



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009
www.blm.gov/wy



In Reply Refer To:
2800(WYD03) (bs)
WYW-186890

Carbon County Clerk
Attn: County Commissioners
P.O. Box 6
Rawlins, WY 82301

Dear Carbon County Board of Commissioners:

The Two Rivers Wind Energy Project is a commercial wind energy facility proposed in Albany and Carbon counties. Project components proposed on non-federal and federal lands include the installation of up to 79 wind turbine generators (WTGs). The proponent, Two Rivers Wind, LLC, which is wholly owned by BluEarth Renewables US, LLC and Clearway Renew LLC, requested a right-of-way (ROW) from the Bureau of Land Management (BLM) on September 20, 2019. This ROW application requested a thirty (30)-year ROW grant on 4,505 acres for the wind development areas (for Phases I-III only, as Phase IV is located on private land). The ROW request also includes a temporary 200-foot-wide ROW (125-foot permanent ROW) where the proposed transmission lines cross 7.6 miles of BLM-administered public lands. Project components proposed on BLM-administered public lands for the wind development areas and the associated transmission lines include the installation of up to 37 WTGs, 25.1 miles of Project roads, 27 miles of electrical collection lines and communication cables, one operations and maintenance building, one substation, and 7.6 miles of transmission lines.

Once the ROW application was filed, the BLM worked to gather information and analyze the project pursuant to the National Environment Policy Act (NEPA). This has included site visits, Plan of Development (POD) review, review by the interdisciplinary team (IDT), and commenting and suggesting revisions to the draft NEPA document provided by the proponent. Two Rivers Wind, LLC, has also applied for an incidental eagle take permit (IETP) from the United States Fish and Wildlife Service (USFWS), and the NEPA analysis for both actions were combined with the BLM and USFWS serving as co-leads on the project.

A draft Environmental Assessment (EA) was released on November 9, 2022, with a thirty (30)-day review period. Eighteen comments were received raising various concerns with the EA involving both the IETP and the BLM ROW.¹

¹ Comments letters can be seen on eplanning at <https://eplanning.blm.gov/eplanning-ui/project/2003881/510>

Since the receipt of comments, the BLM has collected additional data, and is working with Two Rivers Wind, LLC, to revise the plan of develop and project layout to reduce impacts and to respond to comments.² In the past month, the BLM and Two Rivers, LLC, have had several meetings regarding specific issues with avoidance of Tribal and cultural resources. This has resulted in changes to the project layout, including the removal of a turbine which was near an important Tribal site, a redesign of the road network to avoid a cultural site, and the removal of a redundant transmission line. The company has also worked with the BLM to co-locate facilities and reduce the overall disturbance on federal land.

Tribal Consultation and coordination is ongoing, with a virtual meeting set for March 29, 2023. At that meeting, discussion will be held regarding buffers for important Tribal resources as well as the potential effects of this project on Tribal resources. Final cultural surveys and layout adjustments may be required based upon these discussions.

The level of impacts cannot be determined by the Authorized Officer until this above outlined process is finished and analyses are completed. If it is found that the impacts will not be significant, a finding of no significant impact (FONSI) can be entered and the ROW will be issued shortly thereafter.

Although steps in the above process remain, BLM consents to Carbon County issuing a Wind Energy Collection Systems (WECS) conditional use permit for the Two Rivers Wind, LLC project. BLM's consent, however, will not serve as a final decision for the SROW. Instead, it is provided to allow Two Rivers to proceed with the permitting process in Carbon County, WY. BLM's final decision on the SROW will be the final, binding action for these statutory processes.

If you have any questions or need additional information, please contact Timothy Novotny, Field Manager, at the address shown above, e-mail tnovonty@blm.gov, or telephone (307) 328- 4209.

Sincerely,

Andrew Archuleta,

State Director, BLM Wyoming

² The USFWS is responding to comments related to the IETP.