community Nursing program administers a Best Beginnings Program for pregnant women and their families, as well as basic preventative health care services such as immunizations and testing (WDH, 2013a). The proposed Project area is also served by Southwest Wyoming Recovery Access Programs (SW WRAP), which administers the First Call for Help (FC4H) information and referral service that directs individuals to the appropriate community programs for basic needs, emergency assistance, and crisis intervention (SW WRAP, 2013). Public services related to potential mental health and substance abuse treatment are provided at the Wyoming Behavioral Institute (WBI) Sweetwater County Clinic in Rock Springs (WBI, 2013).

The Wyoming Department of Health's (WDH's) Public Health Response Coordinators (PHRC) program consists of a coordinator for each participating county's public health office. The primary goal of the PHRC is to achieve local preparedness for responding to public health incidents through education, planning, training, and surveillance (WDH, 2013b). Sweetwater County is in Region 4 with Uinta and Lincoln counties. PHRCs develop and maintain county public health emergency response plans. They work with county health officers and local emergency planning committees to coordinate county health and medical plans with WDH and other agencies, including hospitals, EMS, and county emergency management agencies.

Fire departments in the area of the proposed Project utilize firefighters in the delivery of both EMS and fire services. **Table 5-53** above, summarizes EMS, Basic Emergency Medical Technician (EMT), and Advanced EMT staffing in Sweetwater County.

FIGURE 5-14
Location of Hospitals near the Proposed Project

Source: CH2M HILL, 2013.

A measure of health care service levels in a particular location relates to the availability of health care professionals. In 2011, the Research and Planning (R&P) section of the Wyoming Department of Workforce Services evaluated the health care needs in Wyoming based on data collected by the OES program. Health care-related occupations in the OES analysis were included based on the description in the Patient Protection and Affordable Care Act in Section 5101i(1) and include "all health care providers with direct patient care and support responsibilities such as physicians, nurses, nurse practitioners…". The OES identified several areas that are considered medically underserved, including Sweetwater County. Sweetwater County is one of 13 counties in Wyoming that have shortages of primary care physicians (PCPs) (Wyoming Department of Workforce Services, 2011). WDH estimated the number of PCPs needed using Rural Health Works Formulas and compared the needs to the number of physicians in place. With an estimated 10 PCPs in place and 17.23 needed, it found that Sweetwater County had a 7.23 deficit of PCPs in 2009 (WDH, 2009). Although the proposed Project area is considered medically underserved, there is caution in constructing or expanding health care facilities because of quick population change in the area. Compared to the rest of the nation, Wyoming is unique in that the state's economy depends on the extraction of natural resources, and that industry has historically shown a boom-and-bust cycle that triggers quick population growth or decline depending on the economy.

Health Needs in Wyoming

As mentioned previously, the R&P section of the Wyoming Department of Workforce Services evaluated the health care needs in Wyoming based on data collected by the OES program. The evaluation was prepared in a 2011 report entitled *Health Care Needs in Wyoming: Advancing the Study* (2011). Wyoming is undergoing significant change in population. According the report, Wyoming is seeing a dramatic increase in the number of persons aged 65 and older. The state is also seeing growth in the working-age population that supports the growth in extraction of natural resources. The two population shifts will place different pressures on the health care system. The increase in persons aged 65 and over will create more demand for geriatric care and care management of patients with multiple chronic conditions associated with the elderly. The increase of working-age persons will increase demand for dental services, preventive services, and primary care services associated with young families.

The key findings of the analysis contained in this report include:

- According to the 2010 U.S. Census Bureau, 26.6 percent of all persons residing in Wyoming in 2010 were baby boomers (between the age of 46 and 64). This number was even higher in many smaller counties. This could have a negative impact on the elderly living in rural area where health care needs are limited by small critical access hospitals that generally provide emergency services, outpatient care, and specific in-patient services. Older residents requiring specialized care may not be able to travel to a hospital that provides the specialized services needed.
- Currently, Wyoming has a shortage of several health care occupations that are specific to long-term health care. When compared to the ratio of licensed health care workers to the population served in the nation as a whole, Wyoming has substantial shortages in home health aides (-746); licensed practical and licensed vocational nurses (-575), nursing, psychiatric, and home health aides (-502), and medical assistants (-445).
- Wyoming colleges are not producing enough graduates to fill the number of average annual openings for selected health care occupations. Some occupations with a substantial number of shortages include RNs (-222), social workers (-118), dental assistants (-78), medical assistants (-75), and physical therapists (-66).

Construction Impacts

The estimated peak non-local construction workforce of 384 persons (during March 2016) could generate a 1 percent increase in demand for primary care physicians, assuming all of the non-local workers relocated to

Sweetwater County. Due to the 2009 recorded deficit of 7.23 physicians in Sweetwater County, temporary workers relocating to Sweetwater County may experience an extended wait time to see a physician or seek medical assistance in neighboring communities. At its peak, the construction workforce could generate an additional 285 emergency room visits, an increase of 1.4 percent based on the number of emergency visits posted by American Health Association Survey in 2013 *(U.S. News & World Report*, 2013).

Medical emergencies would be initiated through 911 calls alerting the EMS system. Calls to 911 from the Project area would be received by RSFD, and the appropriate fire/ambulance crews would be paged for dispatch. The vast majority of non-local workers are not expected to be accompanied by family members, and it is assumed that all workers would secure temporary accommodations for the duration of their involvement in the proposed project. It is unlikely that the presence of the non-local workers in the area, for the relatively short period of construction, would adversely impact the demand for human services or over-extend existing facilities and personnel.

Operations Impacts

The jobs created through the O&M of the proposed project would be staffed by 27 full-time workers. Based on current LOS statistics, these workers, and any associated family members and dependents, would not generate a noticeable increase in demand for health care personnel, services, or facilities and, thus, project-related impacts would be negligible. The addition to the local economy of permanent direct and secondary jobs would add to the stability of the local workforce and communities, and is unlikely to increase the demand for human services. Increased long-term employment would benefit the social and economic condition of present and expected inhabitants in the area of site influence. No substantial impairments to the health, safety, and welfare of the present or expected inhabitants in the area of site influence are anticipated.

5.4.7 Municipal Services

This section describes the location and characteristics of the following municipal services:

- Wastewater treatment facilities
- Water distribution and treatment facilities
- Nonhazardous waste collection and disposal
- Electricity service
- Natural gas service

It is anticipated that the municipal services of Sweetwater County, the cities of Rock Springs and Green River, and the North Rock Springs CDP have the greatest potential to be affected by the Simplot workforce. Impacts to municipal services due to the lodging choices of the non-local workers are likely to be negligible because use of these temporary lodging units is already reflected in the baseline capacity projections of the facilities and will be disbursed throughout the area of site influence. However, more localized impacts are possible in the communities where the proposed Project is located due to the 460 workers (384 non-local) onsite at the Project's peak in March 2016. Additionally, during the operations phase, it is anticipated that most of the permanent workforce will relocate to these communities.

Wastewater Treatment

The Water and Wastewater Program within the Wyoming Department of Environmental Quality (WYDEQ) administers the Wyoming statutes governing these municipal and private services.

The wastewater treatment plant (WWTP) serving Rock Springs was updated and retrofitted in 2009, and currently consists of an activated sludge plant and oxidation ditch. The City of Rock Springs directs all of the influent flow through the primary clarifiers of the activated sludge plant. Wastewater is routed through oxidation ditches of a second plant and then through an ultraviolet (UV) disinfection system. The plant is designed to treat a maximum of 4.2 million gallons per day (mgd), and presently treats an average flow rate

of approximately 2.6 mgd, or about 62 percent of capacity. The treated effluent is discharged to Bitter Creek, a tributary of the Green River (WYDEQ, 2010).

The City of Green River operates a 1.5-mgd enhanced lagoon treatment system to treat an average flow of 1.0 mgd. The system is capable of supporting a population of 16,000. The WWTP consists of two pre-aeration cells, three aerated lagoons, and two polishing ponds with a secondary treatment using slow sand filtration prior to discharge into the Green River (City of Green River, 2013). The treatment plant is nearing the end of its service life and City officials are beginning to explore options for a new facility (*Green River Star*, 2013).

Public wastewater treatment is provided by lagoons in the towns of Baroil, Granger, Superior, and Wamsutter, while private septic systems serve the areas outside of these communities. Private septic systems are permitted and administered by WYDEQ's Water Quality Division (WQD) in Sweetwater and Uinta counties.

The Sweetwater County Growth Management Plan and Agreement requires all lands within the Growth Management Area to be developed as "urban," with public potable water provided, and encourages development with public sewer (Sweetwater County, 2011). The Uinta County Comprehensive Plan also lays out county policies for approval and inspection of sewage and solid waste disposal systems (Uinta County, 2011).

As required by the 1987 Clean Water Act (CWA) amendments, Wyoming prepares an Intended Use Plan (IUP) for each capitalization grant application. The IUP describes how the state will use the Clean Water State Revolving Fund (CWSRF) to meet CWA objectives and further the protection of public health and the environment. **Table 5-61** lists wastewater treatment systems within the area of site influence that were included on the priority list in Wyoming's 2014 IUP.

TABLE 5-61

Fiscal Year 2014 Wastewater Treatment System Priority List for Systems within the Area of Site Influence

Project	Rank	Rank Points	Population	Owner	WYPDES Number	Description	Category	Amount ($1,000)	Estimated Maximum % Principal Forgiveness	Estimated Maximum Principal Forgiveness ($1,000)	Green Type	Green Amount ($1,000)
Lyman Lagoon	9	120	2,115	Lyman, Town of	WY0020117	Periodic discharge permit compliance problems, including *E. coli*, BOD, and pH. Treatment upgrades and/or land application to eliminate discharge.	I	$1,000	25%	$250		
Reliance Area Sewer Connection to Rock Springs	11	120	714	North Sweetwater W&S District	WY0022357	Existing Reliance/North Sweetwater lagoon (no discharge permit) has insufficient capacity for existing flows. B&R Mobile Home Park (WYPDES permit #WY0022128) has periodic discharge permit compliance problems, including TRC, BOD, TSS, pH, and fecal coliforms/*E. coli*. Construct piping and lift station to connect these sewage systems to the Rock Springs collection system and abandon their treatment systems.	IVB	$2,000	25%	$500		
Superior Lagoon	13	120	336	Superior, Town of	WY0021806	Periodic discharge permit compliance problems for *E. coli*. Treatment upgrades or land-apply to eliminate discharge.	I	$1,000	25%	$250		

TABLE 5-61

Fiscal Year 2014 Wastewater Treatment System Priority List for Systems within the Area of Site Influence

Project	Rank	Rank Points	Population	Owner	WYPDES Number	Description	Category	Amount ($1,000)	Estimated Maximum % Principal Forgiveness	Estimated Maximum Principal Forgiveness ($1,000)	Green Type	Green Amount ($1,000)
Green River Lift Station Improvements	37	20	12,515	Green River, City of	WY0020443	Upgrade/replace old, deteriorated lift stations, wet wells, and force mains. Add backup power. Potential green-eligible energy efficiency improvements.	III	$250	25%	$63	EB	$100
Lyman Sewer Improvements	50	20	2,115	Lyman, Town of	WY0020117	Replace/rehabilitate old, deteriorated sewers. Upsize undersized sewers. May be green eligible based on high infiltration/inflow impacting treatment plant; would require business case.	III	$590	25%	$148	WB	$590
Reliance Area Sewer Rehabilitation	60	20	714	North Sweetwater W&S District	WY0022357	Replace/rehabilitate old, deteriorated sewers. Upsize undersized sewers.	III	$2,000	25%	$500		
Wamsutter Sewer Improvements	64	20	451	Wamsutter, Town of	WY0053414	Replace/rehabilitate old, deteriorated sewers. Upsize undersized sewers. Place sewers at greater depth to increase functionality.	III	$900	25%	$225		
Rock Springs Solids Handling	84	0	23036	Rock Springs, City of	WY0022357	Address odor problems associated with current solids handling. Improvements may include digesters, bar screen, grit collection, and other processes.	I	$4,000	25%	$1,000		

TABLE 5-61

Fiscal Year 2014 Wastewater Treatment System Priority List for Systems within the Area of Site Influence

Project	Rank	Rank Points	Population	Owner	WYPDES Number	Description	Category	Amount ($1,000)	Estimated Maximum % Principal Forgiveness	Estimated Maximum Principal Forgiveness ($1,000)	Green Type	Green Amount ($1,000)
Wamsutter Sewer Extensions	114	0	451	Wamsutter, Town of	WY0053414	Extend sewers and add lift station to serve developing areas.	IVA	$200	25%	$50		
Wamsutter Meters	115	0	451	Wamsutter, Town of	WY0053414	Replace existing water meters (including addition of automated meter reading and leak detection capability) to help reduce water use and subsequent wastewater load.	I	$200	25%	$50	WC	$200

Notes:

WYPDES = Wyoming Pollutant Discharge Elimination System

Categories

I. Secondary Wastewater Treatment
II. Advanced Wastewater Treatment
III. Sewer System Rehabilitation
IVA. New Collector Sewers and Appurtenances
IVB. New Interceptor Sewers and Appurtenances
VIA. Stormwater Conveyance
VIB. Stormwater Treatment
VIC. Storm Water Green Infrastructure
X. Recycled Water Distribution

Green Project Types

E = Energy Efficiency
W = Water Efficiency
C = Categorically Green Eligible
B = Business Case Required

Source: WYDEQ, 2013.

Potable Water Treatment and Distribution

Water to the area, including Green River, Rock Springs, North Rock Springs, Purple Sage, Clearview Acres, and Reliance, is supplied through direct diversion from the Green River. A conventional water treatment plant (WTP) with a capacity of 32 mgd serves the entire service area and is located in the City of Green River.

The City of Rock Springs' water system has eight storage tanks with a total capacity of 12 million gallons. The water is pumped from the treatment facility in Green River via 30-inch and 20-inch mains. The average daily use during the summer is 10 million gallons compared to 3 million gallons in the winter.

The Wyoming Water Development Commission (WWDC) and Joint Powers Water Board (JPWB) evaluated the water supply systems in Green River and Rock Springs in 2004. Existing hydraulic shortcomings were identified, and improvements and upgrades were proposed (WWDC, 2009). Wyoming's 2014 drinking water IUP also identified elements within the systems of Green River and Rock Springs that require upgrades, including water storage and transmission, pump station, discharge lines, mains, and a pre-sedimentation basin (WDEQ, 2013)

Water for the town of Granger is also supplied through direct diversion from the Green River and is treated in a conventional WTP. Baroil, Superior, and Wamsutter use groundwater from wells; Superior has a conventional WTP, while Baroil and Wamsutter use disinfection/chlorination to treat their water.

The Bridger Valley Joint Powers Board in Uinta County manages water treatment and supply for Lyman, Mountain View, Fort Bridger, Black Fork, and surrounding areas. Water is supplied from the Black's Fork River and Smith's Fork Creek, and is treated in a conventional WTP. The Town of Lyman also diverts water from three springs, which is disinfected and filtered for use.

Table 5-62 summarizes water system usage, total population served, amount of use, and system capacity for cities and towns within the area of site influence.

TABLE 5-62
Municipal Water Use

Name of Entity	Source	Total Population[1]	Gallons per Capita per Day	Peak Day Demand (acre feet per day)	System Capacity (acre feet per day)	Total Annual System Water Use (million gallons)	Peak Day System Water Use (gallons)
Baroil	Groundwater Wells (5)	96	350	0.77	3.05	14.7	250,000
Bridger Valley Joint Powers Board	Black's Fork River and Smith's Fork Creek	4,500	83	6.60	12.10	140.5	1,500,000
Granger	Green River	146	120	0.31	3.09	18.25	100,000
Green River, Rock Springs, Sweetwater County JPWB	Green River	35,000	129	70.58	97.00	1,839.6	23,000,000
Superior	Groundwater Wells (3)	300	133	0.28	1.60	14.6	90,000
Wamsutter	Groundwater Wells (3)	310	161	0.83	3.09	29.2	270,000

Source: WWDC, 2010.

An IUP is required by the 1996 Safe Drinking Water Act (SDWA) for states applying for a capitalization grant. **Table 5-63** lists drinking water systems from Wyoming's 2014 IUP priority list. The priority list includes public water systems that have expressed interest in the drinking water state revolving fund, are planning capital improvement projects, have been identified as serious public health risks, have received notices of SDWA violations, or were issued administrative orders.

TABLE 5-63
Fiscal Year 2014 Drinking Water System Comprehensive Priority List for Systems within the Area of Influence

Project	Rank	Rank Points	Population	Owner	Public Water System Number	Description	Amount ($1,000)	Estimated Maximum % Principal Forgiveness	Estimated Maximum Principal Forgiveness ($1,000)
GR-RS-SWC JPWB Presedimentation	28	27	40,000	Green River - Rock Springs – Sweetwater Co JPWB	WY5600050	Construct presedimentation basin to reduce peak solids loading to the clarifiers. Miscellaneous system improvements. Green River (water source) subject to rapidly changing high-turbidity events beyond capacity of plant. DWSRF loan has been made.	$2,000	25%	$500
Wamsutter Main Replacements	52	24	451	Wamsutter, Town of	WY5600105	Replace old, deteriorated water mains (cross contamination potential).	$800	25%	$200
Rock Springs Main Replacements	61	22	23,036	Rock Springs, City of	WY5601182	Replace old, deteriorated, and undersized mains (cross contamination potential).	$750	25%	$188
Lyman Distribution Upgrades	70	22	2,115	Lyman, Town of	WY5600033	Replace old, deteriorated water mains (cross contamination potential). Install new master meter to mobile home park. Reconfigure mains to areas previously on private system.	$260	25%	$65

Source: WYDEQ, 2013.

Electrical Service

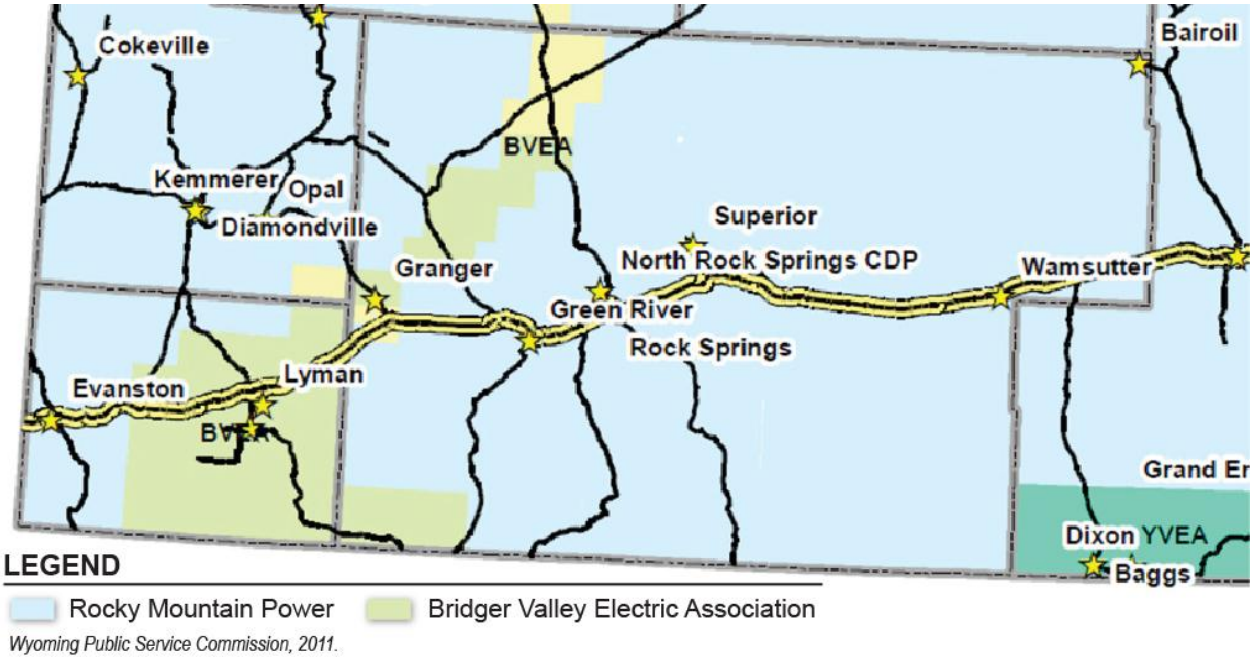
Two suppliers provide electrical service to Sweetwater and Uinta counties, as summarized in **Table 5-64** and shown in **Figure 5-15**. Rocky Mountain Power (RMP) serves most of Sweetwater County, with the exception of the communities of Granger, Farson, and Eden, which are served by Bridger Valley Electric Association (BVEA) along with most of Uinta County.

TABLE 5-64
Electric and Gas Utility Company Service Areas

Company	Areas Served
Electricity	
Rocky Mountain Power (RMP)	Majority of Sweetwater County and northwestern portion of Uinta County.
Bridger Valley Electric Association (BVEA)	Approximately two-thirds of Uinta County and the Sweetwater County communities of Granger, Farson, and Eden.
Gas	
Questar Gas Company	Southwest corner of Sweetwater County, and the northeast and southwest quadrants of Uinta County.
SourceGas	Northeast corner of Sweetwater County.

Source: Wyoming Public Service Commission, 2011.

FIGURE 5-15
Electric Certificated Areas

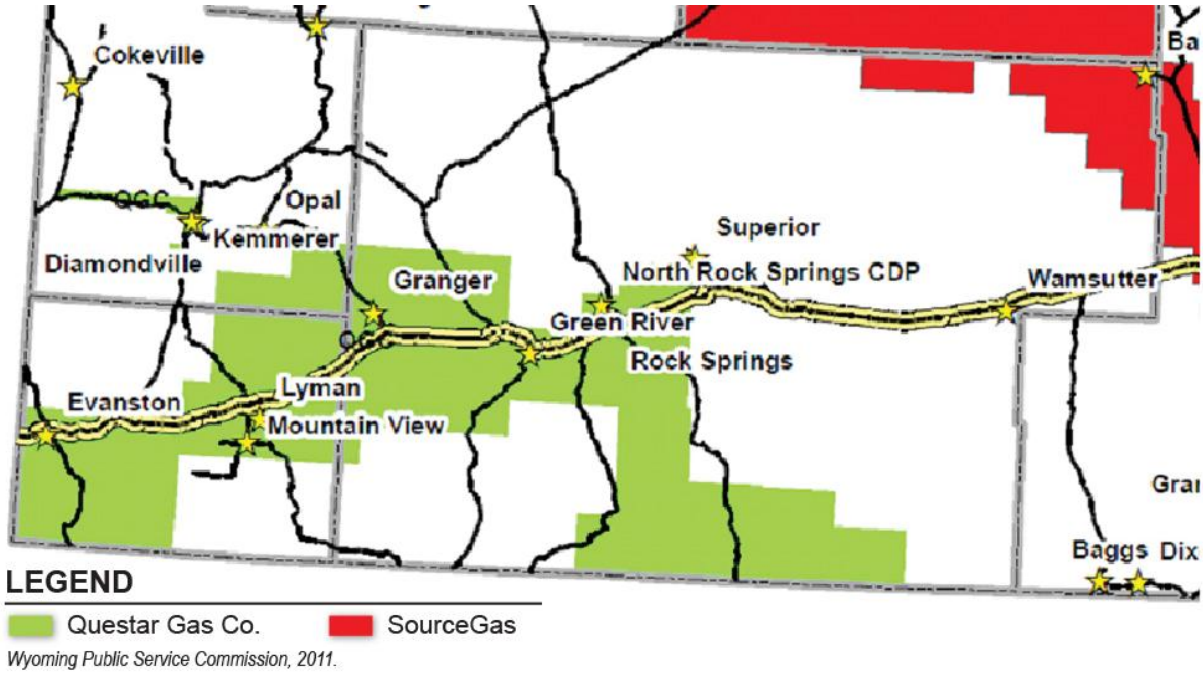


Wyoming Public Service Commission, 2011.

Natural Gas Service

According to the Petroleum Association of Wyoming, Sweetwater County ranked third among all counties in the state in natural gas production in 2012, trailing only Sublette and Johnson counties. As summarized in **Table 5-64** and illustrated in **Figure 5-16**, Questar Gas Company provides natural gas service to southwestern Sweetwater County and approximately half of Uinta County. SourceGas, meanwhile, serves northeastern Sweetwater County, meaning a large portion of the Sweetwater County currently has no access to natural gas service.

FIGURE 5-16
Gas Certificated Areas



Wyoming Public Service Commission, 2011.

Nonhazardous Waste Collection and Disposal

Nonhazardous waste collection and disposal in Sweetwater County are managed by three district boards: Solid Waste Disposal District #1, Solid Waste Disposal District #2, and the Solid Waste Disposal District Eden Valley. Sweetwater County has four landfills and two transfer stations, as described below:

- Farson Landfill, serving the towns of Farson and Eden as well as ranches throughout the district.
- Green River Landfill, serving the City of Green River. Plans are being set to close the landfill and build a transfer station within the next several years.
- Rock Springs Landfill, serving the City of Rock Springs.
- Wamsutter Landfill #2 serving eastern Sweetwater County.
- Point of Rocks transfer station, serving the unincorporated area of Point of Rocks and surrounding rural areas.
- Superior transfer station, serving the Town of Superior.

Sweetwater County Solid Waste Disposal District #1 oversees the landfill in Rock Springs as well as the Superior and Points of Rocks transfer stations. Free disposal services available to residents of the district include compost, bicycles, lawnmowers, old furniture, and building materials. The Rock Springs Landfill accepts refrigerators, paint and paint thinners, used oil, antifreeze, batteries, tires, and e-waste, as well as municipal solid waste (MSW), metal, tires, friable/nonfriable asbestos, and some contaminated soils.

Construction/demolition waste is also accepted at a rate of $55 per ton. Rock Springs Landfill has a current life of 32 years (Sweetwater County Solid Waste District #1, 2013).

Uinta County has landfills in Evanston and Fort Bridger, neither of which accepts out-of-county waste. The Bridger Valley Landfill is set to close in December 2016.

Nonhazardous Waste Collection and Disposal, including Construction Waste Materials.

Simplot is planning for the collection and disposal of nonhazardous waste as follows, and characterized in **Table 5-65.**

- Wood, cardboard, paper, packing materials, and other general waste will be disposed of using 40-cubic-yard (yd^3) dumpsters. At various stages of the Project, it is expected there will be enough cardboard onsite to make recycling of this material practical.
- All scrap metals will be recycled.
- Contaminated solid and liquid waste will be disposed of utilizing disposal companies licensed to handle and dispose of the specific contaminated material in approved industrial landfills.
- Bottles and cans will be recycled.
- Each worker is estimated to generate 0.19 cubic foot of trash per day. A peak of 460 workers is projected to be onsite in March 2016, which equates to a maximum of approximately 3.24 yd^3 of trash daily.

TABLE 5-65
Nonhazardous Waste Collection during Construction

Type of Waste	Waste Generated			
	2014	**2015**	**2016**	**Total**
General Solid Waste (yd^3)	320	1,240	1,040	**2,600**
General Trash (yd^3)	124	618	431	**1,173**
Office Trash (yd^3)	8.6	43.7	44.8	**97.1**
Contaminated solid and liquid waste (yd^3)	11	33	13	**57**
Recyclable Metals (yd^3)	60	200	150	**410**
Cardboard Recycling (yd^3)	0	240	480	**720**
Bottles and Cans (yd^3)	98	488	320	**906**
Sanitary Sewer (gal)	44,290	219,600	153,000	**416,890**
Project Total (Excluding Sanitary Sewer) (yd^3)	**621.6**	**2,862.7**	**2,478.8**	**5,963.1 yd^3**

During construction between 2014 and 2016, waste from the proposed Project is expected to be collected and disposed of at volumes ranging from 621.6 yd^3 in 2014 to 2,862.7 yd^3 in 2015. In 2016, by the close of Project construction, it is estimated Simplot will generate a total of 5,963.1 yd^3 of waste.

All waste will be stored within designated temporary waste collection areas until it is disposed of properly. Waste materials that can be recycled will be stored and transported. Waste that cannot be recycled will be transported offsite to the Rock Springs Landfill. The landfill can accommodate the waste expected to be generated during construction and operation of the proposed Project. No significant impacts to local solid waste disposal sites or services are anticipated based on the volume of waste expected to be generated by the proposed Project.

Construction Impacts

Non-local construction workers are expected to reside primarily in hotels/motels and RV parks located at established sites and facilities in the existing housing stock dispersed throughout the area of site influence. The temporary influx of a peak non-local workforce of 384 workers associated with the construction phase of the proposed Project could increase the demand for municipal services, such as water, wastewater, and solid waste. However, such a modest increase for this short duration would have negligible effects on the provision of these services or the providing facilities. Furthermore, the additional capacity needed is already factored into the baseline due to ongoing use of the temporary lodging units.

Wastewater Treatment and Potable Water Treatment and Distribution.

The additional employment in the communities of Rock Springs and Green River will cause a minor increase in the demand for municipal services, such as potable water, and will generate additional quantities of wastewater. All human solid waste will be transported offsite by a contractor. Clean water and drinking water systems are adequately handling current demands, and are capable of accommodating the minor increases that may result from the increased population during Project construction. Systems needing maintenance or upgrades have been identified and will be serviced as funding becomes available.

Water usage during construction of the proposed Project includes industrial uses such as dust suppression, road compaction, and concrete production, as well as domestic and sanitary uses. The amount of water used for construction depends greatly upon the final lengths and design of the roads and the dust control methods used. Estimates of construction and operational water consumption are presented in more detail in Section 6.5, *Water Supply and Yield Analysis*.

Electricity and Natural Gas Service

Construction Impacts

Project construction and the temporary influx of a peak construction onsite workforce of 384 non-local employees in March 2016 will have negligible effect on electricity and natural gas services. Construction of the proposed Project is expected to require no natural gas supplies and a small amount of electricity, easily within the existing capacity of Rocky Mountain Power. The temporary non-local workforce will be housed in existing temporary housing accommodations in Sweetwater County. As such, these hotels and motels are accounted for in the baseline demands for electricity and natural gas services.

Operations Impacts

Questar will build a natural gas supply line to the proposed Project. Plant operations would require approximately 18.382 million standard cubic feet of natural gas per day. No burden will be placed on existing natural gas supplies because this will be a new direct supply line to the proposed Project.

A transmission line will be constructed by PacifiCorp (Rocky Mountain Power) to supply electricity to the plant. This new line would place no load on the capacity of existing power facilities or supply to the surrounding communities. A power supply of approximately 15 megawatts will be required during operations.

It is anticipated that O&M of the proposed Project would generate one or two dumpsters of waste per week. All waste would be stored within designated temporary waste collection areas until it is collected for transport to the Rock Springs Landfill. Materials that can be recycled would be stored and transported separately.

Plant O&M would require 27 permanent employees, some of whom would be non-local and expected to take up residence within the area of site influence. Negligible quantities of wastewater, potable water, municipal solid waste, hazardous waste materials, electricity, and natural gas would be associated with this minor population influx.

5.5 Human Service Facilities

The Wyoming Department of Family Services (DFS) includes three divisions offering support for residents: Child Support Enforcement, Family Assistance, and, Social Services. The Child Support Enforcement Division provides services ranging from locating parents and establishing paternity to enforcing support payments. Each county is assigned a district contact for local child support services. The Family Assistance Division offers economic assistance by determining eligibility for programs that provide basic services, such as food, heating, and health care, and facilitates connections with other programs geared toward supporting needy families and encouraging self-sufficiency. Services in Sweetwater County are provided through a local field in the City of Green River. Finally, the responsibilities of the Social Services Division relate to protecting the rights of children and vulnerable adults against abuse and neglect as well as supervising delinquent children. This division manages about a dozen specialized and centralized programs that serve the entire state.

Construction Impacts

It is unlikely that the proposed Project will place an increased demand on human service facilities. Rather, the proposed Project will contribute to local employment and adequately compensate the non-local workforce such that these workers will not be eligible for family assistance. The non-local workforce is expected to be composed primarily of single men and women who will not be accompanied by children or other dependents for the short duration of their work constructing the proposed Project. It is anticipated that a significant share of this non-local workforce will consist of workers who are already employed on other construction jobs in the region and will transition to this Project. Potential issues can arise from relationships between the temporary workforce and local residents, such as child support enforcement and economic assistance once the workers depart. Although possible, DFS has indicated in the past that it is not expected to have a significant impact.

Operations Impacts

The proposed Project's permanent workforce is expected to be or become residents, and some are likely to have families. However, it is unlikely they would qualify for family assistance because they will be sufficiently compensated for their work on the Project.

5.6 Summary of Impacts

Table 5-66 presents a summary of impacts for the major resources addressed earlier. The proposed Project will have a positive short-term impact on construction jobs, employing 76 local workers during the peak construction month and an average of 70 local workers during the construction phase. Over the long term, the proposed Project will employ 27 workers onsite for operations.

The economic impact of constructing the proposed Project includes the direct effect from the expenditures to construct the Project plus the additional direct expenditures by the non-local workers on food and accommodations. These two sources of direct expenditures represent new dollars for the local economy, which has the effect of creating additional local jobs, known as secondary jobs. These direct and secondary jobs are measured in terms of their full-time equivalents (FTEs) for the purposes of standardizing the employment statistics. As shown in **Table 5-15,** as of the first quarter in 2013, Sweetwater County employed 24,430 workers, including 1,619 in the construction industry. Over the construction period, the direct employment due to the project would increase by 128 FTEs on an average annual basis. Relative to total construction employment in the county of 1,619 workers, this represents an increase of nearly 8 percent. In addition to the direct jobs, the proposed Project would lead to secondary job creation of 42 jobs per year. Thus, total employment would increase by an average annual 170 FTEs each year from 2014 through 2016. The contribution to the Sweetwater County economy employment is about 1 percent.

Similarly, the operations phase will have a modest positive long-term effect on employment, contributing 27 direct jobs and 66 total jobs to the region. As shown in **Table 5-15,** the manufacturing sector in

Sweetwater County employed 1,386 workers in the first quarter of 2013. The additional 27 Simplot employees would contribute almost 2 percent to total jobs in this sector. The 66 new permanent jobs would increase overall employment in the county by approximately .2 percent.

Impact levels to public services, such as schools, fire protection, law enforcement, and health care, are low (less than 2 percent of baseline conditions) during the peak construction period in the areas of site influence with the proposed Project. Conservatively assuming 5 percent of the non-local workers are accompanied by their families during the construction period, an estimated 36 school-aged children would enter the public school system in Sweetwater County, accounting for a less than a 1 percent impact on school enrollment. Teachers and staff would have the same degree of impact, with the addition of nine staff members to the school system to maintain the current student/teacher ratio; therefore, impact to public education would be considered negligible. Similarly, the operations phase would employ 27 new workers; even if those new workers have school-aged children, the increase in enrollment would be too small to adversely impact the student/teacher ratios. Even at the peak influx of temporary onsite workers associated with the construction phase of the proposed Project, effect on the quality of service provided by fire protection agencies would be negligible. The proposed Project would be served by Sweetwater County Fire District #1, while Rock Springs Fire Department would be available for additional support if necessary. The peak number of onsite workers could generate demand for less than one full-time paid employee, or 0.84 percent of the current supply in Sweetwater County. Simplot will proactively coordinate with the fire department to minimize fire safety hazards, coordinate response efforts, and effectively train Simplot and subcontracting personnel in the fire safety issues. In addition, Simplot will have at least one EMT onsite at all times for assistance. The temporary increase in persons attributed to construction of the Project and the 27 workers associated with the operation phase of the Project would represent negligible increase in demand for law enforcement. To maintain the current level of service, one (statistically 1.27) additional law enforcement officer will be needed. In addition, the workforce population has additional incentive to reduce criminal incidences as they could lose their job.

There is an ongoing shortage of PCPs in Sweetwater County. The WDH evaluated the status of the PCP workforce in Sweetwater County and it is one of 13 counties in Wyoming that have shortages of primary care physicians. Local demand for PCPs could conservatively increase by 0.8 percent during the Project's peak influx of temporary onsite workers, which represents the addition of less than one PCP. While local demand for PCPs will increase by insignificant levels as a result of the CCSM Project, it is likely most non-local worker will retain their PCPs at their home location. At its peak, the construction workforce could generate an additional 285 emergency room visits per year (1.4 percent increase). Because of the relatively small demand likely to be generated by the proposed Project as well as the incentive to work safe to continue employment, it is unlikely the presence of non-local workers in the area will adversely impact demand for health care or human services in the area of interest, or over-extend existing facilities and personnel.

The proposed Project will make substantial contributions to tax revenues for the state and for Sweetwater County and the local communities. During construction, Simplot will pay approximately $0.69 million on average in annual *ad valorem* taxes, an increase of 0.4 percent over current receipts. With completion of construction, this figure increases to $1.6 million for a cumulative total of $40.8 million over the life of the project. This would increase average annual *ad valorem* tax receipts by 0.9 percent. The property tax revenues received by the county are distributed across a number of taxing entities, as shown in **Table 5-34**, with the majority supporting public education. Sales and use taxes paid to the state and area counties will average approximately $3.7 million each year of construction, totaling $11 million. The annual revenue represents about 5 percent of annual Sweetwater County sales and use tax receipts.

TABLE 5-66
Summary of Direct Project Effects and Project-Induced Impacts

Direct Project Effects		
	Peak Month	**Construction Period Average**
Construction Phase		
Total Onsite Workers	460	311
Non-Local Workers	384	241
Local Workers	76	70
Operations Phase		
Local Workers	27	NA

Project-Induced Impacts			
	AOI Baseline Condition	**Project Effect**	**Project Impact (% over baseline condition)**
Construction Phase (YEAR) (FTE)			
Direct	1,619	128	8%
Total	24,430	170	.7%
Operations Phase (FTE)			
Direct	1,386	27	2%
Total	24,430	66	0.3%
Housing Supply (Peak Month – March 2016)			
Vacant Recreational Vehicle Spaces	147	0	N/A
Vacant Permanent Housing For Rent or For Sale	523	19	4%
Vacant Motel and Hotel Rooms	846	319	38%
Public School (Sweetwater County) (2012-2013)			
Students	8,167	36 additional Students	0.44%
Teachers and Staff	2,081	9 additional Teachers/Staff	0.43%
Fire Protection (Sweetwater County)			
Full-Time Paid Personnel	95	0.8 additional full-time paid personnel	0.84%
Emergency Medical Technicians (Basic and Advanced)	50	0	0.00%
Law Enforcement (Sweetwater County)			
Officers	150	1	0.67%
Index Crimes (crimes per 1,000)	26.9	10	0.9%
Healthcare (Memorial Hospital of Sweetwater County)			
Physicians/Dentists	15	0.127	0.8%
Emergency Room Visits	20,258	285	1.4%
Solid Waste Generation (Cubic Yards)			
Construction Debris	Construction waste with be disposed of at the Rock Springs landfill. The landfill has the capacity to accept all construction waste without impacts on the level of service to the community.		

TABLE 5-66
Summary of Direct Project Effects and Project-Induced Impacts

Taxes			
Average Annual *Ad Valorem* Sweetwater County (2015-2017)	$181.8 million	$.7 million	.4%
Cumulative *Ad Valorem* (2018 – YEAR)		$40.8 million	
Average Annual Sales and Use Taxes (2014-2016)	$78 million	$3.7 million	5%

NA – not available or negligible.

Source: CH2M HILL, 2013.

5.7 Cumulative Impacts

Cumulative environmental impacts, as defined in the ISA Rules and Regulations, are the combined impacts upon the environment to the social or economic conditions resulting from construction and operation of the proposed industrial facility and from construction and operation of other ongoing or proposed developments in the area of site influence. The projects considered for potential cumulative impacts to temporary housing were developed using a number of sources and contacts including local planning officials, BLM, and ISD. Those included in the cumulative impact analysis include those developments or events that are being actively planned and / or permitted and have public information available. The following projects and events were included due to their location within or near the Simplot area of influence and some element of overlap with its August 2014 to August 2016 construction schedule:

- Continental Divide/Wamsutter II natural gas play
- Energy Gateway West Transmission Project
- FMC Granger Project
- PacifiCorp Jim Bridger Power Plant, Units 3 and 4

The following projects were considered but not taken further primarily due to lack of readily available information on schedule / workforce or due to their construction schedules or area of site influences not overlapping with that of the Simplot Project:

- Gas - Moxa Arch Area Infill Gas Development Project, Monell Arch Units Project, Hiawatha Regional Energy Development and Horseshoe Basin Unit Project
- Wind - Sandhills Ranch Wind Energy Project and the Chokecherry and Sierra Madre (CCSM) Wind Energy Project
- Transmission - Energy Gateway South Transmission Project and TransWest Express
- UR Energy uranium mine

As mentioned in Section 5.4.5.4, the NHSFR will be held in Rock Springs at the Sweetwater Events Complex for 1 week each summer in 2014 and 2015 (July 13 – 19, 2014 and July 12 – 18, 2015), overlapping with the non-local workforce temporary housing needs for one week in the third quarter of 2015. For the purposes of the cumulative analysis, the NHSFR is already reflected in the Smith Trend Reports vacancy data (January 2007 to November 2013) used to determine the available housing supply by quarter and thus is excluded from the analysis to prevent it being double counted.

5.7.1 Cumulative Workforce Estimates

Proposed developments to be included in the cumulative impact analysis include those developments or events that are being actively planned and / or permitted and have public information available. The following projects and events were included due to their location within or near Simplot's area of influence.

Continental Divide – Creston Natural Gas

BLM has combined two proposals for environmental impact statement (EIS) analysis: Creston/Blue Gap and Continental Divide/Wamsutter II Natural Gas Development Projects into a new project entitled, "Continental Divide-Creston Natural Gas Development Project (CD-C)." The combined proposal includes 8,950 natural gas wells, including 100 to 500 coalbed gas wells. Proponents for this action are British Petroleum (BP) and nearly 20 other leaseholders. The CD-C Project area encompasses about 1.1 million acres of mixed federal, state, and private land within the administrative boundary of the Rawlins Field Office. Wells will be developed using a combination of both vertical and directional drilling. A 15-year construction period with a 30- to 40-year operational period is proposed. The CD-C Project area is located approximately 25 air miles west of the City of Rawlins, within Carbon and Sweetwater counties in southern Wyoming.

The residency allocations for communities within the Simplot area of site influence were provided in the CD-C Project's EIS.[15] The cities of Rock Springs and Green River overlap with the area of interest for temporary housing and, therefore, their temporary housing demands are included in this analysis. It is premature to establish a firm start date for project construction. However, based on an anticipated final environmental impact statement (FEIS) and record of decision (ROD) by February 2015, it is reasonable to estimate a start date of first quarter 2016. For years 1-4, it was estimated that the CD-C non-local workforce would access approximately 81 temporary units in the Simplot area of site influence, primarily in Rock Springs.

FMC Granger Optimization Project

The FMC Granger Optimization Project will be constructed within an existing plant boundary, which is located approximately 6.5 miles northeast of the Town of Granger in Sweetwater County, 45 minutes from City of Green River, and 70 minutes to Rock Springs. Based on its ISA, and assuming a 1-year delay in start, FMC anticipates that the onsite construction workforce (both local and non-local) will ramp up quickly from 47 workers in the second quarter of 2014 to 244 workers by the end of that year, with the workforce peaking at 338 workers in the second quarter of 2015. In addition to the construction workforce, the project also anticipates 57 workers will be needed during the first two quarters of 2016 to assist with the pipeline and well construction, referred to as non-jurisdictional project components. Because a limited amount of FMC's area of interest extends into Lincoln and Uinta counties and they are projecting that the bulk of the non-local workforce will access temporary lodging in Rock Springs or Green River, Simplot assumed that 90 percent of these workers would be accessing the same resources.

Energy Gateway West Transmission Line Project

Idaho Power Company and PacifiCorp (doing business as Rocky Mountain Power) applied to BLM for a right-of-way (ROW) grant to use the federal land for portions of the Energy Gateway West Transmission Line Project (Gateway West Project) in May 2007.[16] BLM released its draft EIS in July 2011 and announced the ROD for the project on November 14, 2013. The ROD included segments 1 through 7 and segment 10 of the project, while deferring its decision on segments 8 and 9 to resolve routing issues in that area.[17] The original application has been revised multiple times to reflect changes and refinements in the route, which is currently composed of 1,103 miles of new 230-kilovolt (kV) and 500-kV high-voltage transmission lines in 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho.

Portions of three segments of Energy Gateway West overlap the Simplot area of site influence in Sweetwater County. The FEIS for the project was used as the basis for the workforce and schedule inputs to

[15] http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/cd_creston.html.

[16] BLM, 2011.

[17] BLM, Final EIS, 2013, http://www.blm.gov/wy/st/en/info/NEPA/documents/cfo/gateway-west/FEIS.html, Accessed by HHB, 1/16/2014.

the cumulative analysis,[18] and provided average and peak temporary workforce numbers by county (**Table 5-67**), which were then proportioned to the analysis based on the percentage of those temporary workers that would likely stay in an area of interest-related housing resource. For example, due to the corridor's direct overlap with the area of interest, it was assumed that the majority (95 percent) of the Gateway West workers temporarily employed in Sweetwater County would likely access temporary housing within the area of interest. This resulted in a total of 273 Energy Gateway West peak non-local workers that were then distributed to the peak seasonal construction quarters (Q2 and Q3) and 101 average non-local workers that were distributed to the average seasonal construction quarters of Q1 and Q4 (see **Table 5-68**). Overall, Gateway West is expected to be constructed between June 2015 and December 2021, with Engineering, Procurement, and Construction (EPC) contract #1, which includes Segments 1, 2 and 3, being constructed between 2015 and 2017.

TABLE 5-67
Segments of Gateway West in Wyoming: Projected Average and Peak Non-Local Workforce by County

	Average Employment Forecast	Peak Employment Forecast			
State/County	Number of People Temporarily Relocating	Number of People Temporarily Relocating	Percentage of AOI Overlap	Peak Non-Local Workers Allocated to AOI	Average Non-Local Workers Allocated to AOI
Carbon	86	230	0		
Converse	17	42	0		
Lincoln	47	127	0		
Natrona	11	30	0		
Sweetwater	126	360	95%	342	120
				342	120

Source: Table 3.4-27 BLM Final EIS, 2013.

The FEIS assumed that during periods of peak construction 20 percent of the workforce will be local while the remaining 80 percent of the workforce will need temporary accommodations, resulting in a non-local workforce ranging from 120 to 342 workers allocated to Simplot's area of site influence, **Table 5-68**.

TABLE 5-68
Gateway West: Contribution to the Cumulative Non-Local Construction Workforce

Time Period	Construction Workforce Allocated to Area of Influence
Q2 2015	342
Q3 2015	342
Q4 2015	120
Q1 2016	120
Q2 2016	342
Q3 2016	342

PacifiCorp Jim Bridger Units 3 and 4

PacifiCorp is in the planning and permitting process for upgrades to Units 3 and 4 of its Jim Bridger Power Plant (JB Project), located approximately 35 miles northeast of Simplot near Point of Rocks in Sweetwater

[18] BLM, Final EIS, 2013, http://www.blm.gov/wy/st/en/info/NEPA/documents/cfo/gateway-west/FEIS.html, Accessed by HHB, 1/16/2014.

County. Simplot's cumulative analysis proportioned the 85 percent of the PacifiCorp non-local workforce to its area of site influence because it directly overlaps with Rock Springs and Green River. While the construction workforce projections are still in the preliminary stages of development, PacifiCorp estimates that approximately 100 workers will be onsite between 2014 and 2016 and a local (70 percent)/non-local (30 percent) split for the purposes of this cumulative analysis resulting in 26 workers per quarter being allocated to the area of interest for the cumulative analysis.[19]

Table 5-69 provides a composite view of the quarterly non-local construction workforce estimates for the four projects. The cumulative non-local workforce would range from 202 in the third quarter of 2014 to a peak of 687 in the second quarter of 2015, with the quarterly average over Simplot's construction period being 521 workers.

TABLE 5-69
Cumulative Non-Local Workforce Estimates, Third Quarter 2014 to Third Quarter 2016

Construction Quarter	Simplot	CD-C	FMC Granger	FMC Granger Non-Jurisdictional	Gateway West	PacifiCorp Jim Bridger	Total
Q3 2014	58		81		37	26	202
Q4 2014	216		165		30	26	437
Q1 2015	266		175		68	26	534
Q2 2015	290		229		143	26	687
Q3 2015	326		179		146	26	677
Q4 2015	370		163		0	26	559
Q1 2016	384	81	129			26	620
Q2 2016	378	81	139	34		26	658
Q3 2016	114	81	61	34		26	316

Adapted from FMC, BLM, PacifiCorp, Simplot Sources.

5.7.2 Cumulative Temporary Housing Estimates

As discussed in Section 5.4.5, there are six RV parks or campgrounds with 294 sites in the Rock Springs - Green River area that can provide accommodations for visits with durations of weeks or months, which should be adequate to meet the peak RV / campsite needs of 103 units in the second quarter of 2015, as presented in **Table 5-70.** The Rock Springs – Green River area has approximately 2,245 rooms at 32 hotels and motels that experience average peak occupancies of approximately 77 percent in the July-to-September time period from 2007 to 2013, which coincides with the cumulative peak in temporary housing needs. Assuming historical vacancy trends continue, a range of 512 to 1,137 hotel / motel units would be available in the area of site influence to accommodate the cumulative hotel needs of 150 to 511 hotel units depending on the quarter. **Table 5-70** further illustrates that a surplus of hotel rooms ranging from eight to 699 should be available during the proposed Project's construction period. While the area would have an average surplus of 411 over the duration of construction, only a minor surplus was available in the third quarter of 2015.

[19] January 16, 2014 Phone Record with Richard Goff, PacifiCorp.

TABLE 5-70
Cumulative Temporary Housing Needs, 3rd Quarter 2014 to 3rd Quarter 2016[a]

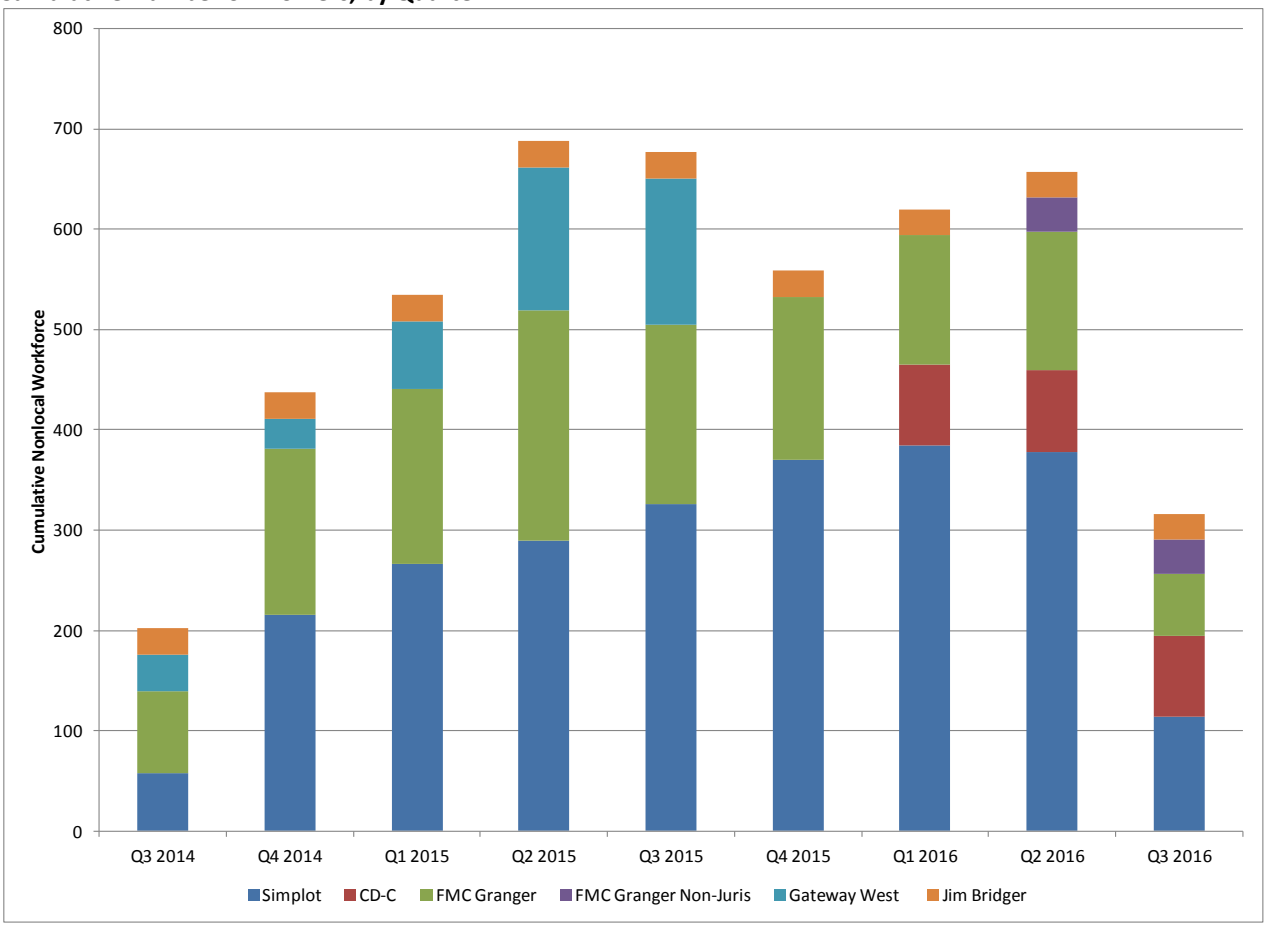
Time Period	Total Non-Local Work-force	Non-Local Workforce Allocated to RV / Campsites (15%)	Non-Local Workforce Allocated to Hotel / Motels (85%)	Single Occupancy Hotel Units (75%)	Double Occupancy Hotel Units (25%)	Single + Double Hotel Units Needed	Hotel Units Available[b]	Hotel Surplus / Needs
Q3 2014	202	30	172	129	21	150	512	362
Q4 2014	437	66	371	279	46	325	1024	699
Q1 2015	534	80	454	340	57	397	1137	740
Q2 2015	687	103	584	438	73	511	689	178
Q3 2015	677	102	575	432	72	503	512	8
Q4 2015	559	84	475	356	59	416	1024	608
Q1 2016	620	93	527	395	66	461	1137	676
Q2 2016	658	99	559	419	70	489	689	200
Q3 2016	316	47	269	202	34	235	512	277

Notes:
[a]Does not reflect the NHSFR discussed below.
[b] Based on average quarterly vacancies from 2007 to 2013.
Source: CH2M HILL and Smith Reports, 2013.

5.7.3 Summary of Cumulative Impacts

The direct cumulative non-local workforce would range from 202 in the third quarter of 2014 to a peak of 687 in the second quarter of 2015, with the quarterly average over Simplot's construction period being 521 workers. As shown in **Figure 5-17**, Simplot would represent about 62 percent of the cumulative non-local workers during the Projects peak in the first quarter of 2016 and 42 percent during the overall cumulative peak workforce, which occurs in the second quarter of 2015. However, the Project would contribute toward sustaining construction employment in the study area at an elevated level. Thereafter, Simplot would contribute a modest amount toward long-term employment in the region by maintaining its expected 27-person operations workforce. The Green River - Rock Springs area has adequate hotel / motel capacity to accommodate the cumulative peak non-local workforce needs with the potential exception of the week of the NHSFR during which an additional 1,298 non-local participants could be competing for the same accommodations. However, very few of the establishments contacted while obtaining housing commitments mentioned the NHSFR, with some noting that many of the participants seemed to have brought their own accommodations with their stock. Other peak cumulative conditions during construction of the proposed Project would be identical to those described in earlier, resource-specific sections.

FIGURE 5-17
Cumulative Number of Workers, by Quarter



Source: CH2M HILL, 2014.

5.8 Trade-Off Analysis

The proposed Project is expected to create ongoing tax benefits for Sweetwater County and the local communities, especially in the Rock Springs area. It is also expected to make modest temporary and long-term contributions to employment in the county. It is anticipated that Project-related impacts, especially on community services, would be minor, and distributed throughout the county, with the majority occurring in the Rock Springs area.

Implementation of the proposed Project would create both primary and secondary employment opportunities, contribute modest growth to the local economy, including the service sectors, and provide an added source of revenues for local governments through the collection of *ad valorem* and sales and use taxes. The potential for short-term impacts associated with implementation of the proposed Project on socioeconomic resources is minimal and more than offset by increases in local tax revenues.

The major long-term impacts of the proposed Project would be the additional revenue collected by the state and distributed to Sweetwater County through increased *ad valorem* taxes. The increased *ad valorem* tax revenues would be distributed by the state and county for schools, roads, and other community infrastructure and services.

Housing for a temporary construction workforce can be a concern of communities in Wyoming. The cumulative analysis shows that there is adequate temporary housing in the area of influence all quarters over the construction period. There can be periods of relatively short duration when some communities within the area of influence will experience a very tight market for temporary housing, especially the third

quarter 2015. Nonetheless, the Project proponent has acquired letters of interest from hotels and motels to ensure that the temporary workforce is adequately housed. Letters of interest from local hotels are shown in **Appendix F.**

5.8.1 Beneficial and Adverse Impacts

The proposed Project is expected to create long-term tax benefits to Sweetwater County and a modest increase in both temporary and long-term employment. Project-related impacts, especially on community services, would be small and would be concentrated in the Rock Springs – Green River area in Sweetwater County, the primary area of site influence. These communities and Sweetwater County in general will be the primary beneficiaries of the proposed Project, and the substantial increases in tax revenues will more than compensate for any minor demands the Project will place on any community services. The proposed Project would have the following benefits to the local communities and county comprising the area of site influence:

- The creation of an annual average 70 local jobs on-site and 128 direct FTE jobs filled by the local area workforce over the construction period.
- Secondary employment creation would add an additional 42 FTEs on average to area jobs each year for the duration of construction.
- The creation of 27 permanent jobs on site would be directly attributable to O&M and 39 new secondary jobs would be created for a total increase of 66 workers due to the operations phase of the Project.
- *Ad valorem* (property) taxes accruing to Sweetwater County would increase as a result of an increase in the fair market value (and assessed value) of the real property comprising the proposed Project site. *Ad valorem* taxes would be approximately $0.69 million annually over the construction phase, which represents an increase in Sweetwater County property taxes of 0.4 percent. The average increment to Sweetwater County property taxes is even more significant during the operations phase when the average annual *ad valorem* taxes paid by the proposed Project exceed $1.6 million, which is approximately 0.9 percent of current annual property tax revenue for the county.
- On average, the construction phase is expected to generate approximately $3.7 million per year in sales and use taxes in the county, for a cumulative total of $11 million. The annual receipts represent a 5 percent increase in Sweetwater County's sales and use tax revenue.
- Temporary construction workers are expected to reside mostly in local hotels and motels. Depending on their length of stay, area counties could gain revenues from the lodging tax levied on room expenditures.
- Minor impacts on local community and public services are more than offset by increases in local government revenue to fund local services.
- Impact assistance funds will further supplement revenues for the local jurisdictions that are affected by the proposed Project.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6.0 Evaluation of Environmental Impacts

Potential environmental impacts associated with the construction, operation, and maintenance of the proposed Project are presented in this section. Resource data were collected from existing sources and field studies performed for the proposed Project. Impact analyses were conducted to evaluate the effects of the Project on the natural environment. Methods of mitigating and avoiding impacts will be implemented as part of the proposed Project and are incorporated into the impact analyses and site-specific monitoring plans. Unless otherwise stated, the area of analysis for the evaluated environmental resources consists of the area within the Project boundary as detailed in **Appendix A**.

6.1 Physical, Chemical, Biological, and Radiological Discharges

There are no anticipated chemical, physical, biological, or radiological discharges associated with construction or operation of the proposed Project that would substantially impair the health, safety, or welfare of the present or expected inhabitants in the area of site influence or the proposed Project area.

6.2 Air Quality

6.2.1 Regulatory Jurisdiction

The Wyoming Department of Environmental Quality's (WDEQ's) Air Quality Division (AQD) implements adopted air quality standards and regulations. Air emissions associated with construction and operation of the proposed Project will be subject to the WDEQ AQD Standards and Regulations. Specifically, Chapter 6 of the Standards and Regulations establishes permitting requirements for all sources being constructed and/or operating in the State of Wyoming. The Simplot Rock Springs fertilizer complex is a major stationary source as defined in Chapter 6. The addition of the ammonia plant is subject to Prevention of Significant Deterioration (PSD) review for greenhouse gases (GHGs). Criteria emissions are less than the PSD significance levels. A PSD air construction permit application was submitted to WDEQ in July 2013. This permit is expected to be issued by June 2014.

6.2.2 Emission Sources

Construction Emissions

Particulate matter (PM), consisting primarily of dust emissions, is the primary pollutant of concern. Most emission points are fugitive in nature. The main source of fugitive dust is the disturbed soil in the construction area for the new facilities; however, this will be a temporary and limited impact. Asphalt, gravel, or concrete will be used as surface coverage beneath and around the various facilities' components.

Operation Emissions

The ammonia plant will have a nominal production capacity of 600 tons per day. It will utilize pipeline-quality natural gas as its primary fuel and raw material. The primary unit operations to be constructed as part of the Ammonia Facility Project include the following:

- A natural gas desulfurization unit;
- A gas-fired steam-methane reformer;

- An isothermal shift reactor;
- A pressure swing adsorption (PSA) system;
- An air separation unit (ASU); and
- An ammonia synthesis reactor.

The proposed Project will include the installation of the following new emission units:

- AM01 – Ammonia Plant Reformer
- AM02 – Process Flare
- AM03 – Ammonia Flare
- AM04 – Startup Heater
- AM05 – Fire Water Pump
- AM06 – Deaerator
- AM07 – Equipment Leaks

The maximum controlled emissions for each unit are shown in **Table 6-1**.

TABLE 6-1
Estimated Maximum Controlled Emissions

	Emissions, tons per year					
Emission Unit	$PM/PM_{10}/PM_{2.5}$	VOC	NO_x	SO_2	CO	CO_2e
AM01 – Ammonia Plant Reformer	8.99	8.83	21.5	0.96	32.8	398,296
AM02 – Process Flare	0.24	0.17	2.15	0.02	11.7	3,693
AM03 – Ammonia Flare	0.31	0.22	2.81	0.02	3.24	1,027
AM04 – Startup Heater	0.01	0.01	0.11	0.00	0.13	187
AM05 – Fire Water Pump	0.02	0.13	0.33	0.02	0.29	58
AM06 – Deaerator	0.00	5.17	0.00	0.00	0.02	1.1
AM07 – Equipment Leaks	0.00	3.74	0.00	0.00	0.00	393
Totals	9.6	18.3	26.9	1.0	48.2	403,654

The proposed facility is in an area of Sweetwater County that is currently classified as attainment or unclassified for all criteria pollutants. As part of the PSD Construction Permit Application (RTP, 2013), an air quality impact analysis and best available control technology (BACT) analysis were conducted for applicable criteria pollutants. AERMOD air dispersion modeling was conducted on the area surrounding the proposed facility to determine attainment with the National Ambient Air Quality Standards (NAAQS)/Wyoming Ambient Air Quality Standards (WAAQS) for particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), carbon monoxide (CO) and nitrogen dioxide (NO_2). All modeled concentrations were less than the Class II modeling significance levels. Additionally, potential Class I impacts were assessed. The closest Class I is the Bridger Wilderness Area approximately 115 km from the facility. An approved Q/D screening assessment was used to determine that estimated impacts were less than 5 percent of the guideline threshold. A BACT analysis was also conducted for each of the emission units and both GHG and criteria pollutants. Additional details on the air permitting analysis can be referenced in the PSD Construction Permit Application submitted to WDEQ-AQD in July 2013.

6.2.3 Construction Impacts

Water trucks will be used as appropriate during construction activities to wet the surface of access roads and other work area sources of fugitive PM. The selected Engineering, Procurement, and Construction (EPC) contractor or subcontractor will be responsible for ensuring that the plant is constructed in accordance with the issued permit conditions. The resulting construction emissions will not significantly impair the environment or the social and economic condition of present or expected inhabitants in the area of site influence.

6.2.4 Operation Impacts

The facility will comply with all permit conditions stipulated in the PSD construction permit to be issued by WDEQ. Dispersion modeling conducted for the facility demonstrated compliance with all NAAQS. Therefore, the operation emissions will not significantly impair the environment or the social and economic condition of present or expected inhabitants in the area of site influence.

6.3 Cultural Resources

Cultural resources of concern consist of historical or archaeological sites that are listed on or are eligible to be listed on the National Register of Historic Places (NRHP).

6.3.1 Regulatory Jurisdiction

The National Historic Preservation Act (NHPA) is the principal federal law guiding federal actions with respect to the treatment of cultural, archaeological, and historic resources. Section 106 (16 USC 470f) of the NHPA requires federal agencies, prior to taking action to implement an undertaking, to take into account the effects of their undertaking on historic properties and to give the Advisory Council on Historic Preservation (ACHP) and the State Historic Preservation Office (SHPO) a reasonable opportunity to comment regarding the undertaking. Historic properties are “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP” (16 USC 470w [5]). The criteria used to evaluate the NRHP eligibility of properties affected by federal agency undertakings are contained in 36 CFR 60.4.

The lead federal or state agency that administers the land or minerals or that issues key permits determines the level and scope of cultural resources inventory that will be required for a project.

There is no nexus for Section 106 consultation on private fee lands unless a federal action would serve as the trigger. Additionally, there are no state laws applicable to the protection of cultural resources on private fee lands.

6.3.2 Survey Results

A cultural resource survey was completed in August 2013 for an area including and surrounding the Project area (Western Archeological Services, 2013). No cultural or historic artifacts were identified. however, three previously recorded historic linear features were identified that intersect the proposed Project area including the Rock Springs to Browns Park Road, the Rock Springs to Hiawatha Road, and the Rock Springs to Browns Park Telephone Line. The Rock Springs to Browns Park Road and the Rock Springs to Browns Park Telephone Line are recommended eligible for nomination to the NRHP. The Rock Springs to Hiawatha Road is recommended not eligible for the NRHP.

The Rock Springs to Browns Park Road is in poor condition. The road has been impacted by industrial development and lacks surface expression for much of its length within the proposed Project area. The Rock Springs to Browns Park Telephone Line parallels the Rock Springs to Browns Park Road.

One telephone pole is located within the vicinity of the proposed Project, but no evidence of the telephone line was observed within the Project area during the survey.

6.3.3 Construction and Operation Impacts

A short segment of the Rock Springs to Browns Park Road, approximately 200 feet, will be affected by the proposed Project. Consultation with the Wyoming State Historic Preservation Office (SHPO), BLM, Questar Pipeline and Simplot representatives and consultants took place November 5, 2013 on the project site to review potential Project impacts to the road. The one remaining telephone pole is outside of the proposed Project's footprint and will not be affected. The SHPO has stated that the proposed Project would not pose any substantial impacts to the road or telephone line. Therefore, no adverse impacts to cultural resources are expected as a result of construction and operation of the proposed Project.

6.4 Surface and Groundwater

6.4.1 Regulatory Jurisdiction

The Wyoming Constitution defines that all natural waters within the boundaries of the state are declared to be the property of the State. The Wyoming State Engineer's Office (WSEO) is charged with the regulation and administration of the water resources in Wyoming. Water quality impacts associated with construction and operation of the proposed Project will be subject to the WDEQ-WQD Standards and Regulations. Specifically, implementing Water Quality Rules and Regulations are found in Chapters 1 to 23, as well as promulgated rules adopted in the Wyoming Environmental Quality Act.

If an applicant for an industrial siting permit plans to construct a facility that will use more than 260.7 million gallons (800 acre-feet [ac-ft]) of water per year, the applicant must submit a water supply and water yield analysis to the State Engineer. The State Engineer will then review the analysis and "render a preliminary opinion as to the quantity of water available for the proposed facility" [W.S. 35-12-108(c)].

6.4.2 Construction

A small quantity of water will be required to support the proposed Project over the 25-month construction period. The main water use during construction will be applications for dust control. The actual amount of water applied daily to control dust is variable and is dependent on daily weather temperatures, humidity, wind speeds, and local precipitation amounts. Water will also be used in the concrete for foundations and other footings. Concrete will be supplied by a local permitted contractor.

During construction of the proposed Project, water will be obtained from the existing connection from the City of Rock Springs to the Simplot fertilizer complex. No new groundwater wells will be installed. Once onsite, water will either be put to immediate use or placed in an onsite temporary water storage tank.

The ephemeral Sweetwater Creek is the nearest named drainage, approximately 1.5 miles southwest of the proposed Project. Sweetwater Creek flows west and confluences with Bitter Creek near Rock Springs. There are no known wetlands or other waters of the United States within the areas to be disturbed by the proposed Project; therefore, no impacts are expected.

6.4.3 Operations

During operations, water will continue to be obtained from the existing connection from the City of Rock Springs to the Simplot fertilizer complex. Approximately 150 gallons per minute (gpm) will be required for plant operation activities. The plant water supply need is met through an existing allocation from the Joint Powers Water Board (JPWB) and from the Simplot Vernal, Utah mine.

Based on estimated water balance calculations, the proposed Project will not exceed the 800 ac-ft/year threshold; therefore, review by the WSEO is not required. Impacts to surface and groundwater during operations are expected to be less than significant.

6.5 Traffic and Transportation

6.5.1 Transportation Facilities

Simplot Phosphates, LLC plans to construct a new anhydrous ammonia plant at its Rock Springs fertilizer complex located along Wyoming Highway 430 (WY 430) in south-central Sweetwater County, approximately 5 miles south of the City of Rock Springs (see **Figure 6-1**).

This section will outline the methodology used to determine the transportation impacts of the proposed Project. The major roadway corridors within the study area are Interstate 80 (I-80), WY 430, U.S. Route 191 (US 191 or Elk Street), Dewar Drive (US 30), and South Side Belt Route (WY 376). I-80 will be the primary route to the site from the west while US 191 will provide site access from the north. Two interchanges are present in the study area: I-80 and Dewar Drive, and I-80 and US 191. **Table 6-2** details the major roads and highways in the study area.

TABLE 6-2
Major Roadway Corridors within the Study Area

Road	Type	General Direction
I-80	Interstate	East-West
US 191	Principal Arterial	North-South
Dewar Drive / US 30	Principal Arterial	East-West
South Side Belt Route (WY 376)	Minor Arterial	East-West
WY 430	Minor Arterial	North-South

Source: CH2M HILL, 2012.

WYDOT recorded traffic counts in 2011 (the latest data available) at several locations in the study area, as shown in **Table 6-3.** The recorded counts were used by WYDOT to determine the background existing scenario in the area for 2011.

TABLE 6-3
2011 Traffic Count and Percent Truck Traffic

Route	Direction	Description	Average Annual Daily Traffic	% Trucks
80	EB	JCT Route 17 (Flaming Gorge Intersection)	9,959	33
80	EB	JCT Route 53 (Dewar Drive Intersection)	8,980	32
80	EB	JCT College Drive Intersection	8,540	34
80	EB	JCT Route 13 (Elk Street Intersection)	7,473	38
80	WB	JCT Route 17 (Flaming Gorge Intersection)	10,084	35
80	WB	JCT Route 53 (Dewar Drive Intersection)	8,531	41
80	WB	JCT College Drive Intersection	8,510	42

TABLE 6-3
2011 Traffic Count and Percent Truck Traffic

Route	Direction	Description	Average Annual Daily Traffic	% Trucks
80	WB	JCT Route 13 (Elk Street Intersection)	7,686	45
191	NB/SB	JCT I-80 (Elk Street Intersection)	24,662	4
30	EB/WB	JCT Frontage Road	28,142	2
30	EB/WB	JCT RD to Rock Springs Junior College	31,183	2
376	EB/WB	WY 376 near Second Street	4,938	4
376	EB/WB	WY 376 South of Walnut Street	3,102	5
376	EB/WB	WY 376 near Marchant Street	1,322	20
1903	NB/SB	New Hampshire Street south of Marchant Street	1,114	24
53	NB/SB	JCT Route 13 and Bridger Avenue	1,5256	3

Source: Wyoming Department of Transportation, 2011.

Union Pacific Railroad (UPRR) operates existing rail infrastructure in the study area, including an east-west line that follows I-80 and a spur line running south to connect to the existing Simplot site. The UPRR line that passes through Rock Springs extends from Green River to the south-southwest before proceeding northeast to Point of Rocks. An intermodal yard is located south of Dewar Drive and east of South Side Belt Route. Bridges extend over the rail line at four locations in Rock Springs and, therefore, no at-grade crossings are present in the city. As a result, the mainline will not impact or be impacted by the construction or operations traffic scenarios. The existing spur line, however, could potentially be impacted by the construction and, therefore, that work will need to be coordinated with UPRR's rail schedule.

6.5.2 Roadway Facilities Adjacent to the Proposed Project

The proposed Project site is located south of I-80 near Rock Springs. I-80 is the only interstate within the study area, and consists of two lanes in each direction with a speed limit of 75 miles per hour (mph). The site will be accessed from Farson to the north, and Green River and Little America to the west, as well as from within Rock Springs. Workers coming from the west will access the site via I-80, Dewar Drive, South Side Belt Route, Marchant Street, and New Hampshire Street. From the north, the site will be accessed via US 191, Elk Street, A Street, Cedar Street, D Street, Connecticut Avenue, and New Hampshire Street. The distribution of the trips during construction is shown in **Figure 6-2**.

The intersections that were analyzed are:

- EB I-80 Off-Ramp / Dewar Drive (Signalized)
- WB I-80 Off-Ramp / Dewar Drive (Signalized)
- US 191 (Elk Street) / EB I-80 Off-Ramp (Signalized)
- US 191 (Elk Street) / WB I-80 Off-Ramp (Signalized)
- Dewar Drive / Gateway Boulevard(Signalized)
- Dewar Drive / South Side Belt Route (Signalized)
- South Side Belt Route / Walnut Street (Unsignalized)
- South Side Belt Route / Marchant Street (Unsignalized)
- Marchant Street / New Hampshire Street (Unsignalized)
- Elk Street (US 191) / Dewar Drive (US 30) (Signalized)

6.5.3 Potentially Affected Roads and Highways

During construction of the proposed Project, 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 and structures. It is assumed that the heavy vehicles will travel during the off-peak and will not contribute to any level of service (LOS) change.

6.5.4 Personnel Access Routes

Construction of the proposed Project is expected to begin in August 2014 and be completed in August 2016, with an anticipated peak construction workforce of 384 non-local workers in March 2016. Workers are expected to travel from Rock Springs, Green River, Little America, and Farson, and will likely use the following access routes:

- Green River and Little America east on I-80 to Dewar Drive to South Side Belt Route to Marchant Street to New Hampshire Street.
- Farson south on US 191 to Elk Street to A Street to Cedar Street to D Street to Connecticut Avenue to New Hampshire Street.
- It is assumed workers staying in Rock Springs would use same routes described above

6.5.5 Truck Access Routes

Construction deliveries to the site will be made by truck, which will use the same roadways as the personnel routes unless restricted by load limits. According to the WYDOT size/weight restrictions, only one restriction is presently in place in the Project study area, as follows:

- US 191: From November 15 to April 1, no vehicles with a gross vehicle weight rating (GVWR) in excess of 40,000 pounds.

The delivery trips will be scheduled outside peak traffic hours. Frequent heavy truck traffic is not expected during the operations period.

Haul trucks are expected to make deliveries to the site over the 24-month construction period. All deliveries will be during off-peak hours and will come from the I-80/Dewar Drive interchange or the I-80/US 191 interchange. All oversized loads will avoid peak traffic hours, holidays, and nighttime hours, unless granted prior approval. Prior to beginning hauls, suppliers and/or haul contractors will be required to check all proposed loads and verify clearances to ensure that no detours are needed. The lowest clearance in the Project study area, 17 feet 9 inches, is at the I-80/US 191 interchange. The interchange at I-80/Dewar Drive has a clearance of 18 feet 2 inches. The contractor must determine the structural sufficiency of major structures and culvert crossings while planning haul routes. There are structures along South Side Belt Route and along Elk Street/ WY 430 over the railroad tracks. As necessary, arrangements to transport oversized loads will be coordinated with and approved by WYDOT. Coordination with the City of Rock Springs is also required.

6.5.6 Traffic Analysis – Existing Conditions

To assess the potential traffic impacts associated with the proposed Project, existing and future traffic conditions were analyzed both with and without the Project for three periods: existing, construction, and operations.

The operating conditions, or LOS, provided by the intersections were assessed using the *Highway Capacity Manual* unsignalized and signalized intersection methodologies. LOS is a term used to

qualitatively describe operating conditions at an intersection based on the delay in seconds for each movement from the minor approaches and the left turns from the major street. There are six LOS classifications given with a letter designation from A to F, with A being the best operating conditions and F the worst. LOS C is desirable for peak-hour operations and LOS D is acceptable based on guidelines from the American Association of State Highway and Transportation Officials (AASHTO). For unsignalized intersections, LOS is the delay going from the minor street to the major street and the worst-leg LOS is taken as the overall intersection LOS. The signalized intersections LOS is defined in terms of average delay per vehicle. The method incorporates delay associated with deceleration, acceleration, stopping, and moving up in the queue.

The 2011 daily volumes described in Section 1.1 above were used to calculate the peak-hour volumes. The peak-hour percentage used for all of the roads was 10 percent based on current engineering practices. For this analysis, it is assumed that the intersection volumes during the AM and PM peak hours would be the same. The peak-hour roadway volumes were then used to determine peak-hour intersection movements used in the traffic operations analysis. The 2011 peak-hour volumes, shown in **Figure 6-3**, indicate that most of the intersections operate at or above LOS C, which is desirable.

Ramp analyses were not conducted because of the minimal volumes on I-80 and because the majority of traffic generated would not access the interstate.

6.5.7 Traffic Analysis – Construction

The potentially affected intersections were analyzed with and without the proposed Project to determine impacts to the facilities due to Project construction. Construction is anticipated to take place from August 2014 to August 2016 and, therefore, 2016 was the year analyzed for the construction scenario.

Background Analysis

The traffic count data were projected to 2016 by increasing the volumes from the 2011 base year volumes. The growth was forecasted using WYDOT's traffic data spreadsheet, which uses historical count data and projects it to a specified year. The background scenario for the 2016 LOS remains the same as the base year with only one exception, as shown in **Figure 6-4**. The Dewar Drive and Gateway Boulevard intersection operates at a LOS D, which is still acceptable.

Total Analysis

Adding the Project-generated traffic to the background traffic yields the volumes for analysis of the proposed Project's construction period. For this analysis, the AM and PM peaks for the intersections were analyzed. The trip generation and distribution process used the following assumptions to calculate the additional turn movement volumes due to construction of the proposed Project:

- The peak construction workforce is estimated to total 384 non-local workers.
- Construction will occur in one daily shift with personnel arriving in the morning peak hour between 6 a.m. and 7 a.m. and departing in the evening peak hour between 4:30 p.m. and 7 p.m.
- Workers will not carpool (most conservative scenario).
- The proposed trips were distributed as shown in **Table 6-4**.

TABLE 6-4
Trip Distribution

	Destination
Departure	**Rock Springs**
Green River	88
Little America	4
Farson	4
Rock Springs	288
Total	**384**

Adding the site-generated traffic to the background traffic yields the volumes for the analysis of the Project's construction period. Analysis during the construction AM peak period shows that intersection delay increased due to the construction traffic. However, most intersections still operate at the same LOS as the background analysis and three decreased but still operate at LOS C or higher, as shown in **Figures 6-5** and **6-6**. During the PM peak period, the analysis is similar to the AM, although three intersections have reduced LOS. The Dewar Drive and South Side Belt Route intersection changes from LOS C to LOS D, the South Side Belt Route and Walnut Street intersection changes from LOS C to LOS D, and the South Side Belt Route and Marchant Street intersection changes from LOS C to LOS E. These decreases in LOS during the PM peak period are due to the increased left turns made by workers at those intersections. There are possible mitigation measures that could be taken to alleviate LOS E at the South Side Belt Route and Marchant Street intersection, including worker carpools. Another measure would be to stagger manner based on the assumption above that they would be departing in the evening between 4:30 p.m. and 7:00 p.m. Analyzing the affected intersection with 100 less left turns on the westbound leg, assuming that there would be carpooling, increases the LOS to D, which would be acceptable.

6.5.8 Traffic Analysis – Operations

The potentially affected intersections were analyzed with and without the Project to determine impacts to the facilities due to the operations at the site once construction is complete. The operations will begin in 2016, so the operations analysis year is the same as the construction analysis year.

Background Analysis

The background volumes for the operations analysis scenario are the same as those for the background construction analysis scenario because they are both in 2016. All intersections operate at or above a LOS D.

Total Analysis

Adding the site generated traffic to the background traffic yields the volumes for the analysis of the Project's operations period. The trip generation and distribution process used the following assumptions to calculate the additional turn movement volumes due to the operation of the Project:

- The proposed Project will employ 27 full-time staff.
- There will be infrequent heavy truck deliveries during the operations period, and these will occur outside peak hours.
- All personnel will travel to the Project site in their own vehicles.

- Personnel will not leave the site during their shifts.

The additional volume generated by the operation of the proposed Project does not decrease the LOS from the background scenario, as shown in **Figures 6-7** and **6-8**.

6.5.9 Conclusion

All but one of the existing intersections analyzed in Rock Springs have adequate capacity to accommodate the expected increase in traffic during the construction and operation phases of the proposed Project. During the construction PM peak, the South Side Belt Route and Marchant Street intersection operates at a LOS E. However, several standard mitigation measures can be implemented to alleviate delays, such as carpooling and staggered peak-hour PM work departures. Analyzing the South Side Belt Route and Marchant Street intersection with carpooling, the LOS increases to a D, which is acceptable.

6.6 Land Use

This section presents information regarding existing and future land uses, zoning, and adopted land use plans and regulations for the study area. It analyzes the consistency of the proposed Project with current and future land uses, policies, and plans.

The proposed Project site is located in Sweetwater County, Wyoming, on lands entirely owned by Simplot. The parcel is currently the location of Simplot Phosphates, LLC Rock Springs facility, a plant that has been in operation since 1986. The surrounding landscape is a checkerboard of privately owned and BLM-managed lands by the Rock Springs Field Offices, along with some parcels of State lands. Surrounding land use of private, State, and BLM-managed lands is primarily grazing.

6.6.1 Consistency with Land Use Plans

Local land use plans establish the vision for how a jurisdiction can develop and establish the goals, objectives, and action items for achieving that vision. The plans also establish a framework to guide and evaluate future development. A land use plan is a key tool that communities use to protect valued resources, guide development in a predictable manner, and encourage a preferred patterning and design of the built environment. These land use plans, in combination with the zoning code, provide a community the ability to evaluate the compatibility of new development and ensure that the objectives of that community are achieved.

The proposed Project lies within Heavy Industrial District (I-2), as determined by Sweetwater County; and, therefore, is subject to requirements set forth in the Zoning Resolution of Sweetwater County (Sweetwater County, 2012).

6.6.2 Construction and Operation Impacts

Chemical fertilizer production is a Permitted Use within the I-2 district. Though anhydrous ammonia produced by the proposed Project is not directly used as a chemical fertilizer, it is a key raw material in the production of chemical fertilizers. The Sweetwater County Zoning Resolution provides the following definition of Permitted Accessory Uses in the I-2 zone:

- Any use which complies with all of the following conditions may be operated as Accessory Use to a Permitted Use:
- Is clearly incidental and customary to and commonly associated with the operation of the Permitted Use.

- Is operated and maintained under the same ownership and on the same Zone Lot as the Permitted Use.
- Does not include residential occupancy except by owners and employees employed on the premises and their families provided, however, that no more than one such dwelling unit shall be allowed for each Permitted Use, and that where permanent residential occupancy is conducted as an Accessory Use, there shall be at least 1 acre of land area. A distance of 15 feet shall be maintained between the Permitted Use and any residential accessory structure.
- Does not include an area of over ten percent of the area of the Zone Lot.

The proposed Project meets the definition of an Accessory Use; therefore, changes in zoning designation or conditional use permits are not needed for the proposed Project. The surrounding non-industrial land uses can continue unaffected by the proposed Project. Agricultural lands or activities will not be affected by the proposed Project. Construction and operation of the proposed Project would not conflict with any adopted land use, land use plan, policy, or regulation.

6.7 Noise

There are no noise restrictions or limits associated with the I-2 district; however, Sweetwater County does have Resolution 08-12-CC-04 that establishes nuisance regulations, including those for noise (Sweetwater County, 2008). This Resolution sets a nuisance noise limit of 70 A-weighted decibels (dBA) beyond the property line of commercial or industrial zoning districts. Per Section 3(d) of the Resolution, noise resulting from the operation of a permitted industrial facility is not considered a public nuisance; therefore, the proposed Project will be in compliance with local noise regulations.

6.7.1 Construction and Operation Impacts

The proposed Project is located in a remote area with no nearby sensitive receptors, and no noise complaints have been raised during the many years of operation of the existing facility. Since August 2012, a construction project of a similar scale as the proposed ammonia plant has been underway at the Simplot facility, and no noise complaints have been reported.

Modeling of the proposed Project indicates operational noise will be 60 dBA or less within a few hundred feet of the facility's boundary (Linde, 2013) **Table 6-5** shows the relative A-weighted noise levels of common sounds measured in the environment and in industry for various sound levels.

TABLE 6-5
Typical Sound Levels Measured in the Environment and Industry

Noise Source at a Given Distance	A-Weighted Sound Level in Decibels	Qualitative Description
Carrier Deck Jet Operation	140	
	130	Pain Threshold
Jet takeoff (200 ft)	120	
Auto Horn (3 ft)	110	Maximum Vocal Effort
Jet takeoff (2,000 ft) Shout (0.5 ft)	100	
New York Subway Station Heavy Truck (50 ft)	90	Very Annoying; Hearing Damage (8-hour, continuous exposure)
Pneumatic drill (50 ft)	80	Annoying

TABLE 6-5
Typical Sound Levels Measured in the Environment and Industry

Noise Source at a Given Distance	A-Weighted Sound Level in Decibels	Qualitative Description
Freight Train (50 ft) Freeway Traffic (50 ft)	70	Intrusive; Telephone Use Difficult
Air Conditioning Unit (20 ft)	60	
Light auto traffic (50 ft)	50	Quiet
Living Room or Bedroom	40	
Library Soft whisper (5 ft)	30	Very Quiet
Broadcasting Studio	20	Recording Studio
	10	Just Audible

Source: Adapted from Table E in NYDEC, 2001.

Based on the estimated noise produced by the proposed Project, and the long distance to any sensitive receptors, construction and operation of the proposed Project is not expected to generate any significant noise-related impacts.

6.8 Recreational Resources

The proposed Project area itself does not provide formal recreational opportunities. There are no developed trails or water bodies accessible by the public. No state parks or national parks are located within 10 miles of the proposed Project site. The Flaming Gorge National Recreation Area is approximately 14 miles west of the proposed Project area, and the Killpecker Sand Dunes Open Play Area is approximately 32 miles north. The closest recreation area to the proposed Project is Three Patches Picnic Area, approximately 8.5 miles south.

6.8.1 Construction Impacts

It is anticipated that the proposed Project would result in a temporary population increase in the area of site influence during construction. A limited number of workers are expected to visit the regional recreational resources. It is anticipated that a very small incremental increase in park visitations would occur during construction. This usage would be limited to periods when employees are not working and would not result in a significant increase in annual visitation. Therefore, the proposed Project is not expected to result in impacts from increased visitation to area parks that would substantially impair the health, safety, and welfare of present or expected local inhabitants.

6.8.2 Operation Impacts

Operation of the proposed Project would not directly impact any parks or recreation facilities. It would not require the conversion of park or recreation facilities to industrial facilities. The closest park lies 8.5 miles from the Project boundary and operation of the proposed Project would not adversely affect recreational opportunities or diminish the quality of the recreational experience for users. The small incremental increase in the operational workforce would not have a noticeable effect on local or regional recreation. As construction and operations would occur within an existing industrial complex with no public recreational facilities, no impacts to recreational resources are expected.

6.9 Scenic Resources

Visual or scenic resources are the natural and built features of the landscape that contribute to the public's experience and appreciation of the environment. Visual resource or scenic impacts are generally defined in terms of a project's physical characteristics and potential visibility and the extent to which the project's presence would change the perceived visual character and quality of the environment in which it would be located.

ISD regulations state that scenic resources must be taken into account in the application process. However, visual resource standards have not been specified at the state or county level, and there are no visual restrictions or limits associated with the I-2 district. Sweetwater County does have Resolution 08-12-CC-04 that establishes nuisance regulations, including those for visual impacts (Sweetwater County, 2008). The proposed Project will be modifying an existing industrial complex, and changes in appearance or visibility will be minor to those viewing the facility, if they would be noticeable at all. Regardless, the proposed Project is located in a remote area with no nearby sensitive receptors, and no complaints regarding the visual nature of the facility have been raised. Construction and operation of the proposed Project are not expected to generate any significant impacts on the scenic quality of the surrounding area.

6.10 Terrestrial and Aquatic Wildlife

This section identifies wildlife species known to or that potentially will occur within the area of site influence and addresses the potential wildlife impacts within the limited Project area. This review specifically evaluates what sensitive or listed wildlife is expected to be encountered in the actual Project area. It is important to note that the proposed Project area is confined to approximately 20 acres immediately adjacent to an existing industrial plant facility. An illustration of the proposed Project area is presented in **Appendix A**.

6.10.1 Regulatory Jurisdiction

The State of Wyoming has jurisdiction over all aquatic and terrestrial wildlife in the state (exclusive of federally listed species), placing species under management of the Wyoming Game and Fish Department (WGFD) or the Department of Agriculture. The WGFD is responsible for oversight of big game species, nongame species, aquatic, and small game species that are non-migratory. The evaluation, plans, and proposals presented in this application must address terrestrial and aquatic wildlife, as well as threatened, endangered, and other species of concern identified in the Wyoming State Wildlife Action Plan (SWAP) (WGFD, 2010). Additionally, W.S. 35-12-110(b) requires the WGFD to provide information and recommendations to the ISC regarding the impacts of projects under the jurisdiction of the ISD.

The U.S. Fish and Wildlife Service (USFWS) has oversight of migratory bird species, whether they are hunted (i.e., waterfowl) or not (i.e., passerine species), and of all federal threatened, endangered, or candidate terrestrial plant and animal species. Many of the species groups under USFWS regulations also receive management and protection under state statutes and regulations. WGFD participates in these activities through interagency operating agreements.

The Wyoming Interagency Spatial Database and Online Management (WISDOM) system is a user-directed database designed to provide information regarding wildlife resources.

6.10.2 Avian Species

Migratory passerine birds and raptor species are protected from take by implementing acts and federal policies. The following details the acts and policies that currently protect migratory birds and raptors.

Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA) offers protection of 836 species of migratory birds (listed in 50 CFR 10.13), including waterfowl, shorebirds, seabirds, wading birds, raptors, and passerines. Generally speaking, the MBTA protects all birds in the United States, except gallinaceous (upland game) birds, rock pigeons, Eurasian collared doves, European starlings, and house sparrows.

The MBTA implements various treaties and conventions between the United States and Japan, Mexico, and the former Soviet Union for the protection of migratory birds. Under the MBTA, taking, killing, or possessing migratory birds is unlawful. Unless permitted by regulation, the MBTA provides that it is unlawful to pursue, hunt, take, capture, or kill; attempt to take, capture, or kill; possess; offer to or sell, barter, purchase, or deliver; or cause to be shipped, exported, imported, transported, carried, or received any migratory bird, part, nest, egg, or product, manufactured or not.

According to the MBTA, a person, association, partnership, or corporation that violates the Act or its regulations is guilty of a misdemeanor and subject to fines, imprisonment, or both. The USFWS is responsible for implementing the provisions of the MBTA, which is enforced by the USFWS Division of Law Enforcement.

Bald and Golden Eagle Protection Act. In addition to the protections afforded to eagles under the MBTA, the Bald and Golden Eagle Protection Act (BGEPA) prohibits knowingly taking, or taking with wanton disregard for the consequences of an activity, any bald eagle (*Haliaeetus leucocephalus*) or golden eagle (*Aquila chrysaetos)* or their body parts, nests, or eggs, which includes collection, molestation, disturbance, or killing. Under the BGEPA, take "includes also pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb" (16 U.S.C. § 668c).

The term "disturb" under the BGEPA has recently been defined as: "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior" (72 CFR 31332). In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagles return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

6.10.3 Federally Listed Species

Threatened and endangered plant and animal species are protected under the federal Endangered Species Act (ESA) of 1973, as amended. Designated threatened and endangered plant and animal species are protected from incidental take by implementing acts and federal policies. The following details the ESA and policies that currently protect threatened and endangered species.

Endangered Species Act of 1973 - Those species classified as threatened or endangered are protected under the ESA, enforced by USFWS. Threatened or endangered species are considered "federally listed" or "listed" after a final rule has been published in the *Federal Register*. Federal

candidate species are those plant and animal species being considered for listing as endangered or threatened, but for which a proposed regulation has not yet been published in the *Federal Register*. Wyoming does not have an endangered species act; therefore, those species with federal designation are protected under the ESA.

Threatened and Endangered Species - Endangered species are those plant and animal species, subspecies, or varieties that are in danger of extinction throughout all or a significant portion of their range. The threatened category comprises plant and animal species, subspecies, or varieties likely to become endangered within the foreseeable future throughout all or a significant portion of their range.

Candidate Species. Federal candidate species are plants and animals for which USFWS has sufficient information on their biological status and threats to propose them as endangered or threatened under the ESA but for which development of a proposed listing regulation is precluded by other higher priority listing activities. Candidate species receive no statutory protection under the ESA. However, USFWS encourages cooperative conservation efforts for these species because they are, by definition, species that may warrant future protection under the ESA.

Recovery Species. Recovery species are those for which a recovery process is in place to restore threatened and endangered species to the point that protection under the ESA is no longer needed. Recovery is the process by which the decline of an endangered or threatened species is arrested or reversed, or threats to its survival are neutralized so that its long-term survival in nature can be ensured.

6.10.4 USFWS Threatened and Endangered Species

Federally listed threatened, endangered, and candidate species potentially occurring in Sweetwater County were identified using the USFWS Endangered Species Database (USFWS, 2014).

Six species may occur in Sweetwater County. The greater sage-grouse is known to occur throughout most of Wyoming and has a medium to high probability of occurring within the Project vicinity. However, the Project is not within any sage-grouse core management areas, and there are no leks within 20 miles of the proposed Project. The yellow-billed cuckoo and black-footed ferret have been historically documented in Sweetwater County, but the ranges of the two species no longer include the Project area and suitable habitat is not present (Keinath et al., 2010). Ute ladies'-tresses is not known to occur within the Project vicinity and suitable habitat is not present (Fertig, 2000). The range of the gray wolf is primarily in northwestern Wyoming and the species is not known to occur in the Project area (WGFD et al., 2013). Bald eagles are known to occur within the Project vicinity, however, surrounding habitat is not ideal and probability of occurrence is low (Keinath et al., 2010). **Table 6-6** provides the species name, status, habitat, and potential for occurrence within the Project area.

TABLE 6-6
Listed Threatened and Endangered Species Potentially Occurring near the Project Area

Species/Listing Name	Scientific Name	Status	Habitat	Potential for Occurrence
Bald eagle	*Haliaeetus leucocephalus*	Recovery	Forested areas with nearby water bodies for foraging	O
Black-footed ferret	*Mustela nigripes*	Endangered	Prairie dog colonies	U
Greater sage-grouse	*Centrocercus urophasianus*	Candidate	Sagebrush basins and foothills	O
Gray wolf	*Canis lupus*	Recovery	Temperate forests, mountains, tundra, taiga,	U

TABLE 6-6
Listed Threatened and Endangered Species Potentially Occurring near the Project Area

Species/Listing Name	Scientific Name	Status	Habitat	Potential for Occurrence
			and grasslands	
Yellow-billed cuckoo	*Coccyzus americanus*	Candidate (proposed threatened)	Deciduous woods and thickets along streams	X
Ute ladies'-tresses orchid	*Spiranthes diluvialis*	Threatened	Seasonally moist soils and wet meadows of drainages	X

Species occurrence (based on Fertig [2000], Keinath et al. [2010], and WGFD et al. [2013])
O = Known to occur.
U = Suitable habitat present, unlikely to occur, no known wild populations.
R = Rare; species may be in the area for just a few days or hours. Suitable habitat in the vicinity of the proposed Project area. Encounters during Project development are very unlikely.
X = Unlikely; no habitat present.

6.10.5 Construction and Operation Impacts

Big Game

Important criteria for federal and state wildlife managers in Wyoming are land areas that are designated as crucial winter ranges, parturition areas, and migration routes for big game. Although the proposed Project is within the seasonal ranges of elk, mule deer, and pronghorn, the proposed Project is not located within any crucial winter ranges, other partition areas, or significant migration routes for these big game species. Given the developed industrial nature of the Project area, big game is not a frequent user of the areas proposed for development by the Project. Therefore, big game species would not be affected by construction or operation of the Project.

Avian

Areas to be affected by construction are located in an already disturbed industrial facility. Species using these areas are accustomed to human activity including noise and vehicle operations. No shrubs or trees will be removed for construction. There are no known nests in the proposed Project area and no avian species are expected to be displaced during construction. Operation of the proposed Project would produce disturbances very similar to the conditions experienced at the site for many years. Therefore, continued operation of the Project is not expected to increase disturbance to avian species. The proposed Project would remain compliant with the MBTA and BGEPA (see Section 6.10.2) and avian species would not be affected by construction or operation of the Project.

Aquatic

No water bodies will be crossed or impacted during construction of the proposed Project. No discharges to surface or groundwater are expected. Therefore, no impacts to aquatic wildlife are expected during construction.

There are no aquatic systems within the area to be affected by the proposed Project. Operation of the Project will use a minimal amount of water, estimated to be 150 gpm that will be sourced from Simplot's existing water connection from the city of Rock Springs. Bitter Creek and subsequent downstream aquatic systems are not expected to be affected by construction or operational water use.

Species with Federal Status

The only federally listed species with a high potential for occurrence in the proposed Project area is the greater sage-grouse. The Project area is not within a sage-grouse core management area or lek area. The proposed Project area has been previously disturbed, is adjacent to an industrialized area, and does not present highly suitable habitat for the species. Therefore, occurrence of the greater sage-grouse within the immediate Project area is expected to be lower than surrounding areas.

Construction and operation activities will result in similar levels of human activity, noise, and vehicle traffic that are currently present at the Simplot fertilizer complex. Direct impacts to greater sage-grouse or its habitat are not expected to result from construction or operation of the proposed Project.

There are no known additional impacts to plants or wildlife that will result from ongoing operations, and no significant population-level impacts are anticipated that may impair the health, safety, or welfare of species with a federal status.

6.11 Cumulative Impacts

The cumulative impacts analysis is organized by resource to provide better presentation of cumulative impacts. Potential direct and indirect impacts were analyzed previously in this section. The environmental impacts evaluation of the proposed Project indicated that, although the construction and operation impacts would not result in significant or adverse resource impacts, minor impacts could occur to some resources; therefore, a cumulative impacts assessment was completed to determine if the minor impacts of the proposed Project could, along with other actions in the area of site influence under the jurisdiction of the ISD, contribute to a significant or adverse cumulative impact.

6.11.1 Approach to Cumulative Impacts Analysis

The ISA lacks issuing guidance that defines or details requisite cumulative impact analysis methodology. Therefore, the Council on Environmental Quality (CEQ) was queried to identify cumulative impact methodology and guidance (CEQ, 1997).

Based on a review of CEQ guidance, the following factors were considered for the proposed Project:

- The direct and indirect impacts of the proposed Project
- An evaluation of which resources, ecosystems, and human communities are affected
- An evaluation of which impacts to these resources are important from a cumulative perspective

Based on additional CEQ guidance, cumulative impacts are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions. Cumulative impacts would occur if incremental impacts of the Project, added to the environmental impacts of past, present, and reasonably foreseeable future actions, would result in adverse impacts to resources. Cumulative impacts could only occur for those resources that are affected by the proposed Project and by other actions whose impacts occur within the same timeframe.

6.11.2 Geographic Scope of Cumulative Analysis

Cumulative environmental impacts, as defined in the ISA Rules and Regulations, means the combined impacts upon the environment to the social or economic conditions resulting from construction and operation of the proposed industrial facility and from construction and operation of other ongoing or proposed developments in the area of site influence.

Proposed developments to be included in cumulative impacts include those developments that are actively planning and have public information available or may be actively permitting under the auspices of the ISA. Therefore, the geographic scope of cumulative impacts analysis is generally based on the area of site influence of each resource.

6.11.3 Timeframe

Potential impacts from the construction of the Project would be relatively short-term, generally occurring over the 25-month construction period. For the purposes of the cumulative impacts analysis, it is assumed that operation of the proposed Project would begin in August 2014. Potential impacts associated with operation of the proposed Project would continue for approximately 25 years.

6.11.4 Past, Present, and Reasonably Foreseeable Actions

The lands of Sweetwater County surrounding the proposed Project area are primarily either privately or BLM-managed, with some interspersed State lands. With the distribution of federally managed lands, NEPA compliance is required for most large project actions. Through NEPA analysis of projects with a federal nexus, federal land management agencies are able to understand how projects relate to one another with respect to cumulative impacts. Similarly, State of Wyoming lands are managed by the Office of State Lands and investments for revenues are directed into the Wyoming State Land Trust. As such, a Special Use Lease is required from the Board of Land Commissioners to develop industrial facilities on State of Wyoming lands. Therefore, each of these governmental entities has specific planning processes and implementing rules that require evaluation prior to construction and operation industrial projects on state and federal lands in the area of site influence.

Private land projects are difficult to track and forecast. Unlike projects analyzed under NEPA, most private projects lack a lengthy permitting process, and there is no overarching management direction for large resource areas. City and county land use plans can provide some guidance on how the municipalities view development in lands under their jurisdiction. Because the proposed Project lies within the general region of Rock Springs, Green River, and the I-80 corridor, there is a constant baseline level of smaller projects ranging from public works (e.g., road construction and repair) to private enterprise (e.g., new business or industrial development).

In evaluating the cumulative impacts of other projects at and around the proposed Project site, the Project team considered relevant historical events in the region and present and reasonably foreseeable future actions under the jurisdiction of the ISA. There are no projects within the area of site influence currently engaged with the ISD seeking evaluation under the ISA. However, the four projects evaluated for cumulative impacts have areas of influence that overlap a portion of the proposed Project area of site influence. Descriptions of the major projects considered in the cumulative impacts are presented in Section 5.6.

Some of the past, present, and reasonably foreseeable activities affecting surrounding lands include the following:

- Oil and natural gas exploration and extraction
- Pipeline construction
- Electric transmission line construction
- Wind power generation projects
- Ranching and grazing
- Phosphate and trona mining

6.11.5 Cumulative Impacts

Construction of the proposed Project along with the other listed projects has the potential to contribute to cumulative impacts, especially if the schedules are concurrent. At the time of construction for the Project, is possible other smaller projects could be underway. Given the low level of impacts expected from the Project, cumulative impacts are not expected to be significant for any resource.

Air Quality

Air quality in the cumulative impact area is generally good, and the area is not in violation of any NAAQS. The proposed Project will obtain air quality permits from WDEQ. Any other projects with emissions sufficient to have cumulative impacts would also be evaluated by the relevant agencies. Because the proposed Project would have minimal ground disturbance, local impacts to air quality from fugitive dust emissions from construction is expected to be minimal. Operation emissions from the proposed Project will remain in compliance with issued permits and is not expected to contribute to significant cumulative impacts.

Surface and Groundwater

Project water will be obtained from the existing connection from the City of Rock Springs. Construction activities are not anticipated to discharge into surface waters, and no significant water use is expected during construction. During operations, there will be no discharge to surface waters; the facility is a zero-discharge facility.

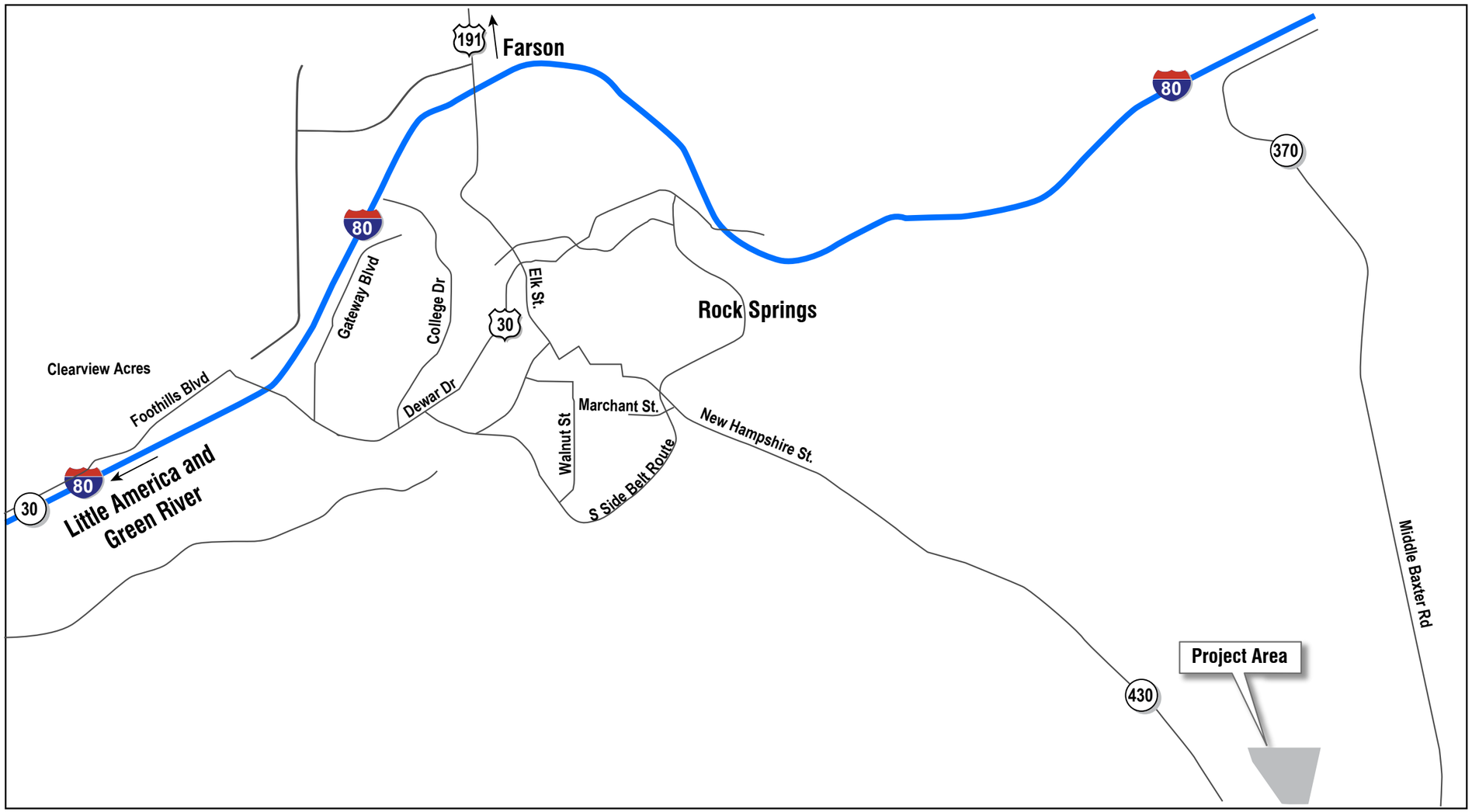
Projects in the cumulative analysis will combine impacts to regional water quantity. It is presumed that future projects will obtain water from existing sources or obtain permits for new withdrawals. The projects considered generally do not require large quantities of water for operations. Rather, the highest water use would be expected during the temporary construction period. For example, the Gateway West Transmission line and the Chokecherry/Sierra Madre Wind Energy Project will require water for concrete to form many foundations. However, once operational, neither project would consume large quantities of water. Due to the minor impacts associated with the proposed Project, water quality and quantity impacts are not expected to contribute to any significant impacts on a cumulative scale.

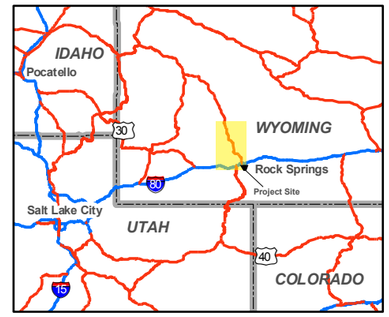
Terrestrial and Aquatic Wildlife

No significant or adverse impacts to wildlife are expected to occur in response to construction and operations of the Project; therefore, implementation of the Project will not contribute to cumulative loss or degradation of these resources. The Project site has been previously disturbed and a reduction of quality habitat will not result from completion of the proposed Project.

As discussed in Section 6.10.4, a total of six USFWS threatened or endangered species may occur or could be affected by projects in Sweetwater County. The only species with a federal status potentially affected by construction is the greater sage-grouse. However, the Project area is not within a sage-grouse core management area or near any lekking grounds. This proposed Project will not result in the loss of highly suitable habitat for the greater sage-grouse, and is not expected to contribute to cumulative impacts to the species or its habitat. Therefore, cumulative impacts to threatened and endangered species or their critical habit is not expected to occur as a result of the proposed Project.

Figures





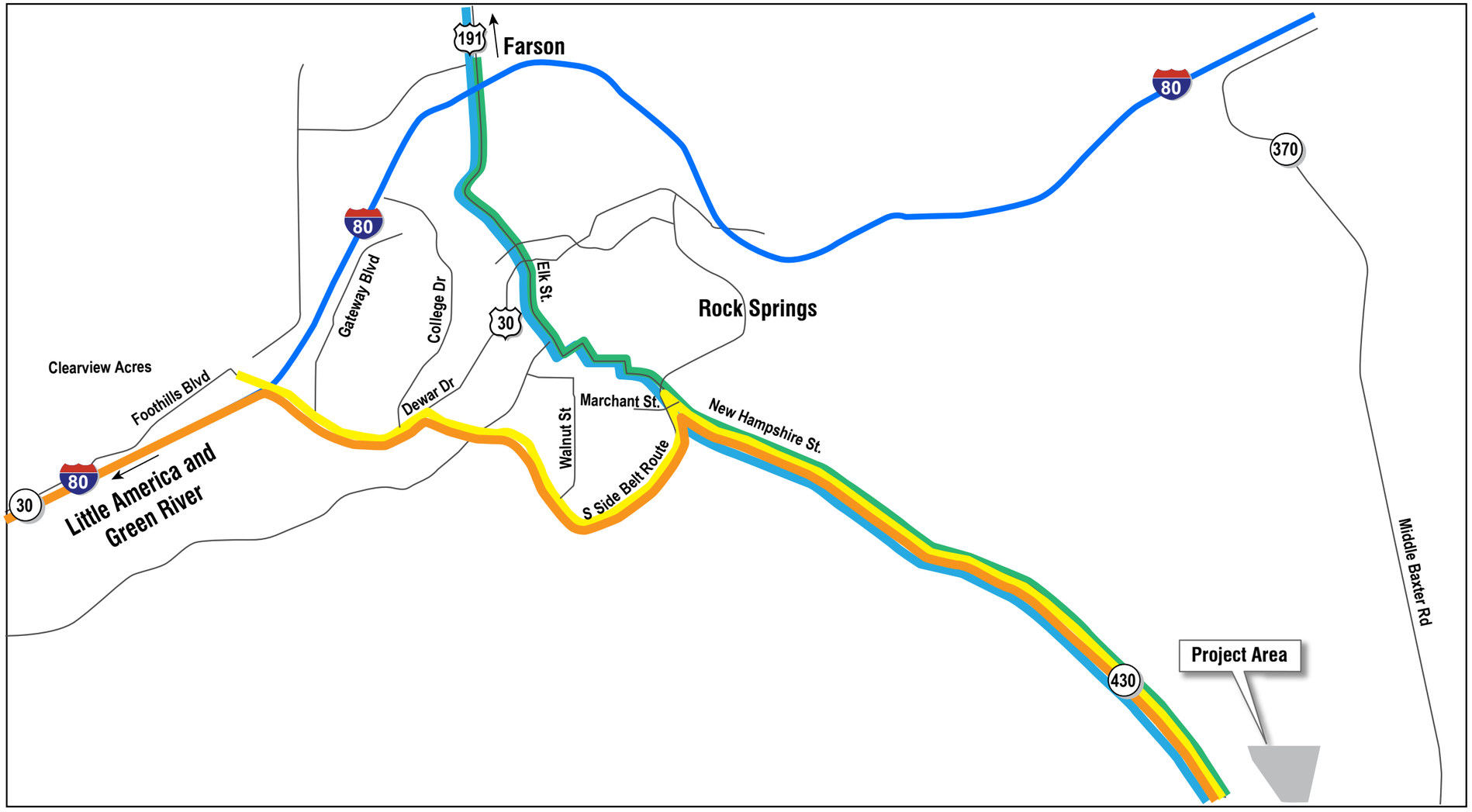
LEGEND

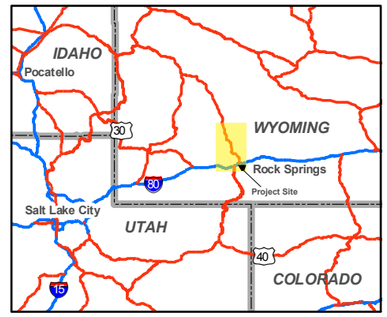
- Interstate
- US Highway
- State Highway

0 3.75 7.75 15
Miles

CH2MHILL

Figure 6-1
Study Area





LEGEND

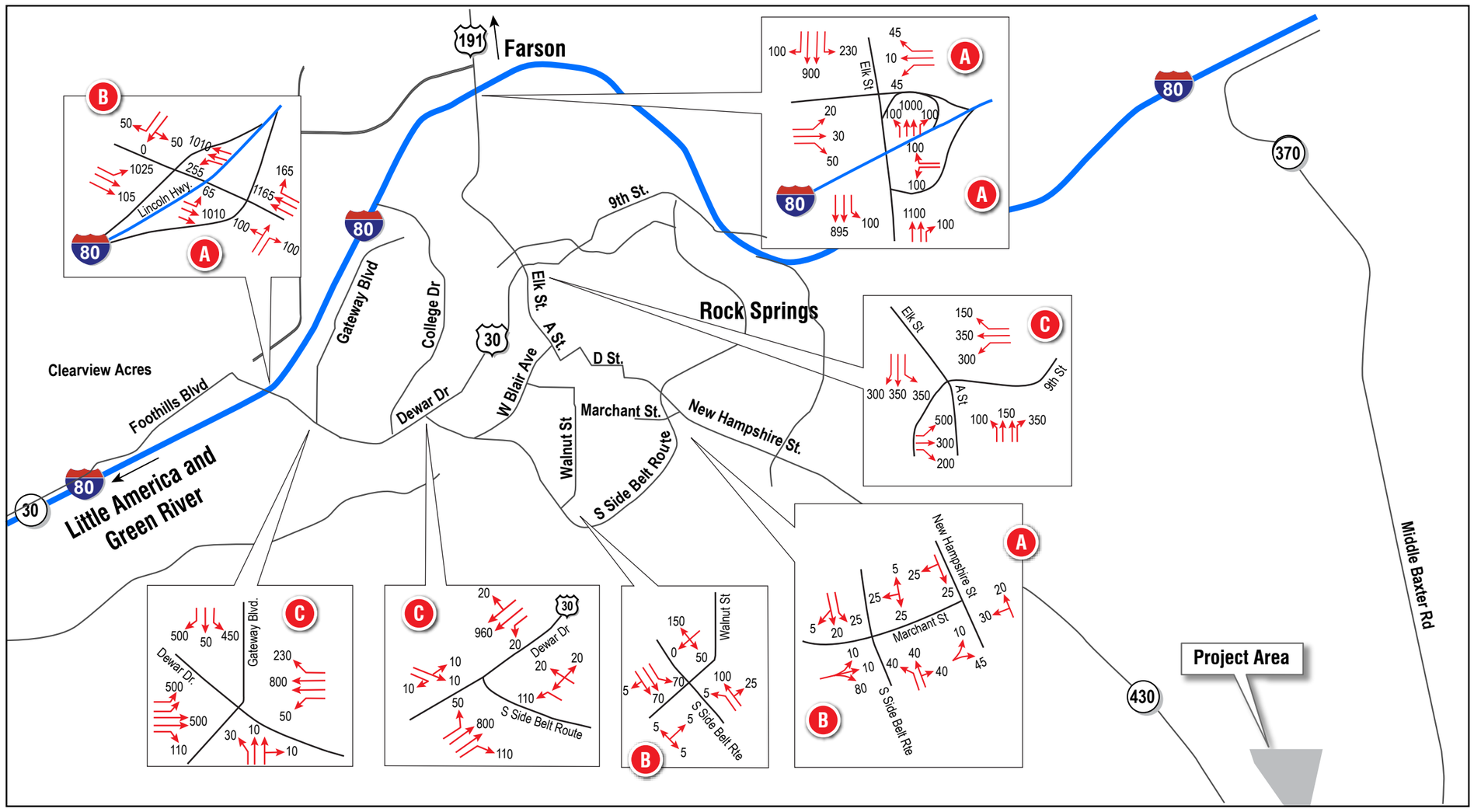
- Interstate
- US Highway
- State Highway

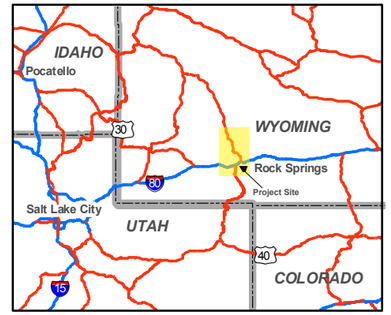
Trip Distribution Construction

- 200 Vehicle
- 95 Vehicle
- 90 Vehicle (from Rock Springs)
- 5 Vehicle (from Farson)

0 3.75 7.75 15
Miles

Figure 6-2
Trip Distribution





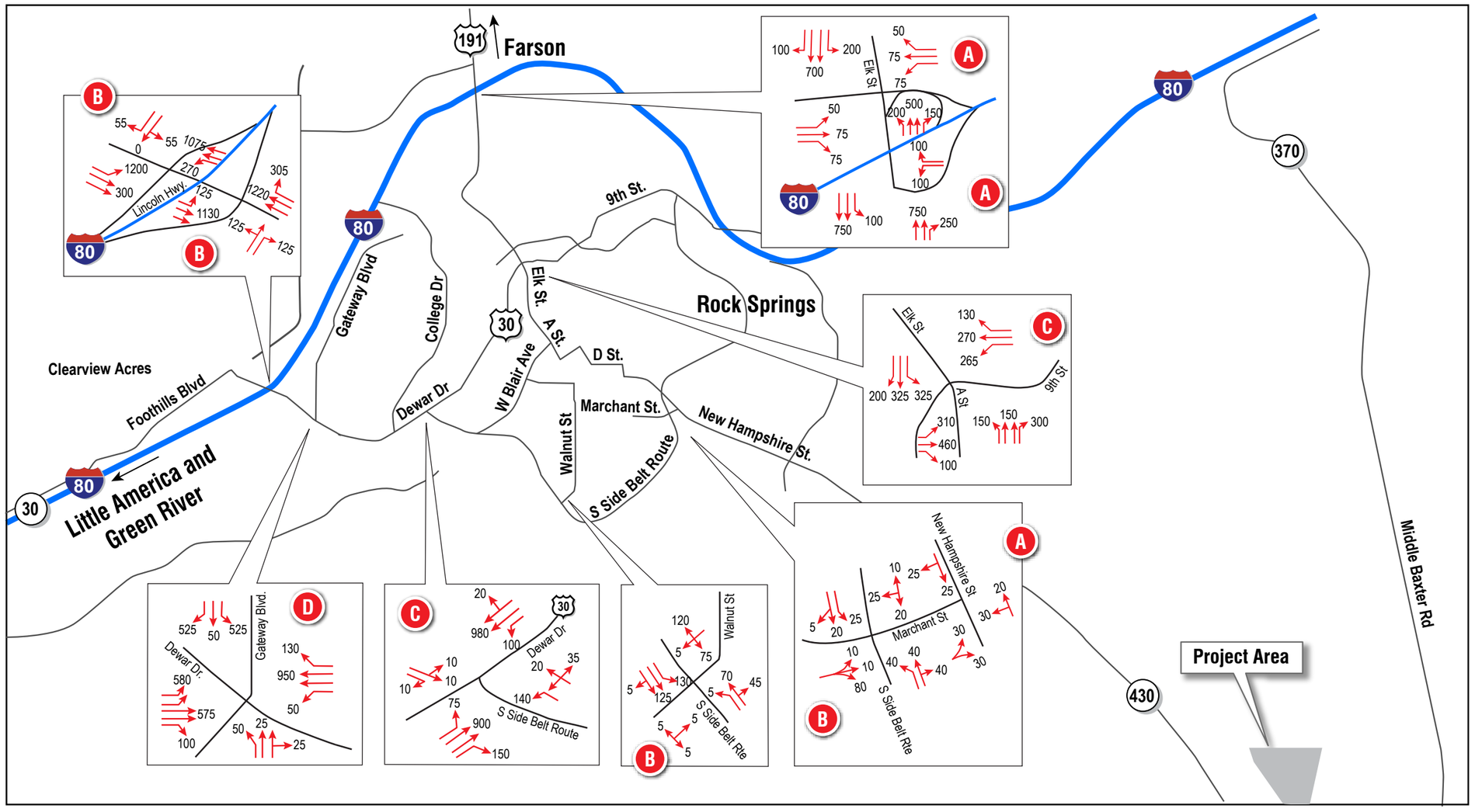
LEGEND

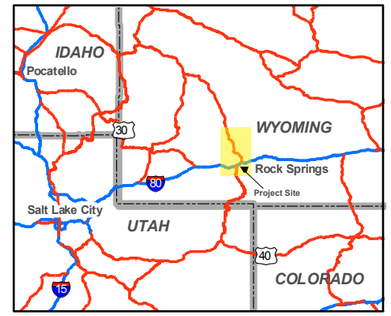
- Interstate
- US Highway
- State Highway
- X Level of Service
  Traffic Movements are Peak Hour Volumes

N

0 3.75 7.75 15
Miles

Figure 6-3
2011 Existing





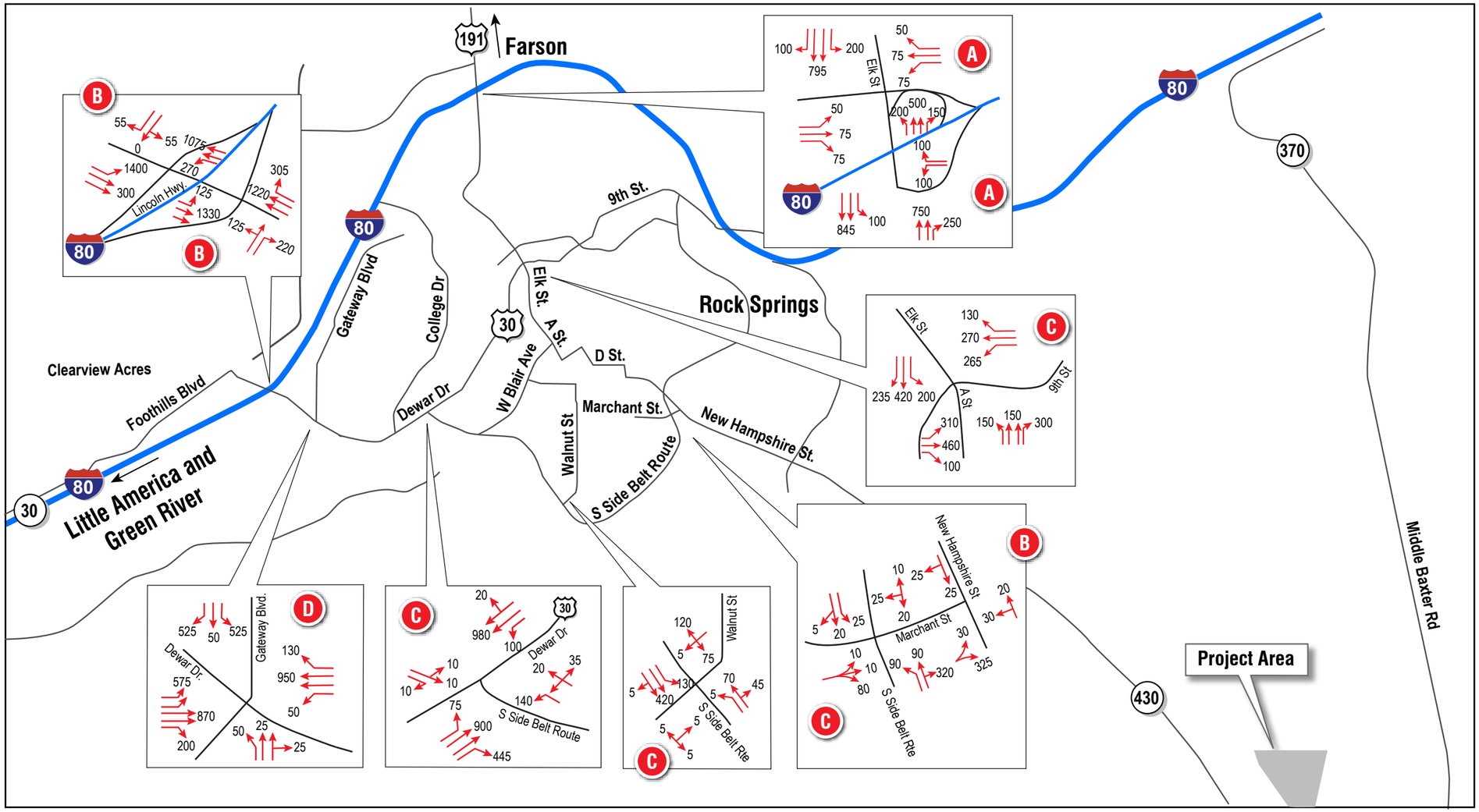
LEGEND

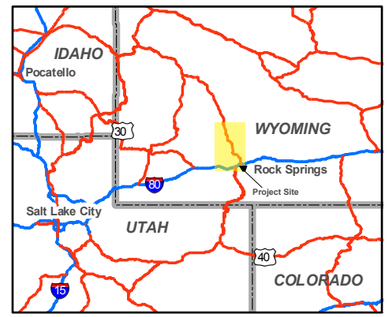
- Interstate
- US Highway
- State Highway
- X — Level of Service
  Traffic Movements are Peak Hour Volumes

N

0 3.75 7.75 15
Miles

Figure 6-4
2016 Background





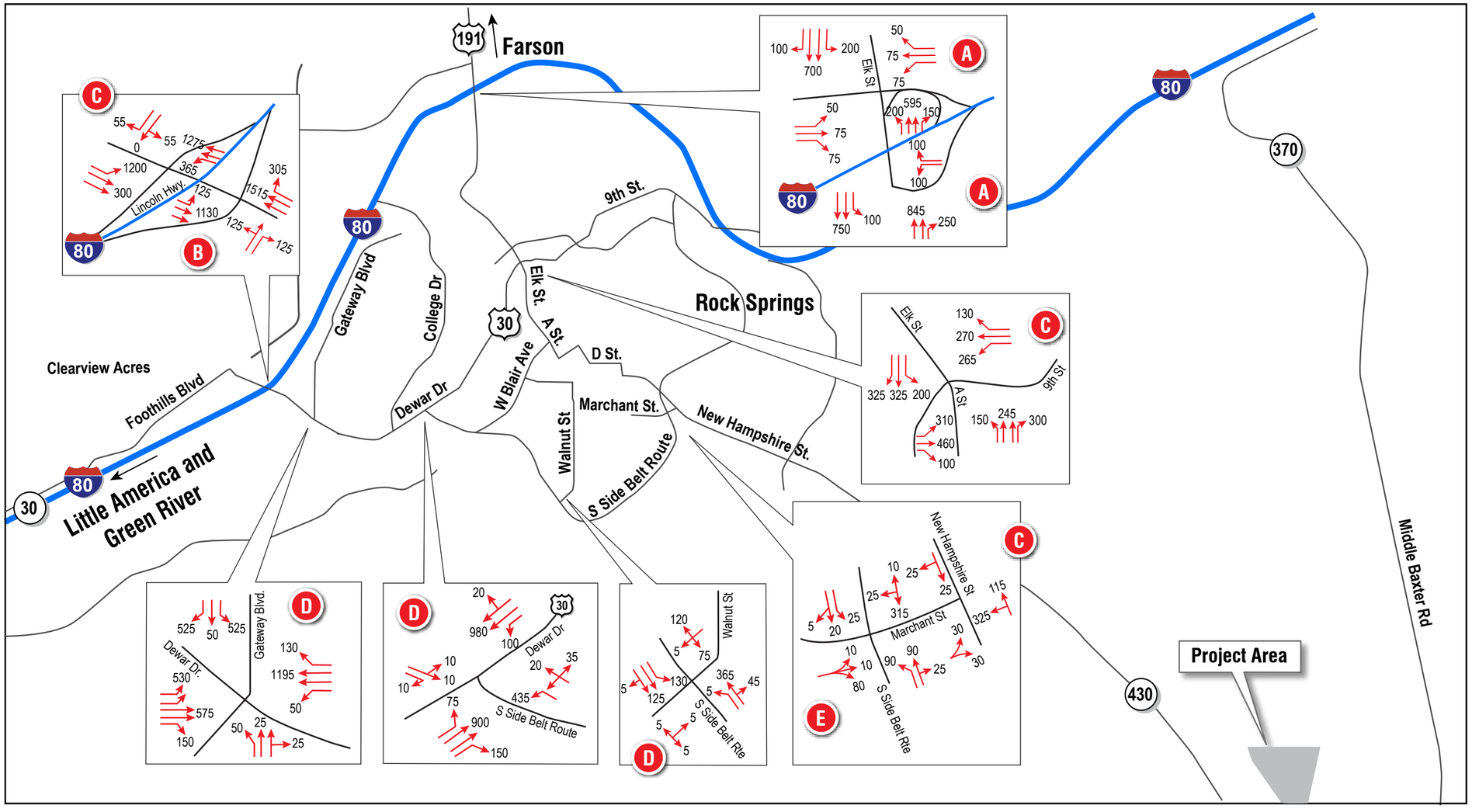
LEGEND

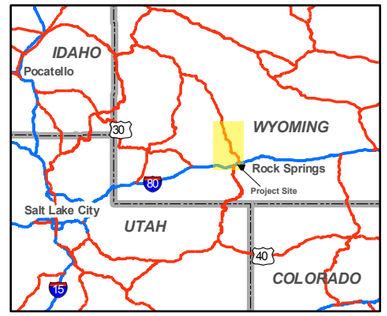
- Interstate
- US Highway
- State Highway
- X Level of Service
  Traffic Movements are Peak Hour Volumes

N

0 3.75 7.75 15
Miles

Figure 6-5
2016 AM Construction





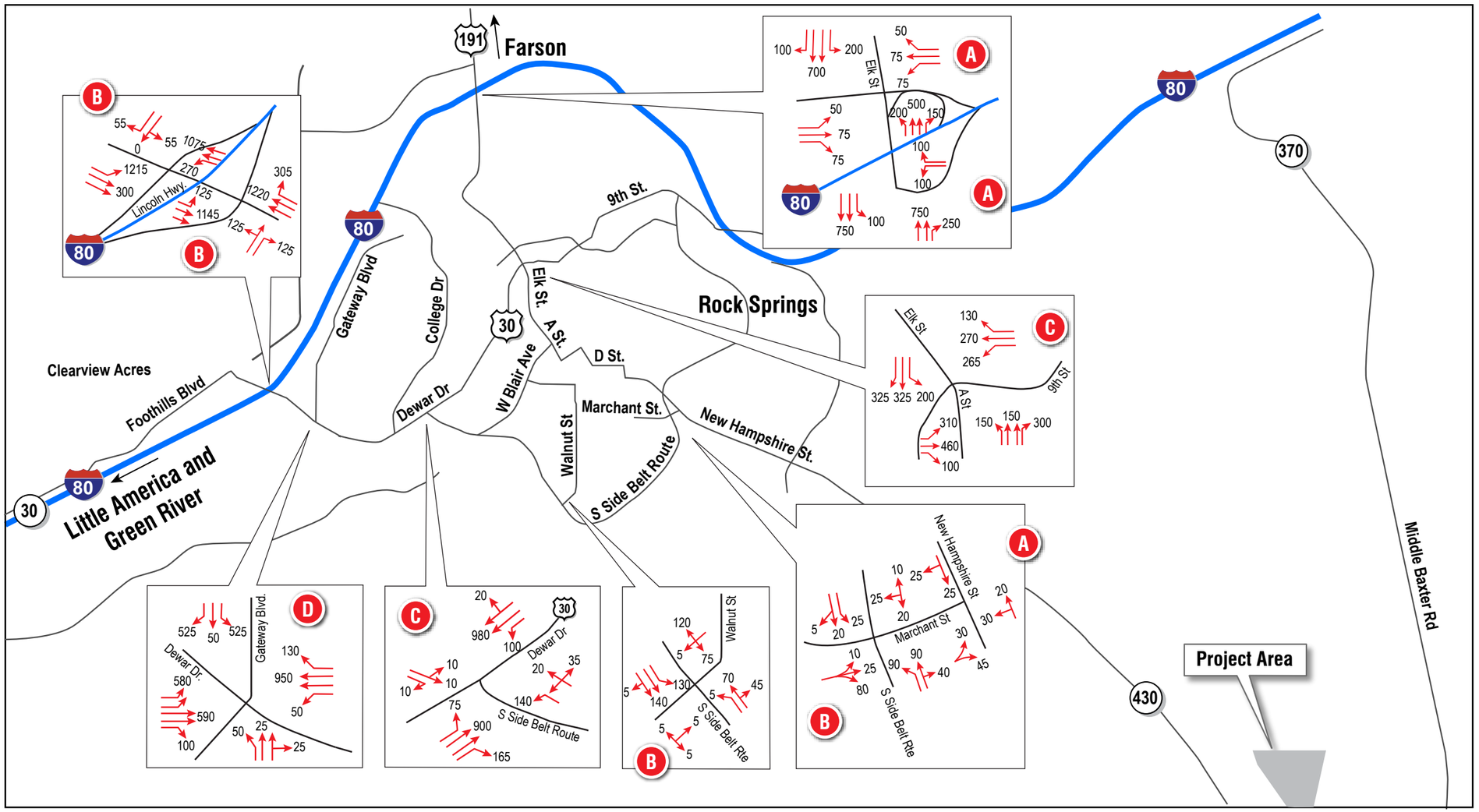
LEGEND

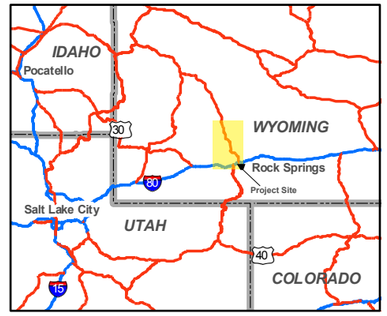
- Interstate
- US Highway
- State Highway
- X Level of Service
  Traffic Movements are Peak Hour Volumes

N

0 3.75 7.75 15
Miles

Figure 6-6
2016 PM Construction





LEGEND

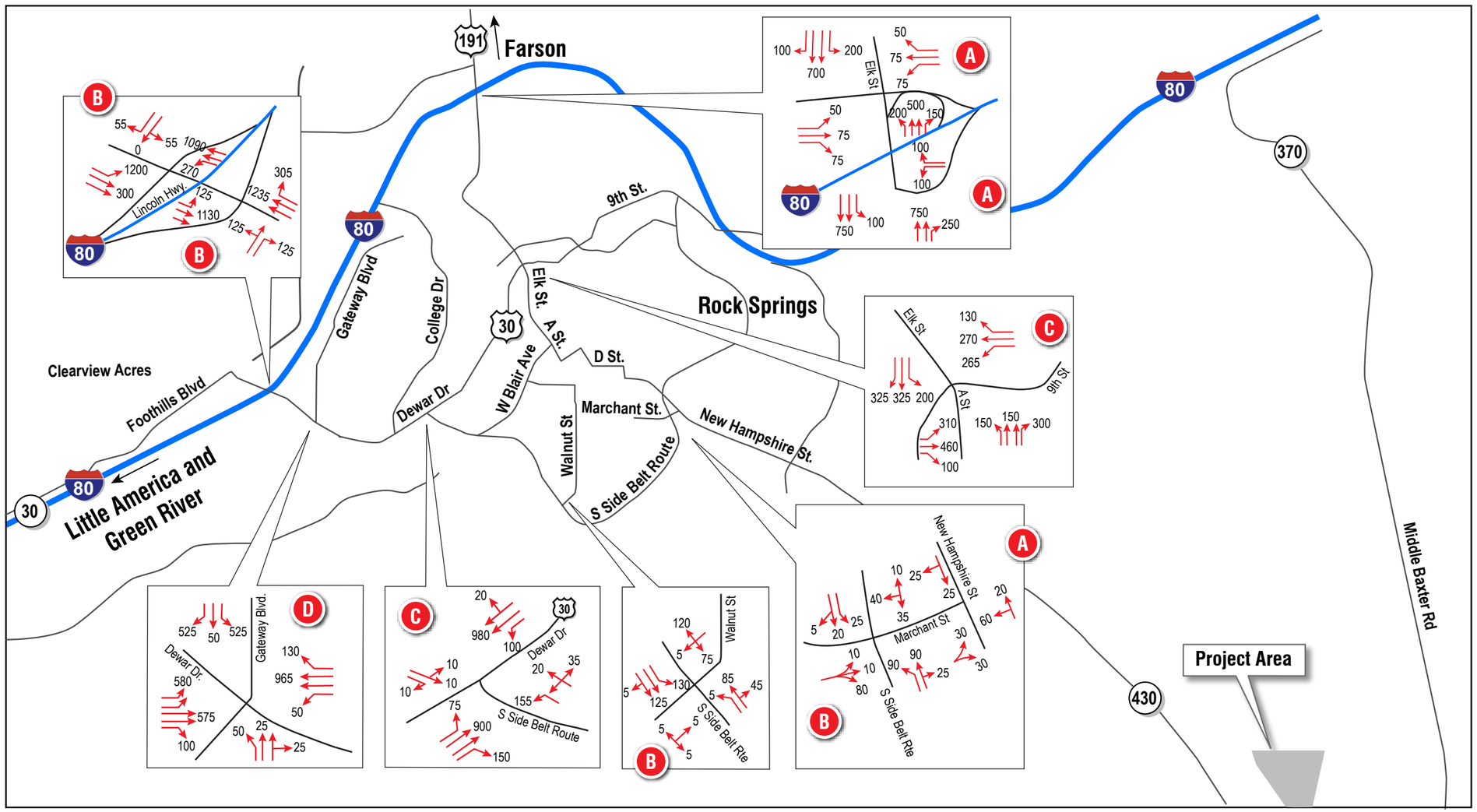
- Interstate
- US Highway
- State Highway
- X Level of Service
  Traffic Movements are Peak Hour Volumes

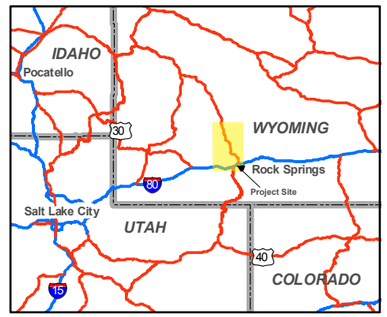
N

0 3.75 7.75 15
Miles

CH2MHILL

Figure 6-7
2016 AM Operations





LEGEND

- Interstate
- US Highway
- State Highway
- X Level of Service
  Traffic Movements are Peak Hour Volumes

N

0 3.75 7.75 15
Miles

Figure 6-8
2016 PM Operations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7.0 Controls, Mitigation, and Monitoring Measures

A number of specific mitigation measures will be implemented to alleviate impacts related to construction and operation of the proposed Project. These measures are described in the following sections.

7.1 Controls

A broad array of measures have been proposed to mitigate the potential hazards associated with the proposed Project and the exposure of persons, animals, and facilities in the area of site influence. These measures can generally be classified as avoidance, prevention, and exclusionary actions.

The following control measures, in combination with setback distances, significantly reduce the likelihood of the public coming within a hazardous distance of the Project and electrical equipment. The proposed Project will be designed, constructed, and operated to adequately restrict public access and minimize impacts.

7.1.1 Avoidance

The overall minimal impacts of the proposed Project are possible largely because of its location. Essentially occurring within an active, remote industrial facility, the proposed Project is not affecting resources in the same manner as would a true greenfield project. This proposed Project location avoided many issues typically faced by large industrial projects, e.g., visual or noise impacts. The site plan maximized the ability to renovate existing facilities and use previously disturbed ground where new construction was necessary.

7.1.2 Prevention

Primary among the means of preventing hazards described herein will be adherence to appropriate design and construction protocols such as those provided by the National Fire Protection Association (NFPA) 70, American Society of Mechanical Engineers (ASME), American National Standards Institute (ANSI), and American Water Works Association (AWWA). A second important form of prevention is the establishment of a skilled workforce and implementation of effective facility-wide maintenance, monitoring, compliance, and security programs. This includes the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP); Spill Prevention, Control, and Countermeasures (SPCC) Plan; and Fire Protection and Prevention Plan; as well as consultation with the appropriate local agencies.

7.1.3 Exclusion

Every hazard identified herein decreases as some function of linear distance. In many cases, therefore, it has been possible to reduce or eliminate hazards to persons and facilities by prohibiting or controlling their presence in the area of site influence. Where multiple hazard areas overlap, the largest distance should govern. The proposed Project, as a component of the currently operating

facility, will have controlled access, and access to the facilities will be limited to persons who are knowledgeable of safety measures and potential risks.

7.1.4 Restricted Public Access

The proposed Project will be located on private lands. Simplot will restrict public access to the main facility and any related or supporting facilities that could pose a potential safety threat. The facility will be staffed continuously during operations.

7.1.5 Health and Safety Measures

Simplot is committed to a safe and healthy workplace that promotes a zero-accident culture. Additionally, Simplot is committed to continuous improvement to identify and control risks so that company safety metrics and performance meets high expectations. To meet this commitment, Simplot's health and safety policies will require the following:

- Operate in compliance with or exceed all health and safety governmental laws, regulations, ordinances, standards, and permit requirements.
- Ensure all employees are involved in health and safety programs with appropriate training and communication to work responsibly, make decisions to carry out their duties, and be accountable for the results.
- Provide a health and safety plan and structure that ensure effective health and safety management with risks, impacts, and legal requirements controlled through appropriate actions and governance.
- Ensure that health and safety goals are set and communicated to all employees and that performance is monitored to promote continuous improvement.
- Work to proactively prevent incidents, accidents, and environmental damage before these occur through sustainable actions and process improvements at all locations.

7.1.6 Worker, Environmental, and Facility Controls

Occupational Hazards

Construction and operations workers at any facility are subject to risk of injury or fatality from physical hazards. While such occupational hazards can be minimized when workers adhere to safety standards and use appropriate protective equipment, injuries or fatalities from on-the-job accidents can still occur. Occupational health and safety are regulated at the federal level through the OSHA (29 USC 651 et seq.). Wyoming has additional laws and regulations that build on the federal law.

Some of the occupational hazards associated with the proposed Project are similar to those of other heavy construction and industrial facilities. Simplot and its subcontractors will comply with all applicable local, state, and federal safety, health, and environmental laws, ordinances, regulations, and standards. Some of the primary laws, ordinances, regulations, and standards designed to protect human health and safety that will be reflected in the design, construction, and operation of the proposed Project include:

- Occupational Safety and Health Act of 1970 (29 USC 651, et seq.) and 29 CFR 1910, Occupational Safety and Health Standards

- Americans with Disabilities Act (ADA) for accessibility at administrative buildings
- Uniform Fire Code Standards
- Uniform Building Code
- NFPA, which provides design standards for the requirements of fire protection systems
- National Institute for Occupational Safety and Health (NIOSH), which requires that safety equipment carry markings, numbers, or certificates of approval for stated standards
- National Electric Safety Code
- American Concrete Institute Standards
- American Institute of Steel Construction Standards
- American Society for Testing and Materials
- National Electric Code

Public Safety

The public will not have access to the proposed Project during construction as it is within the existing Simplot Phosphates facility. Other areas determined to be hazardous, or where security or theft is of concern, may also be fenced or signed. Temporary fencing will typically be a high-visibility plastic mesh. Security guards, cameras, and/or additional fencing may be used as necessary to protect public health and safety as well as Project facilities.

Traffic Management

Construction

The potential for traffic issues will be highest during construction, when deliveries of equipment and materials and worker traffic will occur. A traffic study has been completed (see **Section 6**) that details the number and nature of vehicle trips to, within, and from the proposed Project area. One intersection was identified that could have significant impacts to the levels of service during peak construction periods. However, the analysis revealed that with the implementation of mitigation measures, specifically carpooling, the degree of impacts would be reduced to acceptable levels. No additional significant impacts to the LOS for intersections along Project access routes are expected. Should issues arise; a traffic management plan will be developed in consultation with WYDOT.

Operation

In terms of access traffic, the proposed Project will operate continuously (24 hours per day, 7 days per week). It will employ an additional 27 workers, although not all will be working onsite at the same time. There will be a minimal daily increase in traffic to and from the site.

Construction Waste Management

Solid Waste Management

The generation of solid waste during the construction phase will be handled by disposal at the existing onsite industrial landfill. Portable haul-off 40-cubic-yard dumpsters will be used to collect generated construction waste materials. The dumpsters will be emptied on an as-needed basis There are no plans to store or treat solid waste at the proposed Project construction site other than via portable dumpsters.

Fuel Storage

Aboveground fuel storage tanks will be used by the General Contractor to facilitate onsite equipment refueling. The storage tanks will comply with relevant rules and regulations. No underground tanks will be used during construction or operation of the proposed Project. All aboveground fuel tanks will have secondary containment systems.

Hazardous Wastes

Waste determinations, in accordance with 40 CFR §262.11, will be made by the General Contractor for all the solid wastes generated from construction of the project to determine whether these wastes are hazardous. The General Contractor, in accordance with applicable RCRA requirements, other legal requirements, and Simplot Policies and Procedures will manage all wastes that are determined to be hazardous. Because the onsite industrial landfill is not permitted to accept hazardous wastes, they must be transported offsite for disposal at an approved hazardous waste facility. While it is anticipated that minimal hazardous wastes will be generated as part of the construction of the proposed Project, examples of potential hazardous wastes include waste paints, solvents, aerosol cans, and gasket related chemicals.

The proposed Project is also anticipated to generate asbestos containing materials that will be handled in accordance with WDEQ requirements.

Spill Management

The General Contractor will develop and implement a SPCC Plan in accordance with 40 CFR 112 and Solid Waste Rules and Regulations. If fuels and/or other petroleum-based products are spilled during construction of the proposed Project, a treatment/disposal facility currently permitted by the Solid and Hazardous Waste Division will be contracted to dispose and manage the contaminated soils. The General Contractor will contract with properly licensed firms to clean up contaminated areas and properly dispose of any oily wastes generated as a result of such releases.

7.2 Mitigation Measures

7.2.1 Air Quality

Simplot and its contractors shall use such practicable methods and devices as are reasonably available to control, prevent, and otherwise minimize atmospheric emissions or discharges of air contaminants.

Construction-related dust disturbance shall be controlled by the periodic application of water to all disturbed areas along the ROW and access roads.

Vehicles and equipment showing excessive emission of exhaust gases due to poor engine adjustments or other inefficient operating conditions shall not be operated until corrective adjustments or repairs are made.

7.2.2 Cultural Resources

Should any previously unknown historic/prehistoric sites or artifacts be encountered during construction, all land-altering activities at that location will be immediately suspended and the discovery left intact until such time that Simplot is notified and appropriate measures are taken to ensure compliance with the NHPA and enabling legislation. Should any additional cultural resources be discovered during construction, Simplot will be contacted and may coordinate and consult with

appropriate governmental agencies for suggested voluntary mitigation and preservation measures designed to safeguard such resources.

7.2.3 Biology and Wildlife

To reduce employee-wildlife incidents, construction workers will receive information on wildlife awareness during their employee orientation program. The program will include, at a minimum:

- Information regarding restrictions or prohibition of construction employees' access to sensitive wildlife activity areas;
- Information regarding applicable wildlife laws and resident hunting requirements
- Information regarding policies and laws penalizing wildlife harassment and poaching;
- Statement prohibiting the possession of firearms on the site;
- Reporting procedures and requirements for vehicle collisions with wildlife;
- Reporting procedures and requirements for incidental observation of wildlife including threatened or endangered species; and
- Posted and enforced speed limits to minimize wildlife vehicle collisions.

Removal of vegetation will be limited to that necessary for construction of the proposed Project. Erosion and sedimentation controls will be used to prevent runoff of particulates.

On completion of the work, all work areas, except any permanent access roads, shall be graded, as required, so that all surfaces drain naturally, blend with the natural terrain, and are left in a condition that will facilitate the establishment of natural vegetation, provide for proper drainage, and prevent erosion. All construction materials and debris shall be removed from the proposed Project site in a timely manner.

7.2.4 Fire Prevention and Control

Construction vehicles shall be equipped with government-approved spark arresters. The contractor shall maintain in all construction vehicles a current list of local emergency response providers and methods of contact/communication.

The mechanical systems and equipment, at a minimum, will meet the relevant requirements of NFPA 70, ASME, ANSI, and AWWA.

7.2.5 Land Use

The contractor shall limit movement of crews, vehicles, and equipment to the proposed Project area and access roads to minimize damage to property and disruption of surrounding land use activity.

7.2.6 Noise

Construction vehicles and equipment shall be maintained in proper operating condition and shall be equipped with manufacturers' standard noise control devices or better (e.g., mufflers, engine enclosures).

The proposed Project will be designed to meet or exceed all applicable local, state, and federal noise specifications.

7.2.7 Soils

Administered through proposed Project specifications and job supervision, the following erosion control measures will be implemented to minimize the impacts to soils during and after construction:

- An erosion control plan will be prepared by the contractor that addresses excavation, grading, and erosion control measures during and after construction.
- Limits of construction and areas to be disturbed will be defined and managed by onsite inspectors and construction managers.
- Periodic inspection will be made of erosion control measures by project managers, especially after storms. Erosion control measures will be repaired or replaced as necessary.
- Berms and other water-channeling measures will be used to direct water to appropriate detention ponds.
- Barriers and other measures consisting of hay bales, silt fences, and straw mulches will be used to minimize and control soil erosion.
- All disturbed areas will be restored and reclaimed using certified weed-free native grasses.

7.2.8 Traffic

The contractor shall make all necessary provisions for conformance with federal, state, and local traffic safety standards and shall conduct construction operations to offer the least possible obstruction and inconvenience to public traffic.

Truck deliveries will be scheduled to fall outside of peak hours, both AM and PM, to avoid cumulative impacts during commuting times, both for Project construction workers and for the general public.

7.2.9 Surface Water

Potential impacts to surface water from erosion and sedimentation will be prevented by measures to control runoff during construction and operation of the proposed Project. A pollution prevention plan will be developed and implemented to minimize impacts on water resources during long-term operation of the proposed Project. All requirements of the Storm Water Permit will be administered and adhered to during and after construction.

Simplot facilities fall under SPCC/Stormwater Plan requirements. The facility grounds are defined as inside the fences located around the entire facilities or the entire facility in general. Any contractor activities within these boundaries are required to meet the following requirements:

- No lubricant/chemical/compound in any form will be discharged from its original/intended container onto plant grounds/facilities or into stormwater or treatment systems without direct permission from plant or project management personnel (this includes significant volumes of water).

- No lubricant/chemical/compound in any form in any container will be left unattended in any area where a potential exists for damage from activities (e.g., vehicle traffic, persons working, spillage, uncovered where rain/snow will overflow, temperature extremes, etc.).
- No lubricant/chemical/compound in any form will be located where, if container leakage or overflow occurs, the contents will enter the stormwater or plant treatment systems. Therefore, lubricants or chemicals onsite will be required to be stored properly in solid, well-maintained containments that function properly (e.g., equipment engines, hydraulic systems, fuel systems, oil/lube containers, chemical containers/equipment).
- If large storage quantities of any lubricant/chemical/compound are required for contractor's operation, Simplot maintains containment areas that may be used by contractors (with permission).
- If a spill or leak occurs, the contractor shall immediately contact the Simplot plant shift supervisor (when on the plant site) or contract coordinator (when off the plant site), or Simplot Security.

7.2.10 Water Quality

Construction activities shall be performed by methods that prevent entrance or accidental spillage of solid matter, contaminant debris, and other objectionable pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. Such pollutants and wastes include, but are not restricted to, refuse, garbage, cement, concrete, sanitary waste, industrial waste, radioactive substances, oil and other petroleum products, aggregate processing tailings, mineral salts, and thermal pollution.

Borrow pits shall be so excavated that water will not collect and stand therein. Before being abandoned, the sides of borrow pits shall be brought to stable slopes, with slope intersections shaped to carry the natural contour of adjacent, undisturbed terrain into the pit or borrow area, giving a natural appearance. Waste piles shall be shaped to provide a natural appearance.

Dewatering work for structure foundations or earthwork operations adjacent to, or encroaching on, streams or watercourses shall not be performed without prior approval by the applicable land managing agency or landowner.

Excavated material or other construction materials shall not be stockpiled or deposited near or on stream banks, lake shorelines, or other watercourse perimeters where they can be washed away by high water or storm runoff, or can encroach, in any way, upon the actual water source itself.

Wastewaters from construction operations shall not enter streams, watercourses, or other surface waters without the use of such turbidity control methods as settling ponds, gravel filter entrapment dikes, approved flocculating processes that are not harmful to fish, recirculation systems for washing of aggregates, or other approved methods. Any such wastewaters discharged into surface waters shall be essentially free of settleable material. Settleable material is defined as that material that will settle from the water by gravity during a 1-hour quiescent period.

7.2.11 Paleontological Resources

To reduce the potential for adverse impacts and to foster beneficial impacts from the discovery of fossil resources, the following mitigation measures will be implemented. A qualified paleontologist will be notified if fossils of potential significance are uncovered during ground disturbance. Activities

that might adversely affect such fossils will cease within 100 feet of the discovery or, if possible, the fossils will be set safely aside until their scientific significance can be determined.

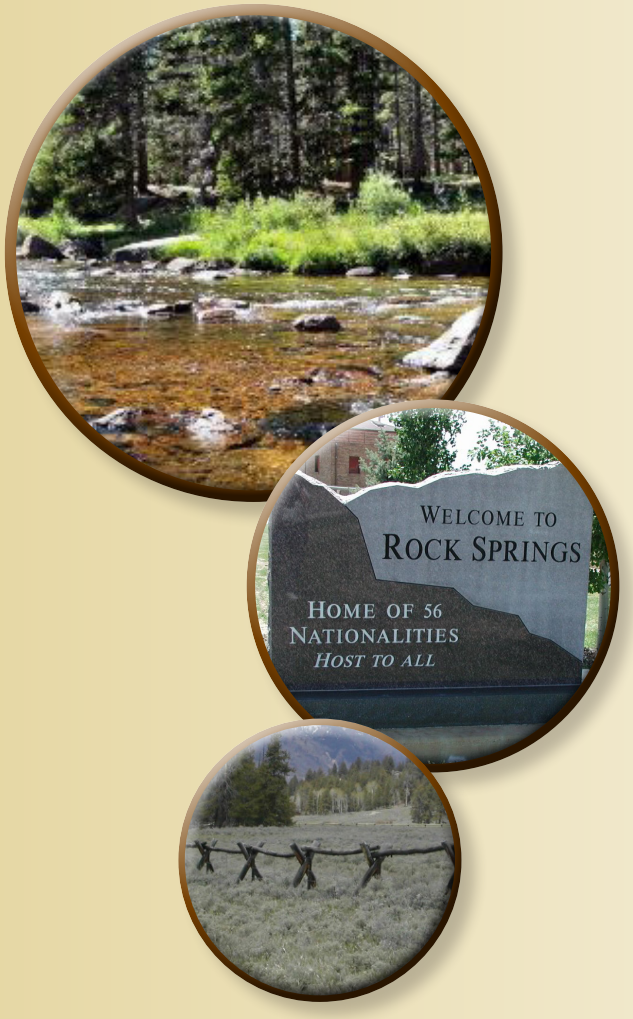
7.3 Monitoring Programs

7.3.1 Air Quality

The facility will comply with all permit conditions stipulated in the PSD construction permits to be issued by WDEQ. The facility will also prepare amendments to the current Title V operating permit, as required.

7.3.2 Wildlife

There are no impacts expected to wildlife, however, the facility will comply with all rules and other requirements that have been stipulated to by the parties or which may be legally imposed by the WGFD, the Land Quality Division, the U.S. Fish and Wildlife Service (USFWS), and the BLM. Simplot will continue to monitor for the presence of wildlife in the facility area and record and report any impacts to wildlife. Impacts to wildlife will be reported to the respective agencies as required.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Welcome to
Rock Springs
Home of 56
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Appendix A-1
Project Site Location

FIGURE A-1
Simplot Phosphates Ammonia Plant Project
Sweetwater County, Wyoming

CH2MHILL

DEN \\MNUSTRICTGFS01\PROJECTS\GIS\DEN\SIMPLOT_ISA\GIS\MAPFILES\SIMPLOT_FIG1_PUBLIC_NOTICE_8X11.MXD SCCUTLER 1/16/2014 4:05:50 PM

Appendix A-2
Ammonia Plant Location

Highlighted Area Shows Proposed Location of Rock Springs Ammonia Plant

Appendix A-3
Ammonia Plant Site Plan

appr. 380m / 1246'

OSBL
ISBL

appr.175m / 574'

appr.112m / 367'

appr. 100m /328'

appr. 210m / 688'

appr. 213m / 698'

appr. 35m / 115'

appr. 167m / 548'

PRELIMINARY RESERVED FOR TRUCK LOADING AREA AND BULLET AREA BY OTHERS

BL-2
TRUCK LOADING CONN. TO FLARE
TRUCK LOADING CONN. TO N2 LINE
R-GRADE AMMONIA EXPORT

BL-3
NATURAL GAS IN
CO2 OUT

BL-4
34,5KV POWER

BL-1
TO RAILWAY LOADING

PROPOSED TIE-IN POINT (RACK BY OTHERS)

BL-1
CHLORINATED POTABLE WATER
MUNICIPAL WATER
STEAM CONDENSATE
LP-STEAM IMPORT/EXPORT
FIRE WATER MAKEUP (TAILINGS WATER)
NH3 PRODUCT (VAPOR)
NH3 PRODUCT (LIQUID)
HP-STEAM IMPORT/EXPORT
SANITARY SEWER
PROCESS WASTE WATER
SURFACE RUNOFF WATER (POT.CONT.)
ENRICHED O2
AMMONIA FLARE EXPORT
ODORIZED NATURAL GAS *BR*
NITROGEN EXPORT
PHONE/COMMUNICATIONS
INTERFACE SIGNALS
EMERGENCY POWER
(REMOVED) OILY WATER
(REMOVED) STORM WATER

PREVAILING WIND
TRUE NORTH
PLANT NORTH

AMMONIA STORAGE UNIT
5804012
AMMONIA TANK

DAM ON HOLD

DEMIN WATER TANK
DEMIN WATER UNIT
ENVI MODULE III
ENVI MODULE II
ENVI MODULE I

PSA PACKAGE UNIT
H2 Compression
H2 FLARE SYSTEM
STEAM REFORMER UNIT
BOIL OFF UNIT
NH3 FLARE SYSTEM
AIR SEPARATION UNIT
INSTRUMENTATION AND ELECTRICAL AND ANALYSER CONTAINER
COOLING WATER UNIT
SYNGAS COMPRESSOR
CONDENSER STEAM TURBINE SYNGAS COMPRESSOR
LAY-DOWN AREA
OIL UNIT
DUCT
PARKING
BUILDING CHEMICAL STORAGE
SPARE PARTS WAREHOUSE
BUILDING ADMIN
ROOM CONTROL CENTRAL
REFRIGERATION UNIT
AMMONIA SYNTHESIS UNIT

0 5 10 20 30 40 50 60 70 80 90 100 METER

0 5 10 20 30 40 50 60 70 80 90 100 150 200 FEET (1 foot=0,3048m)

DATE	DRAWN	CHECKED	CHECKED ENPC1	APPROVED ENPP1	DESCRIPTION	STATUS	ISSUE
24.05.13	DIS	BRANDT	R.Lu	BRANDT	REVISION FOR COST ESTIMATE	A	09A
30.04.13	DIS	BRANDT	R.Lu	BRANDT	REVISION FOR COST ESTIMATE	A	08A
11.04.13	DIS	BRANDT	R.Lu	BRANDT	REVISION	A	07A
14.02.13	ENPP1	BRANDT	R.Lu	BRANDT	REVISION	A	06A
01.02.13	ENPP1	BRANDT	R.Lu	BRANDT	REVISION	A	05
19.12.12	DIS	BRANDT	R.Lu+M.Re.	BRANDT	FOR COST ESTIMATE	A	04
14.12.12	DIS	BRANDT		BRANDT	PRELIMINARY ISSUE	A	03
12.12.12	DIS	BRANDT		BRANDT	PRELIMINARY ISSUE	A	02
11.12.12	DIS	BRANDT		BRANDT	PRELIMINARY ISSUE	A	01

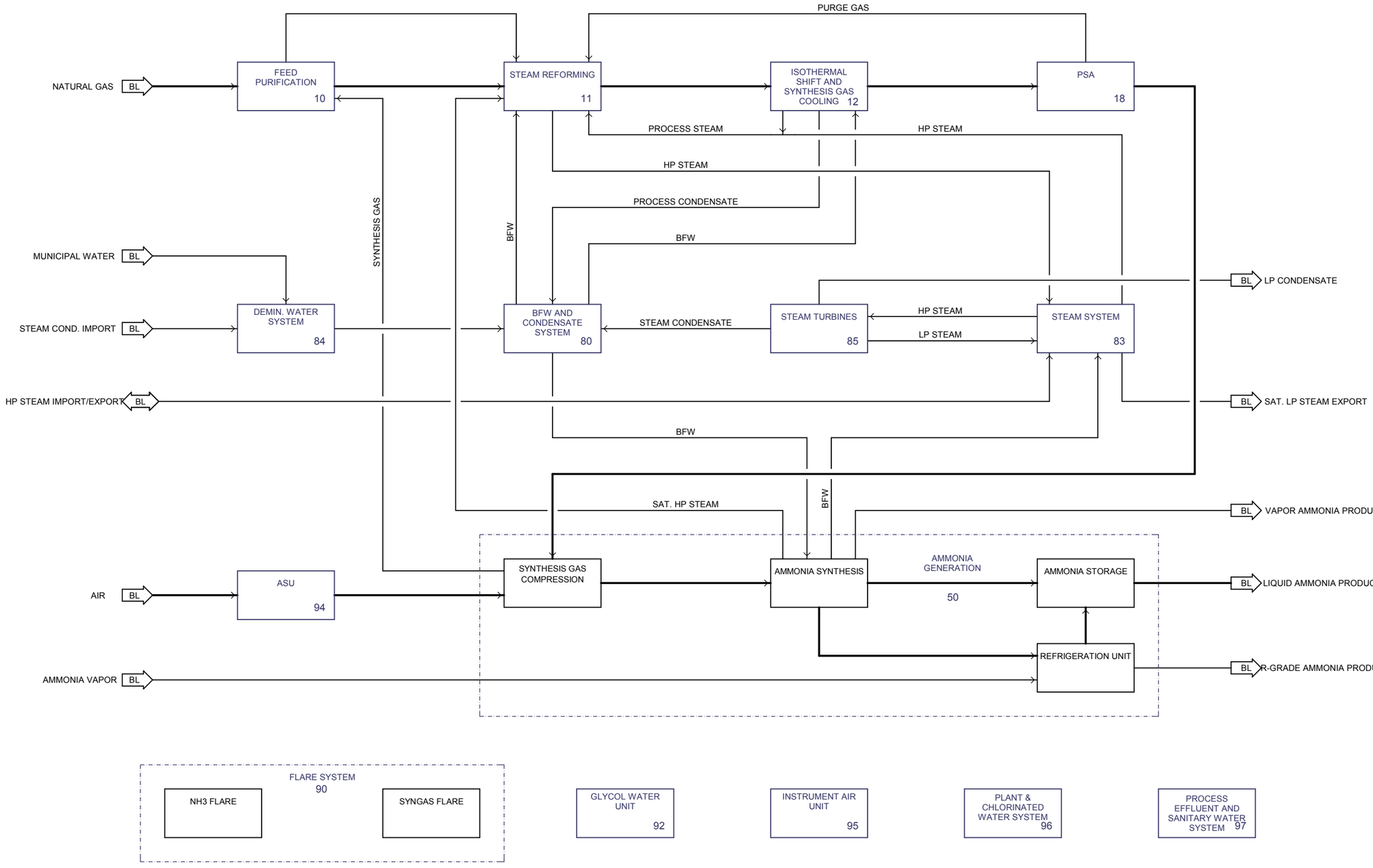
SCALE

Figure A-3
Plot Plan
Ammonia Plant
Optimized Variante A

LINDE AG - GAS AND ENGINEERING
LINDE ENGINEERING DIVISION

JOB.NO. P2612024
CODE ROCK SPRINGS
& AA L-ZP 1010
SHEET 01 OF 01

Appendix A-4
Ammonia Plant Process Diagram



Status	Issue	Date	Prepared	Checked	Approved	Remarks
X	02	19.12.13	Galle / HSDS	Reinke / HSDP	Jarosch / HSDS	FOR P&ID REVIEW MEETING
X	01	31.10.13	Kaspar / HSDS	Reinke / HSDP	Rieth / HSDS	FIRST ISSUE

LINDE AG - Linde Engineering Division 82049 Pullach

Figure A-4
Process Flow Diagram
Ammonia Plant LAC - 600 STPD
BLOCK DIAGRAM

Proj. No. 2610A2R4
Job Code Rock Springs
Doc. No. **&AA-P-FD 01 (EN)**

Simplot
SIMPLOT PHOSPHATES LLC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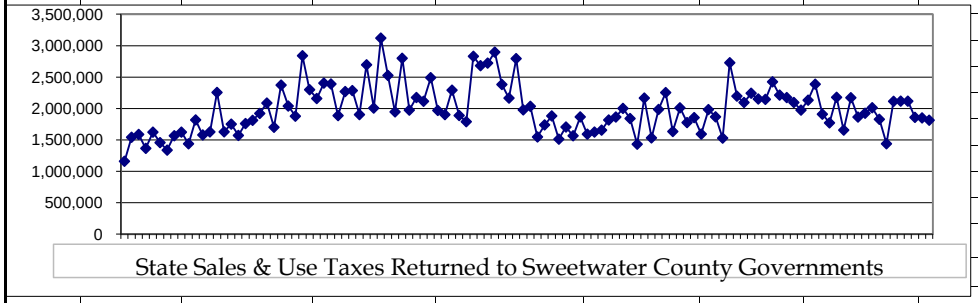
Appendix B-1
Impact Assistance Calculation

History of State Sales and Use Tax Given to Sweetwater County Governments												
		State Share Given			State Share Given to Muni's			Total				
Serial	Month	Sales	Use	Total	Sales	Use	Total					
1	July 04	21,059	1,569	22,628	973,378	163,063	1,136,441	1,159,069				
2	Aug 04	29,591	2,775	32,366	1,242,399	266,454	1,508,853	1,541,219				
3	Sep 04	29,939	2,204	32,143	1,333,278	220,950	1,554,228	1,586,371				
4	Oct O4	29,537	2,363	31,900	1,159,822	172,942	1,332,764	1,364,664				
5	Nov 04	29,986	2,693	32,679	1,336,445	253,737	1,590,182	1,622,861				
6	Dec 04	26,967	2,646	29,613	1,193,723	232,654	1,426,377	1,455,990				
7	Jan 05	24,778	2,010	26,788	1,136,994	172,615	1,309,609	1,336,397				
8	Feb 05	26,639	1,867	28,506	1,380,795	156,430	1,537,225	1,565,731				
9	Mar 05	29,513	2,454	31,967	1,399,176	191,850	1,591,026	1,622,993				
10	Apr 05	22,995	2,392	25,387	1,220,081	191,831	1,411,912	1,437,299				
11	May 05	26,693	3,843	30,536	1,499,967	286,907	1,786,874	1,817,410				
12	Jun 05	27,820	3,324	31,144	1,272,341	274,929	1,547,270	1,578,414				
13	Jul 05	26,793	3,081	29,874	1,277,537	318,883	1,596,420	1,626,294				
14	Aug 05	43,046	3,600	46,646	1,894,993	313,405	2,208,398	2,255,044				
15	Sep 05	31,328	3,152	34,480	1,313,282	279,917	1,593,199	1,627,679				
16	Oct 05	35,716	3,276	38,992	1,381,046	330,372	1,711,418	1,750,410				
17	Nov 05	31,542	3,117	34,659	1,211,707	324,069	1,535,776	1,570,435				
18	Dec 05	29,940	3,242	33,182	1,465,389	261,140	1,726,529	1,759,711				
19	Jan 06	30,891	2,462	33,353	1,537,065	240,695	1,777,760	1,811,113				
20	Feb 06	33,317	3,260	36,577	1,648,912	235,227	1,884,139	1,920,716				
21	Mar 06	37,264	2,794	40,058	1,834,743	211,215	2,045,958	2,086,016				
22	Apr 06	24,044	2,707	26,751	1,437,698	236,050	1,673,748	1,700,499				
23	May 06	36,597	5,708	42,305	1,947,953	381,804	2,329,757	2,372,062				
24	Jun 06	35,290	4,828	40,118	1,718,325	280,203	1,998,528	2,038,646				
25	Jul 06	32,204	3,637	35,841	1,551,406	289,528	1,840,934	1,876,775				
26	Aug 06	47,294	5,788	53,082	2,280,682	505,944	2,786,626	2,839,708				
27	Sep 06	36,883	4,546	41,429	2,034,206	223,035	2,257,241	2,298,670				
28	Oct 06	36,682	5,400	42,082	1,671,987	444,159	2,116,146	2,158,228				
29	Nov 06	43,894	6,509	50,403	1,982,944	370,348	2,353,292	2,403,695				
30	Dec 06	33,188	5,146	38,334	1,842,155	509,146	2,351,301	2,389,635				
31	Jan 07	37,723	4,404	42,127	1,816,218	27,972	1,844,190	1,886,317				
32	Feb 07	35,343	5,035	40,378	1,847,869	381,227	2,229,096	2,269,474				
33	Mar 07	33,061	4,061	37,122	1,842,961	404,711	2,247,672	2,284,794				
34	Apr 07	30,495	3,481	33,976	1,658,865	209,293	1,868,158	1,902,134				
35	May 07	37,735	5,201	42,936	2,282,429	369,540	2,651,969	2,694,905				
36	June 07	30,899	4,116	35,015	1,625,030	345,958	1,970,988	2,006,003				
37	July 07	38,102	6,304	44,406	1,991,634	1,084,337	3,075,971	3,120,377				
38	Aug 07	44,726	6,763	51,489	1,869,079	604,755	2,473,834	2,525,323				
39	Sep 07	39,880	2,638	42,518	1,753,370	149,756	1,903,126	1,945,644				
40	Oct 07	43,701	10,705	54,406	1,979,494	765,106	2,744,600	2,799,006				
41	Nov 07	40,695	4,078	44,773	1,589,988	338,622	1,928,610	1,973,383				
42	Dec 07	35,077	5,290	40,367	1,770,662	363,285	2,133,947	2,174,314				
43	Jan 08	37,749	4,611	42,360	1,796,514	275,161	2,071,675	2,114,035				

44	Feb 08	39,508	6,298	45,806	2,045,031	399,370	2,444,401	2,490,207				
45	Mar 08	34,546	4,636	39,182	1,606,739	322,565	1,929,304	1,968,486				
46	Arp 08	34,093	3,396	37,489	1,521,645	342,783	1,864,428	1,901,917				
47	May 08	38,257	5,519	43,776	1,853,518	394,207	2,247,725	2,291,501				
48	Jun 08	36,646	4,370	41,016	1,567,195	279,494	1,846,689	1,887,705				
49	Jul 08	35,926	3,773	39,699	1,506,413	243,166	1,749,579	1,789,278				
50	Aug 08	51,500	6,242	57,742	2,304,519	468,245	2,772,764	2,830,506				
51	Sep 08	49,413	5,344	54,757	2,070,202	556,169	2,626,371	2,681,128				
52	Oct 08	49,112	5,201	54,313	2,273,152	394,426	2,667,578	2,721,891				
53	Nov 08	41,678	5,389	47,067	2,423,010	426,805	2,849,815	2,896,882				
54	Dec 08	39,746	5,143	44,889	1,797,666	538,948	2,336,614	2,381,503				
55	Jan 09	37,307	4,560	41,867	1,833,551	289,619	2,123,170	2,165,037				
56	Feb 09	46,148	5,517	51,665	2,383,859	358,200	2,742,059	2,793,724				
57	Mar 09	34,909	6,797	41,706	1,684,547	251,373	1,935,920	1,977,626				
58	Apr 09	33,889	5,943	39,832	1,755,016	239,264	1,994,280	2,034,112				
59	May 09	26,999	3,994	30,993	1,242,277	273,321	1,515,598	1,546,591				
60	Jun 09	30,208	3,480	33,688	1,432,817	271,543	1,704,360	1,738,048				
61	Jul 09	33,794	6,022	39,816	1,504,783	336,399	1,841,182	1,880,998				
62	Aug 09	34,291	3,308	37,599	1,343,298	130,282	1,473,580	1,511,179				
63	Sep 09	32,994	4,477	37,471	1,406,188	260,904	1,667,092	1,704,563				
64	Oct 09	31,151	3,847	34,998	1,260,486	269,629	1,530,115	1,565,113				
65	Nov 09	35,726	3,548	39,274	1,583,030	243,140	1,826,170	1,865,444				
66	Dec 09	32,735	3,267	36,002	1,338,304	216,394	1,554,698	1,590,700				
67	Jan 10	26,247	3,784	30,031	1,313,571	280,858	1,594,429	1,624,460				
68	Feb 10	30,969	**861**	31,830	1,381,654	241,359	1,623,013	1,654,843				
69	Mar 10	30,394	3,085	33,479	1,456,602	326,506	1,783,108	1,816,587				
70	Apr 10	27,940	3,397	31,337	1,527,233	305,078	1,832,311	1,863,648				
71	May 10	29,111	3,865	32,976	1,440,463	527,430	1,967,893	2,000,869				
72	Jun 10	32,692	4,266	36,958	1,404,861	397,861	1,802,722	1,839,680				
73	Jul 10	29,563	5,504	35,067	1,176,598	219,313	1,395,911	1,430,978				
74	Aug 10	41,059	4,388	45,447	1,783,679	336,454	2,120,133	2,165,580				
75	Sep 10	32,801	4,041	36,842	1,288,856	205,598	1,494,454	1,531,296				
76	Oct 10	39,501	7,478	46,979	1,573,522	363,522	1,937,044	1,984,023				
77	Nov 10	40,103	4,817	44,920	1,900,959	307,087	2,208,046	2,252,966				
78	Dec 10	30,491	3,203	33,694	1,347,773	251,754	1,599,527	1,633,221				
79	Jan 11	38,411	5,324	43,735	1,625,695	340,597	1,966,292	2,010,027				
80	Feb 11	32,382	4,154	36,536	1,420,699	318,085	1,738,784	1,775,320				
81	Mar 11	33,347	3,902	37,249	1,400,755	416,483	1,817,238	1,854,487				
82	Apr 11	28,207	3,548	31,755	1,310,959	249,636	1,560,595	1,592,350				
83	May 11	35,262	4,836	40,098	1,589,529	352,365	1,941,894	1,981,992				
84	Jun 11	36,429	4,540	40,969	1,498,056	327,602	1,825,658	1,866,627				
85	Jul 11	29,344	4,509	33,853	1,226,457	267,508	1,493,965	1,527,818				
86	Aug 11	49,600	5,555	55,155	2,285,514	387,208	2,672,722	2,727,877				
87	Sept 11	43,559	5,064	48,623	1,535,142	**612,641**	2,147,783	2,196,406				
88	Oct 11	40,906	4,963	45,869	1,713,028	336,291	2,049,319	2,095,188				
89	Nov 11	45,225	6,040	51,265	1,889,400	301,919	2,191,319	2,242,584				
90	Dec 11	35,887	4,641	40,528	1,780,696	329,648	2,110,344	2,150,872				

91	Jan 12	42,647	4,366	47,013	1,753,845	343,848	2,097,693	2,144,706				
92	Feb 12	43,870	4,515	48,385	2,145,056	230,656	2,375,712	2,424,097				
93	Mar 12	33,556	4,373	37,929	1,706,297	468,295	2,174,592	2,212,521				
94	Apr 12	37,799	4,473	42,272	1,771,822	359,357	2,131,179	2,173,451				
95	May 12	37,489	5,515	43,004	1,812,499	239,460	2,051,959	2,094,963				
96	Jun 12	33,444	5,091	38,535	1,597,065	338,208	1,935,273	1,973,808				
97	July 12	37,617	4,512	42,129	1,751,130	338,569	2,089,699	2,131,828				
98	Aug 12	47,798	6,560	54,358	1,974,686	357,036	2,331,722	2,386,080				
99	Sep 12	38,521	4,119	42,640	1,569,316	296,615	1,865,931	1,908,571				
100	Oct 12	41,094	4,646	45,740	1,483,558	241,235	1,724,793	1,770,533				
101	Nov 12	43,535	4,852	48,387	1,794,754	334,285	2,129,039	2,177,426				
102	Dec 12	33,451	5,289	38,740	1,184,176	432,312	1,616,488	1,655,228				
103	Jan 13	40,013	4,311	44,324	**1,735,946**	390,664	2,126,610	2,170,934				
104	Feb 13	34,412	4,020	38,432	1,543,885	280,915	1,824,800	1,863,232				
105	Mar 13	32,200	3,171	35,371	1,627,668	260,840	1,888,508	1,923,879				
106	Apr 13	36,403	4,188	40,591	1,614,112	357,039	1,971,151	2,011,742				
107	May 13	34,703	4,415	39,118	1,465,832	322,328	1,788,160	1,827,278				
108	Jun 13	32,846	5,190	38,036	600,329	799,489	1,399,818	1,437,854				
109	July 13	43,629	5,563	49,192	1,561,580	502,643	2,064,223	2,113,415				
110	Aug 13	38,429	7,745	46,174	536,473	1,533,906	2,070,379	2,116,553				
111	Sep 13	44,415	5,438	49,853	1,682,225	384,024	2,066,249	2,116,102				
112	Oct 13	47,690	5,082	52,772	1,418,900	386,629	1,805,529	1,858,301				
113	Nov 13	35,740	5,222	40,962	1,380,988	427,491	1,808,479	1,849,441				
114	Dec 13	37,103	5,188	42,291	1,455,077	315,396	1,770,473	1,812,764				
						Base Period Amount =		1,904,363				



Forecast of Impact Assistance Payments

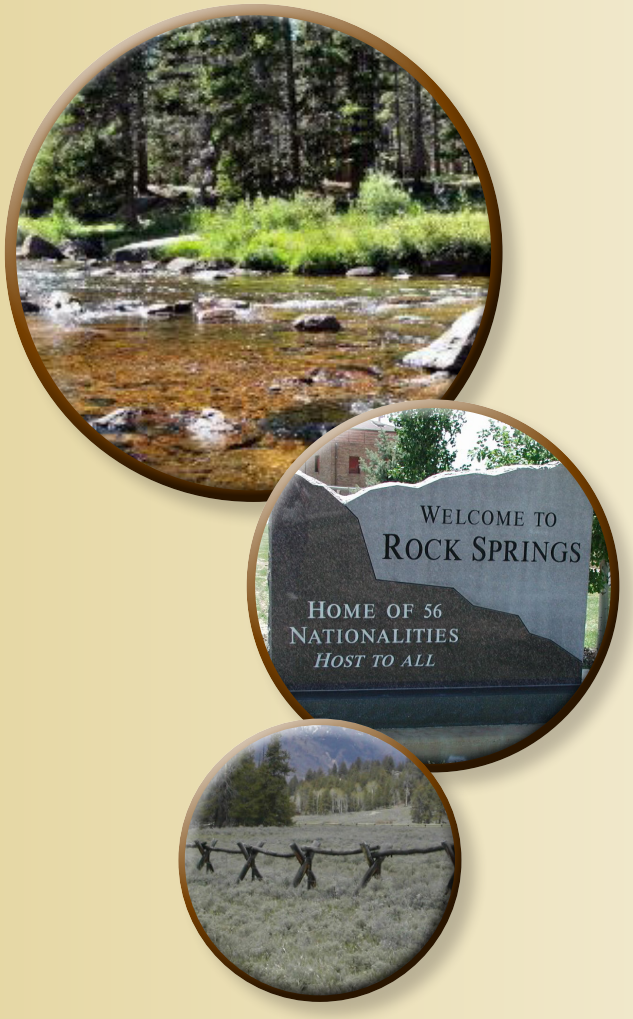
Serial	Month	*SLR*	BasePeriod	**Impact Assistance**
115	Jan 2014	*1,919,381*	1,904,363	***15,018***
116	Feb 2014	*1,921,526*	1,904,363	***17,163***

117	Mar 2014	*1,923,672*	1,904,363	***19,308***								
118	Apr 2014	*1,925,817*	1,904,363	***21,454***								
119	May 2014	*1,927,962*	1,904,363	***23,599***								
120	June 2014	*1,930,108*	1,904,363	***25,744***								
121	Jul 2014	*1,932,253*	1,904,363	***27,890***								
122	Aug 2014	*1,934,398*	1,904,363	***30,035***								
123	Sep 2014	*1,936,544*	1,904,363	***32,180***								
124	Oct 2014	*1,938,689*	1,904,363	***34,326***								
125	Nov 2014	*1,940,834*	1,904,363	***36,471***								
126	Dec 2014	*1,942,980*	1,904,363	***38,616***								
				26,817	Forecast average monthly impact assistance							
				321,804	Forecast yearly impact assistance							
				1.012	Forecast growth rate in sales & use tax							

**** ABOVE FROM WYDEQ-ISD -- DO NOT MODIFY ABOVE THIS ROW****

Serial	Month	*SLR*	BasePeriod	**Assistance**	Project Taxes	SLR + Project Taxes	IAF with Project	Monthly Avg Base SLR	Monthly Avg Project Taxes	Project Taxes + Baseline	Base Period	Monthly Avg IAF
127	Jan 2014	*1,945,125*	1,904,363	***40,762***	330,644	2,275,769	371,406					
128	Feb 2014	*1,947,270*	1,904,363	***42,907***	330,644	2,277,914	373,551					
129	Mar 2014	*1,949,416*	1,904,363	***45,053***	330,644	2,280,060	375,697					
130	Apr 2014	*1,951,561*	1,904,363	***47,198***	330,644	2,282,205	377,842					
131	May 14	*1,953,707*	1,904,363	***49,343***	330,644	2,284,351	379,987					
132	Jun 14	*1,955,852*	1,904,363	***51,489***	330,644	2,286,496	382,133					
133	Jul 14	*1,957,997*	1,904,363	***53,634***	330,644	2,288,641	384,278					
134	Aug 14	*1,960,143*	1,904,363	***55,779***	330,644	2,290,787	386,423					
135	Sep 14	*1,962,288*	1,904,363	***57,925***	330,644	2,292,932	388,569					
136	Oct 14	*1,964,433*	1,904,363	***60,070***	330,644	2,295,077	390,714					
137	Nov 14	*1,966,579*	1,904,363	***62,215***	330,644	2,297,223	392,859					
138	Dec 14	*1,968,724*	1,904,363	***64,361***	330,644	2,299,368	395,005	1,956,925	330,644	2,287,569	1,904,363	*383,205*
139	Jan 15	*1,970,869*	1,904,363	***66,506***	462,534	2,433,403	529,040					
140	Feb 15	*1,973,015*	1,904,363	***68,651***	462,534	2,435,549	531,185					
141	Mar 15	*1,975,160*	1,904,363	***70,797***	462,534	2,437,694	533,331					
142	Apr 15	*1,977,305*	1,904,363	***72,942***	462,534	2,439,839	535,476					
143	May 15	*1,979,451*	1,904,363	***75,088***	462,534	2,441,985	537,622					
144	Jun 15	*1,981,596*	1,904,363	***77,233***	462,534	2,444,130	539,767					
145	Jul 15	*1,983,742*	1,904,363	***79,378***	462,534	2,446,276	541,912					
146	Aug 15	*1,985,887*	1,904,363	***81,524***	462,534	2,448,421	544,058					
147	Sep 15	*1,988,032*	1,904,363	***83,669***	462,534	2,450,566	546,203					
148	Oct 15	*1,990,178*	1,904,363	***85,814***	462,534	2,452,712	548,348					

149	Nov 15	*1,992,323*	1,904,363	***87,960***	462,534	2,454,857	550,494					
150	Dec 15	*1,994,468*	1,904,363	***90,105***	462,534	2,457,002	552,639	1,982,669	462,534	2,445,203	1,904,363	*540,840*
151	Jan 16	*1,996,614*	1,904,363	***92,250***	122,413	2,119,027	214,663					
152	Feb 16	*1,998,759*	1,904,363	***94,396***	122,413	2,121,172	216,809					
153	Mar 16	*2,000,904*	1,904,363	***96,541***	122,413	2,123,317	218,954					
154	Apr 16	*2,003,050*	1,904,363	***98,686***	122,413	2,125,463	221,099					
155	Jun 16	*2,005,195*	1,904,363	***100,832***	122,413	2,127,608	223,245					
156	Jun 16	*2,007,340*	1,904,363	***102,977***	122,413	2,129,753	225,390					
157	Jul 16	*2,009,486*	1,904,363	***105,123***	122,413	2,131,899	227,536					
158	Aug 16	*2,011,631*	1,904,363	***107,268***	122,413	2,134,044	229,681					
159	Sep 16	*2,013,777*	1,904,363	***109,413***	122,413	2,136,190	231,826					
160	Oct 16	*2,015,922*	1,904,363	***111,559***	122,413	2,138,335	233,972					
161	Nov 16	*2,018,067*	1,904,363	***113,704***	122,413	2,140,480	236,117					
162	Dec 16	*2,020,213*	1,904,363	***115,849***	122,413	2,142,626	238,262	2,008,413	122,413	2,130,826	1,904,363	*226,463*
163	Jan 17	*2,022,358*	1,904,363	***117,995***	0	2,022,358	117,995					
164	Feb 17	*2,024,503*	1,904,363	***120,140***	0	2,024,503	120,140					
165	Mar 17	*2,026,649*	1,904,363	***122,285***	0	2,026,649	122,285					
166	Apr 17	*2,028,794*	1,904,363	***124,431***	0	2,028,794	124,431					
167	May 17	*2,030,939*	1,904,363	***126,576***	0	2,030,939	126,576					
168	Jun 17	*2,033,085*	1,904,363	***128,721***	0	2,033,085	128,721					
169	Jul 17	*2,035,230*	1,904,363	***130,867***	0	2,035,230	130,867					
170	Aug 17	*2,037,375*	1,904,363	***133,012***	0	2,037,375	133,012					
171	Sep 17	*2,039,521*	1,904,363	***135,158***	0	2,039,521	135,158					
172	Oct 17	*2,041,666*	1,904,363	***137,303***	0	2,041,666	137,303					
173	Nov 17	*2,043,812*	1,904,363	***139,448***	0	2,043,812	139,448					
174	Dec 17	*2,045,957*	1,904,363	***141,594***	0	2,045,957	141,594	2,034,157	0	2,034,157	1,904,363	*129,794*


WELCOME TO
ROCK SPRINGS
HOME OF 56
NATIONALITIES
HOST TO ALL

Appendix C-1
Project Fact Sheet

SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project

Project Description

The JR Simplot Company has approved preliminary engineering and permitting for an anhydrous ammonia production plant and related utilities to be constructed on Simplot property adjacent to the existing Simplot Phosphates Fertilizer Complex located 4.5 miles south of Rock Springs, WY. This new plant would allow Simplot to produce anhydrous ammonia instead of importing this process feed material. The ammonia plant will utilize natural gas as both a feedstock and fuel. A new natural gas pipeline and an upgraded electrical service will be necessary to support the new plant equipment. Existing water supply is adequate.

The facility will have the ability to store 18,000 tons of ammonia. The ammonia storage tank will operate at atmospheric pressure. The ammonia plant will be designed to operate 350 days per year with a minimum on-stream availability factor of 97%. The plant will be capable of operating at a turndown ratio of 50% of the design capacity while still meeting all required product specifications. The plant and associated utilities will be designed for a life cycle of 25 years. A minimum of three years between major planned maintenance shutdowns will be specified. The ammonia plant will provide in excess of 100,000 lb/hr of process steam for use in the existing phosphate complex.

The plant will be designed to meet all of the applicable regulatory requirements of the Wyoming Department of Environmental Quality. The plant will be designed, constructed and operated per OSHA standards.

Schedule

Permitting is currently underway for the project. Preliminary engineering design began in 2013. The submittal of the Industrial Siting Application to Wyoming DEQ is planned for March 2014. Major equipment would be ordered in mid 2014, construction would start in August 2014 and full commercial operation would commence by fourth quarter 2016.

Simplot is working with Questar Pipeline Company and Rocky Mountain Power for ROW permitting with the Bureau of Land Management and private landowners. Plans of development were submitted to BLM in December 2013. This work should be completed by early summer of 2014.

Construction and Operations Workforce

Construction at the site is expected to start in August 2014. The average construction workforce is estimated at 311 for the 25-month construction duration. The peak construction workforce is estimated at 460 on-site workers. The Operations and Maintenance Workforce for the ammonia facility is estimated to be an additional 27 full time permanent positions.

Benefits and Sustainability

Simplot Phosphates, LLC produces high quality phosphate fertilizer, while maintaining its status as a low cost leader in the fertilizer industry. Fertilizer helps replace missing soil nutrients, thereby promoting stronger plants. In turn, organic matter is increased, root systems are strengthened and soil is less susceptible to wind and water erosion. When erosion and agriculture tilling are decreased, the threat of contamination to rivers and streams is reduced. Also, by improving the efficiency of food production, the fertilizers produced at Simplot Phosphates, LLC help to bring those foods to your table affordably.

The new onsite ammonia facility will eliminate the need to transport in the process feed material and will result in increased cost efficiency of the phosphate fertilizer products. The construction and operation of the ammonia facility will provide investment in the local community, employment and expanded tax base with minimal new infrastructure needed. There will be new jobs for both construction and long-term operation. The project will result in additional property, ad valorem, severance and other taxes paid by the project.

Environment

Major environmental permits required for the project include:

- Wyoming Industrial Development Information and Siting Act (ISA) permit
- Prevention of Significant Deterioration (PSD) Air Construction permit
- Bureau of Land Management (BLM) Right of Way (ROW) permitting for electric and gas

Industrial Siting Permit Application - Simplot is required to obtain an ISA permit from the Wyoming Department of Environmental Quality, Industrial Siting Division (ISD) due to the source category and the estimated construction cost of the project is above the current regulatory threshold of $190.8 Million. The application is expected to be filed in March 2014.

Air - The PSD air construction permit application was submitted to the Wyoming Department of Environmental Quality, Air Quality Division in July 2013. The estimated emissions are over the PSD major threshold for greenhouse gases and minor for the other criteria pollutants.

For more information, contact:

Darin L. Howe
EHSS Manager
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, WY 82901
307-382-1519
darin.howe@simplot.com

Appendix C-2
Open House Newspaper Notice

Public Open House

Simplot Phosphates LLC is proposing to construct an ammonia production plant adjacent to its existing fertilizer production operations approximately 5 miles south of Rock Springs. Presently, Simplot ships in ammonia via rail as a raw material for the existing fertilizer plant. The purpose of the project is to produce ammonia locally, removing the need to import it. The public is invited to an Open House meeting to meet project representatives and learn more about the project.

Meeting Time and Location

Sweetwater County Fire District #1
3010 College Drive; Rock Springs
February 6, 2014
4:00PM to 8:00PM

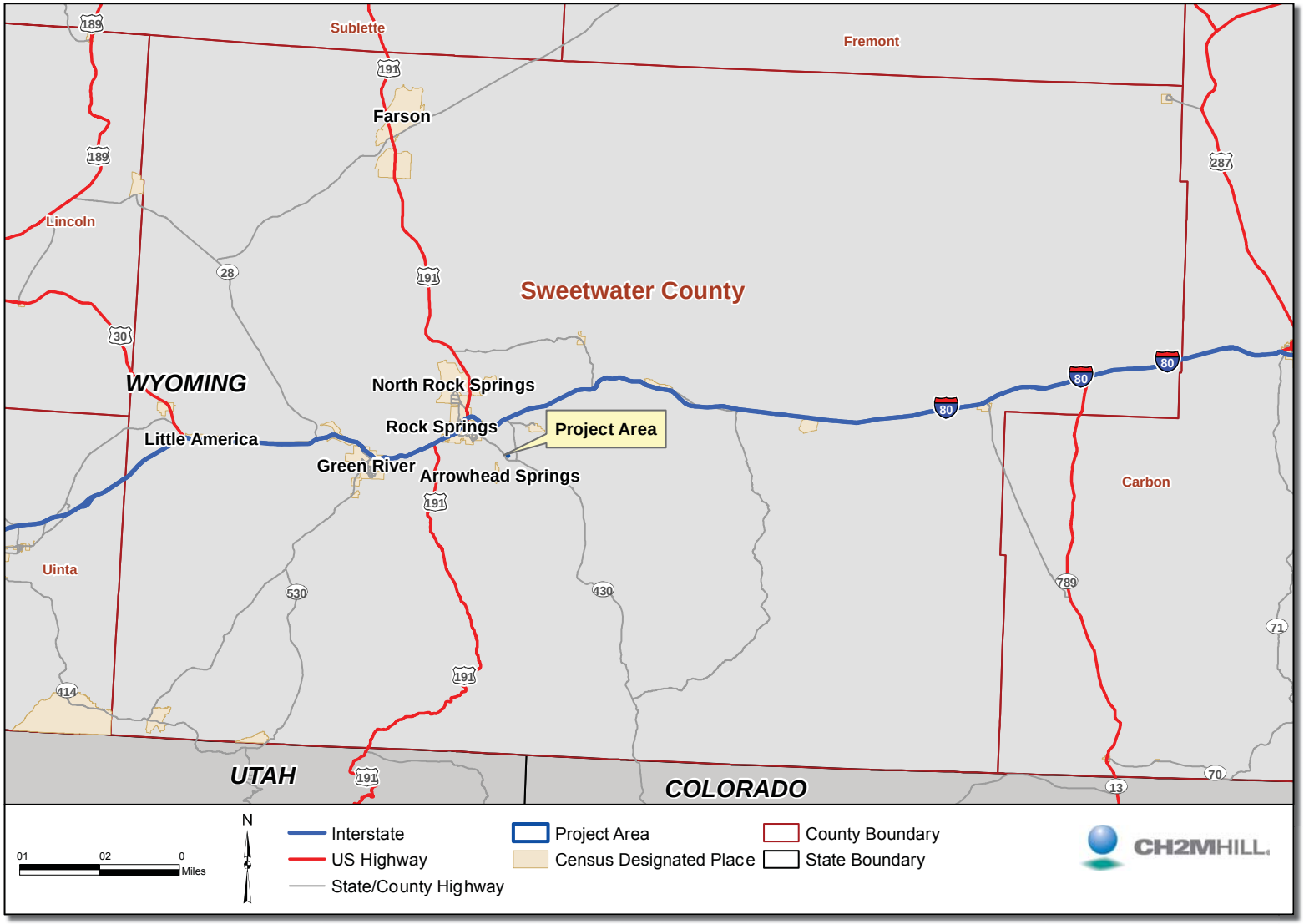
Simplot
SIMPLOT PHOSPHATES LLC

Appendix C-3
Open House Display Posters

Welcome

Simplot Phosphates, LLC
Rock Springs Ammonia Facility Project

Project Area

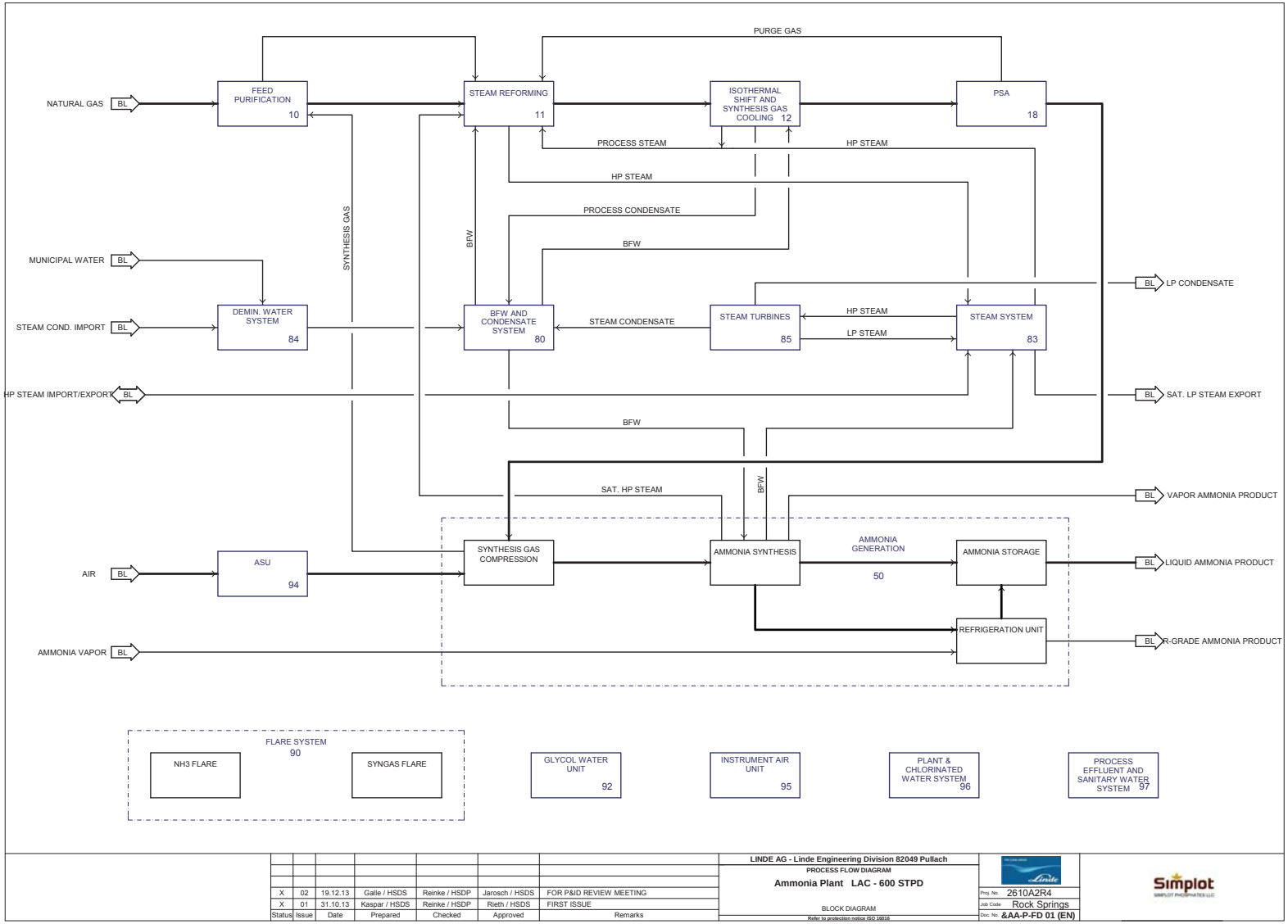


Project Location

Highlighted Area Shows Proposed Location of Rock Springs Ammonia Plant

CH2MHILL.

Ammonia Plant Process Flow Diagram



Project Schedule

Task	Timeline
Received Proposals from Bidders	March 2013
Jurisdictional Meeting with WDEQ-ISD	April 2013
Submitted Air Permit Application to WDEQ-AQD	July 2013
Initiated Preliminary Engineering	September 2013
Submit ISA Permit Application	March 2014
Complete Preliminary Engineering Design	May 2014
Environmental Permits In Place for Construction	June 2014
Commence Site Prep/Earthwork	June 2014
Commence Plant Construction	August 2014
Plant Mechanically Complete	August 2016
Commissioning, Start-Up, Performance Testing Complete	October 2016

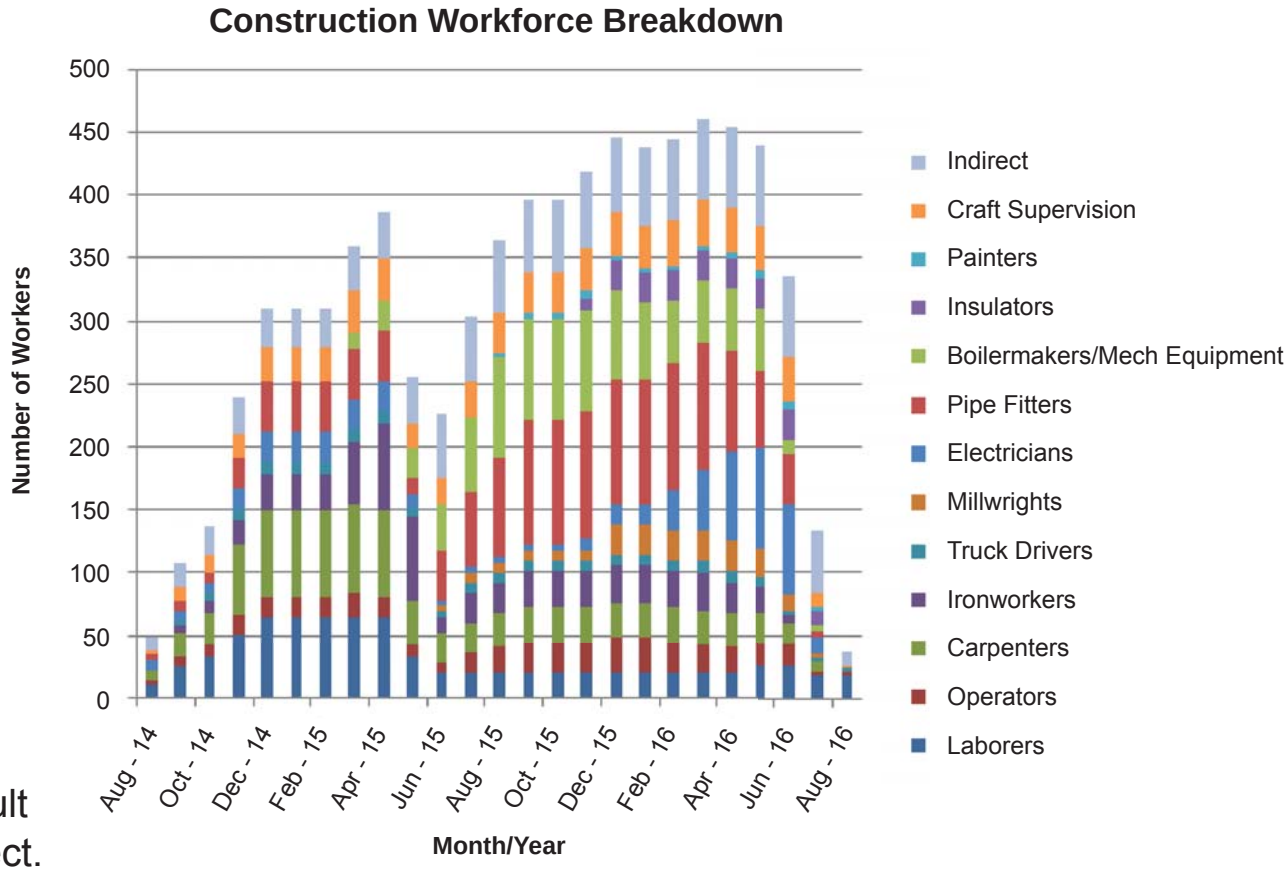
Construction and Operations Workforce

Construction Workforce

Construction at the site is expected to start in August 2014. The average construction workforce is estimated at 311 for the 25-month construction duration. The peak is estimated at 460 on-site workers in the first quarter of 2016.

Construction crafts will include:

- Painters
- Insulators
- Boilermakers
- Pipefitters
- Electricians
- Millwrights
- Truck Drivers
- Ironworkers
- Carpenters
- Equipment Operators
- Laborers
- Construction Management



Operations Workforce

It is estimated that there will be a need for 27 additional permanent positions as a result of the Rock Springs Ammonia Facility Project.

Project Description and Community Benefits

Project Description

The JR Simplot Company has approved preliminary engineering and permitting for an anhydrous ammonia production plant and related utilities to be constructed on Simplot property adjacent to the existing Simplot Phosphates Fertilizer Complex located 4.5 miles south of Rock Springs, WY. This new plant would allow Simplot to produce anhydrous ammonia instead of importing this process feed material. The ammonia plant will utilize natural gas as both a feedstock and fuel. A new natural gas pipeline and an upgraded electrical service will be necessary to support the new plant equipment. Existing water supply is adequate.

Photo of similar Ammonia Production Plant (courtesy of Linde AG)

The facility will have the ability to store 18,000 tons of ammonia. The ammonia storage tank will operate at atmospheric pressure. The ammonia plant will be designed to operate 350 days per year with a minimum on-stream availability factor of 97%. The plant will be capable of operating at a turndown ratio of 50% of the design capacity while still meeting all required product specifications. The plant and associated utilities will be designed for a life cycle of 25 years. A minimum of three years between major planned maintenance shutdowns will be specified. The ammonia plant will provide in excess of 100,000 lb/hr of process steam for use in the existing phosphate complex.

The plant will be designed to meet all of the applicable regulatory requirements of the Wyoming Department of Environmental Quality. The plant will be designed, constructed and operated per OSHA standards.

Community Benefits

New Investment

- project cost in excess of $300 million
- millions of dollars to be spent on local purchases
- local service industry expanded

Employment

- approximately 311 construction jobs (460 peak)
- 27 additional permanent positions

Expanded Tax Base

- additional property, ad valorem, and other taxes paid by project
- additional property taxes paid by new employees moving into area

Environment

Environmental Permits

Major environmental permits required for the project include:

- Wyoming Industrial Development Information and Siting Act (ISA) Permit
- Wyoming Air Construction Permit
- Greenhouse Gas (GHG) Prevention of Significant Deterioration (PSD) Construction Permit
- Amendment to existing Title V Operating Air Permit
- Bureau of Land Management (BLM) Right of Way (ROW) permitting for Electric and Natural Gas

Industrial Siting Permit Application

Simplot Phosphates, LLC is required to obtain an ISA permit from the Wyoming Department of Environmental Quality, Industrial Siting Division (ISD) due to the source category and the estimated construction cost of the project is above the current regulatory threshold of $190.8 million. The application is expected to be filed in March 2014.

The Wyoming ISA permit requirements focus on four main issues:

1. Confirmation from the Wyoming State Engineer's Office (SEO), via a formal opinion letter, that any water consumed by the project would be appropriately used and that such use will not adversely affect other water users in the vicinity.
2. Review of the social and economic impacts of the construction and operation of the project, with identification and mitigation strategies for any predicted impacts.
3. Review of any environmental impacts of the project that are not under the specific jurisdiction of any other state agency.
4. Based on review of the applicant's application and socioeconomic analysis, and input from local agencies, the Industrial Siting Division will make a recommendation to the Industrial Siting Council on the distribution of impact assistance funds.

Current Activities:

- The project team is currently working on the preliminary engineering design.
- The additional water supply needed for the ammonia facility operation will be within the currently permitted level for the Simplot Phosphates plant.
- Work on the socioeconomic analysis and preparation of the Industrial Siting Permit Application is in progress.
- The project team currently has studies underway analyzing the housing needs for both the construction and permanent operations workforce.
- Transportation route and traffic studies are currently underway for both construction/operation personnel and equipment deliveries.
- An air construction permit application and GHG PSD permit application were submitted to WDEQ, Air Quality Division in July 2013.

Appendix C-4
Open House Sign-In Sheet

Simplot
SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project Public Meeting - February 6, 2014 4:00 to 8:00 pm
Sweetwater County Fire District #1
3010 College Drive
Rock Springs, Wyoming
Sign-in Sheet - Please Print Clearly

Name	Representing	Title	Address

Appendix C-5
Open House Comment Form

SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project
Comment Form

If you wish to submit comments for the Simplot Phosphates Rock Springs Ammonia Facility Project, please feel free to use this form or other correspondence and hand it in at a public meeting or mail it to the following address:

Darin L. Howe
EHSS Manager
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, WY 82901
307-382-1519

To submit comments via email: darin.howe@simplot.com

Please Print Clearly

Name: _____ Date: _____

Title: _____Organization that You Represent: _____ Self ☐

Mailing Address: _____ City: _____State: ____Zip: _____

E-mail Address: _____Telephone: _____

Comments: *(Please use back if additional space is needed)*

Appendix C-6
Open House Attendees

Simplot
SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project Public Meeting - February 6, 2014 4:00 to 8:00 pm
Sweetwater County Fire District #1
3010 College Drive
Rock Springs, Wyoming
Sign-in Sheet - Please Print Clearly

Name	Representing	Title	Address
DAVE DAVIS	SWC Assessors	Chief Deputy	GR Courthouse
ANDRE RITTER	LINDE	LEAD ENGINEER PES	Munich, Germany Taschenweg 6
PETE BRADEL	LINDE	CONSTRUCTION MANAGER	BLUE BELL, PA USA
JIM ZIMMERMAN	SWC	CODE ENF	GREEN RIVER
Dallas S. Valder	Cottonwood Creek	Owner	Rock Springs
Tricia Green	Quality Inn/Holiday	manager Inn Express	Rock Springs
Bruce Casper	Fire District #1	Lieutenant Fire Fighter	Rock Springs
Steven Rech	Fire District #1	Lieutenant Fire Fighter	Rock Springs
Keith Heikes	Fire Dist #1	Captain	Rock Springs
Scott Kitchner	Fire District #1	Asst. Fire chief	3010 college Dr. Rock Springs, Wy 82901
Don Nantkes	Emergency Committee	chair	2300 New Hampshire #23 R.S. Wyo. 82901
Mike Catanzaro	Simplot	Project Engineer	Rock Springs
SID GRESSETTE	SIMPLOT	PROJECT ENGINEER	ROCK SPRINGS, WY

Simplot
SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project Public Meeting - February 6, 2014 4:00 to 8:00 pm
Sweetwater County Fire District #1
3010 College Drive
Rock Springs, Wyoming
Sign-in Sheet - Please Print Clearly

Name	Representing	Title	Address
Darin Howe	Simplot Phosphates	EHSS Manager	515 South Highway 430 Rock Springs, WY 82901
Jim Samuelson	J.R. Simplot Co.	Director of Eng	999 Main ST BOISE, ID 83702
Burl Ackerman	J.R. Simplot Co	Director of Eng	999 Main St Boise, ID 83702
JOE HAMMOND	CH2M HILL	PROJ MANAGER	DENVER, CO
BILL LEW	SIMPLOT PHOSPHATES	ENG. MGR	515 SOUTH HWY 430 ROCK SPRINGS, WY 82901
GARY BAILIFF	SW.CO. BOCC	Commissioner	720 YATES GREEN RIVER
Brian Andrews	FD#1	F.F.	Fire District #1
Mike Prevedel	Simplot	Project Mgr.	515 S. Highway 430 Rock Springs, WY 82901
JIM STEVENS	DFPES	FIRE	140 COMMERCE DR GREEN RIVER, WY 82935
JON VOSTERS	STATE OF WYOMING (ELECTRICAL)	INSPECTOR	140 COMMERCE DR. SUITE C, GREEN RIVER 82935
Shaun Uriarte	FD#1	F.F	Fire District #1
Shad Cooper	FD#1	Captain	Fire District #1 - RS
Pat Drinkle	SWCO Assessor	Assessor	80 W Flaming Gorge Way Ste 127 GK

Simplot
SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project Public Meeting - February 6, 2014 4:00 to 8:00 pm
Sweetwater County Fire District #1
3010 College Drive
Rock Springs, Wyoming
Sign-in Sheet - Please Print Clearly

Name	Representing	Title	Address
Tammy Valder	Cottonwood Creek	Manager	415 N. Center St. Ste 102 Rock Springs, WY 82901
James Messer	JM Electrical Services	Owner	50 Reliance Rock Springs WY 82901
JAKE RIBORDY	SWEETWATER COUNTY FIRE DISTRICT #1	BATT. CHIEF	3010 COLLEGE DR. ROCK SPRINGS, WY 82901
Dallas Duller	Sweetwater County Fire District #1	BATT Chief	3010 College Dr. Rock Springs, WY, 82901
Kyle Bertagnolli	" "	Firefighter	" "
Jim Walmsley	Sweetwater County Fire Dist #1	Fire Chief	" "
Jim Sedey	PACIFICORP JIM BRIDGER PLANT	ENG+ENV MGR	P.O. BOX 158 POINT OF ROCKS, WY 82901
Michael Moresh	Rocket Miner	Reporter	3 1/4 D St. Rock Springs, WYO. 82901
MARK KOT	SWCO	PLANNER	KOTM@sweetwy.us
Lissa Anselmi	Holiday Inn	Owner	1675 Sunset Dr. RS WY 82901
Clark Allred	Sweetwater Co Fire Dist #1	Fire Fighter	3010 College Dr. Rock Springs, WY 82901
Bill Stull	Self	RN	1122 Converse CT. RS, WY 82901
Becky Gresette	Self	Marketing	1108 Windriver Dr RS, WY 82901

Simplot
SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project Public Meeting - February 6, 2014 4:00 to 8:00 pm
Sweetwater County Fire District #1
3010 College Drive
Rock Springs, Wyoming
Sign-in Sheet - Please Print Clearly

Name	Representing	Title	Address
Albert Bertagnolli			15 Warbonnet Rock Springs Wyo
Brian Rummel	Simplot		
Sandy DaRif	Senator Barrasso	Field Rep	1575 Dewar Drive Suite 218 RS 82901 Sandy_darife barrasso.senate.gov
Gretchen Borders			27 Warbonnet Rd RS WY 82901
Mark Borders			27 Warbonnet Rd RS WY 82901
Bill Kuppe	Pacificorp		
John Hay	RSGA		Box 247 R.S. 82902
ReneeMcDonough	QED	Branch Mgr.	1724 Decora Dr RS.
~~Jeff Petersen~~	QED	Outside Sales	"
Derek Dubisky	John Bunn Trailer	Representative	P.O. Box 28 Rock Spring 82902
Michelle Prevedel			8 Wardell Ct. RS.
John Prevedel			8 Wardell Ct. Rock Springs 82901
ERIC SCHILLIG	SIMPLOT		

Appendix C-7
Rocket Miner Newspaper Article 01-07-14

Simplot outlines possible expansion

PAUL MURRAY
Rocket-Miner Staff Reporter

ROCK SPRINGS — Two Simplot executives attended the Rock Springs City Council meeting on Tuesday and outlined the proposed expansion of the ammonia operations at the Simplot plant.

The plant is located at 515 S. Highway 430, Rock Springs.

Simplot Environmental, Health and Security manager Darin Howe said the completed project would not expand the plant's current capacity for fertilizer production but would allow for production of ammonia, which presently must be brought in by rail car.

Simplot is seeking the necessary preliminary permits, Howe said.

"We submitted the air quality permit in July, and we hope to be done with that by March or April," he said.

Howe said Simplot is working with the Bureau of Land Management on cultural evaluations, which should be completed by mid-summer.

There will be a proposed Simplot expansion open house from 4-8 p.m. Thursday, Feb. 6 at the Sweetwater County Fire District No. 1 facility.

"We certainly welcome your input," Howe said.

Howe said the expanded plant may require an extra natural gas line but would not likely require substantial additional water service.

The Rock Springs Simplot Phosphates, LLC plant on South Highway 430 is in line for possible expansion to produce ammonia that currently must be railed in. Simplot Environmental, Health and Security manager Darin Howe spoke at the Rock Springs City Council meeting on Tuesday and said expansion plans are still in a preliminary stage.

When Councilman Clark Stith asked Howe about the plant's future water needs, Howe said there would not be a significant increase in water consumption when the project is completed, although there may be some minor increase during summer months due to evaporation.

The expansion plans are in a very preliminary stage, Howe said, and he did not provide a completion date estimate if Simplot goes ahead with the proposal. "We look forward to the project," Rock Springs Mayor Carl Demshar said. "If there is anything we can do to help, let us know."

JOINT POWERS COMMUNICATIONS BOARD

Councilmen unanimously approved a $1,156,738.27budget request for the Joint Powers Combined Communications Board.

SEE SIMPLOT, PAGE 3

Appendix C-8
Rocket Miner Newspaper Article 02-07-14

Open house showcases ammonia facility plant

MICHAEL MARESH
Rocket-Miner Staff Reporter

ROCK SPRINGS — Residents received a glimpse of Simplot Phosphate's plan to build an anhydrous ammonia production plant with related facilities at an open house on Thursday at the Sweetwater County Fire District No. 1 station.

The proposed project would be constructed on existing Simplot property that is located adjacent to the existing fertilizer facility.

The open house was required for the industrial site permit the company needs to acquire before it can move forward.

The plant will have the ability to store 18,000 tons of ammonia, which currently must be brought in by rail car.

Construction is scheduled to begin in August 2014.

► SEE **SIMPLOT**, PAGE 3

Michael Maresh/Rocket-Miner

Joseph Hammond, principal project manager for environmental services, talks to residents at the open house put on by Simplot Phosphates LLC. The company wants to expand Rock Springs ammonia operations.

► SIMPLOT

During its peak time, the company expects to have 460 people working on the project.

Of the 460 workers, more than 300 construction workers will be employed for the expected 25 months it will take to build the new plant.

Once the plant is constructed, Simplot would need to hire 27 additional full-time and permanent employees, though Simplot Environmental, Health and Security manager Darin Howe said not all of them will be working at the ammonia plant.

The plant to be located at 515 S. Highway 430, Rock Springs, is expected to cost more than $300 million to build.

According to the placards at the open house, an added benefit to the project is that the new employees will be paying property taxes to the community where they reside.

While the construction is scheduled to be completed in October 2016, the plant would undergo several months of commissioning of testing it to make sure it works properly.

Howe said many of the processes have yet to be decided on, but added the Linde Group out of Germany, which specializes in these types of projects, will handle the construction part.

Howe said Simplot will be involved in the design and will also be the resource for bringing in contractors.

He said Linde will not be doing the engineering portion for the plant.

Howe said he did not know the exact size of the proposed plant, but added it will be spread out and is close to half the size of its existing facility.

"Some of that is still in the preliminary discussions," Howe said, adding the next step is to get the industrial site permit.

The open house, he said, is for people who are interested about the proposed plant and wanted to learn about the process.

Howe said the open house was hosted at the fire station because Simplot will have to work closely with the fire department for safety procedures.


Welcome to
Rock Springs
Home of 56
Nationalities
Host to All

Appendix D-1
Housing Commitment Summary Table

Appendix D – Summary of Housing Commitments

	January	February	March	April	May	June	July	August	September	October	November	December
Total Units	987	985	993	920	841	730	668	720	780	888	978	1058
Total RV Sites	156	156	147	132	117	99	98	98	110	126	144	160
Total Hotel / Motels	831	829	846	787	724	630	570	623	671	762	834	897
Total Units Directly Committed	***448***	***448***	***498***	***498***	***498***	***473***	***418***	***473***	***473***	***498***	***498***	***498***
Smith 5 Year Average Monthly Vacancy Rate	52%	52%	48%	40%	31%	22%	21%	21%	27%	36%	46%	55%

Community	Hotel / RV site	Total Rooms	Commitment Offered	Assumption	January	February	March	April	May	June	July	August	September	October	November	December
Farson	Sitzman's Motel	10		Standard Availability	5	5	5	4	3	2	2	2	3	4	5	5
Green River	Coachman Inn	18		Standard Availability	9	9	9	7	6	4	4	4	5	7	8	10
Green River	Flaming Gorge Motel	17		Standard Availability	9	9	8	7	5	4	4	3	5	6	8	9
Green River	Hampton Inn & Suites	106	20-30	Commitment	25	25	25	25	25	25	25	25	25	25	25	25
Green River	Mustang Motel	23	30 (Includes Walker's)	Commitment	22	22	22	22	22	22	22	22	22	22	22	22
Green River	Oak Tree Inn	191	38	Commitment	38	38	38	38	38	38	38	38	38	38	38	38
Green River	Super 8	31		Standard Availability	16	16	15	12	10	7	6	6	8	11	14	17
Green River	Sweet Dreams Inn	27		Standard Availability	14	14	13	11	8	6	6	6	7	10	12	15
Green River	Western Motel Inn	31		Standard Availability	16	16	15	12	10	7	6	6	8	11	14	17
Green River	Walker's Motel	9	30 (Includes Mustang)	Commitment	8	8	8	8	8	8	8	8	8	8	8	8
Little America	Little America Hotel	140		Standard Availability	73	73	67	55	43	30	29	29	38	51	64	77
Rock Springs	America's Best Value Inn & Suites	147	20-60	Commitment	40	40	40	40	40	40	40	40	40	40	40	40
Rock Springs	Best Western Outlaw Inn	100	Varies by Month	Commitment	-	-	50	50	50	25	15	25	25	50	50	50
Rock Springs	Budget Host Inn	32		Standard Availability	17	17	15	13	10	7	7	7	9	12	15	18
Rock Springs	Cody Motel	39	Standard Availability	Standard Availability	20	20	19	15	12	8	8	8	11	14	18	21
Rock Springs	Comfort Inn & Suites	57		Standard Availability	30	30	27	23	18	12	12	12	15	21	26	31
Rock Springs	Days Inn	110	30	Commitment	30	30	30	30	30	30	-	30	30	30	30	30
Rock Springs	Econo Lodge	98	40	Commitment	40	40	40	40	40	40	25	40	40	40	40	40
Rock Springs	Elk Motel	18		Standard Availability	9	9	9	7	6	4	4	4	5	7	8	10
Rock Springs	Hampton Inn & Suites	70	10	Commitment	10	10	10	10	10	10	10	10	10	10	10	10
Rock Springs	Holiday Inn	170	70	Commitment	70	70	70	70	70	70	70	70	70	70	70	70
Rock Springs	Holiday Inn Express	79	10	Commitment	10	10	10	10	10	10	10	10	10	10	10	10
Rock Springs	Homewood Suites	84	10	Commitment	10	10	10	10	10	10	10	10	10	10	10	10
Rock Springs	LaQuinta Inn	129	30-40	Commitment	35	35	35	35	35	35	35	35	35	35	35	35
Rock Springs	Motel 6	99		Standard Availability	52	52	47	39	31	21	21	20	27	36	46	54
Rock Springs	Motel 8	96	30	Commitment	30	30	30	30	30	30	30	30	30	30	30	30
Rock Springs	Quality Inn	103	80	Commitment	80	80	80	80	80	80	80	80	80	80	80	80
Rock Springs	Rocky Mountain Motel	10		Standard Availability	5	5	5	4	3	2	2	2	3	4	5	5
Rock Springs	Sands Inn	20		Standard Availability	10	10	10	8	6	4	4	4	5	7	9	11
Rock Springs	Springs Motel	23		Standard Availability	12	12	11	9	7	5	5	5	6	8	11	13
Rock Springs	Springhill Suites	109		Standard Availability	57	57	52	43	34	23	23	22	30	39	50	60
Rock Springs	Super 8 Motel	49		Standard Availability	26	26	23	19	15	11	10	10	13	18	23	27

Appendix D-2
Housing Commitment Correspondence

From: Suzanne Zutter <Suzanne.Zutter@Hilton.com>
Sent: Thursday, February 06, 2014 10:53 AM
To: CH2M HILL
Cc: Tim Newman
Subject: Project Lodging Hampton Inn Green River, WY

Thank you for contacting the Hampton Inn & Suites in Green River, WY regarding room rates for the Simplot Rock Springs Ammonia Plant.

Hampton Inn & Suites has many things to offer guests including our famous breakfast buffet, an in house bar/lounge, and a buffet dinner is served Monday through Thursday night including a salad bar for only $5.00 per night for hotel guests.

We would be pleased to host your crews throughout your construction project. Here is what we can offer:

Second week of August through the end of May - 30 standard sleeping rooms (queen with two beds or king with one bed) per night at a rate of only $89 plus tax.

First week of June though the first week of August - 20 standard sleeping rooms (queen with two beds or king with one bed) per night at a rate of only $99 plus tax.

Feel free to contact me with any questions.

Have a great day.

Suzanne Zutter
Sales Manager
Hampton Inn & Suites
1055 Wild Horse Canyon Rd.
Green River, Wy. 82935
307-875-5300
307-875-6800 - Fax

Jan 30.

Feb 30

March 30

April 30

May 30

June 30

July 30

Aug 30

Sept 30

Oct 30

Nov 30

Dec 30

Number of Rooms

8 Kitchenette apts.

1 bedroom apts.

had TV internet. Furnished.

Mustang Motel and Walker's Motel, Green River

including walkers.

Green River GM

Sent: Tuesday, February 18, 2014 9:57 AM
To: greenriver@mail.oaktreeinn.com
Subject: RE: Simplot Project Lodging - Oak Tree Inn

Hello, please see below for questions regarding the Oak Tree Inn and lodging for the Simplot project.

Thank you,

CH2M HILL

Sent: Tuesday, December 17, 2013 1:54 PM
To: 'greenriver@mail.oaktreeinn.com'
Subject: Project Lodging

Hello Trish,

I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.

Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

Oak Tree Inn

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms	38	38	38	38	38	38	38	38	38	38	38	38

http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy

From: Brandon Moldenhauer <rockspringskoa@gmail.com>
Sent: Tuesday, December 31, 2013 8:48 AM
To: CH2M HILL
Subject: Re: Lodging for Project

Hello
We are very excited to accommodate you. As I am sure you can imagine the amount of RV's can drastically change from year to year. We do have 85 Long term sites all with Full hook ups with free wifi. We do have restrooms w/showers, propane dispensing, close to wal mart, smiths, and white mountain mall.
We also have 5 lodges with kitchens and bathrooms.
We may also be able to use the nightly sites in the winter!

Brandon
Rock Springs KOA

Rock Springs KOA

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms	25-45	25-55	25-55	25-45	25-40	25-35	25-35	25-40	25-45	25-50	25-45	25-45

On Mon, Dec 30, 2013 at 10:09 AM, <CH2M HILL> wrote:

> Hello,
>
> I am reaching out to you in regards to lodging for the workforce of the proposed construction of the **Simplot Rock Springs Ammonia Plant**. The purpose of this message is to obtain written confirmation of the number of RV sites that you anticipate being able to provide. Construction is scheduled to take place **summer 2014 – spring 2016**. The largest numbers of workers needing lodging will occur in the spring of 2015.
>
> Taking into account the other obligations you will have throughout the year, please estimate the total number of sites you may be able to provide for workforce members of the Simplot project, and note if your sites are full hook-up or not. If you believe the number of sites could vary on a monthly basis, you may use the following table to note the numbers by month. Additionally, please describe any special discounts you may offer for long term rental agreements.
>
> **Rock Springs KOA**
>
> | Month | Jan | Feb | March | April | May | June | July | Aug | Sept | Oct | Nov | Dec |
> |---|---|---|---|---|---|---|---|---|---|---|---|---|
> | Number of Rooms | | | | | | | | | | | | |

TO: 720 286 8599

date: 01/06/14

FAX to:

from: THE INN AT ROCK SPRINGS

Americas Best Value Inn

SUBJECT: Rooms Availability

For Simplot expansion plan

Please call me if you have any

Question (307) 371-0809

Piyush Patel (PK)

PHONE (307) 362-9400 FAX (307) 362-8846

Subject: Project Lodging

From:

To: patelpi@yahoo.com;

Date: Tuesday, December 17, 2013 1:33 PM

Hello Piyush,

I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.

Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms	60	60	60	50	40	20	20	20	30	45	50	60

http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy

RE: Simplot Project Lodging - Best Western

From:
Subject: RE: Simplot Project Lodging - Best Western
Date: Tue, February 18, 2014 12:07 pm
To: 51023@hotel.bestwestern.com

Please see below for questions regarding the Best Western Outlaw Inn and lodging for the upcoming Simplot project.

Sent: Tuesday, December 17, 2013 1:45 PM
To: '51023@hotel.bestwestern.com'
Subject: Project Lodging

Hello Debbie,

I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.

Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

Best Western Outlaw Inn 2015

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms			50	50	50	25	15	25	25	50	50	50

http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy

From: Lisa Andicoechea <landicoechea@msn.com>
Sent: Monday, December 30, 2013 2:17 PM
To: CH2M HILL
Subject: RE: Lodging for Project

I have a total of 37 rooms and 2 apartments. included in this total are 7 kitchenettes. We are a weekly motel. as long as you let me know exactly when you need the rooms I will make sure to hold what ever you need. Right now the rates for one bed is $240.00 per week. 2 beds are $250.00. Three beds are $260.00. All these rooms include microwave and fridge. Kitchenettes are $260.00 per week for one bed and $270.00 a week for 2 beds. We also have a monthly rate of $800.00 on all rooms. We have free Wi-Fi, daily housekeeping except Sundays, public laundry, free fax services. If you have further questions, please let me know.

Thank You!

Cody Motel
75 Center Street
Rock Springs, Wy. 82901
307-362-6675 Ext. 0
307-350-0636 (cell)

From: CH2M HILL
To: landicoechea@msn.com
Subject: Lodging for Project
Date: Mon, 30 Dec 2013 16:51:28 +0000

Hello,

I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.
Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

Cody Motel

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec

From: heidi halstead <blondyseven@yahoo.com>
Sent: Thursday, December 19, 2013 10:47 AM
To: CH2M HILL
Subject: Project

I can commit to 30 rooms for each month except for the month of July 13-24, 2013 since I have commited to the High National Rodeo Finals already. I can offer you a rate of $50.00 for singles and $55.00 for doubles for the whole year. Please let me know if I can help you out with your reservations or any further questions.

Sincerely,

Heidi Harvey
General Manager
Days Inn
1545 Elk Street
Rock Springs, WY 82901
(307)362-5646
(307)389-4965 cell
blondyseven@yahoo.com

Hello Heidi,

I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.

Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

Days Inn

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms												

http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy

From: Econo Lodge <rseconolodge@yahoo.com>
Sent: Monday, December 30, 2013 11:12 AM
To: CH2M HILL
Subject: Re: Project Lodging

I wanted to get back to you regarding your lodging needs in the Rock springs area. I have 40 rooms I will be able to offer you each month January 2014 thru December 2016 with the exception of the month of July, during that month I will only have 25 rooms available, but July 2016 I can offer 40 rooms.
I would like to offer you a rate of $55 for a single and $65 for a double.
I look forward to hearing back from you and will be happy to answer any other questions you have.
If you need anything else, please don't hesitate to ask.

Warm regards,

Falon Morgan
General Manager

Econo Lodge
1635 Elk Street
Rock Springs, WY 82935
Phone: 307-382-4217
Fax: 307-362-4150
Email: rseconolodge@yahoo.com

On Dec 17, 2013, at 1:47 PM, CH2M HILL wrote:

> Hello,
>
> I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.
>
> Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.
>
> **EconoLodge**

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec

Christine Hill

From: lq0729gm Rock Springs, WY <lq0729gm@LaQuinta.com>
Sent: Tuesday, December 17, 2013 1:57 PM
To: 'Christine Hill'; 'Kindra Vogel-Bastow'
Subject: FW: Project Lodging

What do you 2 crazy ladies think we should do?

From: [ ]
Sent: Tuesday, December 17, 2013 1:51 PM
To: lq0729gm Rock Springs, WY
Subject: Project Lodging

Hello,

I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.

Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

La Quinta $82 - $99 rate estimate

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms	40	40	40	40	30	30	30	30	30	40	40	40

http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy

Hampton Inn Rock Springs
10 rooms – rate range $119 – $149

From: Sheri Bozner <sbozner@gmail.com>
Sent: Monday, December 30, 2013 11:23 AM
To: CH2M HILL
Subject: Re: Lodging for Project

Good afternoon, thank you for your interest in our facility. I have a total of 26 spaces with full hook ups....open all year round. I have a handful of tenants that live with me year round also. I have the potential to have 20 spaces available at $400.00 a month plus power....water , sewer, garbage included.....That rate is for 2 adults, children are free under the age of 16. Hope we can work something out, would love to accommodate your workers. Thank you so much, Sheri Bozner 307-389-8726 if you have any further questions, please feel free to call.

On Mon, Dec 30, 2013 at 9:11 AM, CH2M HILL wrote:

> Hello,
>
> I am reaching out to you in regards to lodging for the workforce of the proposed construction of the **Simplot Rock Springs Ammonia Plant**. The purpose of this message is to obtain written confirmation of the number of RV sites that you anticipate being able to provide. Construction is scheduled to take place **summer 2014 – spring 2016**. The largest numbers of workers needing lodging will occur in the spring of 2015.
>
> Taking into account the other obligations you will have throughout the year, please estimate the total number of sites you may be able to provide for workforce members of the Simplot project, and note if your sites are full hook-up or not. If you believe the number of sites could vary on a monthly basis, you may use the following table to note the numbers by month. Additionally, please describe any special discounts you may offer for long term rental agreements.
>
> **High Desert Storage and RV Park**

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms												

> http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy
>
> Thank you for your time, I looking forward to your response.
>
> CH2M HILL

From: Dawn Burns <Dawn.Burns@Hilton.com>
Sent: Thursday, December 19, 2013 10:00 AM
To: CH2M HILL
Subject: Project Lodging - Homewood Suites by Hilton in Rock Springs, WY

12-19-2013

My name is Dawn Burns-Director of Sales with the Homewood Suites by Hilton in Rock Springs, WY. Our General Manager, Ginny Wagner forwarded your request onto me. I look forward to working with you!

We would be honored to have you as a part of our Corporate Rate Program in Rock Springs.
The Homewood Suites by Hilton is an all suite property, we know how important it is for those that are extended stay guest to have a place to call "Home" while away from home. All of our spacious and beautifully appointed suites have a fully equipped kitchen, complete with shopping services for the convenience of your guests. Complimentary hot breakfast buffet, evening meal (Monday-Thursday), high speed wireless internet, indoor swimming pool, fitness center and business center are just a few of the amenities we can offer your guests.

We are happy to offer a year around rate of $119.00 nightly plus taxes. Should your guests be staying past 30 days, the rate will be $109.00 nightly plus taxes. We are also willing to block 10 rooms per night to accommodate your guest. Please let us know if we can get the agreement in place so you can start booking your guests right away.

Please feel free to let me know if you have any questions or require any additional information.

Looking forward to hearing back!

Best regards,

Dawn Burns
Director of Sales - The Bed Company of Wyoming
Homewood Suites by Hilton in Rock Springs, WY
Hampton Inn in Rawlins, WY
Hampton Inn in Laramie, WY
605-430-1964
dawn.burns@hilton.com

From: Jessie Wilson <jwhotel@hotmail.com>
Sent: Tuesday, December 17, 2013 2:16 PM
To: CH2M HILL
Subject: RE: Project Lodging

We had a crew here for 11 months so I would feel comfortable saying we could offer 30 rooms and still meet our other obligations

---

From: CH2M HILL
To: jwhotel@hotmail.com
Subject: Project Lodging
Date: Tue, 17 Dec 2013 20:51:45 +0000

Hello Jessie,
I am reaching out to you in regards to lodging for the workforce of the proposed construction of the Simplot Rock Springs Ammonia Plant. Previously, you indicated some availability of rooms to help accommodate the construction workforce. The purpose of this message is to seek written confirmation of the number of hotel/motel rooms that you anticipate being able to provide. Construction is scheduled to take place summer 2014 – spring 2016. The largest numbers of workers needing lodging will occur in the spring of 2015.
Taking into account the other obligations you will have throughout the year, please estimate the total number of rooms your hotel may be able to provide for workforce members of the Simplot project, and note whether the rooms are single or double occupancy (one or two beds). If you believe the number of rooms could vary on a monthly basis, you may use the following table to note the number of rooms by month. Additionally, please describe any special discounts you may offer for long term rental agreements.

Motel 8

Month	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Number of Rooms												

http://livability.com/rock-springs/wy/business/simplot-phosphates-creates-jobs-rock-springs-wy

Thank you for your time, I looking forward to your response.

CH2M HILL
Environmental Services
9193 South Jamaica Street
Englewood, CO 80112

From: Liisa Anselmi Dalton <liisaanselmi@me.com>
Sent: Tuesday, February 18, 2014 3:38 PM
To: CH2M HILL
Cc: Stacy Colvin; Shane Carrillo; Trish Green; Hilary Walsh
Subject: Re: Simplot Project Lodging

At the Holiday Inn we offered 70 rooms at a single occupancy rate of $89 and a double of $94; for the Express we offered 10 rooms at $94 single and $99 double occupancy; for the Quality we offered 80 rooms at a single rate of $64 and double for $69; with the apartments we offered 30 units at a rate of $55 for a 1 bedroom; $60 for a two bedroom and $65 per day for a three bedroom. This is for the Simplot project. Thanks!

Since these are all based on individual pickup with a per diem rate, for the wind project, we would offer the same rates and numbers with a first come first served allotment.

Is this sufficient or do you need more information.

Thanks,
Liisa Anselmi Dalton
liisa@sweetwaterhsa.com
Holiday Inn® Rock Springs
1675 Sunset Dr.
Rock Springs, WY 82901
307-382-9200

STAY YOU.


Welcome to
Rock Springs
Home of 56
Nationalities
Host to All

Appendix E-1
State Agency Contact List

Wyoming State Agency List

fname	lname	sal	title	agency	1address	city	state	zip	phone	Project Information Letter Mailed	Certified Mail Status
John	Cox	Mr.	Director	Department of Transportation	5300 Bishop Avenue	Cheyenne	WY	82009	777-4484	1/23/2014	Received
Christopher	Petrie	Mr.	Chief Counsel	Public Service Commission	2515 Warren Avenue Suite 300	Cheyenne	WY	82002	777-7427	1/23/2014	Received
Scott	Talbott	Mr.	Director	Game & Fish Department	5400 Bishop Avenue	Cheyenne	WY	82009	777-4600	1/23/2014	Received
Thomas	Forslund	Mr.	Director	Department of Health	2300 Capitol Avenue, 4401 Hathaway Building	Cheyenne	WY	82002	777-7656	1/23/2014	Received
Rich	Crandall	Mr.	Director	Department of Education	2300 Capitol Avenue, Hathaway Building, 2nd Floor	Cheyenne	WY	82002-0050	777-7675	1/23/2014	Received
Patrick	Tyrrell	Mr.	State Engineer	Office of State Engineer	122 West 25 Street, 4E	Cheyenne	WY	82002	777-6150	1/23/2014	Received
Thomas	Drean	Mr.	State Geologist	Geological Survey	PO Box 1347	Laramie	WY	82073	766-2286	1/23/2014	Received
Jason	Fearneyhough	Mr.	Director	Department of Agriculture	2219 Carey Avenue	Cheyenne	WY	82002	777-6569	1/23/2014	Received
Todd	Parfitt	Mr.	Director	Department of Environmental Quality	122 West 25 Street, 4W	Cheyenne	WY	82002	777-5593	1/23/2014	Received
Bill	Gern	Mr.	Research & Development	University of Wyoming	1000 E. University Ave. Dept 3355	Laramie	WY	82071	766-5320	1/23/2014	Received
Dan	Noble	Mr.	Director	Department of Revenue	122 West 25 Street, 2E	Cheyenne	WY	82002	777-7961	1/23/2014	Received
Robert	Jensen	Mr.	Chief Executive Officer	Wyoming Business Council	214 West 15 Street	Cheyenne	WY	82002	777-2800	1/23/2014	Received
Joan	Evans	Ms.	Director	Department of Workforce Services	122 West 25 Street, 2E	Cheyenne	WY	82002	777-8621	1/23/2014	Received
Ryan	Lance	Mr.	Director	State Lands & Investments	Herschler 3W, 122 West 25 St.	Cheyenne	WY	82002	777-7331	1/23/2014	Received
Milward	Simpson	Mr.	Director	State Parks & Cultural Resources	2301 Central Avenue	Cheyenne	WY	82002	307-777-6303	1/23/2014	Received
Lanny	Applegate	Mr.	Fire Marshal	Department of Fire Prevention & Electrical Safety	Herschler 1 W, 122 West 25 St.	Cheyenne	WY	82002	777-6385	1/23/2014	Received
Steve	Corsi	Mr.	Director	Department of Family Services	Hathaway Bldg. 3W	Cheyenne	WY	82002	777-7561	1/23/2014	Received
Grant	Black	Mr.	Supervisor	Oil & Gas Conservation Commission	2211 King Boulevard, PO Box 2640	Casper	WY	82602	234-7147	1/23/2014	Received
Steve	Dietrich	Mr.	Administrator	Air Quality Division	Herschler 2E, 122 West 25 Street	Cheyenne	WY	82002	777-7391	1/23/2014	Received
Kevin	Federick	Mr.	Administrator	Water Quality Division	Herschler 4W, 122 West 25 Street	Cheyenne	WY	82002	777-7072	1/23/2014	Received
Alan	Edwards	Mr.	Administrator	Solid & Hazardous Waste Division	Herschler 4W, 122 West 25 Street	Cheyenne	WY	82002	777-6145	1/23/2014	Received
Nancy	Nuttbrock	Ms.	Administrator	Land Quality Division	Herschler 3W, 122 West 25 Street	Cheyenne	WY	82002	777 - 7046	1/23/2014	Received
Alan	Edwards	Mr.	Administrator	Abandoned Mine Lands Division	Herschler 1W, 122 West 25 Street	Cheyenne	WY	82002	777-6145	1/23/2014	Received
Luke	Esch	Mr.	Administrator	Industrial Siting Division	Herschler 4W, 122 West 25 Street	Cheyenne	WY	82002		1/23/2014	Received

Updated 12/31/2013 KW

Appendix E-2
Sweetwater and Uinta Local Agency Contact List

Sweetwater and Uinta Local Agency List

fname	lname	sal	title	office	address	city	state	zip	certifiedID	County	vphone	fphone	Project Information Letter Mailed	Certified Mail Status
Dale	Davis	Mr.	Sweetwater County CC	Sweetwater County CC	80 West Flaming Gorge Way, Ste. 150	Green River	WY	82935		Sweetwater	307-872-3765		1/23/2014	Received
Lana	Wilcox	Ms.	Uinta County CC	Uinta County CC	P.O. Box 810	Evanston	WY	82930		Uinta	307-783-0303		1/23/2014	Received
Marshall	Reaser	Mayor	Town of Bairoil	Town of Bairoil	PO Box 58	Bairoil	WY	82322		Sweetwater	307-324-7653	307-324-4706	1/23/2014	Received
Lenore	Perry	Mayor	Town of Granger	Town of Granger	PO Box 42	Granger	WY	82934		Sweetwater	307-875-5556	307-875-3169	1/23/2014	Received
Hank	Castillon	Mayor	City of Green River	City of Green River	50 East 2nd St. North	Green River	WY	82935		Sweetwater	307-872-0500	307-872-0566	1/23/2014	Received
Carl	Demshar	Mayor	City of Rock Springs	City of Rock Springs	212 D. Street	Rock Springs	WY	82901		Sweetwater	307-352-1510	307-352-1516	1/23/2014	Received
Sarah	Page	Mayor	Town of Superior	Town of Superior	PO Box 40	Superior	WY	82945		Sweetwater	307-362-8173	307-362-8173	1/23/2014	Received
Robb	Phipps	Mayor	Town of Wamsutter	Town of Wamsutter	PO Box 6	Wamsutter	WY	82336		Sweetwater	307-324-0468	307-324-9438	1/23/2014	Received
Troy	Nolan	Mayor	Town of Bear River	Town of Bear River	81 Elk Dr.	Bear River	WY	82930		Uinta	307-789-2800	307-789-2802	1/23/2014	Received
Joy	Bell	Mayor	City of Evanston	City of Evanston	1200 Main St.	Evanston	WY	82930-3396		Uinta	307-783-6300	307-783-6390	1/23/2014	Received
Andrew	Hewitt	Mayor	Town of Lyman	Town of Lyman	PO Box 300	Lyman	WY	82937		Uinta	307-787-6595	307-787-6100	1/23/2014	Received
Scott	Dellinger	Mayor	Town of Mountain View	Town of Mountain View	PO Box 249	Mountain View	WY	82939		Uinta	307-782-3100	307-782-6880	1/23/2014	Received
Paul	Grube	Mr.	Superintendent	Sweetwater County School District #1	POB 1089	Rock Springs	WY	82902		Sweetwater	307 352-3400		1/23/2014	Received
Donna	Little-Kaumo	Mrs.	Superintendent	Sweetwater County School District #2	320 Monroe Ave	Green River	WY	82935		Sweetwater	307 872-5500		1/23/2014	Received
James	Bailey	Mr.	Superintendent	Uinta County School District #1	POB 6002	Evanston	WY	82931		Uinta			1/23/2014	Received
Ryan	Thomas	Mr.	Superintendent	Uinta County School District #1	POB 6002	Evanston	WY	82931		Uinta	307 789-7571		1/23/2014	Received
Jeffrey	Newton	Mr.	Superintendent	Uinta County School District #4	POB 1300	Mountain View	WY	82939		Uinta	307 782-3377 x 4201		1/23/2014	Received
Kent	Stokes	Mr.	Superintendent	Uinta County School District #6	POB 1090	Lyman	WY	82937		Uinta	307 786-4100		1/23/2014	Received
			Rock Springs City-County Airport Board	Rock Springs City-County Airport Board	P.O. Box 1987	Rock Springs	WY	82902-1987		Sweetwater			1/23/2014	Received
Verna	Jeppesen		Sweetwater County School District 1	Sweetwater County School District 1	3550 Foothill Blvd.	Rock Springs	WY	82901		Sweetwater			1/23/2014	Undeliverable
Garie	Henry		Sweetwater County School District No. 2	Sweetwater County School District No. 2	320 Monroe	Green River	WY	82935		Sweetwater	307-872-5500		1/23/2014	Undeliverable
			Lincoln-Uinta Association of Governments Joint Powers Board	Lincoln-Uinta Association of Governments Joint Powers Board	P.O. Box 389	Kemmerer	WY	83101		Uinta			1/23/2014	Undeliverable
			Lincoln-Uinta Revolving Loan JPB	Lincoln-Uinta Revolving Loan JPB	P.O. Box 389	Kemmerer	WY	83101		Uinta			1/23/2014	Undeliverable
			Uinta Co. Fire Protection JPB	Uinta Co. Fire Protection JPB	P.O. Box 640	Evanston	WY	82930		Uinta			1/23/2014	Received
			Uinta County Economic Development Commission	Uinta County Economic Development Commission	225 9th Street	Evanston	WY	82930		Uinta	307-783-0378		1/23/2014	Received
Judd	Redden		Uinta County School District	Uinta County School District	PO Box 1	Evanston	WY	82931		Uinta	307-789-6225		1/23/2014	Undeliverable
			Uinta Protection & Emergency JPB	Uinta Protection & Emergency JPB	225 9th Street	Evanston	WY	82930		Uinta	307-789-3013		1/23/2014	Received
			Eden Farson Cemetery Dist.	Eden Farson Cemetery Dist.	P. O. Box 202	Farson	WY	82932		Sweetwater			1/23/2014	Received
			Eden Valley I & S District	Eden Valley I & S District	P.O. Box 238	Farson	WY	82932		Sweetwater			1/23/2014	Received
			Eden Valley Irr. & Drainage	Eden Valley Irr. & Drainage	P.O. Box 174	Farson	WY	82932		Sweetwater			1/23/2014	Received
			Eden Valley Solid Waste Dist.	Eden Valley Solid Waste Dist.	P.O. Box 232	Farson	WY	82932		Sweetwater			1/23/2014	Received
			Eden-Farson Fire Control Dist.	Eden-Farson Fire Control Dist.	P.O. Box 61	Farson	WY	82932		Sweetwater			1/23/2014	Received
			Sweetwater Co. Weed & Pest	Sweetwater Co. Weed & Pest	P. O. Box 173	Farson	WY	82932		Sweetwater			1/23/2014	Received
			Castle Rock Special Hospital Dist.	Castle Rock Special Hospital Dist.	P.O. Box 219	Green River	WY	82935		Sweetwater			1/23/2014	Received
			Green Rvr/Rk Spgs JPB(Wtr Bd)	Green Rvr/Rk Spgs JPB(Wtr Bd)	P.O. Box 1299	Green River	WY	82935		Sweetwater			1/23/2014	Received
			Jamestown-Rio Vista Fire Control	Jamestown-Rio Vista Fire Control	P. O. Box 1267	Green River	WY	82935		Sweetwater			1/23/2014	Received
			Jamestown-Rio Vista W&S	Jamestown-Rio Vista W&S	3700 Hwy 374, Suite B	Green River	WY	82935		Sweetwater			1/23/2014	Received
			Reliance Fire Dist.	Reliance Fire Dist.	P.O. Box 220	Reliance	WY	82943		Sweetwater			1/23/2014	Received
			Clearview I&S Dist.	Clearview I&S Dist.	P.O. Box 2634	Rock Springs	WY	82901		Sweetwater			1/23/2014	Received
			Rock Springs - Sweetwater Co. Airport JPB	Rock Springs - Sweetwater Co. Airport JPB	P.O. Box 1987	Rock Springs	WY	82902-1987		Sweetwater			1/23/2014	Received
			Sublette Co. Predatory Animal	Sublette Co. Predatory Animal	Box 636	Rock Springs	WY	82902		Sweetwater			1/23/2014	Received
			Sweetwater BOCES	Sweetwater BOCES	Box 428 Section b-640	Rock Springs	WY	82902-0428		Sweetwater			1/23/2014	Received
			Sweetwater Co. Cons. Dist.	Sweetwater Co. Cons. Dist.	79 Winston Drive, Suite 110	Rock Springs	WY	82901		Sweetwater			1/23/2014	Received
			Sweetwater Co. Fire Dist. #1	Sweetwater Co. Fire Dist. #1	P.O. Box 2940	Rock Springs	WY	82902		Sweetwater			1/23/2014	Received
			Sweetwater Co. Jt.Travel/Tour. Bd.	Sweetwater Co. Jt.Travel/Tour. Bd.	P. O. Box 38	Rock Springs	WY	82902		Sweetwater			1/23/2014	Received
			Sweetwater Co. Predatory Animal	Sweetwater Co. Predatory Animal	106 Cedar St.	Rock Springs	WY	82901		Sweetwater			1/23/2014	Received
			Sweetwater Solid Waste #1	Sweetwater Solid Waste #1	P. O. Box 1493	Rock Springs	WY	82902-1493		Sweetwater			1/23/2014	Received
			Sweetwater Solid Waste #2	Sweetwater Solid Waste #2	P.O. Box 1990	Rock Springs	WY	82901		Sweetwater			1/23/2014	Undeliverable
			Ten Mile W&S Dist.	Ten Mile W&S Dist.	P.O. Box 1626	Rock Springs	WY	82902		Sweetwater			1/23/2014	Received
			West Side W&S Dist.	West Side W&S Dist.	66 Purple Sage Rd #14	Rock Springs	WY	82901		Sweetwater			1/23/2014	Undeliverable
			White Mountain W&S Dist.	White Mountain W&S Dist.	P.O. Box 2221	Rock Springs	WY	82901		Sweetwater			1/23/2014	Received
			Evanston Parks & Rec. Dist.	Evanston Parks & Rec. Dist.	275 Saddle Ridge Road	Evanston	WY	82930		Uinta			1/23/2014	Received
			Evanston-Uinta Co. Airport JPB	Evanston-Uinta Co. Airport JPB	1200 Main St.	Evanston	WY	82930		Uinta			1/23/2014	Received
			Evanston-Uinta Co. JPB	Evanston-Uinta Co. JPB	350 City View Dr., Suite 200	Evanston	WY	82930		Uinta			1/23/2014	Received
			Uinta Co. Fire Protection JPB	Uinta Co. Fire Protection JPB	P.O. Box 640	Evanston	WY	82930		Uinta			1/23/2014	Received
			Uinta Co. Weed and Pest	Uinta Co. Weed and Pest	228 9th Street	Evanston	WY	82930		Uinta			1/23/2014	Received
			Fort Bridger W&S	Fort Bridger W&S	Box 2	Fort Bridger	WY	82933		Uinta			1/23/2014	Undeliverable

Sweetwater and Uinta Local Agency List

fname	lname	sal	title	office	address	city	state	zip	certifiedID	County	vphone	fphone	Project Information Letter Mailed	Certified Mail Status
			Ft. Bridger Cemetery Dist.	Ft. Bridger Cemetery Dist.	P.O. Box 276	Fort Bridger	WY	82933		Uinta			1/23/2014	Received
			Ft. Bridger Mobile Home I & S Dist.	Ft. Bridger Mobile Home I & S Dist.	P.O Box 105	Fort Bridger	WY	82933		Uinta			1/23/2014	Received
			Predatory Animal of Uinta Co.	Predatory Animal of Uinta Co.	1347 County Road 217	Fort Bridger	WY	82933		Uinta			1/23/2014	Received
			Huntley Fire Dist.	Huntley Fire Dist.	Route 2 Box 45	Lyman	WY	69352		Uinta			1/23/2014	Received
			Lower Bench W&S	Lower Bench W&S	P.O. Box 412	Lyman	WY	82937		Uinta			1/23/2014	Undeliverable
			Uinta Co. Cons. Dist.	Uinta Co. Cons. Dist.	P.O. Box 370	Lyman	WY	82937		Uinta			1/23/2014	Received
			Bridger Valley JPB	Bridger Valley JPB	P.O. Box 615	Mountain View	WY	82939		Uinta			1/23/2014	Received
			Bridger Valley Water Conservancy Dist.	Bridger Valley Water Conservancy Dist.	Box 177	Mountain View	WY	82939		Uinta			1/23/2014	Received
			Uinta Co. Rural Fire Dist.	Uinta Co. Rural Fire Dist.	P.O. Box 51	Robertson	WY	82944-0651		Uinta			1/23/2014	Received

Appendix E-3
Letter to Local and State Agencies January 21, 2014

SIMPLOT PHOSPHATES LLC

January 21, 2014

Agency
Address 1
Address 2
Address 3

Subject: Simplot Rock Springs Ammonia Facility Project
Wyoming Industrial Siting Permit Application

To whom it may concern:

The JR Simplot Company has approved preliminary engineering and permitting for an anhydrous ammonia production plant and related utilities to be constructed on Simplot property adjacent to the existing Simplot Phosphates Fertilizer Complex located 4.5 miles south of Rock Springs, WY. This new plant would allow Simplot to produce anhydrous ammonia instead of importing this process feed material. The ammonia plant will utilize natural gas as both a feedstock and fuel. A new natural gas pipeline and an upgraded electrical service will be necessary to support the new plant equipment. Existing water supply is adequate. A project information handout is enclosed.

A meeting was held with the Wyoming Department of Environmental Quality Industrial Siting Division (ISD) on April 23, 2013 and again on November 19, 2013. The ISD staff determined that the estimated capital cost of construction for the Project meets or exceeds the current statutory jurisdictional capital cost threshold of $190.8 million (W.S. § 35-12-102).

The ammonia facility is to be located on private land in Sweetwater County. A map of the surrounding area and proposed location of the facility are enclosed.

Permitting is currently underway for the project. A PSD air construction permit application was submitted to Wyoming DEQ in July 2013. The submittal of the Industrial Siting Application to Wyoming DEQ is planned for March 2014 with a public hearing in late May/early June 2014. Construction would start in August 2014 and full commercial operation would commence by fourth quarter 2016.

Simplot is in the process of holding meetings and presentations with potentially affected municipalities, counties, state agencies, and other stakeholders. The meetings will be a venue to discuss potential environmental, social, and economic issues and identify mitigation recommendations and solutions to incorporate into the planning and design of the Project. The Project area of study, as identified by ISD staff during the Jurisdictional Meeting, determined the local governments where informational meetings were held.

Invitation to Participate

Simplot invites you to express your agency's comments and provide feedback so that issues may be considered and addressed directly with your agency, as well as incorporated directly into the ISA permitting application and construction planning process.

You may provide input by sending an email to darin.howe@simplot.com, or by mailing your comments to us at:

Simplot Phosphates, LLC
c/o Darin L. Howe
515 South Highway 430
Rock Springs, WY 82901

Please be sure to include your name and contact info with your comments so that we may follow-up with you effectively. Likewise, if you prefer to discuss the Project further, Simplot is available to meet in person or via phone upon your request.

A public open house with members of the project team, project engineer and environmental consultants is also scheduled for **February 6, 2014** from 4:00 to 8:00 pm at the following location:

Sweetwater County Fire District #1
3010 College Drive
Rock Springs, WY

We look forward to working with you on this Project, and look forward to your input.

Sincerely,

Darin L. Howe
EHSS Manager
Simplot Phosphates, LLC

Attachments: 1) Project Information Handout
2) Simplot Location Map
3) Ammonia Facility Proposed Location

SIMPLOT PHOSPHATES LLC

Rock Springs Ammonia Facility Project

Project Description

The JR Simplot Company has approved preliminary engineering and permitting for an anhydrous ammonia production plant and related utilities to be constructed on Simplot property adjacent to the existing Simplot Phosphates Fertilizer Complex located 4.5 miles south of Rock Springs, WY. This new plant would allow Simplot to produce anhydrous ammonia instead of importing this process feed material. The ammonia plant will utilize natural gas as both a feedstock and fuel. A new natural gas pipeline and an upgraded electrical service will be necessary to support the new plant equipment. Existing water supply is adequate.

The facility will have the ability to store 18,000 tons of ammonia. The ammonia storage tank will operate at atmospheric pressure. The ammonia plant will be designed to operate 350 days per year with a minimum on-stream availability factor of 97%. The plant will be capable of operating at a turndown ratio of 50% of the design capacity while still meeting all required product specifications. The plant and associated utilities will be designed for a life cycle of 25 years. A minimum of three years between major planned maintenance shutdowns will be specified. The ammonia plant will provide in excess of 100,000 lb/hr of process steam for use in the existing phosphate complex.

The plant will be designed to meet all of the applicable regulatory requirements of the Wyoming Department of Environmental Quality. The plant will be designed, constructed and operated per OSHA standards.

Schedule

Permitting is currently underway for the project. Detailed engineering design began in 2013. The submittal of the Industrial Siting Application to Wyoming DEQ is planned for March 2014. Major equipment would be ordered in early 2014, construction would start in August 2014 and full commercial operation would commence by fourth quarter 2016.

Simplot is working with Questar Pipeline Company and Rocky Mountain Power for ROW permitting with the Bureau of Land Management and private landowners. Plans of development were submitted to BLM in December 2013. This work should be completed by early summer of 2014.

Construction and Operations Workforce

Construction at the site is expected to start in August 2014. The average construction workforce is estimated at 311 for the 25-month construction duration. The peak construction workforce is estimated at 460 on-site workers. The Operations and Maintenance Workforce for the ammonia facility is estimated to be an additional 25 full time permanent positions.

Benefits and Sustainability

Simplot Phosphates, LLC produces high quality phosphate fertilizer, while maintaining its status as a low cost leader in the fertilizer industry. Fertilizer helps replace missing soil nutrients, thereby promoting stronger plants. In turn, organic matter is increased, root systems are strengthened and soil is less susceptible to wind and water erosion. When erosion and agriculture tilling are decreased, the threat of contamination to rivers and streams is reduced. Also, by improving the efficiency of food production, the fertilizers produced at Simplot Phosphates, LLC help to bring those foods to your table affordably.

The new onsite ammonia facility will eliminate the need to transport in the process feed material and will result in increased cost efficiency of the phosphate fertilizer products. The construction and operation of the ammonia facility will provide investment in the local community, employment and expanded tax base with minimal new infrastructure needed. There will be new jobs for both construction and long-term operation. The project will result in additional property, ad valorem, severance and other taxes paid by the project.

Environment

Major environmental permits required for the project include:

- Wyoming Industrial Development Information and Siting Act (ISA) permit
- Prevention of Significant Deterioration (PSD) Air Construction permit
- Bureau of Land Management (BLM) Right of Way (ROW) permitting for electric and gas

Industrial Siting Permit Application - Simplot is required to obtain an ISA permit from the Wyoming Department of Environmental Quality, Industrial Siting Division (ISD) due to the source category and the estimated construction cost of the project is above the current regulatory threshold of $190.8 Million. The application is expected to be filed in March 2014.

Air - The PSD air construction permit application was submitted to the Wyoming Department of Environmental Quality, Air Quality Division in July 2013. The estimated emissions are over the PSD major threshold for greenhouse gases and minor for the other criteria pollutants.

For more information, contact:

Darin L. Howe
EHSS Manager
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, WY 82901
307-382-1519
darin.howe@simplot.com

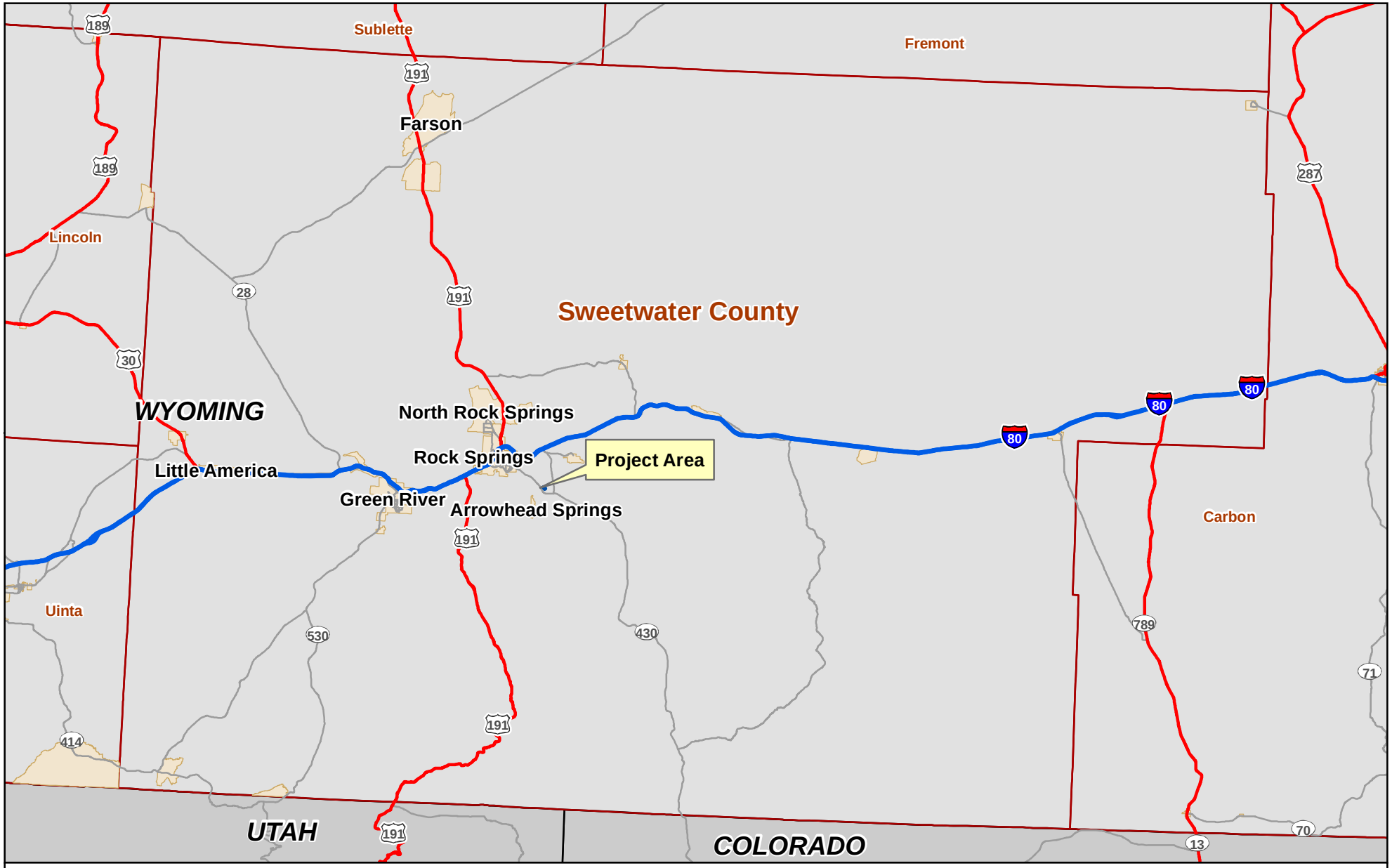
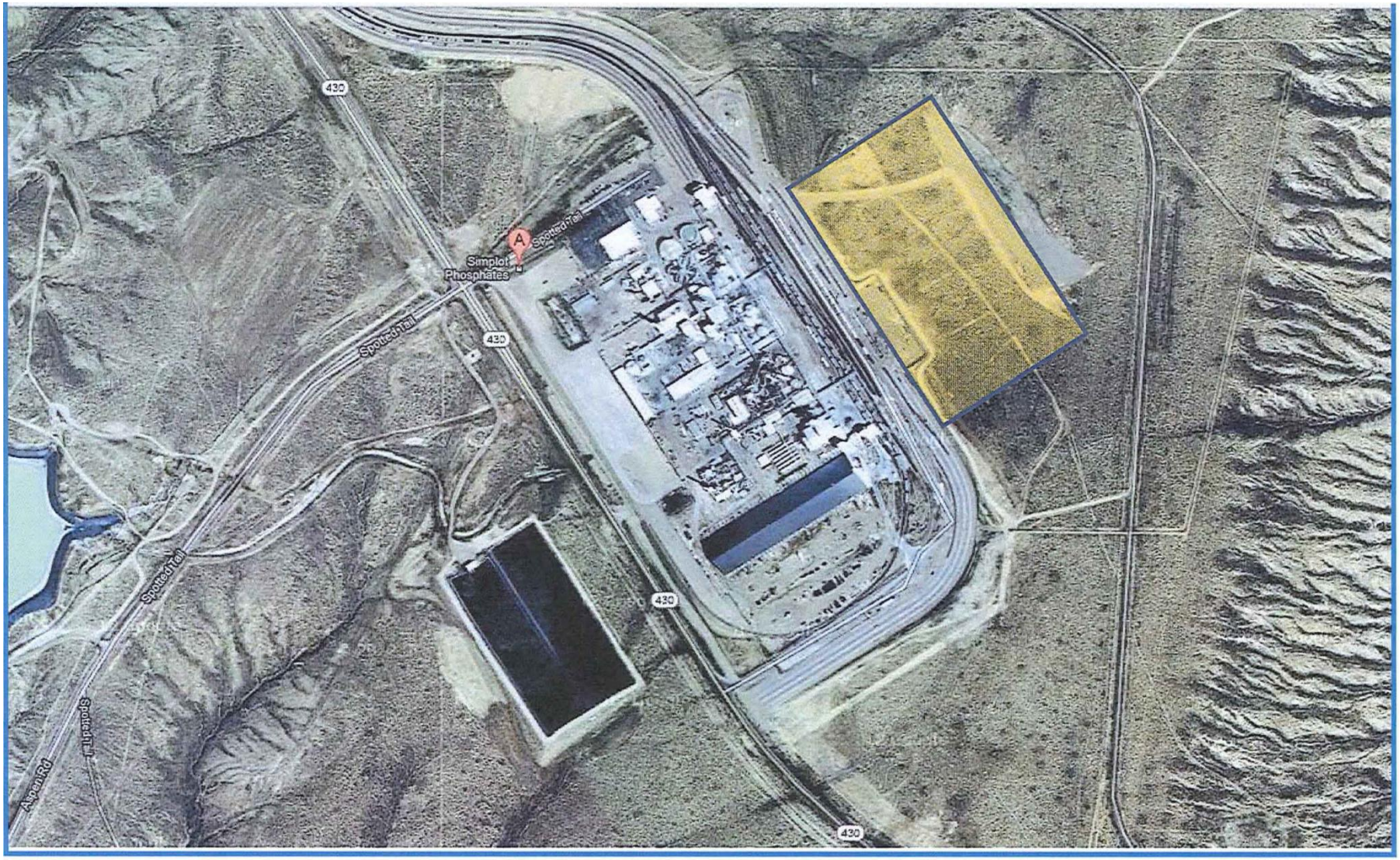


FIGURE 1
Public Notice
Simplot Phosphates Ammonia Plant Project
Sweetwater County, Wyoming

DEN \\MNUSTRICTGFS01\PROJECTS\GIS\DEN\SIMPLOT_ISA\GIS\MAPFILES\SIMPLOT_FIG1_PUBLIC_NOTICE_8X11.MXD SCCUTLER 1/16/2014 4:05:50 PM

CH2MHILL



Highlighted Area Shows Proposed Location of Rock Springs Ammonia Plant

Appendix E-4
Letter from Wyoming Game & Fish 02/05/2014

WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

February 5, 2014

WER 13361
Simplot Phosphates LLC
Wyoming Industrial Siting Permit Application
Simplot Rock Springs Ammonia Facility Project
Sweetwater County

Simplot Phosphates LLC
Attention: Darin L. Howe
515 South Highway 430
Rock Springs, WY 82901

Dear Mr. Howe:

The staff of the Wyoming Game and Fish Department has reviewed the Wyoming Industrial Siting Permit Application concerning the Simplot Rock Springs Ammonia Facility Project for Simplot Phosphates LLC in Sweetwater County. We offer the following comments for your consideration.

Terrestrial Considerations:

We have no terrestrial concerns pertaining to the Simplot Rock Springs Ammonia Facility Proposal located in T18N, R104W, NW ¼ Section 15.

Aquatic Considerations:

To minimize impacts to the aquatic resources of nearby waterways, we recommend the following:

- Accepted best management practices be implemented to ensure that all sediments and other pollutants are contained within the boundaries of the work area. Disturbed areas that are contributing sediment to surface waters as a result of project activities should be promptly re-vegetated to maintain water quality.

- Equipment should be serviced and fueled away from streams and riparian areas. Equipment staging areas should be at least 300 feet from riparian areas.

- Preventing the spread of aquatic invasive species (AIS) is a priority for the State of Wyoming, and in many cases, the intentional or unintentional spread of organisms from

one body of water to another would be considered a violation of State statute and Wyoming Game and Fish Commission Regulation. To prevent the spread of AIS, the following is required:

If equipment has been used in a high risk infested water [a water known to contain Dreissenid mussels* (zebra/quagga mussels)], the equipment must be inspected by an authorized aquatic invasive species inspector recognized by the state of Wyoming prior to its use in any Wyoming water.

Any equipment entering the State by land from March through November (regardless of where it was last used), must be inspected by an authorized aquatic invasive species inspector prior to its use in any Wyoming waters.

If aquatic invasive species are found, the equipment will need to be decontaminated by an authorized aquatic invasive species inspector.

Any time equipment is moved from one 4th level (8-digit) Hydrological Unit Code watershed to another within Wyoming, the following guidelines are recommended:

DRAIN: Drain all water from watercraft, gear, equipment, and tanks. Leave wet compartments open to dry.
CLEAN: Clean all plants, mud, and debris from vehicle, tanks, watercraft, and equipment.
DRY: Dry everything thoroughly. In Wyoming, we recommend drying for 5 days in Summer (June - August); 18 days in Spring (March - May) and Fall (September - November); or 3 days in Winter (December - February) when temperatures are at or below freezing.

*A list of high risk infested waters and locations in Wyoming to obtain an AIS inspection can be found at: wgfd.wyo.gov

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Robb Keith, Green River Region Fisheries Supervisor, at 307-875-3225 Ext. 251 or Patrick Burke, Green River Wildlife Biologist at 307-875-3225 Ext. 8611.

Sincerely,

Mark Konishi
Deputy Director

MK/mf/gb

cc: USFWS
Robb Keith, Green River Region
Patrick Burke, WGFD – Green River Region
Mark Zornes, WGFD – Green River Region

Appendix E-5
Response Letter to Wyoming Game & Fish 02/18/2014

Simplot
SIMPLOT PHOSPHATES LLC

February 18, 2014

Simplot Phosphates LLC -
Wyoming Industrial Siting Permit Application

Mark Konishi, Deputy Director
Wyoming Game and Fish Department
5400 Bishop Blvd.
Cheyenne, WY 82006

Dear Mr. Konishi:

Simplot Phosphates LLC (Simplot) is in receipt of your letter dated February 5, 2014.

Simplot assumes the comments in your letter were intended as a response to Simplot's January 21, 2014 letter introducing the planned Simplot Rock Springs Ammonia Facility Project to various state and local stakeholders, rather than a response to Simplot's Wyoming Industrial Siting Permit Application (Permit Application), as the Permit Application has not yet been submitted to the Wyoming Department of Environmental Quality (WDEQ), Industrial Siting Division (ISD) for consideration.

On behalf of Simplot, I would like to thank you and the Wyoming Game & Fish Department staff for the comments and we will certainly consider them as Simplot finalizes its Permit Application for submittal to the WDEQ - ISD.

Sincerely,

Darin L. Howe,
EHSS Manager

Appendix E-6
Letter from State Engineers Office 02/11/2014

State Engineer's Office

HERSCHLER BUILDING, 4-E CHEYENNE, WYOMING 82002
(307) 777-7354 FAX (307) 777-5451
seoleg@seo.wyo.gov

MATTHEW H. MEAD
GOVERNOR

PATRICK TYRRELL
STATE ENGINEER

11 February, 2014

Darin L. Howe
EHSS Manager
Simplot Phosphates, LLC
515 South Highway 430
Rock Springs, WY 82901

RE: Simplot Rock Springs Ammonia Facility Project
Wyoming Industrial Siting Permit Application

Dear Mr. Howe:

This letter comprises a response to your 21 January, 2013 letter regarding the above referenced project and Wyoming Industrial Siting Permit Application. Your letter states that the "existing water supply is adequate;" therefore, this response is based solely on the existing groundwater right(s) of record filed with the Wyoming State Engineer's Office (SEO).

Our research indicates that there is an existing ground water right appurtenant to the lands in the described area of use. Permit U.W. 69518 was filed with the SEO Ground Water Division in 1985 by Chevron Chemical Company to appropriate shallow ground water from the Seepage Collection Ditch for Miscellaneous and Industrial Uses to be pumped into Gypsum Reservoir (Surface Water Permit No. 8917 R). The water in the reservoir is pumped back to the phosphate fertilizer plant where it is commingled with water brought in from Vernal, Utah in a slurry pipeline and stored in the Clear Water Reservoir (Surface Water Permit No. 8916 R) where the water is ultimately used in the plant for the manufacture of commercial fertilizer.

Based upon annual groundwater use reports submitted to the SEO for this facility, it appears that the annual volume used does not meet or exceed the threshold of W.S. §35-12-108. Thus, the Department of Environmental Quality, Industrial Siting Council may not require Simplot to prepare and submit a Water Supply and Yield Analysis Plan (W.S. §35-12-108). For verification of criteria, it is recommended that you contact Kimber Wichmann, Principal Economist at 307-777-7369.

However, our research indicated several shortcomings with the existing permit that you should be aware of. Item 4 of the *Additional Conditions and Limitations* associated with the existing permit states that "this permit will be automatically cancelled December, 31 2016 unless a written request for an extension of time has been received by the State Engineer prior to December, 31 2016. Special attention should be focused on this deadline as long as Simplot desires to utilize water from this source beyond said cancellation date under the current permit.

Further, during a cursory review of the existing facility, proposed facility, and existing permit, it appears that some of the current and future facility extends beyond the footprint, or area of use, authorized by the original permit. This together with the proposal of an additional facility and additional use may require that an enlargement application be filed to insure that all of the facility is within the defined area of use and water use is consistent with the permit(s).

More importantly, the permit required that "a Statement of Completion will be filed within thirty (30) days of completion of construction, including pump installation." The permit goes on to state that "completion of construction and completion of the beneficial use of water for the purposes specified in Item 4 of this application will be made by December 31, 1987." On 30 September, 1986, a Notice of expiration of time for completion and completion of beneficial use was mailed to the permit holder. To date, no such information has been received by this office. If the facility was completed, including pump installation, and beneficial use was made prior to the deadline noted on the permit, the U.W. 6 – Statement of Completion and Description of Well or Spring and U.W. 8 – Proof of Appropriation and Beneficial Use of Ground Water can be completed, notarized, and submitted to this office. Lack of submission of the Notices will render the permit as expired and water use from this source at the existing facility will not be authorized.

I have enclosed a copy of the original permit and *Additional Conditions and Limitations* for your review. Also enclosed are a blank U.W. 6 and a blank U.W. 8 Notice for you to complete and have notarized if the facility was completed, including pump installation, and beneficial use was made prior to the deadline noted on the permit. If you have any questions regarding the information above, please contact Tony Rutherford at (307) 777-5959.

Sincerely,

Tony Rutherford
Ground Water Division

Encl: 3

Appendix E-7
Response Letter to State Engineers Office 02/21/2014

Simplot
SIMPLOT PHOSPHATES LLC

February 21, 2014

PERMIT NO. U.W. 69518 -
Updated Information

State Engineer's Office
Attention Mr. Tony Rutherford
Herschler Building, 4-E
122 West 25th Street
Cheyenne, WY 82002

Dear Tony:

Per your letter dated February 11, 2014 and our discussion in Cheyenne yesterday, I am sending you information that should update your files regarding our groundwater seepage collection ditch, originally permitted under No. U.W. 69518. This letter will also serve as Simplot's written request for extension as this permit is set to expire on December 31, 2016.

As mentioned to you, the groundwater pumped from this ditch is not used for day to day plant activities and is in no way related to the pending ammonia plant project we hope to undertake later this year. This water is pumped down as needed as part of our process impoundment leak detection system.

Water pumped from this ditch is co-mingled with Utah groundwater that comes from our mining operation near Vernal, Utah and these waters are stored in a lined pond, the Clear Water Reservoir (Surface Water Permit No. 8916 R) that you reference in your letter. This reservoir was the primary process water source for the existing facility up until 1999, but since that time, this system is a back-up supply. This reservoir permit is also due to expire on December 31, 2016, so please consider this letter as a request for extension of this surface water storage as well.

From 1999-Present, our process water is supplied from a connection to the city of Rock Springs. This water supply will provide the small incremental water increase for the pending ammonia plant. The clear water reservoir is still necessary in case of interrupted service from the city connection.

Should you have any questions or comments, feel free to contact me at (307) 382-1519. We would be happy to have you to the facility at any time.

Sincerely,

Darin L Howe

Darin L. Howe
EHSS Manager


Welcome to
Rock Springs
Home of 56
Nationalities
Host to All

Appendix F-1
Letters of Support – Wyoming Business Council

Wyoming
BUSINESS COUNCIL

Tel: 307.777.2800 • Fax: 307.777.2837
214 W. 15th Street • Cheyenne, WY 82001
www.wyomingbusiness.org

February 24, 2014

Ms. Kimber Wichmann, Principal Economist
State of Wyoming
Department of Environmental Quality
Industrial Siting Division
Herschler Building – 4W
122 West 25th Street
Cheyenne, Wyoming 82002

FILE COPY

RE: Simplot Phosphates Ammonia Plant Project

Dear Ms. Wichmann:

The Wyoming Business Council would like to offer our support for the Simplot Ammonia Plant Project in Sweetwater County, Wyoming and its associated benefits to the Sweetwater County and Wyoming economy. It is our understanding that this project will allow Simplot to produce ammonia on site instead of purchasing their ammonia from and industry competitor and relying solely on rail delivery. This production will also utilize the states abundant natural gas resources, adding substantial value to this important commodity.

Simplot is a valued partner in the growth and vibrancy of the economy in Sweetwater County and the State of Wyoming. They employ over 220 employees and contribute significantly to the tax base of the State. The estimated $400 million capital investment in this project is projected to create 300 onsite construction jobs, (with a peak of 460 jobs), for the 25 month construction duration and result in the creation of an additional 27 full time jobs once the plant in on-line.

Simplot is an asset to the State, and we appreciate their continued and expanded investment in the facilities here. We look forward to their successful construction and operation of the ammonia plant.

Sincerely,

Robert K. Jensen
Chief Executive Officer

C: Pat Robbins, WBC South Central Regional Director
Darin Howe, EHSS Manager, Simplot Phosphates

Appendix F-2
Letters of Support – Sweetwater County Commissioners

BOARD OF COUNTY COMMISSIONERS

SWEETWATER COUNTY

- WALLY J. JOHNSON, CHAIRMAN
- JOHN K. KOLB, COMMISSIONER
- GARY BAILIFF, COMMISSIONER
- REID WEST, COMMISSIONER
- DON VAN MATRE, COMMISSIONER

80 WEST FLAMING GORGE WAY, STE 109
GREEN RIVER, WY 82935
PH: (307) 872-3890 ~ FAX (307) 872-3992

March 4, 2014

Kimber Wichmann, Principal Economist
State of Wyoming
Department of Environmental Quality
Industrial Siting Division
Herschler Building, 4W
122 West 25th Street
Cheyenne, WY 82002

Dear Kimber:

I am writing on behalf of the Sweetwater County Board of County Commissioners to express my and the Board's support for the Simplot Ammonia Plant Project in Sweetwater County, Wyoming. The Board has been a strong supporter of economic development in southwestern Wyoming for many years and is pleased to see Simplot's plans for the ammonia plant come to fruition.

Simplot has been a good partner with Sweetwater County. Simplot helps to provide a wonderful quality of life for the local community. Sweetwater County looks forward to the positive economic impacts that the Simplot Ammonia Plant Project will bring such as jobs, increased tax support and growth in the community.

Sincerely,

Wally Johnson, Chairman
Sweetwater County Board of County Commissioners

Cc: Darin Howe, Simplot EHSS Manager, 515 South Highway 430, Rock Springs, WY 82901

Appendix F-3
Letters of Support – City of Green River

CITY of GREEN RIVER
FISH IT. FLOAT IT. LIVE IT.
WYOMING

OFFICE OF THE MAYOR
50 E 2nd North Street Green River WY 82935
(307) 872-6135 hcastillon@cityofgreenriver.org
www.cityofgreenriver.org

March 6, 2014

Kimber Wichmann, Principal Economist
Wyoming DEQ
Industrial Siting Division
Herschler Building, 4W
122 West 25th Street
Cheyenne, WY 82002

Dear Mr. Wichmann:

On behalf of the City of Green River, I am writing to express our support for the Simplot ammonia facility project in Sweetwater County. Simplot Phosphates is a great corporate neighbor, and the City of Green River appreciates the positive impact their presence has on our community.

We are pleased with Simplot's plans to expand their facility south of Rock Springs. Construction and operation of the ammonia production plant is an investment in the local community that will afford additional employment opportunities and tax revenue.

The City fully supports the Simplot expansion project and looks forward to the resulting positive economic benefits.

Sincerely,

Hank Castillon
Mayor

cc: Darin Howe, Simplot Phosphates LLC

Appendix F-4
Letters of Support – City of Rock Springs

Rock Springs
WYOMING

Carl R. Demshar, Jr., Mayor
212 D Street, Rock Springs, WY 82901
Office [307] 352-1510 • FAX [307] 352-1516
carl_demshar@rswy.net

March 10, 2014

Kimber Wichmann, Principal Economist
State of Wyoming
Department of Environmental Quality
Industrial Siting Division
Herschler Building, 4W
122 West 25th Street
Cheyenne, Wyoming 82002

RE: Letter of Support for Simplot Ammonia Plant Project

Dear Ms. Wichmann:

On behalf of myself and the governing body of the City of Rock Springs, I am submitting this letter to show our full support for the Simplot Ammonia Plant Project. We are supporting this project because Simplot has always maintained a very high profile in our community, and has always been a good corporate citizen. With this project, Simplot will continue to contribute to the economic viability of the area through construction jobs, permanent operating jobs, and the purchase of equipment to bring this project to fruition.

Simplot has been a major employer in the area, and they have contributed significantly to the quality of life that we enjoy. The City of Rock Springs and Simplot have maintained a very good partnership for many years, and we look forward to continuing that relationship for many years to come.

Yours very truly,

Carl R. Demshar, Jr.
Mayor

cc: Mr. Darin Howe, Simplot