

## **APPENDIX A**

### **PUBLIC SCOPING**





## NOTICE OF SCOPING

The U.S. Department of Energy (DOE) is preparing a draft Environmental Assessment to analyze and describe the potential environmental impacts associated with proposed actions at the:

**National Wind Technology Center (DOE/EA-1914)  
Jefferson County, Colorado**

The DOE is proposing to analyze future improvements to the existing National Renewable Energy Laboratory's (NREL) National Wind Technology Center (NWTC). DOE's Golden Field Office is preparing a draft Environmental Assessment in accordance with the National Environmental Policy Act (NEPA). The complete scoping letter with attachments is available for review at the Standley Lake Public Library and on the DOE Golden Field Office and NREL websites:

[http://www.eere.energy.gov/golden/Reading\\_Room.aspx](http://www.eere.energy.gov/golden/Reading_Room.aspx)

[http://www.nrel.gov/ehsq/environmental\\_protection.html](http://www.nrel.gov/ehsq/environmental_protection.html)

Public comments on any potential issues and/or environmental impacts of implementing the proposed actions will be accepted until **November 30, 2012**. Please direct any written questions or comments to:

NREL NEPA Comments, National Renewable Energy Laboratory, EHS Office (M.S. RSF 103), 15013 Denver West Parkway, Golden, Colorado 80401 or by email to [NREL.NEPA.Comments@nrel.gov](mailto:NREL.NEPA.Comments@nrel.gov) or by fax to 303-275-4002.



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**National Renewable Energy Laboratory**  
15013 Denver West Parkway - MS RSF 103  
Golden, Colorado 80401-3305

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## Department of Energy

Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

October 31, 2012

TO: DISTRIBUTION LIST

**SUBJECT: NOTICE OF PUBLIC SCOPING – SITE-WIDE ENVIRONMENTAL ASSESSMENT OF THE NATIONAL RENEWABLE ENERGY LABORATORY’S NATIONAL WIND TECHNOLOGY CENTER, GOLDEN, CO (DOE/EA-1914)**

The U.S. Department of Energy (DOE) is proposing to complete a Site-Wide Environmental Assessment (EA) of the National Wind Technology Center (NWTC) to include analysis of potential environmental impacts due to proposed site activities and operations. Details of the proposed project and its location are contained below.

Pursuant to the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA (40 CFR Parts 1500-1508), and DOE’s implementing procedures for compliance with NEPA (10 CFR Part 1021), DOE is preparing an Environmental Assessment (EA) to:

- Identify potential adverse environmental effects as well as ways to avoid, minimize or mitigate such effects should these proposed site activities and operations be implemented;
- Evaluate viable alternatives to the proposed action, including a no action alternative;
- Describe the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity; and,
- Characterize any irreversible and irretrievable commitments of resources that would be involved should these proposed site activities and operations be implemented.

### **PROBABLE ENVIRONMENTAL EFFECTS/ISSUES SCOPED FOR THE ENVIRONMENTAL ASSESSMENT**

The Site-Wide EA will describe and analyze any primary, direct, induced, indirect and cumulative impacts of the Proposed Action and alternatives, and will identify possible mitigation measures to reduce or eliminate those impacts. Beneficial and adverse, on-site and off-site, construction, operation, and maintenance impacts will be discussed, as appropriate. The Site-Wide EA will discuss impacts that may result to:

- Land Use
- Traffic and Transportation
- Noise (Acoustics)
- Visual Quality/Aesthetics
- Historic and Cultural Resources
- Water Resources
- Geology and Soils
- Air Quality, Greenhouse Gases and Climate Change



- Biological Resources
- Hazardous Materials and Waste Management
- Utilities, Infrastructure and Energy
- Energy Efficiency, Renewable Energy and Sustainability
- Human Health and Safety
- Socioeconomics and Environmental Justice
- Intentional Destructive Acts

## **PROPOSED ACTION AND ALTERNATIVES**

The following presents a summary of the Proposed Action and No Action alternative descriptions.

### **Proposed Action**

Proposed new construction projects include additional wind turbine test sites as well as permanent physical improvements to the site, such as buildings, equipment, utilities and other infrastructure. Other activities not requiring permanent facilities or infrastructure include facility operations, management practices and maintenance activities. Specifics of the proposed actions are provided in **Attachment I**.

### **Development of a Reasonable Range Of Alternatives**

DOE is required to consider a reasonable range of alternatives to the proposed action during an environmental review. The definition of alternatives is governed by the “rule of reason”. Reasonable alternatives are those that may be feasibly carried out based on environmental, technical, and economic factors.

Under the No Action Alternative, NREL would continue current activities and operations at NWTC.

## **PUBLIC SCOPING**

The DOE Golden Field Office will make this letter available to all interested federal, state, and local agencies to provide input on issues to be addressed in the Site-Wide EA. Agencies are invited to identify the issues, within their statutory responsibilities that should be considered in the Site-Wide EA. The general public is also invited to submit comments on the scope of the Site-Wide EA.

This letter will be available at Standley Lake Public Library and posted in the DOE Golden Field Office online public reading room and the NREL website:

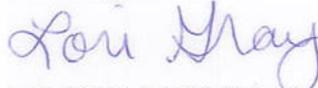
[http://www.eere.energy.gov/golden/Reading\\_Room.aspx](http://www.eere.energy.gov/golden/Reading_Room.aspx), and;  
[http://www.nrel.gov/ehsq/environmental\\_protection.html](http://www.nrel.gov/ehsq/environmental_protection.html)

Please submit your written comments regarding this scoping document on or before November 30, 2012  
to:

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National Renewable Energy Laboratory  
EHS Office, M.S. RSF 103  
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Golden, CO 80401  
(303) 275-4002 (fax)  
email: [NREL.NEPA.Comments@nrel.gov](mailto:NREL.NEPA.Comments@nrel.gov)

The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Lori Gray, NEPA Compliance Officer  
U.S. Department of Energy, Golden Field Office

Attachment I: Project Description

Attachment II: Figures

Figure 1-1. NWTC Regional Map

Figure 2-1. Proposed Project Locations at the NWTC

## **Attachment 1: Project Description**

### **SITE BACKGROUND AND DESCRIPTION**

The National Renewable Energy Laboratory (NREL) is the premier DOE national laboratory dedicated to the research, development, and deployment of renewable energy and energy efficiency technologies. As depicted in **Attachment II, Figure 1-1**, NREL is comprised of two main sites: South Table Mountain (STM) and the National Wind Technology Center (NWTC). Details regarding NREL's mission and research programs are available on the NREL website at: <http://www.nrel.gov>.

The 305-acre NWTC is located in northwest Jefferson County, Colorado, approximately 16 miles northwest of Denver. The site is south of Colorado State Highway 128 and directly east of aggregate mining and processing facilities on the east side of Colorado State Highway 93 between Golden and Boulder, Colorado.

There are currently seven major buildings located on the NWTC site that house research and administrative functions including:

- Administration Building, Building 251;
- Structural Testing Laboratory (STL), Building 254;
- Test Preparation Building (Quonset Hut), Building 260;
- 2.5 MW Dynamometer Test Facility, Building 255;
- 5.0 MW Dynamometer Test Facility and Controllable Grid Interface, Building 258;
- Distributed Energy Resources Test Facility (DERTF), Building H-1; and,
- Blade Test Facility, Building 252.

All seven major buildings are located in the Research and Support Facilities area on the northern portion of the site along the main east-west road (West 119<sup>th</sup> Ave).

Several smaller access control, support, and testing facilities are also located on the NWTC site. These include the Site Entrance Building (SEB) or Guard Post, the electrical switchgear buildings, several trailers, and several data sheds. Currently, the total area of all buildings at the NWTC is approximately 1.3 acres.

The NWTC's existing turbine test sites currently support four megawatt (MW)-scale turbines ranging in output from 1.5 to 3 MW, three mid-scale turbines, ranging from 100 kilowatt (kW) to 600 kW, and nine small wind turbines ranging in size from 1 kW to 8 kW.

In 2002, DOE released a final Site-Wide EA for the NWTC (DOE/EA-1378) evaluating the potential impacts of site operations and short-term and long-term improvements. A Finding of No Significant Impact (FONSI) was signed by DOE on May 31, 2002.

The subject of this Site-Wide EA includes the proposed action discussed below which would support DOE's mission in the R&D of energy efficiency and renewable energy technologies by providing enhanced research and support capabilities to adequately continue state-of-the-art wind energy research.

## **PROPOSED ACTION AND ALTERNATIVES**

The following presents a summary of the Proposed Action and No Action alternative descriptions.

### **Proposed Action**

Under the Proposed Action, DOE proposes to expand operations within the current 305-acre NWTC site. Several new buildings and additions to existing buildings are proposed at the NWTC site, as well as infrastructure upgrades to roads, electrical power, water supply, and sewer lines (NREL 2011c). This would include adding multiple turbines with associated meteorological towers, access roads, data sheds, and infrastructure. New wind turbines would vary in size from small generating capacity (up to 100 kW), to mid-range (up to 1 MW), to large MW-scale turbine installations. Future facility construction, research, development and testing proposed for the NWTC is dependent on changing federal budgets and priorities. The details provided in this assessment are the best estimates that can be made at this time.

**Attachment II, Figure 2-1** presents proposed improvements at the site.

### **Increasing and Enhancing Research and Support Capabilities**

The Proposed Action for new construction would provide for additional facilities at the NWTC, as described below.

*Wind Turbine Component Research and Testing Facility.* DOE would construct a 40,000 square foot facility that would be located west of Building 251. The facility is envisioned as a comprehensive R&D laboratory that would address advanced capabilities in the wind industry.

*Energy Storage Test Facilities.* DOE would construct one or two MW-Scale Energy Storage Test Platform areas, each approximately 200 feet x 220 feet, either south of 119th Avenue and at the north end of Row 3, or on the south end of the site between Rows 2 and 3. Both mobile and permanent energy storage test facilities would be developed to house and test innovative energy storage devices interconnected to variable renewable energy generation sources.

*Staging and Maintenance Warehouse.* DOE would construct a warehouse up to 40,000 square feet, west of the DERTF (Building H-1) in the northwest corner of the site. This facility would be used to support indoor staging of test projects and maintenance of equipment.

*Conference and Learning Facility.* DOE would also build a new Conference and Learning Facility up to 25,000 square feet, located near the NWTC site entrance.

*Modifications of Existing Buildings.* Modification of existing infrastructure includes upgrades to the Administration Building 251, STL Building 254, DERTF Building H-1, and 2.5 MW Dynamometer Building 255. Other modifications such as adding a cool roof to an existing building and expansion of buildings to accommodate new research and operations may be required.

The Proposed Action for infrastructure upgrades would provide for additional capabilities at the NWTC, as described below.

*Other Infrastructure Upgrades.* Other upgrades to the facility would include drinking water system upgrades, fire suppression system upgrades, sanitary waste upgrades, road improvements, data/telecommunications improvements.

*Routine Technical Tasks for Research and Site Maintenance Activities.* These tasks include loading equipment, preparing for tests, moving parts, installing and removing turbines, monitoring, cleaning facilities and equipment, maintaining landscape features, snowplowing, performing pest management, and maintaining buildings and infrastructure.

### **Increasing Site Use and Density**

The Proposed Action provides for additional wind turbines and expansion of the number of field test sites and associated infrastructure to potentially include any combination of up to 10 large MW-scale wind turbines (each rated between 1 MW to 7 MW), up to 10 mid-scale turbines (each rated between 100 kW to 1 MW), and up to 40 small wind turbines (each rated between 300 W to 100 kW). Up to 30 meteorological towers would be installed for testing turbine operations and wind conditions. Some of the meteorological towers would be erected to support upwind and downwind turbulence inflow R&D studies, plus associated infrastructure. These numbers would be considered totals, which include the existing turbines and meteorological towers.

### **Expanding Power Capacity**

The Proposed Action would provide for additional power capacity at the NWTC, as described below.

The current NWTC electrical generation capacity is 11.2 MW. Turbine operations are being curtailed to stay below an existing 10 MW limit in accordance with Xcel Energy requirements. The maximum combined rated electrical generation capacity for the NWTC site over the next 5 years is estimated to be up to 30 MW. Assuming wind technology development continues its current trend toward larger turbines, the projected maximum NWTC electrical generation capacity for the 5- to 10-year timeframe is estimated to increase up to a site total of 50 MW as additional turbines are added and smaller MW-scale turbines are replaced with larger units.

To accommodate an increase to 50 MW, the existing site electrical infrastructure would need to be upgraded to add an additional 40 MW of generation capacity. DOE and NREL would work with a transmission provider for the design and installation of an on-site substation to increase the site-generated power from distribution voltage (13.2kV) to transmission voltage (115kV) along with a short run of transmission line to interconnect with the transmission provider.

### **Development of a Reasonable Range Of Alternatives**

Under the No Action Alternative, current activities and operations would continue at NWTC.

## **Attachment II: Figures**

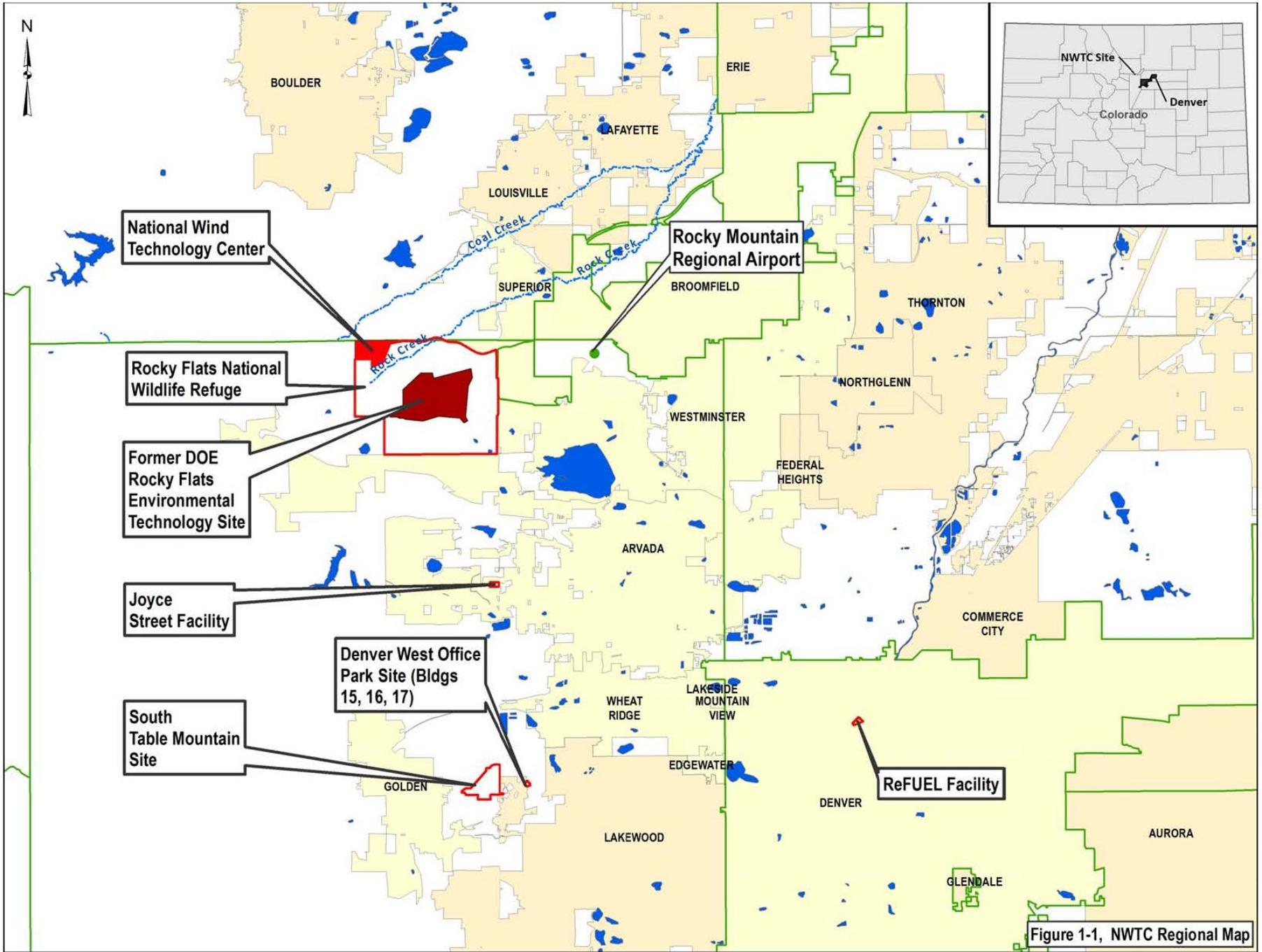
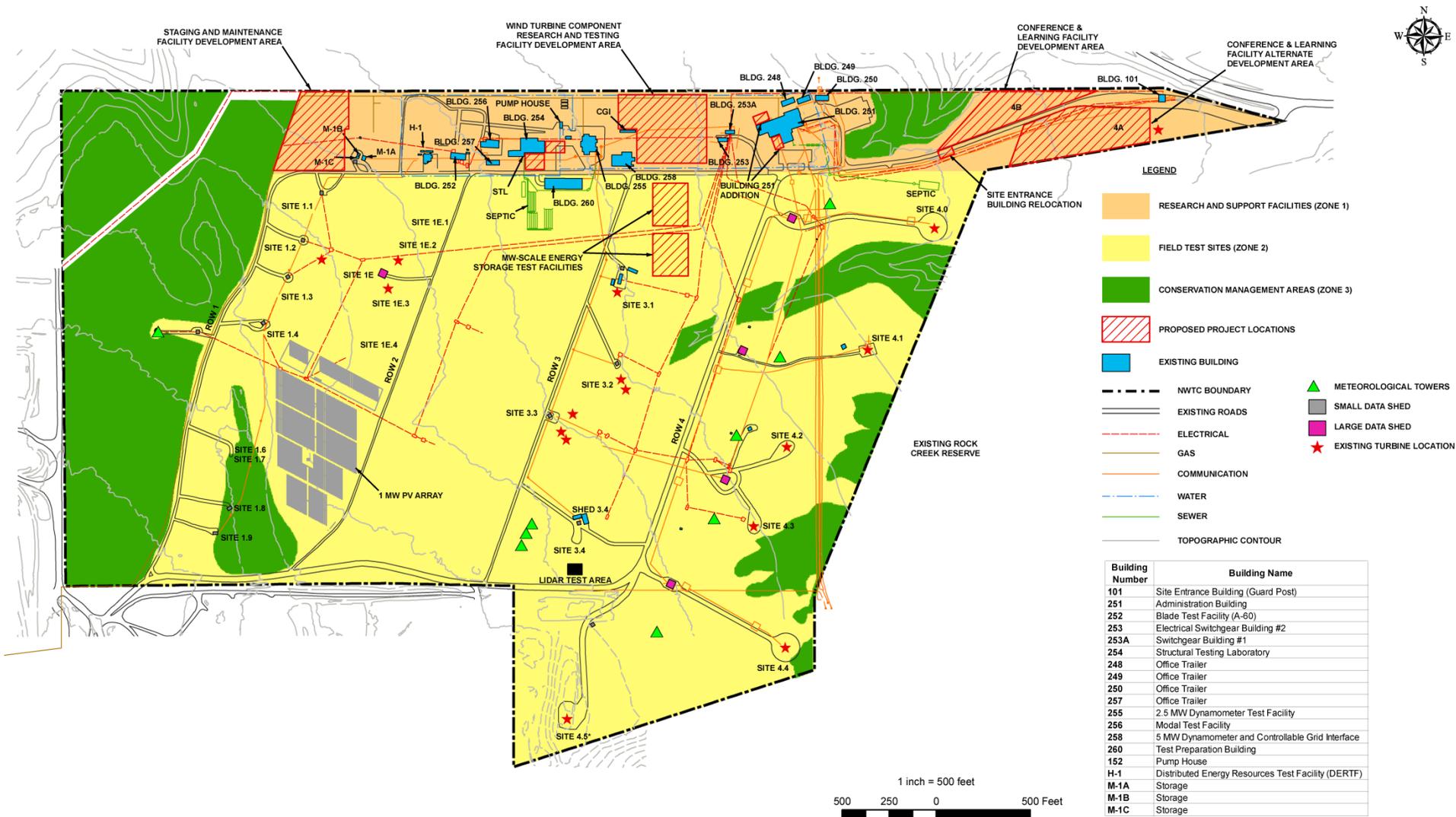


Figure 1-1, NWTC Regional Map



**Figure 2-1.**  
Proposed Project Locations at the  
National Wind Technology Center

### Public Reading Room - NREL DRAFT Environmental Assessments (EAs) and Notice of Scoping/Availability

Below are electronic versions of Golden Field Office Reading Room documents that were created after November 1, 1996, per the requirements of the Electronic Freedom of Information Act Amendment of 1996. Most documents are available in Adobe Acrobat Portable Document Format (PDF). [Download Acrobat Reader.](#)

#### Draft Site-Wide Environmental Assessment of National Renewable Energy Laboratory's National Wind Technology Center, Jefferson County, CO (DOE/EA-1914)

- Notice of Scoping ([PDF 1.6 MB](#))

 [Printable Version](#)

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### Environmental Protection

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### Quality

### Environmental Protection

Protecting the environment is at the heart of NREL's mission to develop new renewable energy technologies. Workers have a responsibility to incorporate the principles of environmental stewardship and sustainability in their work activities. When planning activities and performing daily tasks, our staff considers the potential impacts to the environment:

- The amount and type of wastes generated and reduced,
- The potential release of contaminants to air, land, or water, and
- The effect activities might have on NREL's wildlife, vegetation, and other natural resources. Links to our most recent wildlife and vegetation surveys are below.

NREL's [Environmental Management System](#) integrates the components of environmental protection into the laboratory's management processes and activities. The laboratory's [Sustainable NREL](#) program works with NREL's Environment, Safety, Health, and Quality Office to address NREL's environmental footprint — all areas of potential environmental impact.



*Credit: Steve Wilcox*

### South Table Mountain and National Wind Technology Center Sites Support Native Plants and Animals

NREL's two major sites, South Table Mountain and the National Wind Technology Center, are largely undeveloped, allowing for the preservation of habitats that support numerous species of native plants and animals. Our policy is to foster and maintain healthy and vigorous natural ecosystems in the undeveloped areas, as well as in areas adjacent to research facilities and activities.

Workers are encouraged to enjoy NREL's natural resources, but to do so with respect, minimizing impacts on soils and vegetation, and ensuring that wildlife is not harassed or harmed.

### Environmental Reports

#### Annual Environmental Performance

Each year NREL reports on environmental compliance and performance through its Annual Environmental Performance Report. These reports contain detailed information about NREL's compliance programs, programs that support vegetation and wildlife enhancement, and a forward look to upcoming improvements.

- [2011 NREL Annual Environmental Performance Report](#)
- [2010 NREL Annual Environmental Performance Report](#)
- [2009 NREL Annual Environmental Performance Report](#)
- [2008 NREL Annual Environmental Performance Report](#)
- [2007 NREL Annual Environmental Performance Report](#)

#### Environmental Assessment and Surveys

NREL conducts environmental assessments as required by the National Environmental Policy Act (NEPA) and periodically surveys vegetation and wildlife habitat. Below you will find recent environmental assessments, supplements, and vegetation and wildlife surveys for NREL's South Table Mountain campus in Golden and the National Wind Technology Center south of Boulder.

#### South Table Mountain

##### NEPA

- [South Table Mountain Environmental Assessment 2003](#)
  - [Supplement analysis to the final supplement-II to the Final Site-Wide Environmental Assessment of the National Renewable Energy Laboratory's South Table Mountain complex, July 2011](#)
  - [Final Supplement-II to the Final Site-Wide Environmental Assessment of the National Renewable Energy Laboratory's South Table Mountain Complex \(DOE/EA 1440-S-II\) and Finding of No Significant Impact 2009](#)
  - [South Table Mountain Supplemental Environmental Assessment 2008](#)
  - [South Table Mountain Three Site Development Projects Environmental Assessment 2007](#)

##### Vegetation & Wildlife

- [South Table Mountain Vegetation and Wildlife Survey 2011](#)
- [South Table Mountain Wildlife Survey 2005](#)
- [South Table Mountain Vegetation Survey 2002](#)

#### National Wind Technology Center

##### NEPA

- [National Wind Technology Center Environmental Assessment 2012 – Scoping Letter for Public Review](#)
- [National Wind Technology Center Environmental Assessment 2002](#)

##### Vegetation & Wildlife

- [National Wind Technology Center Vegetation and Wildlife Survey 2011](#)
- [National Wind Technology Center Bird & Bat Report 2003](#)

- [National Wind Technology Center Vegetation Survey 2000](#) 

 [Printable Version](#)

NREL is a national laboratory of the U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, operated by the Alliance for Sustainable Energy, LLC.

Content Last Updated: October 30, 2012

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# AFFIDAVIT OF PUBLICATION

## CAMERA

State of Colorado  
County of Boulder

I, the undersigned agent, do solemnly swear that the CAMERA is a daily newspaper printed, in whole or in part, and published in the City of Boulder, County of Boulder, State of Colorado, and which has general circulation therein and in parts of Boulder and Broomfield counties; that said newspaper has been continuously and uninterruptedly published for a period of more than six months next prior to the first publication of the annexed legal notice of advertisement, that said newspaper has been admitted to the United States mails as second-class matter under the provisions of the Act of March 3, 1879, or any, amendments thereof, and that said newspaper is a daily newspaper duly qualified for publishing legal notices and advertisements within the meaning of the laws of the State of Colorado; that a copy of each number of said newspaper, in which said notice of advertisement was published, was transmitted by mail or carrier to each of the subscribers of said newspaper, according to the accustomed mode of business in this office.

The annexed legal notice or advertisement was published in the regular and entire edition of said daily newspaper once; and that one publication of said notice was in the issue of said newspaper dated **November 1, 2012**.

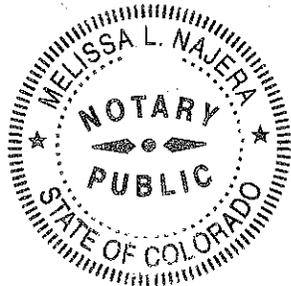
*W. Underk*

Agent

Subscribed and sworn to before me this **1st** day of **November, 2012** in the County of Boulder, State of Colorado.

*Melissa L. Najera*  
Notary Public  
My commission expires 12/11/2014

FEE \$228.50  
ACCOUNT #: 5073406  
AD #5571971



### LEGAL NOTICE NOTICE OF SCOPING

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The DOE Golden Field Office welcomes your input throughout the NEPA Process. DOE anticipates posting the draft Site-Wide Environmental Assessment for public review in Spring 2013. Public scoping comments on the draft Environmental Assessment will be accepted for a period of 30 days. Public comments on any potential issues and/or environmental impacts of implementing the proposed actions will be accepted until November 30, 2012. Please direct any written questions or comments to:

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Published in the Camera on November 1,  
2012 - 5571971

# AFFIDAVIT OF PUBLICATION

Colorado Hometown Weekly

State of Colorado  
County of Boulder, County of Weld

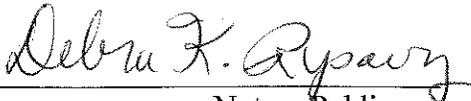
I, the undersigned agent, do solemnly swear that the Colorado Hometown Weekly; is a weekly newspaper published in the County of Boulder and County of Weld, State of Colorado, and has general circulation therein; that said newspaper has been published continuously and uninterrupted in said County of Boulder and County of Weld for a period of more than fifty-two consecutive weeks next prior to the first publication of the annexed legal notice or advertisement' that said newspaper has been admitted to the United States mails as second-class matter under provisions of the Act of March 3, 1879, and amendments thereto; and that said newspaper is duly qualified for publishing legal notices and advertisements within the meaning of the laws of the State of Colorado;

The attached legal notice or advertisement was published in the regular and entire issue of the Colorado Home Weekly for a period of one advertisement in said issue dated **October 31, 2012**



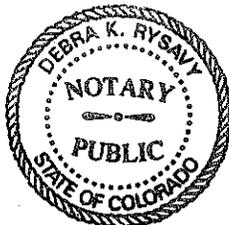
Agent

Subscribed and sworn to before me, this 31<sup>st</sup> day of **October, 2012** in the County of Boulder, State of Colorado.



Notary Public

Fee \$68.20  
Account #5073406  
Ad #5571976



MY COMMISSION EXPIRES  
APRIL 30, 2013

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303-275-4002.

Published in the Colorado Hometown Weekly  
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**The Denver Newspaper Agency**

**PUBLISHER'S AFFIDAVIT**

**City and County of Denver     )  
State of Colorado                )  
  )**

The undersigned   Jean Birch    
being first duly sworn under oath, states  
and affirms as follows:

1. He/she is the legal Advertising Reviewer of the Denver Newspaper Agency, publisher of *The Denver Post* and *Your Hub*.
2. *The Denver Post* and *Your Hub* are newspapers of general circulation that have been published continuously and without interruption for at least fifty-two weeks in Denver County and meet the legal requisites for a legal newspaper under Colo. Rev. Stat. 24-70-103.
3. The notice that is attached hereto is a true copy, published in *The Denver Post* on the following date(s):

on November 1, 2012

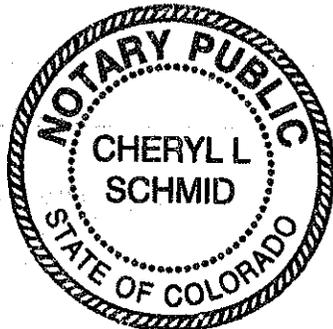
Jean Birch  
Signature

Subscribed and sworn to before me this   1    
day of   November  , 2012.

Cheryl L Schmid  
Notary Public

My commission expires   September 14, 2013  

(SEAL)



**LEGAL NOTICE**

**NOTICE OF SCOPING**

The U.S. Department of Energy (DOE), in compliance with the National Environmental Policy Act of 1969 (NEPA), is preparing a draft Site-Wide Environmental Assessment (DOE/EA-1914) to analyze the potential environmental impacts associated with proposed actions at the National Renewable Energy Laboratory's (NREL's) National Wind Technology Center (NWTC) located in Jefferson County, Colorado. The complete scoping letter with attachments is available for review at the Standley Lake Public Library and on the DOE Golden Field Office and NREL websites:

[http://www.cere.energy.gov/golden/Reading\\_Room.aspx](http://www.cere.energy.gov/golden/Reading_Room.aspx), and click on "NREL Environmental and NEPA Documents", or;

[http://www.nrel.gov/ehsq/environmental\\_protection.html](http://www.nrel.gov/ehsq/environmental_protection.html).

The DOE Golden Field Office welcomes your input throughout the NEPA Process. DOE anticipates posting the draft Site-Wide Environmental Assessment for public review in Spring 2013. Public scoping comments on the draft Environmental Assessment will be accepted for a period of 30 days. Public comments on any potential issues and/or environmental impacts of implementing the proposed actions will be accepted until November 30, 2012. Please direct any written questions or comments to:

NREL NEPA Comments  
National Renewable Energy Laboratory  
EHS Office (M.S. RSF 103)  
15013 Denver West Parkway  
Golden, Colorado 80401

or by email to [NREL.NEPA.Comments@nrel.gov](mailto:NREL.NEPA.Comments@nrel.gov) or by fax to 303-275-4002.

Proof of Publication  
THE GOLDEN TRANSCRIPT

110 N. Rubey Drive Suite 120 Golden, CO 80401

1. I, C Stauffer, am the agent of The Golden Transcript, newspaper printed and published in the city of Golden, County of Jefferson and State of Colorado, and has personal knowledge of all the facts set forth in this affidavit;
  2. That the said newspaper is printed and published once each week on Thursday, and that it has a general circulation in the City of Golden and in the County of Jefferson and elsewhere, delivered by carriers or transmitted by mail to each of the subscribers of said paper, according to the accustomed mode of business in this office;
  3. That the said newspaper was established and has been printed and published in the said City of Golden and the County of Jefferson uninterrupted and continuously during a period of at least 52 consecutive weeks next prior to the first Issue there-of containing said publication, a copy of which is hereto attached;
  4. That the said newspaper is a weekly newspaper of general circulation, and is printed and published in whole or in part in the City of Golden and the said County of Jefferson in which said publication is required by law to be published, a copy of which is hereunto attached;
  5. That the said newspaper is a weekly newspaper qualified to publish legal notices, as defined by the Statutes of the State of Colorado;
  6. That said newspaper had, prior to January 1, 1936, and has ever since that date, been admitted to the United States mail as second class matter under the provisions of the Act of March 3, 1979, or any amendments thereto;
  7. That the said annexed publication was published in the regular and entire edition of the Golden Transcript, a duly qualified weekly newspaper for that purpose, within the terms and means of the Statutes of the State of Colorado;
  8. That the said annexed publication is a full, true, and correct copy of the original which was regularly published in each of the regular and entire issues of the Golden Transcript, a legally qualified paper for that purpose, once each week, on the same day of each week, for 1 successive weeks, by 1 Insertions, and that the first publication thereof was in the November 1, 2012;
- and that the last publication was in the November 1, 2012.

Subscribed and sworn to before me this 1st day of November 2012.

By: C Stauffer

STATE OF COLORADO SS  
County of Jefferson

Witness my hand and official seal

Hillary S. Sullivan

**HILLARY S. SULLIVAN**  
NOTARY PUBLIC  
STATE OF COLORADO

My Commission Expires April 23, 2014

LEGAL NOTICE  
NOTICE OF SCOPING

The U.S. Department of Energy (DOE), in compliance with the National Environmental Policy Act of 1969 (NEPA), is preparing a draft Site-Wide Environmental Assessment (DOE/EA-1914) to analyze the potential environmental impacts associated with proposed actions at the National Renewable Energy Laboratory's (NREL's) National Wind Technology Center (NWTC) located in Jefferson County, Colorado. The complete scoping letter with attachments is available for review at the Standley Lake Public Library and on the DOE Golden Field Office and NREL websites:  
[http://www.eere.energy.gov/golden/Reading\\_Room.aspx](http://www.eere.energy.gov/golden/Reading_Room.aspx), and click on "NREL Environmental and NEPA Documents", or [http://www.nrel.gov/ehsq/environmental\\_protection.html](http://www.nrel.gov/ehsq/environmental_protection.html).  
The DOE Golden Field Office welcomes your input throughout the NEPA Process. DOE anticipates posting the draft Site-Wide Environmental Assessment for public review in Spring 2013. Public scoping comments on the draft Environmental Assessment will be accepted for a period of 30 days. Public comments on any potential issues and/or environmental impacts of implementing the proposed actions will be accepted until November 30, 2012. Please direct any written questions or comments to:  
NREL NEPA Comments  
National Renewable Energy Laboratory  
EHS Office (M.S. RSF 103)  
15013 Denver West Parkway  
Golden, Colorado 80401  
or by email to  
NREL.NEPA.Comments@nrel.gov or by fax to 303-275-4002.  
Published November 1, 2012  
Golden Transcript

2012 NWTC Mailing List --FINAL

	Organization	Name	Address 1	Address 2	City	State	Zip
Boulder County	Ms. Cindy Domenico	Boulder County Commissioner		PO Box 471	Boulder	CO	80306
Boulder County	Mr. Ben Pearlman	Boulder County Commissioner		PO Box 471	Boulder	CO	80306
Boulder County	Mr. Will Toor	Boulder County Commissioner		PO Box 471	Boulder	CO	80306
Boulder County		Boulder County Parks and Open Space		5201 St. Vrain Rd.	Longmont	CO	80503
Boulder County		Boulder County Planning		PO Box 471	Boulder	CO	80306
Boulder County		Boulder County Sheriff's Office		5600 Flatiron Pkwy	Boulder	CO	80301
Broomfield		Broomfield City and County Manager		One DesCombes Drive	Broomfield	CO	80020
Broomfield		Broomfield Open Space & Trails		One DesCombes Drive	Broomfield	CO	80020
Broomfield		Broomfield Planning Department		One DesCombes Drive	Broomfield	CO	80020
Broomfield	Mayor	City and County of Broomfield		One DesCombes Drive	Broomfield	CO	80020
City of Boulder		Boulder City Manager	Municipal Building	1777 Broadway, 2nd Floor	Boulder	CO	80306
City of Boulder	Mayor	City of Boulder	City Council Office	PO Box 791	Boulder	CO	80306
City of Boulder		Open Space & Mountain Parks		66 South Cherryvale Rd.	Boulder	CO	80303
City of Superior	Town Manager	Town of Superior	Town Hall	124 E. Coal Creek Dr.	Superior	CO	80027
District		Rocky Mountain Fire District	Chief	1803 S. Foothills Hwy., Ste. 120	Boulder	CO	80303
Boulder County		Boulder Valley Conservation District		9595 Nelson Road, Box D	Longmont	CO	80501
Federal		Bureau of Land Management	Colorado State Office	2850 Younfield Street	Lakewood	CO	80215
Federal		FAA, Northwest Mountain Region	Airports Division, ANM-600	1601 Lind Avenue, SW, Suite 315	Renton	WA	98057-3356
Federal		FAA, Northwest Mountain Region	Denver Airports District Office	26805 E. 68th Avenue, Suite 224	Denver	CO	80249-6361
Federal		Fish & Wildlife Service	Susan Linner, Colorado Field Supervisor	PO Box 25486-DFC (65412)	Denver	CO	80225
Federal		Fish & Wildlife Service	Sandy Vana-Miller				
Federal		Fish & Wildlife Service	Kevin Kritz, Migratory Birds and State Programs	PO Box 25486, Denver Federal Center	Denver	CO	80225-0486
		Fish & Wildlife Service	Peter Plage	PO Box 25486, Denver Federal Center	Denver	CO	80225-0486
Federal		Jefferson Conservation District	c/o USDA-NRCS Metro Offi	PO Box 25426, Denver Federal Center	Denver	CO	80225-0426
Federal		NEPA Compliance, 8WMEA	EPA Region VIII	999 18th Street	Denver	CO	80202-2466
Federal		Office of Congressman Ed Perlmutter		12600 W. Colfax Ave., Ste. B400	Lakewood	CO	80215
Federal		Office of Congressman Jared Polis		4770 Baseline Rd, #220	Boulder	CO	80303
Federal		Office of Senator Mark Udall		999 18th St., North Tower, Suite 1525	Denver	CO	80202
Federal		Office of Senator Michael Bennet		2300 15th St., Suite 450	Denver	CO	80202
Federal	Mr. John Page	U.S. Wind Turbine Evaluations	Federal Aviation Administration	800 Independence Ave, SW, Room 400 East	Washington	DC	20591

2012 NWTC Mailing List --FINAL

	Organization	Name	Address 1	Address 2	City	State	Zip
Federal	Mr. Terry McKee	US Army Corps of Engineers,	Omaha District	9307 S. Wadsworth Blvd.	Littleton	CO	80128-6901
Federal	Mr. Gregory Davis	US EPA - Region VIII	Stormwater Coordinator; EPR-EP	1595 Wynkoop St.	Denver	CO	80202-1129
Federal		US EPA - Region VIII	Ecosystem Protection	1595 Wynkoop St.	Denver	CO	80202-2405
Federal		US EPA - Region VIII	NEPA Compliance, 8EPR-N Div. of Highways and Transportation	1595 Wynkoop St.	Denver	CO	80202-1129
Jefferson County		Jefferson County		100 Jefferson County Pkwy, Ste. 3500	Golden	CO	80419-3500
Jefferson County	Mr. John Odom	Jefferson County Commissioner		100 Jefferson County Parkway	Golden	CO	80419
Jefferson County	Mr. Donald Rosier	Jefferson County Commissioner		100 Jefferson County Parkway	Golden	CO	80419
Jefferson County	Ms. Faye Griffin	Jefferson County Commissioner		100 Jefferson County Parkway	Golden	CO	80419
Jefferson County		Jefferson County Department of Health	Environmental Health Division	1801 19th St.	Golden	CO	80401
Jefferson County		Jefferson County Development & Transportation	Director	100 Jefferson County Parkway	Golden	CO	80419
Jefferson County		Jefferson County Emergency Management		800 Jefferson County Pkwy	Golden	CO	80419
Jefferson County		Jefferson County Open Space	Director Planning and Engineering Mgr.	700 Jefferson County Pkwy., Ste. 100	Golden	CO	80419-5540
Jefferson County		Jefferson County Planning & Zoning		100 Jefferson County Pkwy, Suite. 3550	Golden	CO	80419-3500
Jefferson County		Jefferson County Road & Bridge	Director	21401 Golden Gate Canyon Rd.	Golden	CO	80403
Jefferson County		Jefferson County Transportation and Engineering	Director	100 Jefferson County Parkway	Golden	CO	80419
Jefferson County		Jefferson County Sherriff's Office		200 Jefferson County Parkway	Golden	CO	80401
Jefferson County	Mr. Kevin McCaskey	Jefferson Economic Council	President & CEO	1667 Cole Blvd., Suite 400	Golden	CO	80401
State		Air Pollution Control Division	Division Director	4300 Cherry Creek Drive South	Denver	CO	80246-1530
State		Colo. Coop. Fish & Wildlife Research Unit	Director	201 JVK Wagar Building, 1484	Fort Collins	CO	80523-1484
State		Colorado Coop Fish & Wildlife Unit	Dept. Fishery and Wildlife Biology	201 Wagner Building, CSU	Fort Collins	CO	80523-1484
State		Colorado Dept. of Agriculture	Conservation Services Division	700 Kiping Street, Suite 4000	Lakewood	CO	80215
State		Colorado Dept. of Natural Resources	Executive Director's Office	1313 Sherman Street, Room 718	Denver	CO	80203
State		Colorado Division of Wildlife	State Raptor Biologist	6060 Broadway	Denver	CO	80216
State		Colorado Division of Wildlife	Director	6060 Broadway	Denver	CO	80216
State		Colorado Geological Survey		1313 Sherman Street, Rm 715	Denver	CO	80203
State		Colorado State Forest Service	Boulder County Office	936 Lefthand Canyon Drive	Boulder	CO	80302-9341
State		Colorado State Forest Service	Golden District Office	1504 Quaker Street	Golden	CO	80401-2956
State		Colorado State Land Board		1313 Sherman Street, Rm 621	Denver	CO	80203

2012 NWTC Mailing List --FINAL

	Organization	Name	Address 1	Address 2	City	State	Zip
State		Colorado State Patrol	District 6 Commander	1096 McIntyre Street	Golden	CO	80401
State		Division of Water Resources	State Engineer	1313 Sherman St., Rm 818	Denver	CO	80203
State		Governor's Energy Office	T.J. Deora, Director	1580 Logan Street, Suite 100	Denver	CO	80203
State		Haz. Materials & Waste Mgm't Div.	Division Director	4300 Cherry Creek Drive South	Denver	CO	80246-1530
State		Office of State Representative Max Tyler	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Representative Cheri Gerou	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Representative Claire Levy	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Representative Debbie Benefield	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Representative Dianne Primavera	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Senator Dan Gibbs	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Senator Evie Hudak	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		Office of State Senator Shawn Mitchell	Colorado State Capitol	200 East Colfax	Denver	CO	80203
State		State Historic Preservation Office		1300 Broadway	Denver	CO	80203
State		State of Colorado	Governor John Hickenlooper	136 State Capitol	Denver	CO	80203-1792
State		Water Quality Control Division	Division Director	4300 Cherry Creek Drive South	Denver	CO	80246-1530
State		Wildfire Mitigation Coordinator/Special Project Forester	Colorado State Forest Service, Wildfire Mitigation	9769 West 119th Drive	Broomfield	CO	80221
Tribal		Oglala Sioux Tribe		PO Box 2070	Pine Ridge	SD	57770
Tribal		Southern Ute Tribe		P.O. Box 737	Ingacio	CO	81137
Tribal		Ute Indian Tribe		P.O. Box 190	Ft. Duchesne	UT	84026
Tribal		Ute Mountain Ute Tribal Council		PO Box JJ	Towaoc	CO	81334
State		Colo Dept of Transportation	Environmental Programs Branch, NEPA Mgr.	4201 East Arkansas Ave	Denver	CO	80222
Special District		Regional Transportation District	Senior Service Planner/Scheduler, North Team	1600 Blake St.	Denver	CO	80202
Special District		Regional Transportation District	Senior Service Planner/Scheduler, West Team	1600 Blake St.	Denver	CO	80202
Boulder County		Boulder County Transportation Department		P.O. Box 471	Boulder	CO	80306
Other	Art Kwerneland	Xcel Energy		1800 Larimer St, Suite 1000	Denver	CO	80202
Other	Howard Kiyota	Xcel Energy		1800 Larimer St, Suite 1400	Denver	CO	80202
Other	Marty Martinez	Xcel Energy		18201 West 10th Ave	Golden	CO	80401



<b>Organization</b>	<b>Name</b>	<b>Address 1</b>	<b>Address 2</b>	<b>City</b>	<b>State</b>	<b>Zip</b>
Mr. Michael Fry	Director of Conservation Advocacy	American Bird Conservancy	1731 Connecticut Avenue, NW	Washington	DC	20009
	Nature Conservancy	Colorado Field Office	2424 Spruce Street	Boulder	CO	80302
Ms. Vickie Patton	General Counsel	Environmental Defense Fund	2060 Broadway, Suite 300	Boulder	CO	80302
Mr. Erich Pica	President	Friends of the Earth	1100 15th Street, NW, 11th Floor	Washington	DC	20005
Mr. Terry Rich	Partners In Flight	National Coordinator	1387 S. Vinnell Way	Boise	ID	83709
Mr. Jerry R. Pardilla	Executive Director	National Tribal Environmental Council	4520 Montgomery Boulevard, NE, Ste. 3	Albuquerque	NM	87109
Mr. David Goldstein	Energy Program Director	Natural Resources Defense Council	111 Sutter Street, 20th Floor	San Francisco	CA	94104
	Friends of the Foothills	P.O. Box 17164 Golden, CO 80402.	PO Box 17164	Golden	CO	80402
Mr. Douglas Larson	Executive Director	Western Interstate Energy Board	1600 Broadway, Suite 1700	Denver	CO	80202
Ms. Penny Anderson	Energy Program	Western Resource Advocates	2260 Baseline Road, Suite 200	Boulder	CO	80302-7740
	Audubon Colorado		1536 Wynkoop St., Ste. 302	Denver	CO	80202
Mr. Joshua Ruschhaupt	Sierra Club Rocky Mountain Chapter		1536 Wynkoop St. 4th Floor	Denver	CO	80202
	Colorado Wildlife Federation		1410 Grant Street, Ste. C-313	Denver	CO	80203
David Anderson	Director and Chief Scientist	Colorado Natural Heritage Program	Colorado State University, 1475 Campus Delivery	Ft. Collins	CO	80523-1475
Bethany Gravell	Executive Director	Center for Native Ecosystems	1536 Wynkoop St.	Denver	CO	80202
	National Wildlife Federation	Rocky Mountain Regional Center	2995 Baseline Rd., Suite 300	Boulder	CO	80303
	colorado environmental coalition	Denver Office	1536 Wynkoop St., #5C	Denver	CO	80202
	Jeffco Open Space Foundation, Inc.	5855 Wadsworth Bypass	Building A, Suite 100	Arvada	CO	80003

2012 Rocky Flats Trustee Council							
	Name	Organization	Address 1	Address 2	City	State	Zip
<i>trustee</i>	Gary Baughman	Rocky Flats Natural Resource Trustee Council	Colorado Department of Public Health and Environment	HMWMD-B2,4300 Cherry Creek Drive South	Denver	CO	80246-1530
<i>trustee</i>	Scott Surovchak	Rocky Flats Natural Resource Trustee Council	DOE-LM	11025 Dover St., Suite 1000	Westminster	CO	80021-5573
<i>trustee</i>	Steve Berendzen	Rocky Flats Natural Resource Trustee Council	USFWS	Building 121	Commerce City	CO	80022-1748 <a href="mailto:steve_berendzen@fws.gov">steve_berendzen@fws.gov</a>
<i>trustee</i>	Daniel S. Miller	Rocky Flats Natural Resource Trustee Council	Colorado Dept. of Law, Natural Resources and Environment Section	1525 Sherman St., 7th floor	Denver	CO	80203 <a href="mailto:dan.miller@state.co.us">dan.miller@state.co.us</a>
<i>trustee</i>	Doug Robotham	Rocky Flats Natural Resource Trustee Council	Colorado Dept. of Natural Resources, Executive Director's Office	1313 Sherman Street, Room 718	Denver	CO	80203 <a href="mailto:Doug.Robotham@state.co.us">Doug.Robotham@state.co.us</a>

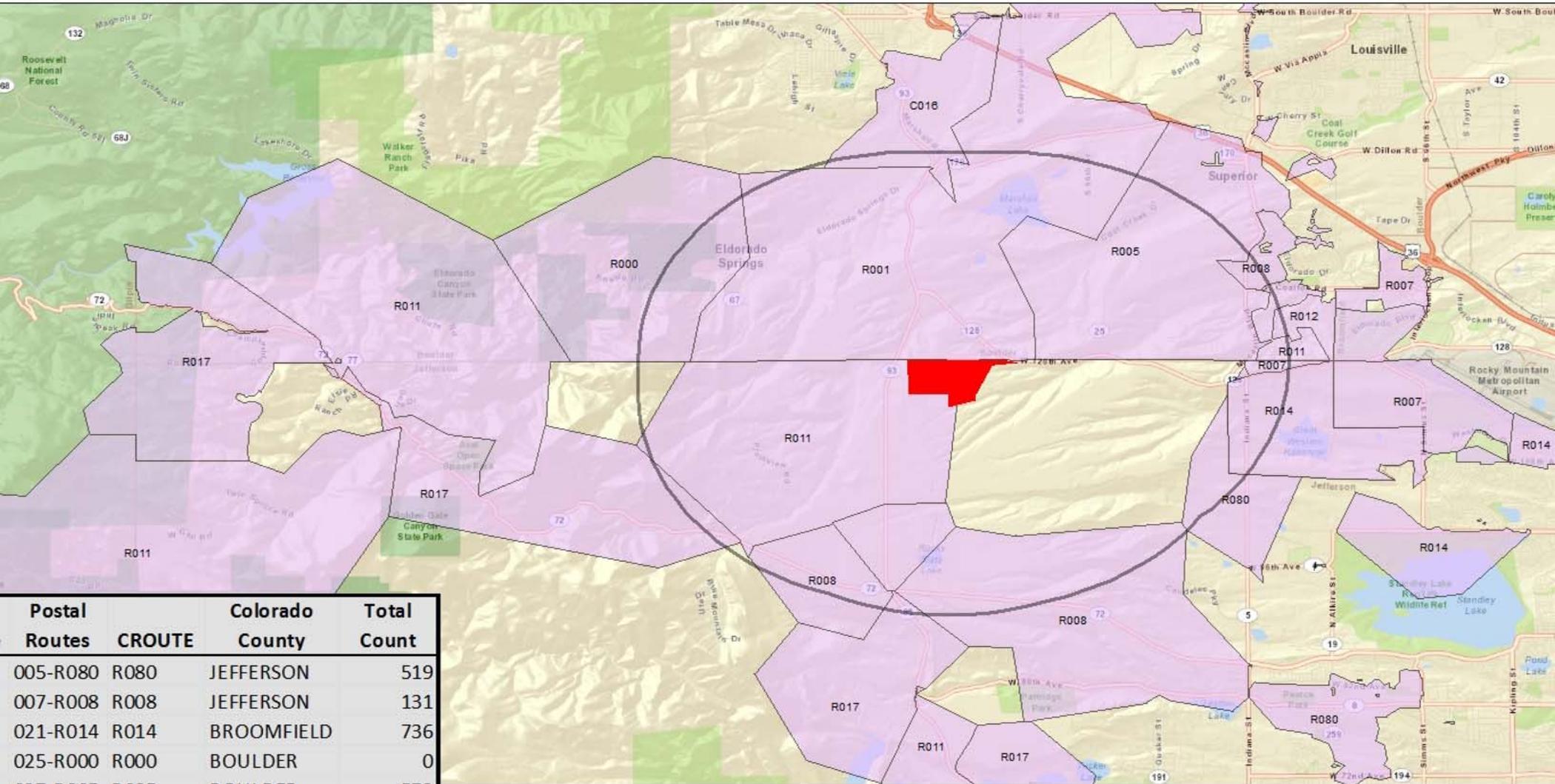
Zip Code	Postal Route	County	Count
80005	R081	Jefferson	668
80007	R008	Jefferson	157
80021	R014	Broomfield	712
80027	R005	Boulder	466
80027	R008	Boulder	473
80027	R011	Boulder	488
80027	R012	Boulder	571
80303	R001	Boulder	316
80403	R011	Jefferson	414
			4265 Total

Data:

Market Maps, Inc. December 2011

Boulder Daily Camera	P.O. Box 591	Boulder	CO	80306 <a href="http://www.dailycamera.com/">http://www.dailycamera.com/</a>	Boulder Cty & surrounding area
Colorado Hometown Weekly	3400 Industrial Lane, Suite 2	Broomfield	CO	80020 <a href="http://www.coloradahometownweekly.com/">http://www.coloradahometownweekly.com/</a>	Erie, Lafayette, Louisville
The Denver Post	101 W. Colfax Ave.	Denver	CO	80202-5177 <a href="http://www.denverpost.com/">http://www.denverpost.com/</a>	Denver metro
Golden Transcript	110 N. Rubey Dr., Suite 120	Golden	CO	80403 <a href="http://www.newsroom@milehighnews.com">http://www.newsroom@milehighnews.com</a>	Golden area

# Postal Routes for NWTC SWEA NOA



Postal Routes	CROUTE	Colorado County	Total Count
005-R080	R080	JEFFERSON	519
007-R008	R008	JEFFERSON	131
021-R014	R014	BROOMFIELD	736
025-R000	R000	BOULDER	0
027-R005	R005	BOULDER	572
027-R008	R008	BOULDER	474
027-R011	R011	BOULDER	487
303-R001	R001	BOULDER	400
305-C016	C016	BOULDER	465
403-R011	R011	JEFFERSON	422
403-R017	R017	JEFFERSON	528
021-R007	R007	JEFFERSON	799
027-R012	R012	BOULDER	572
<b>Grand Total</b>			<b>6105</b>

### Legend

- NWTC Boundary
- Three Mile Radius
- Selected Postal Routes

**Notes:** Map Background from ESRI Street Map World 2D  
 Postal Routes = last 3 digits of zip codes and postal codes  
 Postal Route Data provided by Market Maps, Inc.

## NREL NWTC SWEA Scoping Letter Comment Response

<u>No.</u>	<u>Respondent</u>	<u>Correspondence</u>		<u>Response</u>	
		<u>Date</u>	<u>Comment Summary</u>	<u>Date</u>	<u>Response to Comment</u>
1	Rachael Bray	10/29/2012	Requested assistance locating scoping letter.	10/30/12	Response sent – correspondence attached
2	Bruce Lonnecker	10/28/2012	Expressed concern over complexity of announcement.		The comment is noted.
3	Roberta Richardson	11/3/2012	Requested review of color purple for turbines to decrease attractiveness to insects with potential to reduce songbird and bat deaths.		The comment is noted. The impact of the proposed action is provided in Section 3, Affected Environment and Environmental Consequences.
4	Eric Cosmos	11/27/2012	Expressed concern about increased number of Wind towers and met towers to views of the Flatirons and Front Range.		Visual impacts of the proposed action are analyzed in section 3.5, Visual Quality and Aesthetics. Figures 3-2 through 3-4 provide existing views from various vantage points. Figures 3-6 through 3-8 provide photosimulation of the same views based on the proposed action.
5	Mike Chiropobs	11/13/2012	Requested information on status & budget for proposed action.	12/2/2012	Response sent – correspondence attached
6	Kacey French – City Boulder Open Space & Mountain Parks Dept.	11/30/2012	<p>Comments pertain to four topics:</p> <p>1. Suggestion that the EA assess the impact to avian communities, including the ability to remain in compliance with the Bald and Golden Eagle Protection Act as well as the Migratory Bird Treaty Act.</p> <p>2. Suggestion that the EA assess impacts to nearby bat communities.</p> <p>3. Suggestion that the EA assess impacts to the Northern Leopard frog in areas adjacent to the proposed building in areas 4A and 4B.</p>		<p>1. The Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act are identified in Section 3.9.1, Definition of the Resource. The existing environment is described in Section 3.9.3.5, Threatened, Endangered and Special Status Species, and the environmental consequences are analyzed in Section 3.9.4, Environmental Consequences.</p> <p>2. Bat communities are indicated in Section 3.9.3.4, Mammals, and in particular in the subsection titled Bats. Environmental consequences are analyzed in Section 3.9.4, Environmental Consequences.</p> <p>3. The Conference and Learning Facility initially considered for areas 4A or 4B was not included in the final proposed action.</p>

4. Suggestion that the EA assess impacts to the grassland habitat and movement of elk.

4. Grasslands are identified in Section 3.9.2, Existing Environment for Vegetation, and in particular in the subsection on grasslands. Grasslands are also discussed in Section 3.9.2.2, Conservation Management Areas. Elk are discussed in Section 3.9.3.4, Mammals. Impacts of the proposed action on grasslands and elk are assessed in Section 3.9.4.2, Proposed Action.

7 Timothy R  
Gablehouse for  
Gablehouse Granberg,  
LLC, representing the  
Town of Superior

11/30/2012

Comments pertain primarily to four topics:  
1. Suggestion that impacts on the Rocky Flats  
National Wildlife Refuge be assessed.

1. The Rocky Flats National Wildlife Refuge is identified in Section 3.1.2.2, Surrounding Areas. Impacts of the proposed action are analyzed in Section 3, Affected Environment and Environmental Consequences. DOE has also consulted with the regional office of U.S. Fish and Wildlife.

2. Suggestion that potential contamination from the former Rocky Flats Site be evaluated.

2. This location of the NWTC to the former Rocky Flats site is provided in Section 1.2.3. Section 3.8.2.2, Soils provides analysis of potential contamination from the former Rocky Flats Site.

3. Suggestion that noise from the proposed action be evaluated.

Noise impacts are analyzed in Section 3.3.3.2, Proposed Action and in particular in the subsections titled *Impacts of Construction Noise* and *Impacts from Operational Noise*.

4. Suggestion that visual impacts of the proposed action be assessed.

Visual impacts of the proposed action are analyzed in Section 3.5, Visual Quality and Aesthetics. Figures 3-2 through 3-4 provide existing views from various vantage points. Figures 3-6 through 3-8 provide photosimulation of the same views based on the proposed action.

**From:** [Van Dercook, Amy](#)  
**To:** [Bray, Rachael - DIA](#)  
**Subject:** RE: Scoping Letter for NWTC in Jefferson County, CO  
**Date:** Tuesday, October 30, 2012 8:41:00 AM

---

The scoping period is from November 1, 2012 to November 30, 2012. The scoping letter will be posted by November 1, 2012.

Thank you for your inquiry,  
Amy Van Dercook, P.G.  
U.S. Department of Energy | Golden Field Office  
1617 Cole Blvd., Golden, CO 80401-3393  
Phone: 720.356.1666 | Mobile: 720.233.5392  
Email: [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov)

---

**From:** Bray, Rachael - DIA [mailto:[Rachael.Bray@flydenver.com](mailto:Rachael.Bray@flydenver.com)]  
**Sent:** Monday, October 29, 2012 1:04 PM  
**To:** 'nrel.nepa.comments@nrel.gov'  
**Subject:** Scoping Letter for NWTC in Jefferson County, CO

To Whom it May Concern,

I have looked on the websites as indicated per the notice received in the mail this weekend and cannot find the Scoping Letter with attachments at either location. Can you please provide a better link or check the one's provided:

[http://www.eere.energy.gov/golden/Reading\\_Room.aspx](http://www.eere.energy.gov/golden/Reading_Room.aspx)  
[http://www.nrel.gov/ehsq/environmental\\_protection.html](http://www.nrel.gov/ehsq/environmental_protection.html)

Thanks for your assistance on this matter.

Sincerely,

Rachael Bray  
Project Inspector, AECOM  
Denver International Airport  
8500 Pena Blvd.  
AOB 7th Floor  
Denver, CO 80249-6340  
(303) 342-4540  
FAX (303) 342-2635



**Van Dercook, Amy**

---

**From:** Bruce Lonnecker <thatgeezer@live.com>  
**Sent:** Sunday, October 28, 2012 1:26 PM  
**To:** nrel.nepa.comments@nrel.gov  
**Subject:** Notice of Scoping - Comments

Please translate this notice into English. When we see obfuscating language like this, we assume that the Government is planning actions to hurt us. We expect that these types of requests for comments are only intended to meet the public notice requirements and not really to get comments.

**From:** [Bobbie](#)  
**To:** [NREL.NEPA.Comments@nrel.gov](mailto:NREL.NEPA.Comments@nrel.gov)  
**Subject:** Public Comment - Scoping  
**Date:** Saturday, November 03, 2012 4:58:13 AM

---

U.S. Department of Energy/NREL NWTC,

I am delighted to support the proposed expansion of the National Wind Technology Center.

**Please peruse these links regarding the relation of color of wind turbines to bird/bat deaths and build your new windmills using the color Purple rather than White or Gray. There is a mention in the BBC article about temperature also having a possible effect.**

<[http://news.bbc.co.uk/earth/hi/earth\\_news/newsid\\_9067000/9067721.stm](http://news.bbc.co.uk/earth/hi/earth_news/newsid_9067000/9067721.stm)>

<<http://www.springerlink.com/content/p4565vx242651518/>>

<<http://www.springerlink.com/content/88vm0214083u2r21/>>

The gist of the BBC article is that insects are attracted to White and Gray uppermost, surpassed only by the color Yellow. Purple is least attractive to insects; if swarms of insects surround windmills, birds and bats will follow and the increase in deaths is significant. Our worldwide songbird and bat populations are crashing.

Bats are important pollinators, and with the bee population crashing, this could impact crop production significantly worldwide. We already are having crop impacts due to severe droughts. We need songbirds to stay happy, not to mention the biodiversity impact on the web of life on Earth.

Thank you very much for this opportunity to comment,

Roberta E. Richardson  
11647 Brook Road  
Golden, Colorado 80403-8585

Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has.

~Margaret Mead

US anthropologist & popularizer of anthropology (1901 - 1978)

The temple bell stops  
But the sound keeps coming  
Out of the flowers  
~ Basho

**From:** [cosmos\\_eric](mailto:cosmos_eric)  
**To:** [NREL.NEPA.Comments@nrel.gov](mailto:NREL.NEPA.Comments@nrel.gov)  
**Subject:** NWTC Notice of Scoping - Resident Comment  
**Date:** Tuesday, November 27, 2012 9:45:17 AM

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Hi,

I have reviewed the proposed plan for the "improvements" to the NWTC.

As a resident of Superior, I am very concerned about the environmental, and asthetic impacts this may have on the area. One of the joys of living in this region is the proximity to various open outdoor areas, as well as an unspoiled view of the Flatirons and Front Range.

If I am reading the plan correctly, today there are currently 16 wind towers of various height, with a proposition of growing to 60 wind towers AND 30 meteorological towers. That is quite large jump.

I understand the benefits of alternative energy research, but this plan seems to reach a bit too far.

Please, I would like to be included in all public discussions related to this going forward.

Eric Cosmos  
3624 Huron Peak Ave  
Superior, CO 80027

**From:** [Gray, Lori](#)  
**To:** ["Mike Chiropolos"](#)  
**Subject:** RE: NREL Wind Technology Center, take 2  
**Date:** Monday, December 02, 2013 3:47:36 PM

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Dear Mike,

Thank you for your interest in the NWTC Sitewide EA. DOE considers your email "a comment" that will be considered in the development of the draft EA. In response to your questions:

1. The NWTC Sitewide Environmental Assessment (EA) is being drafted. DOE anticipates posting the draft EA in January 2014 for a public comment period. We are also planning on conducting a public information meeting in January 2014. We will add you to the distribution list to be notified of both these actions.
2. Until the NEPA process is completed and a decision document issued there are no agency plans or ongoing budgeting occurring for the components of the proposed action.
3. Thanks for your offer on furthering the project but DOE must complete the NEPA process before any decisions are made towards funding actions.

Thanks again,  
Lori

**Lori A. Gray, M.S., CSP**

Environmental Stewardship Division Director  
Acting NEPA Division Director  
Environmental Oversight Office  
Office of Energy Efficiency and Renewable Energy  
U.S. Department of Energy  
15013 Denver West Parkway, Golden, CO 80401  
Phone: 720.356.1568 Cell: 720-233.8236  
Email: [lori.gray@go.doe.gov](mailto:lori.gray@go.doe.gov)

**From:** Mike Chiropolos [<mailto:mikechiropolos@gmail.com>]  
**Sent:** Wednesday, November 13, 2013 11:51 AM  
**To:** Gray, Lori  
**Subject:** NREL Wind Technology Center, take 2

Lori,

A few questions regarding the proposed expansion of the NREL Wind Technology Center between Boulder and Golden:

- What is the current status of the project, under 1) NEPA, and 2) agency plans and budgeting
- Who are primary DOE/NREL contacts to discuss furthering the project and making it a reality

I am exploring options to unite public and private stakeholders behind the project. I'm an

attorney with much experience in the advocacy field, including energy and natural resources.

Thanks for any help and leads you can provide.

Sincerely,

Mike Chiropolos

303-956-0595



City of Boulder  
Open Space & Mountain Parks Department  
P.O. Box 791, Boulder, CO 80306; 303-441-3440

MEMORANDUM

To: NREL NEPA Comments

From: Kacey French, Open Space Planner  
Will Keeley, Wildlife Ecologist

Date: 11/30/12

Re: National Wind Technology Center

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Thank you for informing us of the upcoming Environmental Assessment (EA) to analyze and describe the potential environmental impacts associated with the proposed expansion of the National Wind Technology Center (NWTC). The NWTC, along with adjacent City of Boulder Open Space and Mountain Parks (OSMP) properties, Boulder County Open Space properties and the Rocky Flats National Wildlife Refuge comprise approximately 17,000 acres of native grasslands. This large and relatively undeveloped habitat block is ecologically important and supports a variety of wildlife. City of Boulder, Open Space and Mountain Parks (OSMP) staff has identified several issues we suggest be addressed in the EA. Please consider the following comments:

The OSMP property to the north receives considerable use by foraging raptors because of the abundant prey resources in the area. The area has supported nesting Bald and Golden Eagles for at least the previous 5 years. An occupied Bald Eagle nest is located approximately 2.7 km from the proposed “Wind Turbine Development Area” and an occupied Golden Eagle nest is approximately 5 km from the Area. OSMP monitoring indicates that these grasslands also support a rich grassland bird community during the nesting season. Additionally, the two reservoirs north of the NWTC provide crucial stopover habitat for migrating waterfowl. Increasing the number of turbines at NWTC may impact avian communities on OSMP. Recent research has indicated that wind turbines are substantial cause of mortality for birds, particularly raptors and nocturnal migrators (Kunz et al. 2007, Garvin et al. 2011). We suggest the EA assess the impact to avian communities, including the ability to remain in compliance with the Bald and Golden Eagle Protection Act as well as the Migratory Bird Treaty Act.

Hoary bats have been observed foraging above tree-tops in the forested areas on OSMP property approximately 3 km from the NWTC, and a water source, which could be used by bats, is 300m from the proposed site. Recent evidence suggests that bats, particularly tree bats like Hoary bats, are severely affected by the presence of wind turbines (Arnett et al. 2008, Ellison et al. 2012). Some researchers believe these species may actually be attracted to wind turbines, especially

when migrating or mating, and conclude that wind turbines are a substantial cause of mortality. We suggest the EA assess impacts to these nearby bat communities.

We suggest alternatives that incorporate daily or seasonal use cycles of the turbines to minimize impact to birds and bats be analyzed.

A pond nearby on OSMP property (approximately 150m from the proposed 4A and 4B buildings) has supported Northern Leopard Frogs in recent years. This pond is spring fed and may act as a critical over-wintering site for leopard frogs breeding in the ephemeral ponds to the north. This site also has habitat characteristics similar to leopard frog breeding sites on OSMP. Northern leopard frogs are considered sensitive in Colorado and other western states, and populations of this once common amphibian are declining (Smith and Keinath 2007). Semlitsch and Bodie (2003) recommended protecting a buffer zone of 290m around wetlands in order to avoid deleterious effects of human activities on ranid populations. We suggest the EA assess potential impacts to the Northern Leopard frogs, the nearby pond, and the ability to mitigate impacts of construction, maintenance, and everyday use of building 4A and 4B to the pond described above. We recommend this analysis include the ability to minimize runoff containing vehicular fluids (i.e., oil, coolant), materials used to improve traction (i.e., sand, gravel), and eliminate ice (i.e. salt) from associated parking lots into this pond.

This important grassland habitat block supports a resident elk herd of about 30 animals in addition to the previously described avian populations. We suggest the EA address the impacts of additional wind turbines to the habitat effectiveness of this grassland habitat block, including effects of this project on the movement of elk within the block.

Please contact us if you have any questions.

Kacey French  
Open Space Planner  
720-564-2081  
[frenchk@bouldercolorado.gov](mailto:frenchk@bouldercolorado.gov)

Will Keeley  
Wildlife Ecologist  
720-564-2085  
[keeleyw@bouldercolorado.gov](mailto:keeleyw@bouldercolorado.gov)

#### Literature Cited

- Arnett, E.B. et al. 2008. Patterns of bat fatalities at wind energy facilities in North America. *Journal of Wildlife Management* 72: 61-78.
- Ellison, L.E., 2012, Bats and wind energy—A literature synthesis and annotated bibliography: U.S. Geological Survey Open-File Report 2012–1110, 57 p.
- Garvin J.C., C.S. Jennelle, D. Drake, and S.M. Grodsky. 2011. Response of raptors to a windfarm. *Journal of Applied Ecology* 48: 199-209.
- Kunz T.H. et al. 2007. Assessing impacts of wind-energy development on nocturnally active birds and bats: a guidance document. *Journal of Wildlife Management* 71: 2449-2486.

- Semlitsch R.D. and J.R. Bodie. 2003. Biological criteria for buffer zones around wetlands and riparian habitats for amphibians and reptiles. *Conservation Biology* 17: 1219-1228.
- Smith, B.E. and D.A. Keinath. 2007. Northern Leopard Frog (*Rana pipiens*): a technical conservation assessment. [Online]. USDA Forest Service, Rocky Mountain Region. Available: <http://www.fs.fed.us/r2/projects/scp/assessments/northernleopardfrog.pdf> [Nov 12 2012].

# GABLEHOUSE GRANBERG, LLC

Attorneys and Counselors at Law

410 SEVENTEENTH STREET  
SUITE 1375  
DENVER, COLORADO 80202

TIMOTHY R. GABLEHOUSE  
(303) 572-0050  
(800) 818-0050  
FAX (303) 572-3037  
tgablehouse@gcglc.com

November 30, 2012

*VIA EMAIL ONLY*

NREL NEPA Comments  
National Renewable Energy Laboratory  
EHS Office, M.S. RSF 103  
15013 Denver West Parkway  
Golden, CO 8040

Re: Response to Notice of Public Scoping - Site-Wide Environmental Assessment of the National Renewable Energy Laboratory's Nation Wind Technology Center, Golden, CO (DOE/EA-1914)

Dear NREL/DOE:

We represent the Town of Superior and provide these comments to the scoping document for your consideration on their behalf.

In a letter dated October 31, 2012, DOE/NREL requests scoping comments on a Site-Wide EA intended to support the proposal to increase the facilities and activities located at the Wind Technology Center (WTC). These proposals appear to contemplate facilities and activities that would be orders of magnitude greater than current uses. Unfortunately, the October 31 letter is so deficient in details that it is impossible to know exactly what is proposed.

There was a 2002 EA that evaluated a proposed expansion of the then existing activity at the WTC; however, it is not clear whether those proposals were executed and how much of the current proposal is simply refinement of activities proposed in 2002 but never built. For the reasons stated below, the 2002 EA is now not very relevant and its conclusions cannot be reasonably applied to the current proposal.

While we agree that an EA can be the appropriate initial step in the process for NEPA compliance, we suspect that an EIS will ultimately be necessary given the magnitude of the current proposals. DOE/NREL would be well advised to save time and money by proceeding on that basis now.

Much Has Changed Since the 2002 EA

The WTC borders a portion of the Rocky Flats National Wildlife Refuge (Refuge). The 2002 EA does not consider impacts on the Refuge, basing its conclusion instead on the argument that study of impacts to the Refuge were premature as no management plan for the Refuge had been prepared. See Response to Comments F.4 at Page 5-8 of the 2002 EA.

This conclusion is no longer valid because the Refuge exists and there is now a management plan along with an environmental impact statement that post-date the 2002 EA. Impacts to the Refuge must be added to the list of Environmental Effects/Issues to be scoped during the proposed EA process.

One of the impacts to the Refuge of great concern is weed infestation. As the 2002 EA notes, construction has the potential to promote weed infestation. A report by the Inspector General of the Department of the Interior, "Status of the Rocky Flats National Wildlife Refuge" dated October 28, 2011, concludes that "invasive weeds could potentially destroy the biological diversity of the Refuge." The potential for the proposed action on the WTC to contribute to this problem must be studied.

In March 2003, EPA determined that the WTC was not part of the National Priorities List Rocky Flats Site undergoing extensive testing, evaluation and cleanup and was not, therefore, considered as part of the substantial environmental testing conducted under the RCRA Facility Investigation – Remedial Investigation/Corrective Measures Study – Feasibility Study Report for the Rocky Flats Environmental Technology Site (RI/FS/CRA) completed in 2006. This extensive study finds some evidence of soil contaminants, including heavy metals and radiological contaminants, that could harm public health in the vicinity of the WTC. Specifically, the RCRA Facility Investigation, Contaminant Fate and Transport report, Section 8: Attachment 2, Future Conditions - Groundwater and Air, prepared by DOE in June 2006 describes portions of the WTC as a possible source from which plutonium contamination in near-surface soils could be distributed by wind.

The 2002 EA did not evaluate exposures to persons off-site from contaminated soils disturbed during construction. It refers only to soil sampling done in 1993 - 1995 for the purpose of determining characteristics of a very small area prior to construction of a leach field.

Substantial evidence now exists suggesting that contamination associated with the Rocky Flats Environmental Technology Site could exist on the WTC property. The RI/FS/CRA only considered exposure scenarios for refuge workers and visitors; the 1993 - 1995 soil tests were extremely limited in scope; and the currently proposed activity could involve extensive soil disturbance. The potential for radiological and other contaminants being disturbed during

construction of each of the specific project components now proposed at the WTC site must be considered as part of the new EA.

Noise is listed as an impact to be studied in the currently proposed EA. The proposed EA must evaluate noise, but must do so in the context of increased population, new development and the significant investment surrounding communities have made in recreation and open space directly adjacent to the WTC.

Visual impacts were mentioned but not evaluated in any meaningful fashion in the 2002 EA. The current request for scoping comments does not provide enough detail to understand the actual magnitude of the visual impact that will result from the proposed action. As before, the increased population and new development since 2002 make it clear that this visual impact will be greater than anything previously studied. Also, it should be clear that visual impact, along with noise, are matters of great concern and controversy with wind turbine installations.

A meaningful study of noise and visual impacts, rather than essentially ignoring them as was done in the 2002 EA, is necessary. This will require actual depiction of the visual impacts from the proposed alternative versus no-action and modeling of noise at a level of sophistication normally done in an EIS.

The 2002 EA notes the presence of endangered species in areas that would be impacted by those proposals. The current proposed EA must evaluate impacts on endangered species in a meaningful fashion and it's highly inappropriate for DOE/NREL to have failed to specifically list impacts to endangered species in its October 31, 2012 letter rather than vaguely refer to "biological resources".

The "no-action" alternative must be based on actual site conditions rather than on anything proposed at the time of the 2002 EA, but not built. Conditions have changed too much in the intervening eight years for DOE/NREL to use the selected alternative from the 2002 EA and FONSI as a baseline.

Sincerely,



Timothy R. Gablehouse  
for Gablehouse Granberg LLC

TRG/tg

**Van Dercook, Amy**

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**Subject:** FW: Comment letter re Notice of Proposed Scoping - DOE/EA-1914

**From:** NREL NEPA Comments

**Sent:** Monday, December 03, 2012 1:20 PM

**To:** 'tgablehouse@gcglc.com'

**Subject:** RE: Comment letter re Notice of Proposed Scoping - DOE/EA-1914

Dear Mr. Gablehouse, we have received your letter dated November 30, 2012. Thank you for your input during the scoping process for the site-wide EA for the National Wind Technology Center.

Brenda Beatty

Senior Environmental/Biological Scientist

EHS Office

National Renewable Energy Laboratory

Ph: (303) 275-3234

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**From:** Timothy Gablehouse [<mailto:tgablehouse@gcglc.com>]

**Sent:** Thursday, November 29, 2012 5:16 PM

**To:** NREL NEPA Comments

**Subject:** Comment letter re Notice of Proposed Scoping - DOE/EA-1914

**Please acknowledge receipt.**

**Thank you.**

**Tim**

---

**TIMOTHY R. GABLEHOUSE**

**GABLEHOUSE GRANBERG, LLC**

410 17<sup>th</sup> St., Suite 1375 | Denver, CO 80202 | 303.572.0050



## Department of Energy

Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

November 20, 2012

Ms. Beth Moyski  
Assistant Town Manager  
Town of Superior  
124 East Coal Creek Drive  
Superior, CO 80027

**SUBJECT: U.S. Department of Energy Site-Wide Environmental Assessment for the National Wind Technology Center at the National Renewable Energy Laboratory, Jefferson County, CO**

Dear Ms. Moyski,

Thank you for your recent invitation to provide a briefing at an upcoming Town of Superior Board meeting regarding the recent Notice of Public Scoping for the U.S. Department of Energy's Site-Wide Environmental Assessment (EA) of the National Wind Technology Center (NWTC) at the National Renewable Energy Laboratory (NREL). The U.S. Department of Energy (DOE) and NREL appreciate your request and your intent of keeping the citizens of your community informed.

DOE is at the initial stages of its National Environmental Policy Act (NEPA) process and there has been no official decision on potential expansion of facilities or operations at the NWTC. Since DOE must ensure the same information is provided to all interested parties throughout the NEPA process, we are unable to accommodate your request because not all stakeholders would be engaged through a Town of Superior Board meeting.

The NEPA process begins with a public scoping period where federal, state and local agencies and the public are informed of a federal agency's plans to prepare an EA. During this public scoping process, DOE invites stakeholders to provide input on the EA's scope, including the potential issues and impacts to be addressed. This input will help DOE determine the issues to analyze in the EA. DOE would greatly appreciate any input the Town of Superior or its town members have on the potential issues and impacts to be addressed by the EA.

At the end of the public scoping period, DOE will begin drafting the EA. The site-wide EA will evaluate the potential environmental impacts of ongoing and reasonably foreseeable activities over a five-to-ten year time period. DOE intends to conduct a public information meeting when the draft EA is available for public review. The Town of Superior is on our distribution list to be notified when a draft document is ready and when any upcoming DOE public information meetings are scheduled. The review of the draft EA is another important opportunity for the public and federal, state and local agencies to be involved in the NEPA process by providing comments on the draft document.



Ms. Beth Moyski  
Assistant Town Manager  
November 19, 2012

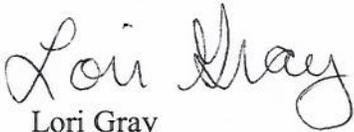
Future facility construction, research, development and testing proposed for the NWTC is dependent on changing federal budgets and priorities. Currently, there is no proposed date for construction or any budget allocation. The details to be provided in the upcoming EA are the best estimates that can be made, at this time.

DOE welcomes your input throughout our NEPA process. We would like to encourage you to participate in the public scoping process by submitting written comments for consideration by DOE on or before November 30, 2012. Written comments should be submitted to:

NREL NEPA Comments  
National Renewable Energy Laboratory  
EHS Office, M.S. RSF 103  
15013 Denver West Parkway  
Golden, CO 80401  
(303) 275-4002 (fax)

Comments may also be submitted by email at: [NREL.NEPA.Comments@nrel.gov](mailto:NREL.NEPA.Comments@nrel.gov)

Sincerely,



Lori Gray  
NEPA Compliance Officer  
U.S. Department of Energy  
Golden Field Office

## **APPENDIX B**

### **AIR EMISSIONS CALCULATIONS**



The methods used to calculate emissions of carbon monoxide (CO), volatile organic compounds (VOCs), oxides of nitrogen (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), particulate matter less than 10 microns (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and carbon dioxide (CO<sub>2</sub>) from construction-related sources of air pollutant emissions are documented in this appendix.

- Section B.1 – Estimated Air Emissions Resulting from New Construction in Zones 1 and 2, Proposed Action (CY 2015)
- Section B.2 – Estimated Air Emissions Resulting from Modifications in Zones 1 and 2, Proposed Action (CY 2015)
- Section B.3 – Estimated Air Emissions Resulting from Infrastructure Improvements in Zones 1 and 2, Proposed Action (CY 2015)
- Section B.4 – Estimated Air Emissions Resulting from Standby Generator Emissions
- Section B.5 – Estimated Air Emissions Resulting from Wind Turbine and Associated Infrastructure Construction in Zone 2, Proposed Action (CY 2015)
- Section B.6 – Estimated Air Emissions Resulting from Wind Turbine Construction in Zone 2, Proposed Action (CY 2016 or CY 2017)
- Section B.7 – Estimated Air Emissions Resulting from Expanding Power Capacity at the NWTC Site, Proposed Action (CY 2015)

<b>Summary</b>	Summarizes total emissions for the Construction of new Facilities in Zone 1 & 2 (Proposed Action) in 2015
<b>Combustion</b>	Estimates emissions from non-road equipment exhaust.
<b>Fugitive</b>	Estimates particulate emissions from construction and demolition activities including earthmoving, vehicle traffic, and windblown dust.
<b>Grading</b>	Estimates the number of days of site preparation, to be used for estimating heavy equipment exhaust and earthmoving dust emissions.
<b>Haul Truck On-Road</b>	Estimates emissions from haul trucks hauling fill materials to the job site.
<b>Construction Commuter</b>	Estimates emissions for construction workers commuting to the site.
<b>Emergency Generator</b>	Estimates emissions from the operation of emergency generators.
<b>AQCR Tier Report</b>	Summarizes total emissions for the Metropolitan Denver Intrastate AQCR report for 2008, to be used to compare the Proposed Action to regional emissions.

**Air Emissions for the Proposed Action in 2015**

	<b>NO<sub>x</sub> (ton)</b>	<b>VOC (ton)</b>	<b>CO (ton)</b>	<b>SO<sub>2</sub> (ton)</b>	<b>PM<sub>10</sub> (ton)</b>	<b>PM<sub>2.5</sub> (ton)</b>	<b>CO<sub>2</sub> (ton)</b>
Combustion	4.85	0.61	2.13	0.38	0.35	0.34	549.22
Fugitive Dust	-	-	-	-	6.28	0.63	-
Haul Truck On-Road	0.26	0.06	0.18	0.00	0.01	0.01	127.92
Commuter	0.07	0.07	0.66	0.00	0.01	0.01	119.01
<b>TOTAL</b>	<b>5.17</b>	<b>0.75</b>	<b>2.98</b>	<b>0.39</b>	<b>6.65</b>	<b>0.98</b>	<b>796.15</b>

Note: Total PM<sub>10/2.5</sub> fugitive dust emissions are assuming USEPA 50% control efficiencies.

CO <sub>2</sub> emissions converted to metric tons =	<b>722.110</b>	<b>metric tons</b>	
State of Colorado's CO <sub>2</sub> emissions =	<b>96,500,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of Colorado's CO <sub>2</sub> emissions =	<b>0.00075%</b>		
United States' CO <sub>2</sub> emissions =	<b>5,631,300,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of USA's CO <sub>2</sub> emissions =	<b>0.000013%</b>		

Source: U.S. Department of Energy, Energy Information Administration (U.S. DOE/EIA). 2013. Table 1. State Emissions by Year (Million Metric Tons of Carbon Dioxide). Available online <[http://www.eia.gov/environment/emissions/state/state\\_emissions.cfm](http://www.eia.gov/environment/emissions/state/state_emissions.cfm)>. Data released January 2013. Data accessed 10 May 2013.

Since future year budgets were not readily available, actual 2008 air emissions inventories for the counties were used as an approximation of the regional inventory. Because emissions from the Proposed Action in 2015 are several orders of magnitude below significance, the conclusion would be the same, regardless of whether future year budget data set were used.

**Metropolitan Intrastate AQCR Air Basin**

Year	Point and Area Sources Combined					
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
2008	94,978	128,147	427,106	15,239	68,576	15,665

Source: USEPA National Emissions Inventory (NEI) (<http://neibrowser.epa.gov/eis-public-web/home.html>). Site visited on 10 May 2013

**Air Emissions from the Proposed Action in 2015**

Point and Area Sources Combined						
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
	94,978	128,147	427,106	15,239	68,576	15,665
	5.169	0.750	2.980	0.386	6.649	0.979
	<b>0.005%</b>	<b>0.0006%</b>	<b>0.0007%</b>	<b>0.003%</b>	<b>0.010%</b>	<b>0.006%</b>

Regional Emissions  
Emissions  
% of Regional

**Combustion Emissions**

Combustion Emissions of VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO<sub>2</sub> due to Construction and Demolition

<b>General Construction and Modification Activities</b>	<b>Area Disturbed</b>	
1.) Construction of new Wind Turbine Component Research & Testing Facility	120,000 ft <sup>2</sup> 40,000 ft <sup>2</sup>	Total Area Disturbed New Facility
2.) Grid Storage Test Pad Area	0 ft <sup>2</sup> ft <sup>2</sup>	Existing pads, no new construction
3.) Construction of Staging & Maintenance Warehouse	120,000 ft <sup>2</sup> 40,000 ft <sup>2</sup>	Total Area Disturbed New Warehouse
Total Construction Area:	80,000 ft <sup>2</sup> 1.84 acres	
Total Pavement Area:	0 ft <sup>2</sup> 0.00 acres	
Total Disturbed Area:	240,000 ft <sup>2</sup> 5.51 acres	
Construction Duration:	12 months	
Annual Construction Activity:	240 days	Assume 4 weeks per month, 5 days per week.

## Emission Factors Used for Construction Equipment

References: Guide to Air Quality Assessment, SMAQMD, 2004; and U.S. EPA NONROAD Emissions Model, Version 2005.0.0

Emission factors are taken from the NONROAD model and were provided to e2M by Larry Landman of the Air Quality and Modeling Center (Landman.Larry@epamail.epa.gov) on 12/14/07. Factors provided are for the weighted average US fleet for CY2007.

Assumptions regarding the type and number of equipment are from SMAQMD Table 3-1 unless otherwise noted.

### Grading

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Bulldozer	1	13.60	0.96	5.50	1.02	0.89	0.87	1456.90
Motor Grader	1	9.69	0.73	3.20	0.80	0.66	0.64	1141.65
Water Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Total per 10 acres of activity	3	41.64	2.58	15.71	3.45	2.55	2.47	4941.53

### Paving

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Paver	1	3.83	0.37	2.06	0.28	0.35	0.34	401.93
Roller	1	4.82	0.44	2.51	0.37	0.43	0.42	536.07
Truck	2	36.71	1.79	14.01	3.27	1.99	1.93	4685.95
Total per 10 acres of activity	4	45.37	2.61	18.58	3.93	2.78	2.69	5623.96

### Demolition

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Loader	1	13.45	0.99	5.58	0.95	0.93	0.90	1360.10
Haul Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Total per 10 acres of activity	2	31.81	1.89	12.58	2.58	1.92	1.87	3703.07

### Building Construction

Equipment <sup>d</sup>	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
<b>Stationary</b>								
Generator Set	1	2.38	0.32	1.18	0.15	0.23	0.22	213.06
Industrial Saw	1	2.62	0.32	1.97	0.20	0.32	0.31	291.92
Welder	1	1.12	0.38	1.50	0.08	0.23	0.22	112.39
<b>Mobile (non-road)</b>								
Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Forklift	1	5.34	0.56	3.33	0.40	0.55	0.54	572.24
Crane	1	9.57	0.66	2.39	0.65	0.50	0.49	931.93
Total per 10 acres of activity	6	39.40	3.13	17.38	3.12	2.83	2.74	4464.51

Note: Footnotes for tables are on following page

**Architectural Coatings**

Equipment	No. Reqd. <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup>	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Air Compressor	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77
Total per 10 acres of activity	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77

- a) The SMAQMD 2004 guidance suggests a default equipment fleet for each activity, assuming 10 acres of that activity, (e.g., 10 acres of grading, 10 acres of paving, etc.). The default equipment fleet is increased for each 10 acre increment in the size of the construction project. That is, a 26 acre project would round to 30 acres and the fleet size would be three times the default fleet for a 10 acre project.
- b) The SMAQMD 2004 reference lists emission factors for reactive organic gas (ROG). For the purposes of this worksheet ROG = VOC. The NONROAD model contains emissions factors for total HC and for VOC. The factors used here are the VOC factors.
- c) The NONROAD emission factors assume that the average fuel burned in nonroad trucks is 1100 ppm sulfur. Trucks that would be used for the Proposed Actions will all be fueled by highway grade diesel fuel which cannot exceed 500 ppm sulfur. These estimates therefore over-estimate SO2 emissions by more than a factor of two.
- d) Typical equipment fleet for building construction was not itemized in SMAQMD 2004 guidance. The equipment list above was assumed based on SMAQMD 1994 guidance.

## PROJECT-SPECIFIC EMISSION FACTOR SUMMARY

Source	Equipment Multiplier*	Project-Specific Emission Factors (lb/day)						
		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub> **	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	1	41.641	2.577	15.710	3.449	2.546	2.469	4941.526
Paving Equipment	1	45.367	2.606	18.578	3.926	2.776	2.693	5623.957
Demolition Equipment	1	31.808	1.886	12.584	2.585	1.923	1.865	3703.074
Building Construction	1	39.396	3.130	17.382	3.116	2.829	2.744	4464.512
Air Compressor for Architectural Coating	1	3.574	0.373	1.565	0.251	0.309	0.300	359.773
Architectural Coating**			23.052					

\*The equipment multiplier is an integer that represents units of 10 acres for purposes of estimating the number of equipment required for the project.

\*\*Emission factor is from the evaporation of solvents during painting, per "Air Quality Thresholds of Significance", SMAQMD, 1994

Example: SMAQMD Emission Factor for Grading Equipment NO<sub>x</sub> = (Total Grading NO<sub>x</sub> per 10 acre)\*(Equipment Multiplier)

### Summary of Input Parameters

	Total Area (ft <sup>2</sup> )	Total Area (acres)	Total Days	
Grading:	240,000	5.51	4	(from "Grading" worksheet)
Paving:	0	0.00	0	
Demolition:	0	0.00	0	
Building Construction:	80,000	1.84	240	
Architectural Coating	80,000	1.84	20	(per SMAQMD "Air Quality of Thresholds of Significance", 1994)

NOTE: The 'Total Days' estimate for paving is calculated by dividing the total number of acres by 0.21 acres/day, which is a factor derived from the 2005 MEANS Heavy Construction Cost Data, 19th Edition, for 'Asphaltic Concrete Pavement, Lots and Driveways - 6" stone base', which provides an estimate of square feet paved per day. There is also an estimate for 'Plain Cement Concrete Pavement', however the estimate for asphalt is used because it is more conservative. The 'Total Days' estimate for demolition is calculated by dividing the total number of acres by 0.02 acres/day, which is a factor also derived from the 2005 MEANS reference. This is calculated by averaging the demolition estimates from 'Building Demolition - Small Buildings, Concrete', assuming a height of 30 feet for a two-story building; from 'Building Footings and Foundations Demolition - 6" Thick, Plain Concrete'; and from 'Demolish, Remove Pavement and Curb - Concrete to 6" thick, rod reinforced'. Paving is double-weighted since projects typically involve more paving demolition. The 'Total Days' estimate for building construction is assumed to be 230 days, unless project-specific data is known.

### Total Project Emissions by Activity (lbs)

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	166.56	10.31	62.84	13.80	10.18	9.88	19,766
Paving	-	-	-	-	-	-	0
Demolition	-	-	-	-	-	-	0
Building Construction	9,455.12	751.15	4,171.75	747.92	678.97	658.60	1,071,483
Architectural Coatings	71.48	468.50	31.31	5.02	6.19	6.00	7,195
<b>Total Emissions (lbs):</b>	<b>9,693.16</b>	<b>1,229.96</b>	<b>4,265.90</b>	<b>766.74</b>	<b>695.34</b>	<b>674.48</b>	<b>1,098,444</b>

### Results: Total Project Annual Emission Rates

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Total Project Emissions (lbs)	9,693.16	1,229.96	4,265.90	766.74	695.34	674.48	1,098,444
Total Project Emissions (tons)	4.847	0.615	2.133	0.383	0.348	0.337	549.222

**Construction Fugitive Dust Emissions**

**Construction Fugitive Dust Emission Factors**

	<b>Emission Factor</b>	<b>Units</b>	<b>Source</b>
Construction and Demolition Activities	0.19 ton PM <sub>10</sub> /acre-month		MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM <sub>10</sub> /acre-month		MRI 1996; EPA 2001; EPA 2006

**PM<sub>2.5</sub> Emissions**

PM <sub>2.5</sub> Multiplier	0.10	(10% of PM <sub>10</sub> emissions assumed to be PM <sub>2.5</sub> )	EPA 2001; EPA 2006
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**Control Efficiency**

0.50	(assume 50% control efficiency for PM <sub>10</sub> and PM <sub>2.5</sub> emissions)	EPA 2001; EPA 2006
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**Project Assumptions**

***New Roadway Construction (0.42 ton PM<sub>10</sub>/acre-month)***

Duration of Construction Project	12 months
Area	0.00 acres

***General Construction and Demolition Activities (0.19 ton PM<sub>10</sub>/acre-month)***

Duration of Project	12 months
Area	5.51 acres

	<b>Project Emissions (tons/year)</b>			
	<b>PM<sub>10</sub> uncontrolled</b>	<b>PM<sub>10</sub> controlled</b>	<b>PM<sub>2.5</sub> uncontrolled</b>	<b>PM<sub>2.5</sub> controlled</b>
New Roadway Construction	0.000	0.000	0.000	0.000
General Construction Activities	12.562	6.281	1.256	0.628
<b>Total</b>	<b>12.562</b>	<b>6.281</b>	<b>1.256</b>	<b>0.628</b>

## Construction Fugitive Dust Emission Factors

### General Construction Activities Emission Factor

**0.19 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM<sub>10</sub>/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM<sub>10</sub>/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM<sub>10</sub>/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM<sub>10</sub>/acre-month) and 75% of the average emission factor (0.11 ton PM<sub>10</sub>/acre-month). The 0.19 ton PM<sub>10</sub>/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM<sub>10</sub>/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particulate (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District as well as the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas.

### New Road Construction Emission Factor

**0.42 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM<sub>10</sub>/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM<sub>10</sub>/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

### PM<sub>2.5</sub> Multiplier

**0.10**

PM<sub>2.5</sub> emissions are estimated by applying a particle size multiplier of 0.10 to PM<sub>10</sub> emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

### Control Efficiency for PM<sub>10</sub> and PM<sub>2.5</sub>

**0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas (EPA 2006). Wetting controls will be applied during project construction.

### References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

## Grading Schedule

Estimate of time required to grade a specified area.

### Input Parameters

Construction area: 5.51 acres/yr (from Combustion Worksheet)  
 Qty Equipment: 3.00 (calculated based on 3 pieces of equipment for every 10 acres)

### Assumptions.

Terrain is mostly flat.

An average of 6" soil is excavated from one half of the site and backfilled to the other half of the site; no soil is hauled off-site or borrowed.

200 hp bulldozers are used for site clearing.

300 hp bulldozers are used for stripping, excavation, and backfill.

Vibratory drum rollers are used for compacting.

Stripping, Excavation, Backfill and Compaction require an average of two passes each.

Excavation and Backfill are assumed to involve only half of the site.

### Calculation of days required for one piece of equipment to grade the specified area.

Reference: Means Heavy Construction Cost Data, 19th Ed., R. S. Means, 2005.

Means Line No.	Operation	Description	Output	Units	Acres per equip-day	equip-days per acre	Acres/yr (project- specific)	Equip-days per year
2230 200 0550	Site Clearing	Dozer & rake, medium brush	8	acre/day	8	0.13	5.51	0.69
2230 500 0300	Stripping	Topsoil & stockpiling, adverse soil	1,650	cu. yd/day	2.05	0.49	5.51	2.69
2315 432 5220	Excavation	Bulk, open site, common earth, 150' haul	800	cu. yd/day	0.99	1.01	2.75	2.78
2315 120 5220	Backfill	Structural, common earth, 150' haul	1,950	cu. yd/day	2.42	0.41	2.75	1.14
2315 310 5020	Compaction	Vibrating roller, 6" lifts, 3 passes	2,300	cu. yd/day	2.85	0.35	5.51	1.93
TOTAL								9.23

### Calculation of days required for the indicated pieces of equipment to grade the designated acreage.

(Equip)(day)/yr: 9.23  
 Qty Equipment: 3.00  
 Grading days/yr: 3.08

**Haul Truck Emissions**

Emissions from hauling excavation material and construction supplies are estimated in this spreadsheet.

Emission Estimation Method: United States Air Force (USAF), Air Force Center for Environmental Excellence (AFCEE), Air Emissions Guide for Air Force Mobile Sources (Revised January 2003).

**Assumptions:**

Haul trucks carry 20 cubic yards of material per trip.

The average distance from the project site to the materials source is estimated to be 15 miles; therefore, a haul truck will travel 30 miles round trip.

Estimated number of trips required by haul trucks = total amount of material/20 cubic yards per truck

Amount of Building Materials (Above Ground) =	11,852 cubic yards	Assumes 4 feet of building material are needed for each floor
Amount of Building Materials (Below Ground) =	14,815 cubic yards	Assumes 5 feet of material are needed for the below ground portion of the building
Amount of Excavation Material =	35,556 cubic yards	Assumes 12 feet of material would need to be excavated on average
Amount of Paving Material =	0 cubic yards	
Number of trucks required =	3,111 heavy duty diesel haul truck trips	
Miles per trip =	30 miles	

**Heavy Duty Diesel Vehicle (HDDV) Average Emission Factors (grams/mile)**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
<i>HDDV</i>	<b>2.498</b>	<b>0.617</b>	<b>1.782</b>	<b>0.012</b>	<b>0.097</b>	<b>0.071</b>	<b>1243.400</b>

Notes:

Emission factors for all pollutants are from USAF AFCEE 2013.

Emission factors are from Tables 5-11 for the 2015 calendar year, high altitude (USAF AFCEE 2013).

**HDDV Haul Truck Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	<b>513.992</b>	<b>126.955</b>	<b>366.667</b>	<b>2.469</b>	<b>19.959</b>	<b>14.609</b>	<b>255843.621</b>
tons	<b>0.257</b>	<b>0.063</b>	<b>0.183</b>	<b>0.001</b>	<b>0.010</b>	<b>0.007</b>	<b>127.922</b>

Example Calculation: NO<sub>x</sub> emissions (lbs) = 30 miles per trip \* 369 trips \* NO<sub>x</sub> emission factor (g/mile) \* lb/453.6 g

**Construction Commuter Emissions**

Emissions from construction workers commuting to the job site are estimated in this spreadsheet.

Emission Estimation Method: Emission factors from the South Coast Air Quality Management District (SCAQMD) EMFAC 2007 (v 2.3) Model (on-road) were used. These emission factors are available online at <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>.

**Assumptions:**

Passenger vehicle emission factors for scenario year 2015 are used.  
 The average roundtrip commute for a construction worker = 30 miles  
 Number of construction days = 240 days  
 Number of construction workers (daily) = 30 people

**Passenger Vehicle Emission Factors for Year 2015 (lbs/mile)**

NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
0.00060188	0.00066355	0.00614108	0.00001070	0.00009259	0.00006015	1.10192837

Source: South Coast Air Quality Management District. EMFAC 2007 (ver 2.3) On-Road Emissions Factors. Last updated April 24, 2008. Available online: <<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>>. Accessed 10 May 2013.

**Notes:**

The SMAQMD 2007 reference lists emission factors for reactive organic gas (ROG). For purposes of this worksheet ROG = VOC.

**Construction Commuter Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	130.005	143.326	1326.473	2.312	19.999	12.992	238016.529
tons	0.065	0.072	0.663	0.001	0.010	0.006	119.008

Example Calculation: NO<sub>x</sub> emissions (lbs) = 60 miles/day \* NO<sub>x</sub> emission factor (lb/mile) \* number of construction days \* number of workers

**Metropolitan Denver Intrastate AQCR**

Row #	State	County	All Emission Sources					
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
1	CO	Adams	66,166.23	26,263.59	15,754.51	4,113.54	7,737.02	19,333.51
2	CO	Arapahoe	81,600.76	12,367.17	14,903.74	2,946.89	257.86	17,198.71
3	CO	Boulder	45,011.54	10,596.07	5,430.68	1,352.87	916.72	19,013.11
4	CO	Clear Creek	11,912.27	1,885.71	2,655.93	610.36	17.25	6,297.05
5	CO	Denver	93,351.26	21,309.92	13,878.24	2,743.43	3,261.35	17,554.47
6	CO	Douglas	43,182.53	7,519.29	5,067.58	1,219.57	145.18	18,030.73
7	CO	Gilpin	2,100.91	515.19	477.55	155.45	6.26	4,251.82
8	CO	Jefferson	83,780.29	14,521.39	10,407.51	2,523.01	2,897.01	26,467.27
Grand Total			427,106	94,978	68,576	15,665	15,239	128,147

SOURCE:

<http://neibrowser.epa.gov/eis-public-web/home.html>

USEPA National Emissions Inventory (NEI)

<b>Summary</b>	Summarizes total emissions for the Modification of Existing Buildings in Zone 1 & 2 (Proposed Action) in 2015
<b>Combustion</b>	Estimates emissions from non-road equipment exhaust.
<b>Fugitive</b>	Estimates particulate emissions from construction and demolition activities including earthmoving, vehicle traffic, and windblown dust.
<b>Grading</b>	Estimates the number of days of site preparation, to be used for estimating heavy equipment exhaust and earthmoving dust emissions.
<b>Haul Truck On-Road</b>	Estimates emissions from haul trucks hauling fill materials to the job site.
<b>Construction Commuter</b>	Estimates emissions for construction workers commuting to the site.
<b>Emergency Generator</b>	Estimates emissions from the operation of emergency generators.
<b>AQCR Tier Report</b>	Summarizes total emissions for the Metropolitan Denver Intrastate AQCR report for 2008, to be used to compare the Proposed Action to regional emissions.

**Air Emissions for the Proposed Action in 2015**

	<b>NO<sub>x</sub> (ton)</b>	<b>VOC (ton)</b>	<b>CO (ton)</b>	<b>SO<sub>2</sub> (ton)</b>	<b>PM<sub>10</sub> (ton)</b>	<b>PM<sub>2.5</sub> (ton)</b>	<b>CO<sub>2</sub> (ton)</b>
Combustion	4.78	0.46	2.11	0.38	0.34	0.33	541.81
Fugitive Dust	-	-	-	-	0.40	0.04	-
Haul Truck On-Road	0.03	0.01	0.02	0.00	0.00	0.00	14.31
Commuter	0.07	0.07	0.66	0.00	0.01	0.01	119.01
<b>TOTAL</b>	<b>4.88</b>	<b>0.53</b>	<b>2.79</b>	<b>0.38</b>	<b>0.75</b>	<b>0.38</b>	<b>675.12</b>

Note: Total PM<sub>10/2.5</sub> fugitive dust emissions are assuming USEPA 50% control efficiencies.

CO <sub>2</sub> emissions converted to metric tons =	<b>612.338</b>	<b>metric tons</b>	
State of Colorado's CO <sub>2</sub> emissions =	<b>96,500,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of Colorado's CO <sub>2</sub> emissions =	<b>0.00063%</b>		
United States' CO <sub>2</sub> emissions =	<b>5,631,300,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of USA's CO <sub>2</sub> emissions =	<b>0.000011%</b>		

Source: U.S. Department of Energy, Energy Information Administration (U.S. DOE/EIA). 2013. Table 1. State Emissions by Year (Million Metric Tons of Carbon Dioxide). Available online <[http://www.eia.gov/environment/emissions/state/state\\_emissions.cfm](http://www.eia.gov/environment/emissions/state/state_emissions.cfm)>. Data released January 2013. Data accessed 10 May 2013.

Since future year budgets were not readily available, actual 2008 air emissions inventories for the counties were used as an approximation of the regional inventory. Because emissions from the Proposed Action in 2015 are several orders of magnitude below significance, the conclusion would be the same, regardless of whether future year budget data set were used.

**Metropolitan Denver Intrastate AQCR Air Basin**

Year	Point and Area Sources Combined					
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
2008	94,978	128,147	427,106	15,239	68,576	15,665

Source: USEPA National Emissions Inventory (NEI) (<http://neibrowser.epa.gov/eis-public-web/home.html>). Site visited on 10 May 2013

**Air Emissions from the Proposed Action in 2015**

Point and Area Sources Combined						
<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>	
94,978	128,147	427,106	15,239	68,576	15,665	
4.878	0.535	2.793	0.379	0.751	0.380	
<b>0.005%</b>	<b>0.0004%</b>	<b>0.0007%</b>	<b>0.002%</b>	<b>0.001%</b>	<b>0.002%</b>	

Regional Emissions  
Emissions  
% of Regional

Summary

Estimated Emissions for the Modification of Existing Buildings in Zone 12 (Proposed Action) in FY2015

**Combustion Emissions**

Combustion Emissions of VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO<sub>2</sub> due to Construction and Demolition

<b>Proposed Modification Activities</b>	<b>Area Disturbed</b>	
4.) Building 251 Addition	10,000 ft <sup>2</sup>	Total Area Disturbed
	5,000 ft <sup>2</sup>	Addition
5.) STL (Building 254) Addition (Zone 1)	5,000 ft <sup>2</sup>	Total Area Disturbed
	3,500 ft <sup>2</sup>	Building Addition and estimated High Bay Addition
6.) DERTF Upgrades (Zone 1)	120 ft <sup>2</sup>	Total Area Disturbed
	66 ft <sup>2</sup>	6 Hydrogen tanks
7.) Upgrades to 2.5 Dynamometer	0 ft <sup>2</sup>	Total Area Disturbed - Interior Upgrades only
8.) Cool Roof Upgrades	0 ft <sup>2</sup>	Total Area Disturbed - Exterior Upgrades only, no ground disturbed
Total Construction Area:	8,566 ft <sup>2</sup>	
	0.20 acres	
Total Pavement Area:	0 ft <sup>2</sup>	
	0.00 acres	
Total Disturbed Area:	15,120 ft <sup>2</sup>	
	0.35 acres	
Construction Duration:	12 months	
Annual Construction Activity:	240 days	Assume 4 weeks per month, 5 days per week.

## Emission Factors Used for Construction Equipment

References: Guide to Air Quality Assessment, SMAQMD, 2004; and U.S. EPA NONROAD Emissions Model, Version 2005.0.0

Emission factors are taken from the NONROAD model and were provided to e2M by Larry Landman of the Air Quality and Modeling Center (Landman.Larry@epamail.epa.gov) on 12/14/07. Factors provided are for the weighted average US fleet for CY2007.

Assumptions regarding the type and number of equipment are from SMAQMD Table 3-1 unless otherwise noted.

### Grading

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Bulldozer	1	13.60	0.96	5.50	1.02	0.89	0.87	1456.90
Motor Grader	1	9.69	0.73	3.20	0.80	0.66	0.64	1141.65
Water Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
<b>Total per 10 acres of activity</b>	<b>3</b>	<b>41.64</b>	<b>2.58</b>	<b>15.71</b>	<b>3.45</b>	<b>2.55</b>	<b>2.47</b>	<b>4941.53</b>

### Paving

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Paver	1	3.83	0.37	2.06	0.28	0.35	0.34	401.93
Roller	1	4.82	0.44	2.51	0.37	0.43	0.42	536.07
Truck	2	36.71	1.79	14.01	3.27	1.99	1.93	4685.95
<b>Total per 10 acres of activity</b>	<b>4</b>	<b>45.37</b>	<b>2.61</b>	<b>18.58</b>	<b>3.93</b>	<b>2.78</b>	<b>2.69</b>	<b>5623.96</b>

### Demolition

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Loader	1	13.45	0.99	5.58	0.95	0.93	0.90	1360.10
Haul Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
<b>Total per 10 acres of activity</b>	<b>2</b>	<b>31.81</b>	<b>1.89</b>	<b>12.58</b>	<b>2.58</b>	<b>1.92</b>	<b>1.87</b>	<b>3703.07</b>

### Building Construction

Equipment <sup>d</sup>	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
<b>Stationary</b>								
Generator Set	1	2.38	0.32	1.18	0.15	0.23	0.22	213.06
Industrial Saw	1	2.62	0.32	1.97	0.20	0.32	0.31	291.92
Welder	1	1.12	0.38	1.50	0.08	0.23	0.22	112.39
<b>Mobile (non-road)</b>								
Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Forklift	1	5.34	0.56	3.33	0.40	0.55	0.54	572.24
Crane	1	9.57	0.66	2.39	0.65	0.50	0.49	931.93
<b>Total per 10 acres of activity</b>	<b>6</b>	<b>39.40</b>	<b>3.13</b>	<b>17.38</b>	<b>3.12</b>	<b>2.83</b>	<b>2.74</b>	<b>4464.51</b>

Note: Footnotes for tables are on following page

### Architectural Coatings

Equipment	No. Req <sup>d</sup> . per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup>	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Air Compressor	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77
Total per 10 acres of activity	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77

- a) The SMAQMD 2004 guidance suggests a default equipment fleet for each activity, assuming 10 acres of that activity, (e.g., 10 acres of grading, 10 acres of paving, etc.). The default equipment fleet is increased for each 10 acre increment in the size of the construction project. That is, a 26 acre project would round to 30 acres and the fleet size would be three times the default fleet for a 10 acre project.
- b) The SMAQMD 2004 reference lists emission factors for reactive organic gas (ROG). For the purposes of this worksheet ROG = VOC. The NONROAD model contains emissions factors for total HC and for VOC. The factors used here are the VOC factors.
- c) The NONROAD emission factors assume that the average fuel burned in nonroad trucks is 1100 ppm sulfur. Trucks that would be used for the Proposed Actions will all be fueled by highway grade diesel fuel which cannot exceed 500 ppm sulfur. These estimates therefore over-estimate SO<sub>2</sub> emissions by more than a factor of two.
- d) Typical equipment fleet for building construction was not itemized in SMAQMD 2004 guidance. The equipment list above was assumed based on SMAQMD 1994 guidance.

## PROJECT-SPECIFIC EMISSION FACTOR SUMMARY

Source	Equipment Multiplier*	Project-Specific Emission Factors (lb/day)						
		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub> **	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	1	41.641	2.577	15.710	3.449	2.546	2.469	4941.526
Paving Equipment	1	45.367	2.606	18.578	3.926	2.776	2.693	5623.957
Demolition Equipment	1	31.808	1.886	12.584	2.585	1.923	1.865	3703.074
Building Construction	1	39.396	3.130	17.382	3.116	2.829	2.744	4464.512
Air Compressor for Architectural Coating	1	3.574	0.373	1.565	0.251	0.309	0.300	359.773
Architectural Coating**			7.543					

\*The equipment multiplier is an integer that represents units of 10 acres for purposes of estimating the number of equipment required for the project.

\*\*Emission factor is from the evaporation of solvents during painting, per "Air Quality Thresholds of Significance", SMAQMD, 1994

Example: SMAQMD Emission Factor for Grading Equipment NO<sub>x</sub> = (Total Grading NO<sub>x</sub> per 10 acre)\*(Equipment Multiplier)

### Summary of Input Parameters

	Total Area (ft <sup>2</sup> )	Total Area (acres)	Total Days	
Grading:	15,120	0.35	1	(from "Grading" worksheet)
Paving:	0	0.00	0	
Demolition:	0	0.00	0	
Building Construction:	8,566	0.20	240	
Architectural Coating	8,566	0.20	20	(per SMAQMD "Air Quality of Thresholds of Significance", 1994)

NOTE: The 'Total Days' estimate for paving is calculated by dividing the total number of acres by 0.21 acres/day, which is a factor derived from the 2005 MEANS Heavy Construction Cost Data, 19th Edition, for 'Asphaltic Concrete Pavement, Lots and Driveways - 6" stone base', which provides an estimate of square feet paved per day. There is also an estimate for 'Plain Cement Concrete Pavement', however the estimate for asphalt is used because it is more conservative. The 'Total Days' estimate for demolition is calculated by dividing the total number of acres by 0.02 acres/day, which is a factor also derived from the 2005 MEANS reference. This is calculated by averaging the demolition estimates from 'Building Demolition - Small Buildings, Concrete', assuming a height of 30 feet for a two-story building; from 'Building Footings and Foundations Demolition - 6" Thick, Plain Concrete'; and from 'Demolish, Remove Pavement and Curb - Concrete to 6" thick, rod reinforced'. Paving is double-weighted since projects typically involve more paving demolition. The 'Total Days' estimate for building construction is assumed to be 230 days, unless project-specific data is known.

### Total Project Emissions by Activity (lbs)

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	41.64	2.58	15.71	3.45	2.55	2.47	4,942
Paving	-	-	-	-	-	-	0
Demolition	-	-	-	-	-	-	0
Building Construction	9,455.12	751.15	4,171.75	747.92	678.97	658.60	1,071,483
Architectural Coatings	71.48	158.32	31.31	5.02	6.19	6.00	7,195
<b>Total Emissions (lbs):</b>	<b>9,568.24</b>	<b>912.06</b>	<b>4,218.77</b>	<b>756.40</b>	<b>687.70</b>	<b>667.07</b>	<b>1,083,620</b>

### Results: Total Project Annual Emission Rates

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Total Project Emissions (lbs)	9,568.24	912.06	4,218.77	756.40	687.70	667.07	1,083,620
Total Project Emissions (tons)	4.784	0.456	2.109	0.378	0.344	0.334	541.810

## Construction Fugitive Dust Emissions

### Construction Fugitive Dust Emission Factors

	Emission Factor	Units	Source
Construction and Demolition Activities	0.19	ton PM <sub>10</sub> /acre-month	MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42	ton PM <sub>10</sub> /acre-month	MRI 1996; EPA 2001; EPA 2006

### PM<sub>2.5</sub> Emissions

PM <sub>2.5</sub> Multiplier	0.10	(10% of PM <sub>10</sub> emissions assumed to be PM <sub>2.5</sub> )	EPA 2001; EPA 2006
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### Control Efficiency

	0.50	(assume 50% control efficiency for PM <sub>10</sub> and PM <sub>2.5</sub> emissions)	EPA 2001; EPA 2006
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### Project Assumptions

#### *New Roadway Construction (0.42 ton PM<sub>10</sub>/acre-month)*

Duration of Construction Project	12 months
Area	0.00 acres

#### *General Construction and Demolition Activities (0.19 ton PM<sub>10</sub>/acre-month)*

Duration of Project	12 months
Area	0.35 acres

	Project Emissions (tons/year)			
	PM <sub>10</sub> uncontrolled	PM <sub>10</sub> controlled	PM <sub>2.5</sub> uncontrolled	PM <sub>2.5</sub> controlled
New Roadway Construction	0.000	0.000	0.000	0.000
General Construction Activities	0.791	0.396	0.079	0.040
<b>Total</b>	<b>0.791</b>	<b>0.396</b>	<b>0.079</b>	<b>0.040</b>

## Construction Fugitive Dust Emission Factors

### General Construction Activities Emission Factor

**0.19 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM<sub>10</sub>/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM<sub>10</sub>/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM<sub>10</sub>/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM<sub>10</sub>/acre-month) and 75% of the average emission factor (0.11 ton PM<sub>10</sub>/acre-month). The 0.19 ton PM<sub>10</sub>/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM<sub>10</sub>/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particulate (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District as well as the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas.

### New Road Construction Emission Factor

**0.42 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM<sub>10</sub>/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM<sub>10</sub>/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

### PM<sub>2.5</sub> Multiplier

**0.10**

PM<sub>2.5</sub> emissions are estimated by applying a particle size multiplier of 0.10 to PM<sub>10</sub> emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

### Control Efficiency for PM<sub>10</sub> and PM<sub>2.5</sub>

**0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas (EPA 2006). Wetting controls will be applied during project construction.

### References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

## Grading Schedule

Estimate of time required to grade a specified area.

### Input Parameters

Construction area: 0.35 acres/yr (from Combustion Worksheet)  
 Qty Equipment: 3.00 (calculated based on 3 pieces of equipment for every 10 acres)

### Assumptions.

Terrain is mostly flat.

An average of 6" soil is excavated from one half of the site and backfilled to the other half of the site; no soil is hauled off-site or borrowed.

200 hp bulldozers are used for site clearing.

300 hp bulldozers are used for stripping, excavation, and backfill.

Vibratory drum rollers are used for compacting.

Stripping, Excavation, Backfill and Compaction require an average of two passes each.

Excavation and Backfill are assumed to involve only half of the site.

### Calculation of days required for one piece of equipment to grade the specified area.

Reference: Means Heavy Construction Cost Data, 19th Ed., R. S. Means, 2005.

Means Line No.	Operation	Description	Output	Units	Acres per equip-day	equip-days per acre	Acres/yr (project- specific)	Equip-days per year
2230 200 0550	Site Clearing	Dozer & rake, medium brush	8	acre/day	8	0.13	0.35	0.04
2230 500 0300	Stripping	Topsoil & stockpiling, adverse soil	1,650	cu. yd/day	2.05	0.49	0.35	0.17
2315 432 5220	Excavation	Bulk, open site, common earth, 150' haul	800	cu. yd/day	0.99	1.01	0.17	0.18
2315 120 5220	Backfill	Structural, common earth, 150' haul	1,950	cu. yd/day	2.42	0.41	0.17	0.07
2315 310 5020	Compaction	Vibrating roller, 6" lifts, 3 passes	2,300	cu. yd/day	2.85	0.35	0.35	0.12
TOTAL								0.58

### Calculation of days required for the indicated pieces of equipment to grade the designated acreage.

(Equip)(day)/yr: 0.58  
 Qty Equipment: 3.00  
 Grading days/yr: 0.19

**Haul Truck Emissions**

Emissions from hauling excavation material and construction supplies are estimated in this spreadsheet. Emission Estimation Method: United States Air Force (USAF) Institute for Environment, Safety and Occupational Health Risk Analysis (IERA) Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations (Revised January 2013).

**Assumptions:**

Haul trucks carry 20 cubic yards of material per trip.  
 The average distance from the project site to the materials source is estimated to be 15 miles; therefore, a haul truck will travel 30 miles round trip.  
 Estimated number of trips required by haul trucks = total amount of material/20 cubic yards per truck

Amount of Building Materials (Above Ground) =	1,565 cubic yards	Assumes 4 feet of building material are needed for the single floor of Building 254 and 251 additions, 6 hydrogen tanks, and an estimation of 2,000 square feet of materials for cool roof installations.
Amount of Building Materials (Below Ground) =	1,586 cubic yards	Assumes 5 feet of material are needed for the below ground portion of Buildings 251 and 254 and the proposed hydrogen tanks.
Amount of Excavation Material =	3,807 cubic yards	Assumes 12 feet of material would need to be excavated on average
Amount of Paving Material =	0 cubic yards	
Number of trucks required =	348 heavy duty diesel haul truck trips	
Miles per trip =	30 miles	

**Heavy Duty Diesel Vehicle (HDDV) Average Emission Factors (grams/mile)**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
HDDV	2.498	0.617	1.782	0.012	0.097	0.071	1243.400

Notes:  
 Emission factors for all pollutants are from USAF IERA 2013.  
 Emission factors are from Tables 5-11 for the 2015 calendar year, high altitude (USAF IERA 2013).

**HDDV Haul Truck Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	57.483	14.198	41.007	0.276	2.232	1.634	28612.759
tons	0.029	0.007	0.021	0.000	0.001	0.001	14.306

Example Calculation: NO<sub>x</sub> emissions (lbs) = 30 miles per trip \* 369 trips \* NO<sub>x</sub> emission factor (g/mile) \* lb/453.6 g

**Construction Commuter Emissions**

Emissions from construction workers commuting to the job site are estimated in this spreadsheet.

Emission Estimation Method: Emission factors from the South Coast Air Quality Management District (SCAQMD) EMFAC 2007 (v 2.3) Model (on-road) were used. These emission factors are available online at <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>.

**Assumptions:**

Passenger vehicle emission factors for scenario year 2015 are used.

The average roundtrip commute for a construction worker = 30 miles  
 Number of construction days = 240 days  
 Number of construction workers (daily) = 30 people

**Passenger Vehicle Emission Factors for Year 2015 (lbs/mile)**

NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
0.00060188	0.00066355	0.00614108	0.00001070	0.00009259	0.00006015	1.10192837

Source: South Coast Air Quality Management District. EMFAC 2007 (ver 2.3) On-Road Emissions Factors. Last updated April 24, 2008. Available online: <<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>>. Accessed 10 May 2013.

**Notes:**

The SMAQMD 2007 reference lists emission factors for reactive organic gas (ROG). For purposes of this worksheet ROG = VOC.

**Construction Commuter Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	130.005	143.326	1326.473	2.312	19.999	12.992	238016.529
tons	0.065	0.072	0.663	0.001	0.010	0.006	119.008

Example Calculation: NO<sub>x</sub> emissions (lbs) = 60 miles/day \* NO<sub>x</sub> emission factor (lb/mile) \* number of construction days \* number of workers

**South Central Coast Air Basin**

			All Emission Sources					
Row #	State	County	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
1	CO	Adams	66,166.23	26,263.59	15,754.51	4,113.54	7,737.02	19,333.51
2	CO	Arapahoe	81,600.76	12,367.17	14,903.74	2,946.89	257.86	17,198.71
3	CO	Boulder	45,011.54	10,596.07	5,430.68	1,352.87	916.72	19,013.11
4	CO	Clear Creek	11,912.27	1,885.71	2,655.93	610.36	17.25	6,297.05
5	CO	Denver	93,351.26	21,309.92	13,878.24	2,743.43	3,261.35	17,554.47
6	CO	Douglas	43,182.53	7,519.29	5,067.58	1,219.57	145.18	18,030.73
7	CO	Gilpin	2,100.91	515.19	477.55	155.45	6.26	4,251.82
8	CO	Jefferson	83,780.29	14,521.39	10,407.51	2,523.01	2,897.01	26,467.27
Grand Total			427,105.80	94,978.34	68,575.73	15,665.11	15,238.66	128,146.68

SOURCE:  
<http://neibrowser.epa.gov/eis-public-web/home.html>  
 USEPA National Emissions Inventory (NEI)

<b>Summary</b>	Summarizes total emissions for the Infrastructure Improvements in Zone 1 & 2 (Proposed Action) in 2015
<b>Combustion</b>	Estimates emissions from non-road equipment exhaust.
<b>Fugitive</b>	Estimates particulate emissions from construction and demolition activities including earthmoving, vehicle traffic, and windblown dust.
<b>Grading</b>	Estimates the number of days of site preparation, to be used for estimating heavy equipment exhaust and earthmoving dust emissions.
<b>Haul Truck On-Road</b>	Estimates emissions from haul trucks hauling fill materials to the job site.
<b>Construction Commuter</b>	Estimates emissions for construction workers commuting to the site.
<b>AQCR Tier Report</b>	Summarizes total emissions for the Metropolitan Denver Intrastate AQCR report for 2008, to be used to compare the Proposed Action to regional emissions.

**Air Emissions for the Proposed Action in 2015**

	<b>NO<sub>x</sub> (ton)</b>	<b>VOC (ton)</b>	<b>CO (ton)</b>	<b>SO<sub>2</sub> (ton)</b>	<b>PM<sub>10</sub> (ton)</b>	<b>PM<sub>2.5</sub> (ton)</b>	<b>CO<sub>2</sub> (ton)</b>
Combustion	4.85	0.42	2.13	0.38	0.35	0.34	549.56
Fugitive Dust	-	-	-	-	5.88	0.59	-
Haul Truck On-Road	0.14	0.04	0.10	0.00	0.01	0.00	71.92
Commuter	0.07	0.07	0.66	0.00	0.01	0.01	119.01
<b>TOTAL</b>	<b>5.06</b>	<b>0.53</b>	<b>2.90</b>	<b>0.39</b>	<b>6.24</b>	<b>0.94</b>	<b>740.49</b>

Note: Total PM<sub>10/2.5</sub> fugitive dust emissions are assuming USEPA 50% control efficiencies.

CO <sub>2</sub> emissions converted to metric tons =	<b>671.628</b>	<b>metric tons</b>	
State of Colorado's CO <sub>2</sub> emissions =	<b>96,500,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of Colorado's CO <sub>2</sub> emissions =	<b>0.00070%</b>		
United States' CO <sub>2</sub> emissions =	<b>5,631,300,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of USA's CO <sub>2</sub> emissions =	<b>0.000012%</b>		

Source: U.S. Department of Energy, Energy Information Administration (U.S. DOE/EIA). 2013. Table 1. State Emissions by Year (Million Metric Tons of Carbon Dioxide). Available online <[http://www.eia.gov/environment/emissions/state/state\\_emissions.cfm](http://www.eia.gov/environment/emissions/state/state_emissions.cfm)>. Data released January 2013. Data accessed 10 May 2013.

Since future year budgets were not readily available, actual 2008 air emissions inventories for the counties were used as an approximation of the regional inventory. Because emissions from the Proposed Action in 2015 are several orders of magnitude below significance, the conclusion would be the same, regardless of whether future year budget data set were used.

**Metropolitan Denver Intrastate AQCR Air Basin**

Year	Point and Area Sources Combined					
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
2008	94,978	128,147	427,106	15,239	68,576	15,665

Source: USEPA National Emissions Inventory (NEI) (<http://neibrowser.epa.gov/eis-public-web/home.html>). Site visited on 10 May 2013

**Air Emissions from the Proposed Action in 2015**

Point and Area Sources Combined						
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
	94,978	128,147	427,106	15,239	68,576	15,665
	5.058	0.531	2.901	0.385	6.242	0.936
	<b>0.005%</b>	<b>0.0004%</b>	<b>0.0007%</b>	<b>0.003%</b>	<b>0.009%</b>	<b>0.006%</b>

Regional Emissions  
Emissions  
% of Regional

**Combustion Emissions**

Combustion Emissions of VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO<sub>2</sub> due to Construction and Demolition

<b>Proposed Modification Activities</b>	<b>Area Disturbed</b>	
9.) Drinking Water Systems Upgrades	102,960 ft <sup>2</sup>	Total Area Disturbed - 3.9 miles long, approximately 5 ft wide
10.) Fire Suppression System Upgrades	3,000 ft <sup>2</sup>	Total Area Disturbed - new 200,000 gallon tank
	1,300 ft <sup>2</sup>	Area of tank (estimated to be 20' diameter, 100' high)
11.) Sanitary Waste Upgrades	60,810 ft <sup>2</sup>	Total Area Disturbed - 3,450 linear feet of piping (5 ft wide of disturbed area)
	1,000 ft <sup>2</sup>	and 1 acre to house equipment and infrastructure (estimated to be 1,000 square feet)
12.) Road Improvements	3,600 ft <sup>2</sup>	Total Area Disturbed (estimated)
	1,200 ft <sup>2</sup>	Additional paved area
13.) Data & Telecommunications Improvements	52,800 ft <sup>2</sup>	Total Area Disturbed - estimated 2.0 miles, approximately 5 ft wide
Total Construction Area:	2,300 ft <sup>2</sup>	
	0.05 acres	
Total Pavement Area:	1,200 ft <sup>2</sup>	
	0.03 acres	
Total Disturbed Area:	223,170 ft <sup>2</sup>	
	5.12 acres	
Construction Duration:	12 months	
Annual Construction Activity:	240 days	Assume 4 weeks per month, 5 days per week.

## Emission Factors Used for Construction Equipment

References: Guide to Air Quality Assessment, SMAQMD, 2004; and U.S. EPA NONROAD Emissions Model, Version 2005.0.0

Emission factors are taken from the NONROAD model and were provided to e<sup>2</sup>M by Larry Landman of the Air Quality and Modeling Center (Landman.Larry@epamail.epa.gov) on 12/14/07. Factors provided are for the weighted average US fleet for CY2007.

Assumptions regarding the type and number of equipment are from SMAQMD Table 3-1 unless otherwise noted.

### Grading

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Bulldozer	1	13.60	0.96	5.50	1.02	0.89	0.87	1456.90
Motor Grader	1	9.69	0.73	3.20	0.80	0.66	0.64	1141.65
Water Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
<b>Total per 10 acres of activity</b>	<b>3</b>	<b>41.64</b>	<b>2.58</b>	<b>15.71</b>	<b>3.45</b>	<b>2.55</b>	<b>2.47</b>	<b>4941.53</b>

### Paving

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Paver	1	3.83	0.37	2.06	0.28	0.35	0.34	401.93
Roller	1	4.82	0.44	2.51	0.37	0.43	0.42	536.07
Truck	2	36.71	1.79	14.01	3.27	1.99	1.93	4685.95
<b>Total per 10 acres of activity</b>	<b>4</b>	<b>45.37</b>	<b>2.61</b>	<b>18.58</b>	<b>3.93</b>	<b>2.78</b>	<b>2.69</b>	<b>5623.96</b>

### Demolition

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Loader	1	13.45	0.99	5.58	0.95	0.93	0.90	1360.10
Haul Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
<b>Total per 10 acres of activity</b>	<b>2</b>	<b>31.81</b>	<b>1.89</b>	<b>12.58</b>	<b>2.58</b>	<b>1.92</b>	<b>1.87</b>	<b>3703.07</b>

### Building Construction

Equipment <sup>d</sup>	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
<b>Stationary</b>								
Generator Set	1	2.38	0.32	1.18	0.15	0.23	0.22	213.06
Industrial Saw	1	2.62	0.32	1.97	0.20	0.32	0.31	291.92
Welder	1	1.12	0.38	1.50	0.08	0.23	0.22	112.39
<b>Mobile (non-road)</b>								
Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Forklift	1	5.34	0.56	3.33	0.40	0.55	0.54	572.24
Crane	1	9.57	0.66	2.39	0.65	0.50	0.49	931.93
<b>Total per 10 acres of activity</b>	<b>6</b>	<b>39.40</b>	<b>3.13</b>	<b>17.38</b>	<b>3.12</b>	<b>2.83</b>	<b>2.74</b>	<b>4464.51</b>

Note: Footnotes for tables are on following page

### Architectural Coatings

Equipment	No. Req <sup>d</sup> . per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup>	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Air Compressor	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77
Total per 10 acres of activity	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77

- a) The SMAQMD 2004 guidance suggests a default equipment fleet for each activity, assuming 10 acres of that activity, (e.g., 10 acres of grading, 10 acres of paving, etc.). The default equipment fleet is increased for each 10 acre increment in the size of the construction project. That is, a 26 acre project would round to 30 acres and the fleet size would be three times the default fleet for a 10 acre project.
- b) The SMAQMD 2004 reference lists emission factors for reactive organic gas (ROG). For the purposes of this worksheet ROG = VOC. The NONROAD model contains emissions factors for total HC and for VOC. The factors used here are the VOC factors.
- c) The NONROAD emission factors assume that the average fuel burned in nonroad trucks is 1100 ppm sulfur. Trucks that would be used for the Proposed Actions will all be fueled by highway grade diesel fuel which cannot exceed 500 ppm sulfur. These estimates therefore over-estimate SO<sub>2</sub> emissions by more than a factor of two.
- d) Typical equipment fleet for building construction was not itemized in SMAQMD 2004 guidance. The equipment list above was assumed based on SMAQMD 1994 guidance.

## PROJECT-SPECIFIC EMISSION FACTOR SUMMARY

Source	Equipment Multiplier*	Project-Specific Emission Factors (lb/day)						
		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub> **	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	1	41.641	2.577	15.710	3.449	2.546	2.469	4941.526
Paving Equipment	1	45.367	2.606	18.578	3.926	2.776	2.693	5623.957
Demolition Equipment	1	31.808	1.886	12.584	2.585	1.923	1.865	3703.074
Building Construction	1	39.396	3.130	17.382	3.116	2.829	2.744	4464.512
Air Compressor for Architectural Coating	1	3.574	0.373	1.565	0.251	0.309	0.300	359.773
Architectural Coating**			3.909					

\*The equipment multiplier is an integer that represents units of 10 acres for purposes of estimating the number of equipment required for the project.

\*\*Emission factor is from the evaporation of solvents during painting, per "Air Quality Thresholds of Significance", SMAQMD, 1994

Example: SMAQMD Emission Factor for Grading Equipment NO<sub>x</sub> = (Total Grading NO<sub>x</sub> per 10 acre)\*(Equipment Multiplier)

### Summary of Input Parameters

	Total Area (ft <sup>2</sup> )	Total Area (acres)	Total Days	
Grading:	223,170	5.12	3	(from "Grading" worksheet)
Paving:	1,200	0.03	1	
Demolition:	0	0.00	0	
Building Construction:	2,300	0.05	240	
Architectural Coating	2,300	0.05	20	(per SMAQMD "Air Quality of Thresholds of Significance", 1994)

NOTE: The 'Total Days' estimate for paving is calculated by dividing the total number of acres by 0.21 acres/day, which is a factor derived from the 2005 MEANS Heavy Construction Cost Data, 19th Edition, for 'Asphaltic Concrete Pavement, Lots and Driveways - 6" stone base', which provides an estimate of square feet paved per day. There is also an estimate for 'Plain Cement Concrete Pavement', however the estimate for asphalt is used because it is more conservative. The 'Total Days' estimate for demolition is calculated by dividing the total number of acres by 0.02 acres/day, which is a factor also derived from the 2005 MEANS reference. This is calculated by averaging the demolition estimates from 'Building Demolition - Small Buildings, Concrete', assuming a height of 30 feet for a two-story building; from 'Building Footings and Foundations Demolition - 6" Thick, Plain Concrete'; and from 'Demolish, Remove Pavement and Curb - Concrete to 6" thick, rod reinforced'. Paving is double-weighted since projects typically involve more paving demolition. The 'Total Days' estimate for building construction is assumed to be 230 days, unless project-specific data is known.

### Total Project Emissions by Activity (lbs)

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	124.92	7.73	47.13	10.35	7.64	7.41	14,825
Paving	45.37	2.61	18.58	3.93	2.78	2.69	5,624
Demolition	-	-	-	-	-	-	0
Building Construction	9,455.12	751.15	4,171.75	747.92	678.97	658.60	1,071,483
Architectural Coatings	71.48	85.64	31.31	5.02	6.19	6.00	7,195
<b>Total Emissions (lbs):</b>	<b>9,696.89</b>	<b>847.13</b>	<b>4,268.77</b>	<b>767.22</b>	<b>695.57</b>	<b>674.70</b>	<b>1,099,127</b>

### Results: Total Project Annual Emission Rates

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Total Project Emissions (lbs)	9,696.89	847.13	4,268.77	767.22	695.57	674.70	1,099,127
Total Project Emissions (tons)	4.848	0.424	2.134	0.384	0.348	0.337	549.563

**Construction Fugitive Dust Emissions**

**Construction Fugitive Dust Emission Factors**

	<b>Emission Factor</b>	<b>Units</b>	<b>Source</b>
Construction and Demolition Activities	0.19	ton PM <sub>10</sub> /acre-month	MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42	ton PM <sub>10</sub> /acre-month	MRI 1996; EPA 2001; EPA 2006

**PM<sub>2.5</sub> Emissions**

PM <sub>2.5</sub> Multiplier	0.10	(10% of PM <sub>10</sub> emissions assumed to be PM <sub>2.5</sub> )	EPA 2001; EPA 2006
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**Control Efficiency**

	0.50	(assume 50% control efficiency for PM <sub>10</sub> and PM <sub>2.5</sub> emissions)	EPA 2001; EPA 2006
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**Project Assumptions**

***New Roadway Construction (0.42 ton PM<sub>10</sub>/acre-month)***

Duration of Construction Project	12 months
Area	0.03 acres

***General Construction Activities (0.19 ton PM<sub>10</sub>/acre-month)***

Duration of Project	12 months
Area	5.10 acres

	<b>Project Emissions (tons/year)</b>			
	<b>PM<sub>10</sub> uncontrolled</b>	<b>PM<sub>10</sub> controlled</b>	<b>PM<sub>2.5</sub> uncontrolled</b>	<b>PM<sub>2.5</sub> controlled</b>
New Roadway Construction	0.139	0.069	0.014	0.007
General Construction Activities	11.618	5.809	1.162	0.581
<b>Total</b>	<b>11.757</b>	<b>5.879</b>	<b>1.176</b>	<b>0.588</b>

## Construction Fugitive Dust Emission Factors

### General Construction Activities Emission Factor

**0.19 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM<sub>10</sub>/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM<sub>10</sub>/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM<sub>10</sub>/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM<sub>10</sub>/acre-month) and 75% of the average emission factor (0.11 ton PM<sub>10</sub>/acre-month). The 0.19 ton PM<sub>10</sub>/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM<sub>10</sub>/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particulate (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District as well as the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas.

### New Road Construction Emission Factor

**0.42 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM<sub>10</sub>/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM<sub>10</sub>/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

### PM<sub>2.5</sub> Multiplier

**0.10**

PM<sub>2.5</sub> emissions are estimated by applying a particle size multiplier of 0.10 to PM<sub>10</sub> emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

### Control Efficiency for PM<sub>10</sub> and PM<sub>2.5</sub>

**0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas (EPA 2006). Wetting controls will be applied during project construction.

### References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

## Grading Schedule

Estimate of time required to grade a specified area.

### Input Parameters

Construction area: 5.12 acres/yr (from Combustion Worksheet)  
 Qty Equipment: 3.00 (calculated based on 3 pieces of equipment for every 10 acres)

### Assumptions.

Terrain is mostly flat.

An average of 6" soil is excavated from one half of the site and backfilled to the other half of the site; no soil is hauled off-site or borrowed.

200 hp bulldozers are used for site clearing.

300 hp bulldozers are used for stripping, excavation, and backfill.

Vibratory drum rollers are used for compacting.

Stripping, Excavation, Backfill and Compaction require an average of two passes each.

Excavation and Backfill are assumed to involve only half of the site.

### Calculation of days required for one piece of equipment to grade the specified area.

Reference: Means Heavy Construction Cost Data, 19th Ed., R. S. Means, 2005.

Means Line No.	Operation	Description	Output	Units	Acres per equip-day	equip-days per acre	Acres/yr (project- specific)	Equip-days per year
2230 200 0550	Site Clearing	Dozer & rake, medium brush	8	acre/day	8	0.13	5.12	0.64
2230 500 0300	Stripping	Topsoil & stockpiling, adverse soil	1,650	cu. yd/day	2.05	0.49	5.12	2.50
2315 432 5220	Excavation	Bulk, open site, common earth, 150' haul	800	cu. yd/day	0.99	1.01	2.56	2.58
2315 120 5220	Backfill	Structural, common earth, 150' haul	1,950	cu. yd/day	2.42	0.41	2.56	1.06
2315 310 5020	Compaction	Vibrating roller, 6" lifts, 3 passes	2,300	cu. yd/day	2.85	0.35	5.12	1.80
TOTAL								8.58

### Calculation of days required for the indicated pieces of equipment to grade the designated acreage.

(Equip)(day)/yr: 8.58  
 Qty Equipment: 3.00  
 Grading days/yr: 2.86

**Haul Truck Emissions**

Emissions from hauling excavation material and construction supplies are estimated in this spreadsheet. Emission Estimation Method: United States Air Force (USAF) Institute for Environment, Safety and Occupational Health Risk Analysis (IERA) Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations (Revised January 2013).

**Assumptions:**

Haul trucks carry 20 cubic yards of material per trip.  
 The average distance from the project site to the materials source is estimated to be 15 miles; therefore, a haul truck will travel 30 miles round trip.  
 Estimated number of trips required by haul trucks = total amount of material/20 cubic yards per truck

Amount of Materials (Piping) =	3,845 cubic yards	Assumes 3 feet of piping and other construction materials needed for drinking water system, sanitary waste upgrades, and data and telecommunication lines.
Amount of Building Materials (Above Ground) =	341 cubic yards	Assumes 4 feet of material are needed for the aboveground portion of new tank and sewer infrastructure.
Amount of Building Materials (Below Ground) =	30,754 cubic yards	Assumes 5 feet of material are needed for the below ground portion of the proposed water tank and sewer infrastructure, and the drinking water and sanitary water piping upgrades.
Amount of Paving Material =	44 cubic yards	
Number of trucks required =	1,749 heavy duty diesel haul truck trips	
Miles per trip =	30 miles	

**Heavy Duty Diesel Vehicle (HDDV) Average Emission Factors (grams/mile)**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
<i>HDDV</i>	<b>2.498</b>	<b>0.617</b>	<b>1.782</b>	<b>0.012</b>	<b>0.097</b>	<b>0.071</b>	<b>1243.400</b>

Notes:  
 Emission factors for all pollutants are from USAF IERA 2013.  
 Emission factors are from Tables 5-11 for the 2015 calendar year, high altitude (USAF IERA 2013).

**HDDV Haul Truck Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	<b>288.985</b>	<b>71.378</b>	<b>206.153</b>	<b>1.388</b>	<b>11.222</b>	<b>8.214</b>	<b>143844.421</b>
tons	<b>0.144</b>	<b>0.036</b>	<b>0.103</b>	<b>0.001</b>	<b>0.006</b>	<b>0.004</b>	<b>71.922</b>

Example Calculation: NO<sub>x</sub> emissions (lbs) = 30 miles per trip \* 369 trips \* NO<sub>x</sub> emission factor (g/mile) \* lb/453.6 g

**Construction Commuter Emissions**

Emissions from construction workers commuting to the job site are estimated in this spreadsheet.

Emission Estimation Method: Emission factors from the South Coast Air Quality Management District (SCAQMD) EMFAC 2007 (v 2.3) Model (on-road) were used. These emission factors are available online at <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>.

**Assumptions:**

Passenger vehicle emission factors for scenario year 2015 are used.  
 The average roundtrip commute for a construction worker = 30 miles  
 Number of construction days = 240 days  
 Number of construction workers (daily) = 30 people

**Passenger Vehicle Emission Factors for Year 2015 (lbs/mile)**

NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
0.00060188	0.00066355	0.00614108	0.00001070	0.00009259	0.00006015	1.10192837

Source: South Coast Air Quality Management District. EMFAC 2007 (ver 2.3) On-Road Emissions Factors. Last updated April 24, 2008. Available online: <<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>>. Accessed 10 May 2013.

**Notes:**

The SMAQMD 2007 reference lists emission factors for reactive organic gas (ROG). For purposes of this worksheet ROG = VOC.

**Construction Commuter Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	130.005	143.326	1326.473	2.312	19.999	12.992	238016.529
tons	0.065	0.072	0.663	0.001	0.010	0.006	119.008

Example Calculation: NO<sub>x</sub> emissions (lbs) = 60 miles/day \* NO<sub>x</sub> emission factor (lb/mile) \* number of construction days \* number of workers

**Metropolitan Denver Intrastate AQCR**

Row #	State	County	All Emission Sources					
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
1	CO	Adams	66,166.23	26,263.59	15,754.51	4,113.54	7,737.02	19,333.51
2	CO	Arapahoe	81,600.76	12,367.17	14,903.74	2,946.89	257.86	17,198.71
3	CO	Boulder	45,011.54	10,596.07	5,430.68	1,352.87	916.72	19,013.11
4	CO	Clear Creek	11,912.27	1,885.71	2,655.93	610.36	17.25	6,297.05
5	CO	Denver	93,351.26	21,309.92	13,878.24	2,743.43	3,261.35	17,554.47
6	CO	Douglas	43,182.53	7,519.29	5,067.58	1,219.57	145.18	18,030.73
7	CO	Gilpin	2,100.91	515.19	477.55	155.45	6.26	4,251.82
8	CO	Jefferson	83,780.29	14,521.39	10,407.51	2,523.01	2,897.01	26,467.27
Grand Total			427,105.80	94,978.34	68,575.73	15,665.11	15,238.66	128,146.68

SOURCE:

<http://neibrowser.epa.gov/eis-public-web/home.html>

USEPA National Emissions Inventory (NEI)

## Section B.4

### Estimated Standby Generator Emissions

Generator horsepower (hp)	Conversion from kW to Btu/hr	Engine Btu/hr (Assume 90% efficiency converting mechanical to electrical power)	Engine MMBtu/hr
200	2545.5	565,657	0.57

Diesel Industrial Engine Emission Factors from AP-42, Section 3.4	NO <sub>x</sub>	CO	VOC	PM-10	SO <sub>2</sub>	CO <sub>2</sub>
	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu
Emission Factor	3.2	0.85	0.09	0.1	1.01	165

Assume max. 100 hr/yr operation and testing per generator	NO <sub>x</sub>	CO	VOC	PM-10	SO <sub>2</sub>	CO <sub>2</sub>
	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)
	181.01	48.08	5.09	5.66	57.13	9,333.34

Emissions Per Generator	NO <sub>x</sub>	CO	VOC	PM-10	SO <sub>2</sub>	CO <sub>2</sub>
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
	0.091	0.024	0.0025	0.0028	0.029	4.667

Source: USEPA 1996. AP-42. Large Stationary Diesel And All Stationary Dual-fuel Engines. Table 3.4-1. Page 3.4-5.

<b>Summary</b>	Summarizes total emissions for the Construction of Wind Turbines and Associated Infrastructure in Zone 2 (Proposed Action) in 2015 - 2017
<b>Combustion</b>	Estimates emissions from non-road equipment exhaust.
<b>Fugitive</b>	Estimates particulate emissions from construction and demolition activities including earthmoving, vehicle traffic, and windblown dust.
<b>Grading</b>	Estimates the number of days of site preparation, to be used for estimating heavy equipment exhaust and earthmoving dust emissions.
<b>Haul Truck On-Road</b>	Estimates emissions from haul trucks hauling fill materials to the job site.
<b>Construction Commuter</b>	Estimates emissions for construction workers commuting to the site.
<b>Emergency Generator</b>	Estimates emissions from the operation of emergency generators.
<b>AQCR Tier Report</b>	Summarizes total emissions for the Metropolitan Denver Intrastate AQCR report for 2008, to be used to compare the Proposed Action to regional emissions.

**Air Emissions for the Proposed Action in 2015 thru 2017**

	<b>NO<sub>x</sub> (ton)</b>	<b>VOC (ton)</b>	<b>CO (ton)</b>	<b>SO<sub>2</sub> (ton)</b>	<b>PM<sub>10</sub> (ton)</b>	<b>PM<sub>2.5</sub> (ton)</b>	<b>CO<sub>2</sub> (ton)</b>
Combustion	66.15	15.14	35.51	16.13	2.06	2.00	7,181.57
Fugitive Dust	-	-	-	-	8.98	0.90	-
Haul Truck On-Road	0.01	0.00	0.01	0.00	0.00	0.00	5.92
Commuter	0.07	0.07	0.66	0.00	0.01	0.01	119.01
<b>TOTAL</b>	<b>66.22</b>	<b>15.21</b>	<b>36.18</b>	<b>16.13</b>	<b>11.06</b>	<b>2.91</b>	<b>7,306.50</b>

Note: Total PM<sub>10/2.5</sub> fugitive dust emissions are assuming USEPA 50% control efficiencies.

CO <sub>2</sub> emissions converted to metric tons =	<b>6,626.999</b>	<b>metric tons</b>	
State of Colorado's CO <sub>2</sub> emissions =	<b>96,500,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of Colorado's CO <sub>2</sub> emissions =	<b>0.00687%</b>		
United States' CO <sub>2</sub> emissions =	<b>5,631,300,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of USA's CO <sub>2</sub> emissions =	<b>0.000118%</b>		

Source: U.S. Department of Energy, Energy Information Administration (U.S. DOE/EIA). 2013. Table 1. State Emissions by Year (Million Metric Tons of Carbon Dioxide). Available online <[http://www.eia.gov/environment/emissions/state/state\\_emissions.cfm](http://www.eia.gov/environment/emissions/state/state_emissions.cfm)>. Data released January 2013. Data accessed 10 May 2013.

Since future year budgets were not readily available, actual 2008 air emissions inventories for the counties were used as an approximation of the regional inventory. Because emissions from the Proposed Action in 2015 - 2017 are several orders of magnitude below significance, the conclusion would be the same, regardless of whether future year budget data set were used.

**Metropolitan Intrastate AQCR Air Basin**

Year	Point and Area Sources Combined					
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
2008	94,978	128,147	427,106	15,239	68,576	15,665

Source: USEPA National Emissions Inventory (NEI) (<http://neibrowser.epa.gov/eis-public-web/home.html>). Site visited on 10 May 2013

**Air Emissions from the Proposed Action in 2015 thru 2017**

Point and Area Sources Combined						
<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>	
94,978	128,147	427,106	15,239	68,576	15,665	
66.224	15.212	36.182	16.133	11.057	2.907	
<b>0.070%</b>	<b>0.0119%</b>	<b>0.0085%</b>	<b>0.106%</b>	<b>0.016%</b>	<b>0.019%</b>	

Regional Emissions  
Emissions  
% of Regional

**Combustion Emissions**

Combustion Emissions of VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO<sub>2</sub> due to Construction.

<b>General Construction and Modification Activities</b>	<b>Area Disturbed</b>	
1.) Construction of 3 utility-scale turbines	261,360 ft <sup>2</sup>	Total Area Disturbed; based on 2 acres per turbine.
2.) Construction of 4 mid-scale turbines	17,424 ft <sup>2</sup>	Total Area Disturbed; based on 0.1 acres per turbine
3.) Construction of 11 small turbines	47,916 ft <sup>2</sup>	Total Area Disturbed; based on 0.1 acres per turbine

Total Disturbed Area: 343,250 ft<sup>2</sup>  
7.88 acres

Construction Duration: 12 months  
Annual Construction Activity: 240 days      Assume 4 weeks per month, 5 days per week.

## Emission Factors Used for Construction Equipment

References: U.S. EPA NONROAD Emissions Model, Version 2005.0.0, Wind Energy Siting Study (2008), Wind Energy Final Programmatic Environmental Impact Statement (2005), and Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling-- Compression-Ignition (EPA420-P-04-009)

Emission factors are taken from the NONROAD model and crankcase Emission Factors for Nonroad Engine Modeling-- Compression-Ignition

### Wind Turbine Construction (Utility-Scale)

Equipment <sup>c, f</sup>	No. Req'd per turbine	NO <sub>x</sub> (lb/turbine)	VOC <sup>a</sup> (lb/turbine)	CO (lb/turbine)	SO <sub>2</sub> <sup>b</sup> (lb/turbine)	PM <sub>10</sub> (lb/turbine)	PM <sub>2.5</sub> <sup>d</sup> (lb/turbine)	CO <sub>2</sub> <sup>e</sup> (lb/turbine)
Site Preparation								
Backhoe	2	1555.5817	334.2913	825.4107	376.9613	47.6198	46.1913	167575.24
Dozer	2	2074.1090	445.7218	1100.5476	502.6150	63.4931	61.5883	223,433.65
Loader	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Truck	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Concrete Truck	16	2539.7253	557.1522	1375.6845	628.2688	79.3664	76.9854	279292.07
Dump/Haul Truck	2	2285.7527	501.4370	1238.1161	565.4419	71.4298	69.2869	251362.86
Foundation and Tower Construction								
Hydraulic crane	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Skid Steer	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Truck	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Welding Rig	1	222.2260	234.0039	146.8279	47.3821	11.9050	11.5478	23427.75
Dump/Haul Truck	6	1142.8764	250.7185	619.0580	282.7209	35.7149	34.6434	125681.43
Paver/Compactor	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Roller	1	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
		15264.81	3493.34	8194.58	3722.75	476.20	461.91	1657286.35

### Wind Turbine Construction (Mid-scale)

Equipment <sup>c, f</sup>	No. Req'd per turbine	NO <sub>x</sub> (lb/turbine)	VOC <sup>a</sup> (lb/turbine)	CO (lb/turbine)	SO <sub>2</sub> <sup>b</sup> (lb/turbine)	PM <sub>10</sub> (lb/turbine)	PM <sub>2.5</sub> <sup>d</sup> (lb/turbine)	CO <sub>2</sub> <sup>e</sup> (lb/turbine)
Site Preparation								
Backhoe	2	777.7909	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
Dozer	2	1037.0545	222.8609	550.2738	251.3075	31.7466	30.7942	111,716.83
Loader	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Truck	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Concrete Truck	16	1269.8626	278.5761	687.8423	314.1344	39.6832	38.4927	139646.03
Dump/Haul Truck	2	1142.8764	250.7185	619.0580	282.7209	35.7149	34.6434	125681.43
Foundation and Tower Construction								
Hydraulic crane	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Skid Steer	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Truck	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Welding Rig	1	111.1130	117.0020	73.4139	23.6910	5.9525	5.7739	11713.88
Dump/Haul Truck	6	571.4382	125.3593	309.5290	141.3605	17.8574	17.3217	62840.72
Paver/Compactor	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Roller	1	388.8954	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
		7632.40	1746.67	4097.29	1861.38	238.10	230.96	828643.17

Project Combustion

Estimated Emissions for Construction of Wind Turbines and Associated Infrastructure in Zone 2 (Proposed Action) in FY2015 thru 2017

### Wind Turbine Construction (Small-scale)

Equipment <sup>c, f</sup>	No. Reqd per turbine	NO <sub>x</sub> (lb/turbine)	VOC <sup>a</sup> (lb/turbine)	CO (lb/turbine)	SO <sub>2</sub> <sup>b</sup> (lb/turbine)	PM <sub>10</sub> (lb/turbine)	PM <sub>2.5</sub> <sup>d</sup> (lb/turbine)	CO <sub>2</sub> <sup>e</sup> (lb/turbine)
<b>Site Preparation</b>								
Backhoe	2	518.5272	111.4304	275.1369	125.6538	15.8733	15.3971	55858.41
Dozer	2	691.3697	148.5739	366.8492	167.5383	21.1644	20.5294	74,477.88
Loader	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
Truck	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
Concrete Truck	16	846.5751	185.7174	458.5615	209.4229	26.4555	25.6618	93097.36
Dump/Haul Truck	2	761.9176	167.1457	412.7054	188.4806	23.8099	23.0956	83787.62
<b>Foundation and Tower Construction</b>								
Hydraulic crane	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
Skid Steer	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
Truck	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
Welding Rig	1	74.0753	78.0013	48.9426	15.7940	3.9683	3.8493	7809.25
Dump/Haul Truck	6	380.9588	83.5728	206.3527	94.2403	11.9050	11.5478	41893.81
Paver/Compactor	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
Roller	1	259.2636	55.7152	137.5685	62.8269	7.9366	7.6985	27929.21
		5088.27	1164.45	2731.53	1240.92	158.73	153.97	552428.78

a) VOC emissions are assumed to be equal to 1.053 times the HC emissions.

b) The SO<sub>2</sub> emission factors assume that the average fuel burned in nonroad trucks is 1100 ppm sulfur. Trucks that would be used for the Proposed Action construction will all be fueled by highway grade diesel fuel which cannot exceed 500 ppm sulfur. These estimates therefore conservatively over-estimate SO<sub>2</sub> emissions by more than a factor of two.

c) The equipment list above was based on Wind Energy Siting Study (2008) and Wind Energy Final Programmatic Environmental Impact Statement (2005)

d) PM<sub>2.5</sub> are estimated as 0.97 times the PM<sub>10</sub> emissions

e) CO<sub>2</sub> emission factors are based on brake-specific fuel consumption

f) Construction equipment emission rates were calculated assuming equipment would meet Tier 2 and Tier 3 emissions standards for nonroad engines.

#### Sample Daily Construction Emission Calculation:

(NO<sub>x</sub> emission factor - based on equipment type and horsepower)(equipment horsepower)(hours used per day)(number used)(pound/gram conversion factor)

#### Sample Preferred Alignment Total Construction Calculation:

(Daily Construction Emissions) (Number of days used during project life)

### Results: Total Project Annual Emission Rates

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM10	PM2.5	CO <sub>2</sub>
Total Project Emissions (lbs)	132294.9943	30275.65212	71019.7131	32263.871	4127.05355	4003.241942	14363148.35
Total Project Emissions (tons)	66.14749714	15.138	35.510	16.132	2.064	2.002	7181.574173

## Construction Fugitive Dust Emissions

### Construction Fugitive Dust Emission Factors

	Emission Factor	Units	Source
Construction and Demolition Activities	0.19	ton PM <sub>10</sub> /acre-month	MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42	ton PM <sub>10</sub> /acre-month	MRI 1996; EPA 2001; EPA 2006

### PM<sub>2.5</sub> Emissions

PM <sub>2.5</sub> Multiplier	0.10	(10% of PM <sub>10</sub> emissions assumed to be PM <sub>2.5</sub> )	EPA 2001; EPA 2006
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### Control Efficiency

0.50	(assume 50% control efficiency for PM <sub>10</sub> and PM <sub>2.5</sub> emissions)	EPA 2001; EPA 2006
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### Project Assumptions

#### *New Roadway Construction (0.42 ton PM<sub>10</sub>/acre-month)*

Duration of Construction Project	12 months
Area	0.00 acres

#### *General Construction and Demolition Activities (0.19 ton PM<sub>10</sub>/acre-month)*

Duration of Project	12 months
Area	7.88 acres

	Project Emissions (tons/year)			
	PM <sub>10</sub> uncontrolled	PM <sub>10</sub> controlled	PM <sub>2.5</sub> uncontrolled	PM <sub>2.5</sub> controlled
New Roadway Construction	0.000	0.000	0.000	0.000
General Construction Activities	17.966	8.983	1.797	0.898
<b>Total</b>	<b>17.966</b>	<b>8.983</b>	<b>1.797</b>	<b>0.898</b>

## Construction Fugitive Dust Emission Factors

### General Construction Activities Emission Factor

**0.19 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM<sub>10</sub>/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM<sub>10</sub>/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM<sub>10</sub>/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM<sub>10</sub>/acre-month) and 75% of the average emission factor (0.11 ton PM<sub>10</sub>/acre-month). The 0.19 ton PM<sub>10</sub>/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM<sub>10</sub>/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particulate (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District as well as the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas.

### New Road Construction Emission Factor

**0.42 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM<sub>10</sub>/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM<sub>10</sub>/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

### PM<sub>2.5</sub> Multiplier

**0.10**

PM<sub>2.5</sub> emissions are estimated by applying a particle size multiplier of 0.10 to PM<sub>10</sub> emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

### Control Efficiency for PM<sub>10</sub> and PM<sub>2.5</sub>

**0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas (EPA 2006). Wetting controls will be applied during project construction.

### References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

**Haul Truck Emissions**

Emissions from hauling excavation material and construction supplies are estimated in this spreadsheet. Emission Estimation Method: United States Air Force (USAF) Institute for Environment, Safety and Occupational Health Risk Analysis (IERA) Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations (Revised December 2003).

**Assumptions:**

Haul trucks carry 20 cubic yards of material per trip.

The average distance from the project site to the materials source is estimated to be 15 miles; therefore, a haul truck will travel 30 miles round trip.

Estimated number of trips required by haul trucks = total amount of material/20 cubic yards per truck

Transportation of Wind Turbine components = 144  
 Number of trucks required = 144 heavy duty diesel haul truck trips  
 Miles per trip = 30 miles

Assumes one wind turbine (any size) can require up to eight hauls to the project site – one nacelle, three blades, and three to four tower sections.

**Heavy Duty Diesel Vehicle (HDDV) Average Emission Factors (grams/mile)**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
HDDV	2.498	0.617	1.782	0.012	0.097	0.071	1243.400

Notes:

Emission factors for all pollutants are from USAF IERA 2013.

Emission factors are from Tables 5-11 for the 2015 calendar year, high altitude (USAF IERA 2013).

**HDDV Haul Truck Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	23.790	5.876	16.971	0.114	0.924	0.676	11841.905
tons	0.012	0.003	0.008	0.000	0.000	0.000	5.921

Example Calculation: NO<sub>x</sub> emissions (lbs) = 30 miles per trip \* 369 trips \* NO<sub>x</sub> emission factor (g/mile) \* lb/453.6 g

**Construction Commuter Emissions**

Emissions from construction workers commuting to the job site are estimated in this spreadsheet.

Emission Estimation Method: Emission factors from the South Coast Air Quality Management District (SCAQMD) EMFAC 2007 (v 2.3) Model (on-road) were used. These emission factors are available online at <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>.

**Assumptions:**

Passenger vehicle emission factors for scenario year 2015 are conservatively used.  
 The average roundtrip commute for a construction worker = 30 miles  
 Number of construction days = 240 days  
 Number of construction workers (daily) = 30 people

**Passenger Vehicle Emission Factors for Year 2015 (lbs/mile)**

NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
0.00060188	0.00066355	0.00614108	0.00001070	0.00009259	0.00006015	1.10192837

Source: South Coast Air Quality Management District. EMFAC 2007 (ver 2.3) On-Road Emissions Factors. Last updated April 24, 2008. Available online: <<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>>. Accessed 10 May 2013.

**Notes:**

The SMAQMD 2007 reference lists emission factors for reactive organic gas (ROG). For purposes of this worksheet ROG = VOC.

**Construction Commuter Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	130.005	143.326	1326.473	2.312	19.999	12.992	238016.529
tons	0.065	0.072	0.663	0.001	0.010	0.006	119.008

Example Calculation: NO<sub>x</sub> emissions (lbs) = 60 miles/day \* NO<sub>x</sub> emission factor (lb/mile) \* number of construction days \* number of workers

**Metropolitan Denver Intrastate AQCR**

Row #	State	County	All Emission Sources					
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
1	CO	Adams	66,166.23	26,263.59	15,754.51	4,113.54	7,737.02	19,333.51
2	CO	Arapahoe	81,600.76	12,367.17	14,903.74	2,946.89	257.86	17,198.71
3	CO	Boulder	45,011.54	10,596.07	5,430.68	1,352.87	916.72	19,013.11
4	CO	Clear Creek	11,912.27	1,885.71	2,655.93	610.36	17.25	6,297.05
5	CO	Denver	93,351.26	21,309.92	13,878.24	2,743.43	3,261.35	17,554.47
6	CO	Douglas	43,182.53	7,519.29	5,067.58	1,219.57	145.18	18,030.73
7	CO	Gilpin	2,100.91	515.19	477.55	155.45	6.26	4,251.82
8	CO	Jefferson	83,780.29	14,521.39	10,407.51	2,523.01	2,897.01	26,467.27
Grand Total			427,106	94,978	68,576	15,665	15,239	128,147

SOURCE:

<http://neibrowser.epa.gov/eis-public-web/home.html>

USEPA National Emissions Inventory (NEI)

## Emission Factors

	Rated Power (hp)	Hours of Use per day	No. Used	Days Used	NO <sub>x</sub>	HC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
					g/bhp-hr	g/bhp-hr	g/bhp-hr	g/hp-hr	g/bhp-hr	g/bhp-hr	g/bhp-hr
<b>Site Preparation - Utility</b>											
Backhoe	150	8	2	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Bulldozer	200	8	2	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Loader	150	8	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Water truck	200	6	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Concrete truck	250	1	16	60	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
Dump/Haul Truck	300	6	2	60	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
<b>Construction</b>											
Skid Steer	150	8	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Hydraulic Crane	200	6	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Water Truck	200	6	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Welding Rig	50	6	1	60	5.6	5.6	3.7	1.194008	0.3	0.29	590.3695
Dump/Haul Truck	300	1	6	60	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
Paver/Compactor	150	8	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Roller/Sheepsfoot	150	8	1	60	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531

## Emissions each day

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
<b>Site Preparation - Utility</b>							
Backhoe	25.92636203	5.57152229	13.75684516	6.282687728	0.793664144	0.76985422	2792.920673
Bulldozer	34.56848271	7.428696386	18.34246021	8.37691697	1.058218858	1.026472293	3723.89423
Loader	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Water truck	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Concrete truck	42.32875434	9.285870483	22.92807527	10.47114621	1.322773573	1.283090366	4654.867788
Dump/Haul Truck	38.0958789	8.357283435	20.63526774	9.424031591	1.190496216	1.154781329	4189.381009
<b>Construction</b>							
Skid Steer	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Hydraulic Crane	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Water Truck	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Welding Rig	3.703766005	3.900065603	2.44713111	0.789701119	0.198416036	0.192463555	390.462568
Dump/Haul Truck	19.04793945	4.178641717	10.31763387	4.712015796	0.595248108	0.577390665	2094.690505
Paver/Compactor	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Roller/Sheepsfoot	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
<b>Total</b>	254.41	58.22	136.58	62.05	7.94	7.70	27,621.44

## Emissions per turbine

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
	lbs	lbs	lbs	lbs	lbs	lbs	lbs
<b>Site Preparation - Utility</b>							
Backhoe	1555.581722	334.2913374	825.4107096	376.9612637	47.61984863	46.19125317	167575.2404
Bulldozer	2074.108963	445.7217832	1100.547613	502.6150182	63.49313151	61.58833756	223433.6538
Loader	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Water truck	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Concrete truck	2539.72526	557.152229	1375.684516	628.2687728	79.36641438	76.98542195	279292.0673
Dump/Haul Truck	2285.752734	501.4370061	1238.116064	565.4418955	71.42977295	69.28687976	251362.8605
<b>Construction</b>							
Skid Steer	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Hydraulic Crane	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Water Truck	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Welding Rig	222.2259603	234.0039362	146.8278666	47.38206712	11.90496216	11.54781329	23427.75408
Dump/Haul Truck	1142.876367	250.718503	619.0580322	282.7209477	35.71488647	34.64343988	125681.4303
Paver/Compactor	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Roller/Sheepsfoot	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
<b>Total</b>	15,264.81	3,493.34	8,194.58	3,722.75	476.20	461.91	1,657,286.35
Total (tons)	7.632403517	1.746672238	4.097291143	1.861377194	0.238099243	0.230956266	828.6431738

## Emission Factors

	Rated Power (hp)	Hours of Use per day	No. Used	Days Used	Emission Factors						
					NO <sub>x</sub> g/bhp-hr	HC g/bhp-hr	CO g/bhp-hr	SO <sub>2</sub> g/hp-hr	PM <sub>10</sub> g/bhp-hr	PM <sub>2.5</sub> g/bhp-hr	CO <sub>2</sub> g/bhp-hr
<b>Site Preparation - Mid</b>											
Backhoe	150	8	2	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Bulldozer	200	8	2	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Loader	150	8	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Water truck	200	6	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Concrete truck	250	1	16	30	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
Dump/Haul Truck	300	6	2	30	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
<b>Construction</b>											
Skid Steer	150	8	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Hydraulic Crane	200	6	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Water Truck	200	6	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Welding Rig	50	6	1	30	5.6	5.6	3.7	1.194008	0.3	0.29	590.3695
Dump/Haul Truck	300	1	6	30	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
Paver/Compactor	150	8	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Roller/Sheepsfoot	150	8	1	30	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531

## Emissions each day

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
<b>Site Preparation - Mid</b>							
Backhoe	25.92636203	5.57152229	13.75684516	6.282687728	0.793664144	0.76985422	2792.920673
Bulldozer	34.56848271	7.428696386	18.34246021	8.37691697	1.058218858	1.026472293	3723.89423
Loader	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Water truck	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Concrete truck	42.32875434	9.285870483	22.92807527	10.47114621	1.322773573	1.283090366	4654.867788
Dump/Haul Truck	38.0958789	8.357283435	20.63526774	9.424031591	1.190496216	1.154781329	4189.381009
<b>Construction</b>							
Skid Steer	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Hydraulic Crane	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Water Truck	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Welding Rig	3.703766005	3.900065603	2.44713111	0.789701119	0.198416036	0.192463555	390.462568
Dump/Haul Truck	19.04793945	4.178641717	10.31763387	4.712015796	0.595248108	0.577390665	2094.690505
Paver/Compactor	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Roller/Sheepsfoot	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
<b>Total</b>	254.41	58.22	136.58	62.05	7.94	7.70	27,621.44

Emissions per turbine

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
	lbs	lbs	lbs	lbs	lbs	lbs	lbs
<b>Site Preparation - Mid</b>							
Backhoe	777.790861	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
Bulldozer	1037.054481	222.8608916	550.2738064	251.3075091	31.74656575	30.79416878	111716.8269
Loader	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Water truck	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Concrete truck	1269.86263	278.5761145	687.842258	314.1343864	39.68320719	38.49271098	139646.0336
Dump/Haul Truck	1142.876367	250.718503	619.0580322	282.7209477	35.71488647	34.64343988	125681.4303
<b>Construction</b>							
Skid Steer	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Hydraulic Crane	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Water Truck	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Welding Rig	111.1129801	117.0019681	73.41393331	23.69103356	5.952481079	5.773906646	11713.87704
Dump/Haul Truck	571.4381836	125.3592515	309.5290161	141.3604739	17.85744324	17.32171994	62840.71514
Paver/Compactor	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Roller/Sheepsfoot	388.8954305	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
<b>Total</b>	7,632.40	1,746.67	4,097.29	1,861.38	238.10	230.96	828,643.17
Total (tons)	2.544134506	0.582224079	1.365763714	0.620459065	0.079366414	0.076985422	276.2143913

## Emission Factors

	Rated Power (hp)	Hours of Use per day	No. Used	Days Used	Emission Factors						
					NO <sub>x</sub> g/bhp-hr	HC g/bhp-hr	CO g/bhp-hr	SO <sub>2</sub> g/hp-hr	PM <sub>10</sub> g/bhp-hr	PM <sub>2.5</sub> g/bhp-hr	CO <sub>2</sub> g/bhp-hr
<b>Site Preparation - Small</b>											
Backhoe	150	8	2	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Bulldozer	200	8	2	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Loader	150	8	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Water truck	200	6	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Concrete truck	250	1	16	20	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
Dump/Haul Truck	300	6	2	20	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
<b>Construction</b>											
Skid Steer	150	8	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Hydraulic Crane	200	6	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Water Truck	200	6	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Welding Rig	50	6	1	20	5.6	5.6	3.7	1.194008	0.3	0.29	590.3695
Dump/Haul Truck	300	1	6	20	4.8	1.0	2.6	1.187408	0.15	0.15	527.8531
Paver/Compactor	150	8	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531
Roller/Sheepsfoot	150	8	1	20	4.9	1.0	2.6	1.187408	0.15	0.15	527.8531

## Emissions each day

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
<b>Site Preparation - Small</b>							
Backhoe	25.92636203	5.57152229	13.75684516	6.282687728	0.793664144	0.76985422	2792.920673
Bulldozer	34.56848271	7.428696386	18.34246021	8.37691697	1.058218858	1.026472293	3723.89423
Loader	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Water truck	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Concrete truck	42.32875434	9.285870483	22.92807527	10.47114621	1.322773573	1.283090366	4654.867788
Dump/Haul Truck	38.0958789	8.357283435	20.63526774	9.424031591	1.190496216	1.154781329	4189.381009
<b>Construction</b>							
Skid Steer	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Hydraulic Crane	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Water Truck	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Welding Rig	3.703766005	3.900065603	2.44713111	0.789701119	0.198416036	0.192463555	390.462568
Dump/Haul Truck	19.04793945	4.178641717	10.31763387	4.712015796	0.595248108	0.577390665	2094.690505
Paver/Compactor	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
Roller/Sheepsfoot	12.96318102	2.785761145	6.87842258	3.141343864	0.396832072	0.38492711	1396.460336
<b>Total</b>	254.41	58.22	136.58	62.05	7.94	7.70	27,621.44

Emissions per turbine

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
	lbs	lbs	lbs	lbs	lbs	lbs	lbs
<b>Site Preparation - Small</b>							
Backhoe	518.5272406	111.4304458	275.1369032	125.6537546	15.87328288	15.39708439	55858.41345
Bulldozer	691.3696542	148.5739277	366.8492043	167.5383394	21.16437717	20.52944585	74477.88461
Loader	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
Water truck	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
Concrete truck	846.5750868	185.7174097	458.5615053	209.4229243	26.45547146	25.66180732	93097.35576
Dump/Haul Truck	761.9175781	167.1456687	412.7053548	188.4806318	23.80992432	23.09562659	83787.62018
<b>Construction</b>							
Skid Steer	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
Hydraulic Crane	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
Water Truck	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
Welding Rig	74.07532009	78.00131206	48.9426222	15.79402237	3.968320719	3.849271098	7809.251359
Dump/Haul Truck	380.958789	83.57283435	206.3526774	94.24031591	11.90496216	11.54781329	41893.81009
Paver/Compactor	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
Roller/Sheepsfoot	259.2636203	55.7152229	137.5684516	62.82687728	7.936641438	7.698542195	27929.20673
<b>Total</b>	5,088.27	1,164.45	2,731.53	1,240.92	158.73	153.97	552,428.78
Total (tons)	2.544134506	0.582224079	1.365763714	0.620459065	0.079366414	0.076985422	276.2143913

<b>Summary</b>	Summarizes total emissions for the Construction of Wind Turbines and Associated Infrastructure in Zone 2 (Proposed Action) in 2016
<b>Combustion</b>	Estimates emissions from non-road equipment exhaust.
<b>Fugitive</b>	Estimates particulate emissions from construction and demolition activities including earthmoving, vehicle traffic, and windblown dust.
<b>Grading</b>	Estimates the number of days of site preparation, to be used for estimating heavy equipment exhaust and earthmoving dust emissions.
<b>Haul Truck On-Road</b>	Estimates emissions from haul trucks hauling fill materials to the job site.
<b>Construction Commuter</b>	Estimates emissions for construction workers commuting to the site.
<b>Emergency Generator</b>	Estimates emissions from the operation of emergency generators.
<b>AQCR Tier Report</b>	Summarizes total emissions for the Metropolitan Denver Intrastate AQCR report for 2008, to be used to compare the Proposed Action to regional emissions.

**Air Emissions for the Proposed Action in FY2016**

	<b>NO<sub>x</sub> (ton)</b>	<b>VOC (ton)</b>	<b>CO (ton)</b>	<b>SO<sub>2</sub> (ton)</b>	<b>PM<sub>10</sub> (ton)</b>	<b>PM<sub>2.5</sub> (ton)</b>	<b>CO<sub>2</sub> (ton)</b>
Combustion	4.75	0.38	2.09	0.38	0.34	0.33	538.21
Fugitive Dust	-	-	-	-	0.46	0.05	-
Haul Truck On-Road	0.01	0.00	0.01	0.00	0.00	0.00	5.17
Commuter	0.06	0.07	0.62	0.00	0.01	0.01	119.53
<b>TOTAL</b>	<b>4.82</b>	<b>0.45</b>	<b>2.72</b>	<b>0.38</b>	<b>0.81</b>	<b>0.38</b>	<b>662.92</b>

Note: Total PM<sub>10/2.5</sub> fugitive dust emissions are assuming USEPA 50% control efficiencies.

CO <sub>2</sub> emissions converted to metric tons =	<b>601.267</b>	<b>metric tons</b>	
State of Colorado's CO <sub>2</sub> emissions =	<b>96,500,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of Colorado's CO <sub>2</sub> emissions =	<b>0.00062%</b>		
United States' CO <sub>2</sub> emissions =	<b>5,631,300,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of USA's CO <sub>2</sub> emissions =	<b>0.000011%</b>		

Source: U.S. Department of Energy, Energy Information Administration (U.S. DOE/EIA). 2013. Table 1. State Emissions by Year (Million Metric Tons of Carbon Dioxide). Available online <[http://www.eia.gov/environment/emissions/state/state\\_emissions.cfm](http://www.eia.gov/environment/emissions/state/state_emissions.cfm)>. Data released January 2013. Data accessed 10 May 2013.

Since future year budgets were not readily available, actual 2008 air emissions inventories for the counties were used as an approximation of the regional inventory. Because emissions from the Proposed Action in 2016 are several orders of magnitude below significance, the conclusion would be the same, regardless of whether future year budget data set were used.

**Metropolitan Intrastate AQCR Air Basin**

Year	Point and Area Sources Combined					
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
2008	94,978	128,147	427,106	15,239	68,576	15,665

Source: USEPA National Emissions Inventory (NEI) (<http://neibrowser.epa.gov/eis-public-web/home.html>). Site visited on 10 May 2013

**Air Emissions from the Proposed Action in 2016**

Point and Area Sources Combined						
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
	94,978	128,147	427,106	15,239	68,576	15,665
	4.818	0.448	2.722	0.377	0.813	0.384
	<b>0.005%</b>	<b>0.0003%</b>	<b>0.0006%</b>	<b>0.002%</b>	<b>0.001%</b>	<b>0.002%</b>

Regional Emissions  
Emissions  
% of Regional

**Combustion Emissions**

Combustion Emissions of VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO<sub>2</sub> due to Construction and Demolition

<b>General Construction and Modification Activities</b>	<b>Area Disturbed</b>	
4.) Construction of gravel access road	8,800 ft <sup>2</sup>	Total Area Disturbed - approximately 400' x 22'
5.) Installation of electrical cable and fiber optics	4,000 ft <sup>2</sup>	Total Area Disturbed - approximately 400' x 10'
6.) Construction of 2 data sheds	3,750 ft <sup>2</sup>	Total Area Disturbed (estimated)
	1,250 ft <sup>2</sup>	Two 25' x 25' sheds
7.) Construction of 11 meteorological towers	1,100 ft <sup>2</sup>	Total Area Disturbed
Total Construction Area:	1,250 ft <sup>2</sup>	
	0.03 acres	
Total Pavement Area:	0 ft <sup>2</sup>	
	0.00 acres	
Total Disturbed Area:	17,650 ft <sup>2</sup>	
	0.41 acres	
Construction Duration:	12 months	
Annual Construction Activity:	240 days	Assume 4 weeks per month, 5 days per week.

## Emission Factors Used for Construction Equipment

References: Guide to Air Quality Assessment, SMAQMD, 2004; and U.S. EPA NONROAD Emissions Model, Version 2005.0.0

Emission factors are taken from the NONROAD model and were provided to e2M by Larry Landman of the Air Quality and Modeling Center (Landman.Larry@epamail.epa.gov) on 12/14/07. Factors provided are for the weighted average US fleet for CY2007.

Assumptions regarding the type and number of equipment are from SMAQMD Table 3-1 unless otherwise noted.

### Grading

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Bulldozer	1	13.60	0.96	5.50	1.02	0.89	0.87	1456.90
Motor Grader	1	9.69	0.73	3.20	0.80	0.66	0.64	1141.65
Water Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Total per 10 acres of activity	3	41.64	2.58	15.71	3.45	2.55	2.47	4941.53

### Paving

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Paver	1	3.83	0.37	2.06	0.28	0.35	0.34	401.93
Roller	1	4.82	0.44	2.51	0.37	0.43	0.42	536.07
Truck	2	36.71	1.79	14.01	3.27	1.99	1.93	4685.95
Total per 10 acres of activity	4	45.37	2.61	18.58	3.93	2.78	2.69	5623.96

### Demolition

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Loader	1	13.45	0.99	5.58	0.95	0.93	0.90	1360.10
Haul Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Total per 10 acres of activity	2	31.81	1.89	12.58	2.58	1.92	1.87	3703.07

### Building Construction

Equipment <sup>d</sup>	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
<b>Stationary</b>								
Generator Set	1	2.38	0.32	1.18	0.15	0.23	0.22	213.06
Industrial Saw	1	2.62	0.32	1.97	0.20	0.32	0.31	291.92
Welder	1	1.12	0.38	1.50	0.08	0.23	0.22	112.39
<b>Mobile (non-road)</b>								
Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Forklift	1	5.34	0.56	3.33	0.40	0.55	0.54	572.24
Crane	1	9.57	0.66	2.39	0.65	0.50	0.49	931.93
Total per 10 acres of activity	6	39.40	3.13	17.38	3.12	2.83	2.74	4464.51

Note: Footnotes for tables are on following page

- a) The SMAQMD 2004 guidance suggests a default equipment fleet for each activity, assuming 10 acres of that activity, (e.g., 10 acres of grading, 10 acres of paving, etc.). The default equipment fleet is increased for each 10 acre increment in the size of the construction project. That is, a 26 acre project would round to 30 acres and the fleet size would be

*Project Combustion*

*Estimated Emissions for Construction of Wind Turbines and Associated Infrastructure in Zone 2 (Proposed Action) in FY2016*

- three times the default fleet for a 10 acre project.
- b) The SMAQMD 2004 reference lists emission factors for reactive organic gas (ROG). For the purposes of this worksheet ROG = VOC. The NONROAD model contains emissions factors for total HC and for VOC. The factors used here are the VOC factors.
  - c) The NONROAD emission factors assume that the average fuel burned in nonroad trucks is 1100 ppm sulfur. Trucks that would be used for the Proposed Actions will all be fueled by highway grade diesel fuel which cannot exceed 500 ppm sulfur. These estimates therefore over-estimate SO<sub>2</sub> emissions by more than a factor of two.
  - d) Typical equipment fleet for building construction was not itemized in SMAQMD 2004 guidance. The equipment list above was assumed based on SMAQMD 1994 guidance.

## PROJECT-SPECIFIC EMISSION FACTOR SUMMARY

Source	Equipment Multiplier*	Project-Specific Emission Factors (lb/day)						
		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub> **	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	1	41.641	2.577	15.710	3.449	2.546	2.469	4941.526
Paving Equipment	1	45.367	2.606	18.578	3.926	2.776	2.693	5623.957
Demolition Equipment	1	31.808	1.886	12.584	2.585	1.923	1.865	3703.074
Building Construction	1	39.396	3.130	17.382	3.116	2.829	2.744	4464.512

\*The equipment multiplier is an integer that represents units of 10 acres for purposes of estimating the number of equipment required for the project.

\*\*Emission factor is from the evaporation of solvents during painting, per "Air Quality Thresholds of Significance", SMAQMD, 1994

Example: SMAQMD Emission Factor for Grading Equipment NO<sub>x</sub> = (Total Grading NO<sub>x</sub> per 10 acre)\*(Equipment Multiplier)

### Summary of Input Parameters

	Total Area (ft <sup>2</sup> )	Total Area (acres)	Total Days	
Grading:	17,650	0.41	1	(from "Grading" worksheet)
Paving:	0	0.00	0	
Demolition:	0	0.00	0	
Building Construction:	1,250	0.03	240	
Architectural Coating	1,250	0.03	20	(per SMAQMD "Air Quality of Thresholds of Significance", 1994)

NOTE: The 'Total Days' estimate for paving is calculated by dividing the total number of acres by 0.21 acres/day, which is a factor derived from the 2005 MEANS Heavy Construction Cost Data, 19th Edition, for 'Asphaltic Concrete Pavement, Lots and Driveways - 6" stone base', which provides an estimate of square feet paved per day. There is also an estimate for 'Plain Cement Concrete Pavement', however the estimate for asphalt is used because it is more conservative. The 'Total Days' estimate for demolition is calculated by dividing the total number of acres by 0.02 acres/day, which is a factor also derived from the 2005 MEANS reference. This is calculated by averaging the demolition estimates from 'Building Demolition - Small Buildings, Concrete', assuming a height of 30 feet for a two-story building; from 'Building Footings and Foundations Demolition - 6" Thick, Plain Concrete'; and from 'Demolish, Remove Pavement and Curb - Concrete to 6" thick, rod reinforced'. Paving is double-weighted since projects typically involve more paving demolition. The 'Total Days' estimate for building construction is assumed to be 230 days, unless project-specific data is known.

### Total Project Emissions by Activity (lbs)

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	41.64	2.58	15.71	3.45	2.55	2.47	4,942
Paving	-	-	-	-	-	-	0
Demolition	-	-	-	-	-	-	0
Building Construction	9,455.12	751.15	4,171.75	747.92	678.97	658.60	1,071,483
<b>Total Emissions (lbs):</b>	<b>9,496.76</b>	<b>753.73</b>	<b>4,187.46</b>	<b>751.37</b>	<b>681.52</b>	<b>661.07</b>	<b>1,076,424</b>

### Results: Total Project Annual Emission Rates

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Total Project Emissions (lbs)	9,496.76	753.73	4,187.46	751.37	681.52	661.07	1,076,424
Total Project Emissions (tons)	4.748	0.377	2.094	0.376	0.341	0.331	538.212

**Construction Fugitive Dust Emissions**

**Construction Fugitive Dust Emission Factors**

	<b>Emission Factor</b>	<b>Units</b>	<b>Source</b>
Construction and Demolition Activities	0.19 ton PM <sub>10</sub> /acre-month		MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM <sub>10</sub> /acre-month		MRI 1996; EPA 2001; EPA 2006

**PM<sub>2.5</sub> Emissions**

PM <sub>2.5</sub> Multiplier	0.10	(10% of PM <sub>10</sub> emissions assumed to be PM <sub>2.5</sub> )	EPA 2001; EPA 2006
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**Control Efficiency**

0.50	(assume 50% control efficiency for PM <sub>10</sub> and PM <sub>2.5</sub> emissions)	EPA 2001; EPA 2006
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**Project Assumptions**

***New Roadway Construction (0.42 ton PM<sub>10</sub>/acre-month)***

Duration of Construction Project	12 months
Area	0.00 acres

***General Construction Activities (0.19 ton PM<sub>10</sub>/acre-month)***

Duration of Project	12 months
Area	0.41 acres

	<b>Project Emissions (tons/year)</b>			
	<b>PM<sub>10</sub> uncontrolled</b>	<b>PM<sub>10</sub> controlled</b>	<b>PM<sub>2.5</sub> uncontrolled</b>	<b>PM<sub>2.5</sub> controlled</b>
New Roadway Construction	0.000	0.000	0.000	0.000
General Construction Activities	0.924	0.462	0.092	0.046
<b>Total</b>	<b>0.924</b>	<b>0.462</b>	<b>0.092</b>	<b>0.046</b>

## Construction Fugitive Dust Emission Factors

### General Construction Activities Emission Factor

**0.19 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM<sub>10</sub>/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM<sub>10</sub>/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM<sub>10</sub>/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM<sub>10</sub>/acre-month) and 75% of the average emission factor (0.11 ton PM<sub>10</sub>/acre-month). The 0.19 ton PM<sub>10</sub>/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM<sub>10</sub>/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particulate (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District as well as the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas.

### New Road Construction Emission Factor

**0.42 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM<sub>10</sub>/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM<sub>10</sub>/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

### PM<sub>2.5</sub> Multiplier

**0.10**

PM<sub>2.5</sub> emissions are estimated by applying a particle size multiplier of 0.10 to PM<sub>10</sub> emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

### Control Efficiency for PM<sub>10</sub> and PM<sub>2.5</sub>

**0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas (EPA 2006). Wetting controls will be applied during project construction.

### References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

## Grading Schedule

Estimate of time required to grade a specified area.

### Input Parameters

Construction area: 0.41 acres/yr (from Combustion Worksheet)  
 Qty Equipment: 3.00 (calculated based on 3 pieces of equipment for every 10 acres)

### Assumptions.

Terrain is mostly flat.

An average of 6" soil is excavated from one half of the site and backfilled to the other half of the site; no soil is hauled off-site or borrowed.

200 hp bulldozers are used for site clearing.

300 hp bulldozers are used for stripping, excavation, and backfill.

Vibratory drum rollers are used for compacting.

Stripping, Excavation, Backfill and Compaction require an average of two passes each.

Excavation and Backfill are assumed to involve only half of the site.

### Calculation of days required for one piece of equipment to grade the specified area.

Reference: Means Heavy Construction Cost Data, 19th Ed., R. S. Means, 2005.

Means Line No.	Operation	Description	Output	Units	Acres per equip-day	equip-days per acre	Acres/yr (project- specific)	Equip-days per year
2230 200 0550	Site Clearing	Dozer & rake, medium brush	8	acre/day	8	0.13	0.41	0.05
2230 500 0300	Stripping	Topsoil & stockpiling, adverse soil	1,650	cu. yd/day	2.05	0.49	0.41	0.20
2315 432 5220	Excavation	Bulk, open site, common earth, 150' haul	800	cu. yd/day	0.99	1.01	0.20	0.20
2315 120 5220	Backfill	Structural, common earth, 150' haul	1,950	cu. yd/day	2.42	0.41	0.20	0.08
2315 310 5020	Compaction	Vibrating roller, 6" lifts, 3 passes	2,300	cu. yd/day	2.85	0.35	0.41	0.14
TOTAL								0.68

### Calculation of days required for the indicated pieces of equipment to grade the designated acreage.

(Equip)(day)/yr: 0.68  
 Qty Equipment: 3.00  
 Grading days/yr: 0.23

**Haul Truck Emissions**

Emissions from hauling excavation material and construction supplies are estimated in this spreadsheet. Emission Estimation Method: United States Air Force (USAF) Institute for Environment, Safety and Occupational Health Risk Analysis (IERA) Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations (Revised December 2003).

**Assumptions:**

Haul trucks carry 20 cubic yards of material per trip. The average distance from the project site to the materials source is estimated to be 15 miles; therefore, a haul truck will travel 30 miles round trip. Estimated number of trips required by haul trucks = total amount of material/20 cubic yards per truck

Amount of Building Materials (Above Ground) =	185 cubic yards	Assumes 4 feet of building material are needed for data sheds
Amount of Building Materials (Below Ground) =	231 cubic yards	Assumes 5 feet of material are needed for the below ground portion of the data sheds
Amount of Excavation Material =	556 cubic yards	Assumes 12 feet of material would need to be excavated on average
Amount of Paving Material =	1,544 cubic yards	Assumes 3 feet of excavated material excavated and removed on average for access road, utilities, and towers.
Number of trucks required =	126 heavy duty diesel haul truck trips	
Miles per trip =	30 miles	

**Heavy Duty Diesel Vehicle (HDDV) Average Emission Factors (grams/mile)**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
HDDV	2.195	0.599	1.593	0.012	0.089	0.063	1243.400

Notes:  
Emission factors for all pollutants are from USAF IERA 2013.  
Emission factors are from Tables 5-12 for the 2016 calendar year, high altitude (USAF IERA 2013).

**HDDV Haul Truck Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	18.267	4.985	13.257	0.100	0.741	0.524	10347.961
tons	0.009	0.002	0.007	0.000	0.000	0.000	5.174

Example Calculation: NO<sub>x</sub> emissions (lbs) = 30 miles per trip \* 369 trips \* NO<sub>x</sub> emission factor (g/mile) \* lb/453.6 g

**Construction Commuter Emissions**

Emissions from construction workers commuting to the job site are estimated in this spreadsheet.

Emission Estimation Method: Emission factors from the South Coast Air Quality Management District (SCAQMD) EMFAC 2007 (v 2.3) Model (on-road) were used. These emission factors are available online at <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>.

**Assumptions:**

Passenger vehicle emission factors for scenario year 2016 are conservatively used.  
 The average roundtrip commute for a construction worker = 30 miles  
 Number of construction days = 240 days  
 Number of construction workers (daily) = 30 people

**Passenger Vehicle Emission Factors for Year 2016 (lbs/mile)**

NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
0.00055658	0.00063254	0.00575800	0.00001071	0.00009392	0.00006131	1.10677664

Source: South Coast Air Quality Management District. EMFAC 2007 (ver 2.3) On-Road Emissions Factors. Last updated April 24, 2008. Available online: <<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>>. Accessed 10 May 2013.

**Notes:**

The SMAQMD 2007 reference lists emission factors for reactive organic gas (ROG). For purposes of this worksheet ROG = VOC.

**Construction Commuter Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	120.221	136.630	1243.727	2.312	20.286	13.244	239063.755
tons	0.060	0.068	0.622	0.001	0.010	0.007	119.532

Example Calculation: NO<sub>x</sub> emissions (lbs) = 60 miles/day \* NO<sub>x</sub> emission factor (lb/mile) \* number of construction days \* number of workers

**Metropolitan Denver Intrastate AQCR**

Row #	State	County	All Emission Sources					
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
1	CO	Adams	66,166.23	26,263.59	15,754.51	4,113.54	7,737.02	19,333.51
2	CO	Arapahoe	81,600.76	12,367.17	14,903.74	2,946.89	257.86	17,198.71
3	CO	Boulder	45,011.54	10,596.07	5,430.68	1,352.87	916.72	19,013.11
4	CO	Clear Creek	11,912.27	1,885.71	2,655.93	610.36	17.25	6,297.05
5	CO	Denver	93,351.26	21,309.92	13,878.24	2,743.43	3,261.35	17,554.47
6	CO	Douglas	43,182.53	7,519.29	5,067.58	1,219.57	145.18	18,030.73
7	CO	Gilpin	2,100.91	515.19	477.55	155.45	6.26	4,251.82
8	CO	Jefferson	83,780.29	14,521.39	10,407.51	2,523.01	2,897.01	26,467.27
Grand Total			427,106	94,978	68,576	15,665	15,239	128,147

SOURCE:

<http://neibrowser.epa.gov/eis-public-web/home.html>

USEPA National Emissions Inventory (NEI)

<b>Summary</b>	Summarizes total emissions for Expanding Power Capacity (Proposed Action) in 2015
<b>Combustion</b>	Estimates emissions from non-road equipment exhaust.
<b>Fugitive</b>	Estimates particulate emissions from construction and demolition activities including earthmoving, vehicle traffic, and windblown dust.
<b>Grading</b>	Estimates the number of days of site preparation, to be used for estimating heavy equipment exhaust and earthmoving dust emissions.
<b>Haul Truck On-Road</b>	Estimates emissions from haul trucks hauling fill materials to the job site.
<b>Construction Commuter</b>	Estimates emissions for construction workers commuting to the site.
<b>Emergency Generator</b>	Estimates emissions from the operation of emergency generators.
<b>AQCR Tier Report</b>	Summarizes total emissions for the Metropolitan Denver Intrastate AQCR report for 2008, to be used to compare the Proposed Action to regional emissions.

**Air Emissions for the Proposed Action in FY2015**

	<b>NO<sub>x</sub> (ton)</b>	<b>VOC (ton)</b>	<b>CO (ton)</b>	<b>SO<sub>2</sub> (ton)</b>	<b>PM<sub>10</sub> (ton)</b>	<b>PM<sub>2.5</sub> (ton)</b>	<b>CO<sub>2</sub> (ton)</b>
Combustion	4.83	0.62	2.13	0.38	0.35	0.34	546.75
Fugitive Dust	-	-	-	-	5.74	0.57	-
Haul Truck On-Road	0.28	0.07	0.20	0.00	0.01	0.01	139.68
Commuter	0.07	0.07	0.66	0.00	0.01	0.01	119.01
<b>TOTAL</b>	<b>5.17</b>	<b>0.76</b>	<b>2.99</b>	<b>0.38</b>	<b>6.10</b>	<b>0.92</b>	<b>805.44</b>

Note: Total PM<sub>10/2.5</sub> fugitive dust emissions are assuming USEPA 50% control efficiencies.

CO <sub>2</sub> emissions converted to metric tons =	<b>730.537</b>	<b>metric tons</b>	
State of Colorado's CO <sub>2</sub> emissions =	<b>96,500,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of Colorado's CO <sub>2</sub> emissions =	<b>0.00076%</b>		
United States' CO <sub>2</sub> emissions =	<b>5,631,300,000</b>	<b>metric tons</b>	(U.S. DOE/EIA 2013)
Percent of USA's CO <sub>2</sub> emissions =	<b>0.000013%</b>		

Source: U.S. Department of Energy, Energy Information Administration (U.S. DOE/EIA). 2013. Table 1. State Emissions by Year (Million Metric Tons of Carbon Dioxide). Available online <[http://www.eia.gov/environment/emissions/state/state\\_emissions.cfm](http://www.eia.gov/environment/emissions/state/state_emissions.cfm)>. Data released January 2013. Data accessed 10 May 2013.

Since future year budgets were not readily available, actual 2008 air emissions inventories for the counties were used as an approximation of the regional inventory. Because emissions from the Proposed Action in 2015 are several orders of magnitude below significance, the conclusion would be the same, regardless of whether future year budget data set were used.

**Metropolitan Denver Intrastate AQCR Air Basin**

Year	Point and Area Sources Combined					
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
2008	94,978	128,147	427,106	15,239	68,576	15,665

Source: USEPA National Emissions Inventory (NEI) (<http://neibrowser.epa.gov/eis-public-web/home.html>). Site visited on 10 May 2013

**Air Emissions from the Proposed Action in 2015**

Point and Area Sources Combined						
	<b>NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>PM<sub>10</sub> (tpy)</b>	<b>PM<sub>2.5</sub> (tpy)</b>
	94,978	128,147	427,106	15,239	68,576	15,665
	5.171	0.762	2.989	0.384	6.104	0.924
	<b>0.005%</b>	<b>0.0006%</b>	<b>0.0007%</b>	<b>0.003%</b>	<b>0.009%</b>	<b>0.006%</b>

Regional Emissions  
Emissions  
% of Regional

**Combustion Emissions**

Combustion Emissions of VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and CO<sub>2</sub> due to Construction and Demolition

**Proposed Modification Activities****Area Disturbed**

1.) Construction of Substation	163,350 ft <sup>2</sup>	Total Area Disturbed
	54,450 ft <sup>2</sup>	Facility
2.) Addition and upgrades of existing substation	30,492 ft <sup>2</sup>	Total Area Disturbed
	30,492 ft <sup>2</sup>	Building Addition
3.) Installation of aboveground transmission lines	25,344 ft <sup>2</sup>	Total Area Disturbed - 4.8 miles, approximately 1 foot wide

Total Construction Area:	84,942 ft <sup>2</sup>
	1.95 acres
Total Pavement Area:	0 ft <sup>2</sup>
	0.00 acres
Total Disturbed Area:	219,186 ft <sup>2</sup>
	5.03 acres

Construction Duration:	12 months	
Annual Construction Activity:	240 days	Assume 4 weeks per month, 5 days per week.

## Emission Factors Used for Construction Equipment

References: Guide to Air Quality Assessment, SMAQMD, 2004; and U.S. EPA NONROAD Emissions Model, Version 2005.0.0

Emission factors are taken from the NONROAD model and were provided to e2M by Larry Landman of the Air Quality and Modeling Center (Landman.Larry@epamail.epa.gov) on 12/14/07. Factors provided are for the weighted average US fleet for CY2007.

Assumptions regarding the type and number of equipment are from SMAQMD Table 3-1 unless otherwise noted.

### Grading

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Bulldozer	1	13.60	0.96	5.50	1.02	0.89	0.87	1456.90
Motor Grader	1	9.69	0.73	3.20	0.80	0.66	0.64	1141.65
Water Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
<b>Total per 10 acres of activity</b>	<b>3</b>	<b>41.64</b>	<b>2.58</b>	<b>15.71</b>	<b>3.45</b>	<b>2.55</b>	<b>2.47</b>	<b>4941.53</b>

### Paving

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Paver	1	3.83	0.37	2.06	0.28	0.35	0.34	401.93
Roller	1	4.82	0.44	2.51	0.37	0.43	0.42	536.07
Truck	2	36.71	1.79	14.01	3.27	1.99	1.93	4685.95
<b>Total per 10 acres of activity</b>	<b>4</b>	<b>45.37</b>	<b>2.61</b>	<b>18.58</b>	<b>3.93</b>	<b>2.78</b>	<b>2.69</b>	<b>5623.96</b>

### Demolition

Equipment	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Loader	1	13.45	0.99	5.58	0.95	0.93	0.90	1360.10
Haul Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
<b>Total per 10 acres of activity</b>	<b>2</b>	<b>31.81</b>	<b>1.89</b>	<b>12.58</b>	<b>2.58</b>	<b>1.92</b>	<b>1.87</b>	<b>3703.07</b>

### Building Construction

Equipment <sup>d</sup>	No. Req <sup>d</sup> . <sup>a</sup> per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
<b>Stationary</b>								
Generator Set	1	2.38	0.32	1.18	0.15	0.23	0.22	213.06
Industrial Saw	1	2.62	0.32	1.97	0.20	0.32	0.31	291.92
Welder	1	1.12	0.38	1.50	0.08	0.23	0.22	112.39
<b>Mobile (non-road)</b>								
Truck	1	18.36	0.89	7.00	1.64	1.00	0.97	2342.98
Forklift	1	5.34	0.56	3.33	0.40	0.55	0.54	572.24
Crane	1	9.57	0.66	2.39	0.65	0.50	0.49	931.93
<b>Total per 10 acres of activity</b>	<b>6</b>	<b>39.40</b>	<b>3.13</b>	<b>17.38</b>	<b>3.12</b>	<b>2.83</b>	<b>2.74</b>	<b>4464.51</b>

Note: Footnotes for tables are on following page

### Architectural Coatings

Equipment	No. Req <sup>d</sup> . per 10 acres	NO <sub>x</sub> (lb/day)	VOC <sup>b</sup> (lb/day)	CO (lb/day)	SO <sub>2</sub> <sup>c</sup>	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)	CO <sub>2</sub> (lb/day)
Air Compressor	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77
Total per 10 acres of activity	1	3.57	0.37	1.57	0.25	0.31	0.30	359.77

- a) The SMAQMD 2004 guidance suggests a default equipment fleet for each activity, assuming 10 acres of that activity, (e.g., 10 acres of grading, 10 acres of paving, etc.). The default equipment fleet is increased for each 10 acre increment in the size of the construction project. That is, a 26 acre project would round to 30 acres and the fleet size would be three times the default fleet for a 10 acre project.
- b) The SMAQMD 2004 reference lists emission factors for reactive organic gas (ROG). For the purposes of this worksheet ROG = VOC. The NONROAD model contains emissions factors for total HC and for VOC. The factors used here are the VOC factors.
- c) The NONROAD emission factors assume that the average fuel burned in nonroad trucks is 1100 ppm sulfur. Trucks that would be used for the Proposed Actions will all be fueled by highway grade diesel fuel which cannot exceed 500 ppm sulfur. These estimates therefore over-estimate SO<sub>2</sub> emissions by more than a factor of two.
- d) Typical equipment fleet for building construction was not itemized in SMAQMD 2004 guidance. The equipment list above was assumed based on SMAQMD 1994 guidance.

## PROJECT-SPECIFIC EMISSION FACTOR SUMMARY

Source	Equipment Multiplier*	Project-Specific Emission Factors (lb/day)						
		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub> **	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	1	41.641	2.577	15.710	3.449	2.546	2.469	4941.526
Paving Equipment	1	45.367	2.606	18.578	3.926	2.776	2.693	5623.957
Demolition Equipment	1	31.808	1.886	12.584	2.585	1.923	1.865	3703.074
Building Construction	1	39.396	3.130	17.382	3.116	2.829	2.744	4464.512
Air Compressor for Architectural Coating	1	3.574	0.373	1.565	0.251	0.309	0.300	359.773
Architectural Coating**			23.753					

\*The equipment multiplier is an integer that represents units of 10 acres for purposes of estimating the number of equipment required for the project.

\*\*Emission factor is from the evaporation of solvents during painting, per "Air Quality Thresholds of Significance", SMAQMD, 1994

Example: SMAQMD Emission Factor for Grading Equipment NO<sub>x</sub> = (Total Grading NO<sub>x</sub> per 10 acre)\*(Equipment Multiplier)

### Summary of Input Parameters

	Total Area (ft <sup>2</sup> )	Total Area (acres)	Total Days	
Grading:	219,186	5.03	3	(from "Grading" worksheet)
Paving:	0	0.00	0	
Demolition:	0	0.00	0	
Building Construction:	84,942	1.95	240	
Architectural Coating	84,942	1.95	20	(per SMAQMD "Air Quality of Thresholds of Significance", 1994)

NOTE: The 'Total Days' estimate for paving is calculated by dividing the total number of acres by 0.21 acres/day, which is a factor derived from the 2005 MEANS Heavy Construction Cost Data, 19th Edition, for 'Asphaltic Concrete Pavement, Lots and Driveways - 6" stone base', which provides an estimate of square feet paved per day. There is also an estimate for 'Plain Cement Concrete Pavement', however the estimate for asphalt is used because it is more conservative. The 'Total Days' estimate for demolition is calculated by dividing the total number of acres by 0.02 acres/day, which is a factor also derived from the 2005 MEANS reference. This is calculated by averaging the demolition estimates from 'Building Demolition - Small Buildings, Concrete', assuming a height of 30 feet for a two-story building; from 'Building Footings and Foundations Demolition - 6" Thick, Plain Concrete'; and from 'Demolish, Remove Pavement and Curb - Concrete to 6" thick, rod reinforced'. Paving is double-weighted since projects typically involve more paving demolition. The 'Total Days' estimate for building construction is assumed to be 230 days, unless project-specific data is known.

### Total Project Emissions by Activity (lbs)

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Grading Equipment	124.92	7.73	47.13	10.35	7.64	7.41	14,825
Paving	-	-	-	-	-	-	0
Demolition	-	-	-	-	-	-	0
Building Construction	9,455.12	751.15	4,171.75	747.92	678.97	658.60	1,071,483
Architectural Coatings	71.48	482.52	31.31	5.02	6.19	6.00	7,195
<b>Total Emissions (lbs):</b>	<b>9,651.52</b>	<b>1,241.41</b>	<b>4,250.19</b>	<b>763.29</b>	<b>692.79</b>	<b>672.01</b>	<b>1,093,503</b>

### Results: Total Project Annual Emission Rates

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Total Project Emissions (lbs)	9,651.52	1,241.41	4,250.19	763.29	692.79	672.01	1,093,503
Total Project Emissions (tons)	4.826	0.621	2.125	0.382	0.346	0.336	546.751

**Construction Fugitive Dust Emissions**

**Construction Fugitive Dust Emission Factors**

	<b>Emission Factor</b>	<b>Units</b>	<b>Source</b>
Construction and Demolition Activities	0.19 ton PM <sub>10</sub> /acre-month		MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM <sub>10</sub> /acre-month		MRI 1996; EPA 2001; EPA 2006

**PM<sub>2.5</sub> Emissions**

PM <sub>2.5</sub> Multiplier	0.10	(10% of PM <sub>10</sub> emissions assumed to be PM <sub>2.5</sub> )	EPA 2001; EPA 2006
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**Control Efficiency**

	0.50	(assume 50% control efficiency for PM <sub>10</sub> and PM <sub>2.5</sub> emissions)	EPA 2001; EPA 2006
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**Project Assumptions**

***New Roadway Construction (0.42 ton PM<sub>10</sub>/acre-month)***

Duration of Construction Project	12 months
Area	0.00 acres

***General Construction and Demolition Activities (0.19 ton PM<sub>10</sub>/acre-month)***

Duration of Project	12 months
Area	5.03 acres

	<b>Project Emissions (tons/year)</b>			
	<b>PM<sub>10</sub> uncontrolled</b>	<b>PM<sub>10</sub> controlled</b>	<b>PM<sub>2.5</sub> uncontrolled</b>	<b>PM<sub>2.5</sub> controlled</b>
New Roadway Construction	0.000	0.000	0.000	0.000
General Construction Activities	11.473	5.736	1.147	0.574
<b>Total</b>	<b>11.473</b>	<b>5.736</b>	<b>1.147</b>	<b>0.574</b>

## Construction Fugitive Dust Emission Factors

### General Construction Activities Emission Factor

**0.19 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM<sub>10</sub>/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM<sub>10</sub>/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM<sub>10</sub>/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM<sub>10</sub>/acre-month) and 75% of the average emission factor (0.11 ton PM<sub>10</sub>/acre-month). The 0.19 ton PM<sub>10</sub>/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM<sub>10</sub>/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particulate (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District as well as the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas.

### New Road Construction Emission Factor

**0.42 ton PM<sub>10</sub>/acre-month** Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM<sub>10</sub>/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM<sub>10</sub>/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

### PM<sub>2.5</sub> Multiplier

**0.10**

PM<sub>2.5</sub> emissions are estimated by applying a particle size multiplier of 0.10 to PM<sub>10</sub> emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

### Control Efficiency for PM<sub>10</sub> and PM<sub>2.5</sub>

**0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM<sub>10</sub> and PM<sub>2.5</sub> in PM nonattainment areas (EPA 2006). Wetting controls will be applied during project construction.

### References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

## Grading Schedule

Estimate of time required to grade a specified area.

### Input Parameters

Construction area: 5.03 acres/yr (from Combustion Worksheet)  
 Qty Equipment: 3.00 (calculated based on 3 pieces of equipment for every 10 acres)

### Assumptions.

Terrain is mostly flat.

An average of 6" soil is excavated from one half of the site and backfilled to the other half of the site; no soil is hauled off-site or borrowed.

200 hp bulldozers are used for site clearing.

300 hp bulldozers are used for stripping, excavation, and backfill.

Vibratory drum rollers are used for compacting.

Stripping, Excavation, Backfill and Compaction require an average of two passes each.

Excavation and Backfill are assumed to involve only half of the site.

### Calculation of days required for one piece of equipment to grade the specified area.

Reference: Means Heavy Construction Cost Data, 19th Ed., R. S. Means, 2005.

Means Line No.	Operation	Description	Output	Units	Acres per equip-day	equip-days per acre	Acres/yr (project- specific)	Equip-days per year
2230 200 0550	Site Clearing	Dozer & rake, medium brush	8	acre/day	8	0.13	5.03	0.63
2230 500 0300	Stripping	Topsoil & stockpiling, adverse soil	1,650	cu. yd/day	2.05	0.49	5.03	2.46
2315 432 5220	Excavation	Bulk, open site, common earth, 150' haul	800	cu. yd/day	0.99	1.01	2.52	2.54
2315 120 5220	Backfill	Structural, common earth, 150' haul	1,950	cu. yd/day	2.42	0.41	2.52	1.04
2315 310 5020	Compaction	Vibrating roller, 6" lifts, 3 passes	2,300	cu. yd/day	2.85	0.35	5.03	1.76
TOTAL								8.43

### Calculation of days required for the indicated pieces of equipment to grade the designated acreage.

(Equip)(day)/yr: 8.43  
 Qty Equipment: 3.00  
 Grading days/yr: 2.81

**Haul Truck Emissions**

Emissions from hauling excavation material and construction supplies are estimated in this spreadsheet. Emission Estimation Method: United States Air Force (USAF) Institute for Environment, Safety and Occupational Health Risk Analysis (IERA) Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations (Revised January 2013).

**Assumptions:**

Haul trucks carry 20 cubic yards of material per trip.  
 The average distance from the project site to the materials source is estimated to be 15 miles; therefore, a haul truck will travel 30 miles round trip.  
 Estimated number of trips required by haul trucks = total amount of material/20 cubic yards per truck

Amount of Building Materials (Above Ground) =	12,584 cubic yards	Assumes 4 feet of building material are needed for the single floor of the proposed substation and substation addition.
Amount of Building Materials (Below Ground) =	15,730 cubic yards	Assumes 5 feet of material are needed for the below ground portion of the proposed substation and substation addition.
Amount of Excavation Material =	37,752 cubic yards	Assumes 12 feet of material would need to be excavated on average for proposed substation and substation addition
Amount of Materials, transmissions lines =	1,877 cubic yards	Assumes 2 foot depth of material would need to be hauled on average for the proposed transmissions lines
Number of trucks required =	3,397 heavy duty diesel haul truck trips	
Miles per trip =	30 miles	

**Heavy Duty Diesel Vehicle (HDDV) Average Emission Factors (grams/mile)**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
HDDV	2.498	0.617	1.782	0.012	0.097	0.071	1243.400

Notes:  
 Emission factors for all pollutants are from USAF IERA 2013.  
 Emission factors are from Tables 5-11 for the 2015 calendar year, high altitude (USAF IERA 2013).

**HDDV Haul Truck Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	561.251	138.628	400.380	2.696	21.794	15.952	279367.529
tons	0.281	0.069	0.200	0.001	0.011	0.008	139.684

Example Calculation: NO<sub>x</sub> emissions (lbs) = 30 miles per trip \* 369 trips \* NO<sub>x</sub> emission factor (g/mile) \* lb/453.6 g

**Construction Commuter Emissions**

Emissions from construction workers commuting to the job site are estimated in this spreadsheet.

Emission Estimation Method: Emission factors from the South Coast Air Quality Management District (SCAQMD) EMFAC 2007 (v 2.3) Model (on-road) were used. These emission factors are available online at <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>.

**Assumptions:**

Passenger vehicle emission factors for scenario year 2015 are used.  
 The average roundtrip commute for a construction worker = 30 miles  
 Number of construction days = 240 days  
 Number of construction workers (daily) = 30 people

**Passenger Vehicle Emission Factors for Year 2015 (lbs/mile)**

NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
0.00060188	0.00066355	0.00614108	0.00001070	0.00009259	0.00006015	1.10192837

Source: South Coast Air Quality Management District. EMFAC 2007 (ver 2.3) On-Road Emissions Factors. Last updated April 24, 2008. Available online: <<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>>. Accessed 10 May 2013.

**Notes:**

The SMAQMD 2007 reference lists emission factors for reactive organic gas (ROG). For purposes of this worksheet ROG = VOC.

**Construction Commuter Emissions**

	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
lbs	130.005	143.326	1326.473	2.312	19.999	12.992	238016.529
tons	0.065	0.072	0.663	0.001	0.010	0.006	119.008

Example Calculation: NO<sub>x</sub> emissions (lbs) = 60 miles/day \* NO<sub>x</sub> emission factor (lb/mile) \* number of construction days \* number of workers

**South Central Coast Air Basin**

Row #	State	County	All Emission Sources					
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
1	CO	Adams	66,166.23	26,263.59	15,754.51	4,113.54	7,737.02	19,333.51
2	CO	Arapahoe	81,600.76	12,367.17	14,903.74	2,946.89	257.86	17,198.71
3	CO	Boulder	45,011.54	10,596.07	5,430.68	1,352.87	916.72	19,013.11
4	CO	Clear Creek	11,912.27	1,885.71	2,655.93	610.36	17.25	6,297.05
5	CO	Denver	93,351.26	21,309.92	13,878.24	2,743.43	3,261.35	17,554.47
6	CO	Douglas	43,182.53	7,519.29	5,067.58	1,219.57	145.18	18,030.73
7	CO	Gilpin	2,100.91	515.19	477.55	155.45	6.26	4,251.82
8	CO	Jefferson	83,780.29	14,521.39	10,407.51	2,523.01	2,897.01	26,467.27
Grand Total			427,105.80	94,978.34	68,575.73	15,665.11	15,238.66	128,146.68

SOURCE:

<http://neibrowser.epa.gov/eis-public-web/home.html>

USEPA National Emissions Inventory (NEI)

## **APPENDIX C**

### **PLANT SPECIES RECORDED ON SITE**



## Appendix C

### Plant Species Recorded On Site

Scientific Binomial (Synonym)	Common Name
<b>Xeric Mixed Grasslands</b>	
<i>Asclepias pumila</i>	Plains milkweed
<i>Yucca glauca</i>	Yucca
<i>Allium textile</i>	Wild onion
<i>Eremogone fendleri</i>	Desert sandwort
<i>Paronychia jamesii</i>	James' nailwort
<i>Amaranthus retroflexus</i>	Redroot pigweed
<i>Rhus aromatica</i> var. <i>trilobata</i>	Skunkbrush
<i>Harbouria trachypleura</i>	Whisk broom parsley
<i>Lomatium orientale</i>	Lomatium
<i>Apocynum cannabinum</i>	Indian hemp
<i>Asclepias speciosa</i>	Showy milkweed
<i>Achillea lanulosa</i>	Yarrow
<i>Acosta diffusa</i> ( <i>Centaurea diffusa</i> )	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Anaphalis margaritace</i>	Pearly everlasting
<i>Antennaria rosea</i>	Pussytoes
<i>Arnica fulgens</i>	Arnica
<i>Artemisia campestris</i>	Field sagewort
<i>Artemisia frigida</i>	Fringed sagebrush
<i>Artemisia ludoviciana</i>	Prairie sagewort
<i>Aster ericoides</i>	White aster
<i>Aster porteri</i>	White aster
<i>Breea arvensis</i> ( <i>Cirsium arvense</i> )	Canada thistle
<i>Brickellia eupatorioides</i>	Brickellia
<i>Carduus nutans</i>	Musk thistle
<i>Chrysothamnus nauseosus</i>	Rubber rabbitbrush
<i>Cichorium intybus</i>	Chicory
<i>Cirsium undulatum</i>	Wavyleaf thistle
<i>Cirsium vulgare</i>	Bull thistle
<i>Conyza canadensis</i>	Horseweed
<i>Erigeron divergens</i>	Spreading fleabane
<i>Gaillardia aristata</i>	Blanketflower
<i>Grindelia squarrosa</i>	Curlycup gumweed
<i>Gutierrezia sarothrae</i>	Broom snakeweed
<i>Helianthus annuus</i>	Common sunflower

Scientific Binomial (Synonym)	Common Name
<i>Helianthus petiolaris</i>	Prairie sunflower
<i>Helianthus rigidus</i>	Stiff sunflower
<i>Lactuca serriola</i>	Prickly lettuce
<i>Liatris punctata</i>	Dotted gayfeather
<i>Oligosporus dracunculus (Artemisia dracunculus)</i>	Wild tarragon
<i>Ratibida columnifera</i>	Prairie coneflower
<i>Senecio crassulus</i>	Butterweed
<i>Senecio integerrimus</i>	Groundsel
<i>Senecio spartioides</i>	Groundsel
<i>Solidago missouriensis</i>	Prairie goldenrod
<i>Solidago mollis</i>	Soft goldenrod
<i>Solidago nana</i>	Goldenrod
<i>Taraxacum officinale</i>	Common dandelion
<i>Townsendia hookeri</i>	Easter daisy
<i>Tragopogon dubius</i>	Goatsbeard
<i>Cynoglossum officinale</i>	Houndstongue
<i>Lithospermum incisum</i>	Narrowleaf gromwell
<i>Oreocarya virgata (Cryptantha virgata)</i>	Miner's candle
<i>Alyssum alyssoides</i>	Pale alyssum
<i>Cardaria draba</i>	Whitetop
<i>Erysimum capitatum</i>	Western wallflower
<i>Lesquerella ludoviciana</i>	Bladderpod
<i>Sisymbrium altissimum</i>	Tumbling mustard
<i>Coryphantha missouriensis</i>	Yellow pincushion
<i>Echinocereus viridiflorus</i>	Hen-and-chicks
<i>Opuntia fragilis</i>	Brittle cactus
<i>Opuntia macrorhiza</i>	Plains prickly pear
<i>Calochortus gunnisonii</i>	Mariposa lily
<i>Symphoricarpos occidentalis</i>	Western snowberry
<i>Bassia sieversiana (Kochia scoparia)</i>	Kochia
<i>Chenopodium album</i>	Common lambsquarters
<i>Kochia scoparia (Bassia sieversiana)</i>	Summer cypress
<i>Convolvulus arvensis</i>	Field bindweed
<i>Carex brevior</i>	Sedge
<i>Carex filifolia</i>	Thread -leafed sedge
<i>Tithymalus brachyceras</i>	Spurge
<i>Ephorbia esula</i>	Leafy spurge
<i>Tithymalus montanus</i>	Spurge
<i>Astragalus crassicaarpus</i>	Groundplum milkvetch

Scientific Binomial (Synonym)	Common Name
<i>Astragalus mollissimus</i>	Woolly locoweed
<i>Astragalus sp.</i>	Locoweed
<i>Dalea purpurea (Petalostemon purpurea)</i>	Purple prairie clover
<i>Glycyrrhiza lepidota</i>	American licorice
<i>Lupinus argenteus</i>	Silver lupine
<i>Melilotus albus</i>	White sweetclover
<i>Melilotus officinalis</i>	Yellow sweetclover
<i>Oxytropis lambertii</i>	Lambert locoweed
<i>Psoraleidum tenuiflora</i>	Slimflower scurfpea
<i>Thermopsis rhombifolia</i>	Prairie goldenpea
<i>Pneumonanthe affinis (Gentiana affinis)</i>	Bottle gentian
<i>Erodium cicutarium</i>	Filaree
<i>Delphinium nuttallianum</i>	Blue larkspur
<i>Phacelia heterophylla (Phacelia hastata var. leucophylla)</i>	Scorpioweed
<i>Hypericum perforatum</i>	St. Johnswort
<i>Iris missouriensis</i>	Wild iris
<i>Juncus sp.</i>	Rush
<i>Leucocrinum montanum</i>	Sand lily
<i>Linum lewisii</i>	Perennial flax
<i>Sphaeralcea coccinea</i>	Scarlet globemallow
<i>Toxicoscordion venenosum (Zigadenus venenosus)</i>	Death camass
<i>Calylophus serrulatus</i>	Shrubby evening-primrose
<i>Gaura coccinea</i>	Scarlet gaura
<i>Oenothera howardii (Oenothera brachycarpa)</i>	Evening-primrose
<i>Aphyllon fasciculatum (Orobanche fasciculata)</i>	Broomrape
<i>Oxalis dillenii</i>	Woodsorrel
<i>Argemone polyanthemos</i>	Prickly poppy
<i>Pinus ponderosa</i>	Ponderosa pine
<i>Plantago lanceolata</i>	English plantain
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Agrostis scabra</i>	Ticklegrass
<i>Andropogon gerardii</i>	Big bluestem
<i>Anisantha tectorum (Bromus tectorum)</i>	Cheatgrass
<i>Aristida purpurea (Aristida purpurea var. robusta)</i>	Red three-awn
<i>Bouteloua curtipendula</i>	Side-oats grama
<i>Bromopsis inermis (Bromus inermis)</i>	Smooth brome grass
<i>Buchloë dactyloides</i>	Buffalograss
<i>Chondrosium gracile (Bouteloua gracilis)</i>	Blue grama
<i>Dactylis glomerata</i>	Orchard grass

Scientific Binomial (Synonym)	Common Name
<i>Elymus canadensis</i>	Canada wild rye
<i>Elymus trachycaulus</i> ( <i>Agropyron caninum</i> ssp. <i>majus</i> )	Slender wheatgrass
<i>Koeleria macrantha</i> ( <i>Koeleria pyramidata</i> )	Junegrass
<i>Lophopyrum elongatum</i> ( <i>Agropyron elongatum</i> )	Tall wheatgrass
<i>Muhlenbergia montana</i>	Mountain muhly
<i>Oryzopsis hymenoides</i>	Indian ricegrass
<i>Panicum capillare</i>	Witchgrass
<i>Panicum virgatum</i>	Switchgrass
<i>Pascopyrum smithii</i> ( <i>Agropyron smithii</i> )	Western wheatgrass
<i>Pleum pratense</i>	Common timothy
<i>Poa compressa</i>	Canada bluegrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Poa secunda</i> ( <i>Poa canbyi</i> )	Canby bluegrass
<i>Schizachyrium scoparium</i> ( <i>Andropogon scoparius</i> )	Little bluestem
<i>Sorghastrum nutans</i>	Indian-grass
<i>Sporobolus cryptandrus</i>	Sand dropseed
<i>Stipa comata</i>	Needle-and-thread
<i>Stipa viridula</i>	Green needlegrass
<i>Ipomopsis spicata</i>	Ipomopsis
<i>Eriogonum alatum</i>	Winged eriogonum
<i>Eriogonum</i> sp.	Wild buckwheat
<i>Eriogonum umbellatum</i>	Wild buckwheat
<i>Pterogonum alatum</i> ( <i>Erigeron alatum</i> )	Winged buckwheat
<i>Rumex crispus</i>	Curly dock
<i>Talinum parviflorum</i>	Prairie fameflower
<i>Crataegus erythropoda</i>	Hawthorn
<i>Potentilla hippiana</i>	Wooly cinquefoil
<i>Potentilla recta</i>	Sulfur cinquefoil
<i>Rosa sayi</i> ( <i>Rosa acicularis</i> )	Prickly wild rose
<i>Rosa woodsii</i>	Woods rose
<i>Comandra umbellata</i>	Bastard-toadflax
<i>Castilleja sessiliflora</i>	Downy paintbrush
<i>Linaria genistifolia</i> subsp. <i>dalmatica</i> ( <i>Linaria dalmatica</i> )	Dalmatian toadflax
<i>Penstemon virgatus</i>	Penstemon
<i>Verbascum blattaria</i>	Moth mullein
<i>Verbascum thapsus</i>	Common mullein
<i>Verbena bracteata</i>	Prostrate verbena
<i>Viola nuttallii</i>	Yellow prairie violet
<b>Mesic Mixed Grassland</b>	
<i>Allium textile</i>	Wild onion

Scientific Binomial (Synonym)	Common Name
<i>Acosta diffusa</i> ( <i>Centaurea diffusa</i> )	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Artemisia ludoviciana</i>	Prairie sagewort
<i>Aster porteri</i>	White aster
<i>Breea arvensis</i> ( <i>Cirsium arvense</i> )	Canada thistle
<i>Carduus nutans</i>	Musk thistle
<i>Cirsium undulatum</i>	Wavyleaf thistle
<i>Gaillardia aristata</i>	Blanketflower
<i>Lactuca serriola</i>	Prickly lettuce
<i>Liatis punctata</i>	Dotted gayfeather
<i>Ratibida columnifera</i>	Prairie coneflower
<i>Tragopogon dubius</i>	Salsify
<i>Lithospermum arvense</i>	Corn gromwell
<i>Lesquerella ludoviciana</i>	Bladderpod
<i>Thlaspi arvense</i>	Fanweed
<i>Convolvulus arvensis</i>	Field bindweed
<i>Eleocharis palustris</i>	Spikerush
<i>Melilotus officinalis</i>	Yellow sweetclover
<i>Psoraleidum tenuiflora</i>	Slimflower scurfpea
<i>Pneumonanthe affinis</i> ( <i>Gentiana affinis</i> )	Bottle gentian
<i>Phacelia heterophylla</i> ( <i>Phacelia hastata</i> var. <i>leucophylla</i> )	Scorpionweed
<i>Hypericum perforatum</i>	St. Johnswort
<i>Agrostis gigantea</i> ( <i>Agrostis alba</i> )	Redtop
<i>Andropogon gerardii</i>	Big bluestem
<i>Bouteloua curtipendula</i>	Side-oats grama
<i>Bromopsis inermis</i> ( <i>Bromus inermis</i> )	Smooth brome grass
<i>Koeleria macrantha</i> ( <i>Koeleria pyramidata</i> )	Junegrass
<i>Muhlenbergia montana</i>	Mountain muhly
<i>Panicum virgatum</i>	Switchgrass
<i>Pascopyrum smithii</i> ( <i>Agropyron smithii</i> )	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa fendleriana</i>	Muttongrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Polypogon monspeliensis</i>	Rabbitfoot grass
<i>Schizachyrium scoparium</i> ( <i>Andropogon scoparius</i> )	Little bluestem
<i>Sorghastrum nutans</i>	Indian-grass
<i>Ranunculus</i> sp.	Buttercup
<i>Geum aleppicum</i>	Avens
<i>Rosa sayi</i> ( <i>Rosa acicularis</i> )	Prickly wild rose

Scientific Binomial (Synonym)	Common Name
<i>Commandra umbellata</i>	Bastard-toadflax
<i>Verbascum thapsis</i>	Common mullein
<i>Veronica peregrina</i>	Purslane speedwell
<i>Typha latifolia</i>	Common cattail
<b>Ponderosa Pine Woodland</b>	
<i>Yucca glauca</i>	Yucca
<i>Allium textile</i>	Wild onion
<i>Cerastrium strictum</i>	Mouse-ear
<i>Eremogone fendleri</i>	Desert sandwort
<i>Eremogone hookeri (Arenaria hookeri)</i>	Desert sandwort
<i>Paronychia jamesii</i>	James' nailwort
<i>Rhus aromatica var. trilobata</i>	Skunkbrush
<i>Toxicodendron rydbergii</i>	Poison ivy
<i>Harbouria trachypleura</i>	Whisk broom parsley
<i>Apocynum cannabinum</i>	Indian hemp
<i>Achillea lanulosa</i>	Yarrow
<i>Acosta diffusa (Centaurea diffusa)</i>	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Antennaria rosea</i>	Pussytoes
<i>Artemisia absinthium</i>	Wormwood
<i>Artemisia ludoviciana</i>	Prairie sagewort
<i>Aster ericoides</i>	White aster
<i>Brickellia eupatorioides</i>	Brickellia
<i>Breea arvensis (Cirsium arvense)</i>	Canada thistle
<i>Cirsium undulatum</i>	Wavyleaf thistle
<i>Grindelia revoluta</i>	Gumweed
<i>Grindelia squarrosa</i>	Curlycup gumweed
<i>Gutierrezia sarothrae</i>	Broom snakeweed
<i>Heterotheca villosa (Chrysopsis villosa)</i>	Hairy golden aster
<i>Lactuca serriola</i>	Prickly lettuce
<i>Liatris punctata</i>	Dotted gayfeather
<i>Oligosporus dracunculus (Artemisia dracunculus)</i>	Wild tarragon
<i>Senecio crassulus</i>	Butterweed
<i>Senecio spartioides</i>	Groundsel
<i>Solidago mollis</i>	Soft goldenrod
<i>Taraxacum officinale</i>	Common dandelion
<i>Cynoglossum officinale</i>	Houndstongue
<i>Lithospermum incisum</i>	Narrowleaf gromwell
<i>Alyssum alyssoides</i>	Pale alyssum
<i>Erysimum capitatum</i>	Western wallflower

Scientific Binomial (Synonym)	Common Name
<i>Coryphantha vivipara</i> var. <i>vivipara</i>	Nipple cactus
<i>Echinocereus viridiflorus</i>	Hen-and-chicks
<i>Opuntia macrorhiza</i>	Plains prickly pear
<i>Opuntia polyacantha</i>	Plains prickly pear
<i>Campanula rotundifolia</i>	Common harebell
<i>Symphoricarpos occidentalis</i>	Western snowberry
<i>Townsendia hookeri</i>	Easter daisy
<i>Chenopodium album</i>	Common lambsquarters
<i>Convolvulus arvensis</i>	Field bindweed
<i>Carex brevior</i>	Sedge
<i>Carex filifolia</i>	Thread-leafed sedge
<i>Carex</i> sp.	Sedge
<i>Astragalus mollissimus</i>	Woolly locoweed
<i>Dalea purpurea</i> ( <i>Petalostemon purpurea</i> )	Purple prairie clover
<i>Lupinus argenteus</i>	Silver lupine
<i>Oxytropis lambertii</i>	Lambert locoweed
<i>Psoraleidium tenuiflora</i>	Slimflower scurfpea
<i>Thermopsis rhombifolia</i>	Prairie goldenpea
<i>Frasera speciosa</i>	Monument plant
<i>Pneumonanthe affinis</i> ( <i>Gentiana affinis</i> )	Bottle gentian
<i>Geranium caespitosum</i>	Wild geranium
<i>Geranium viscosissimum</i>	Sticky geranium
<i>Ribes aureum</i>	Golden current
<i>Ribes cereum</i>	Wax current
<i>Delphinium nuttallianum</i>	Blue larkspur
<i>Phacelia heterophylla</i> ( <i>Phacelia hastata</i> )	Scorpioweed
<i>Hypericum perforatum</i>	St. Johnswort
<i>Monarda fistulosa</i>	Bee balm
<i>Leucocrinum montanum</i>	Sand lily
<i>Calylophus serrulatus</i>	Shrubby eveningprimrose
<i>Oenothera coronopifolia</i>	Combleaf eveningprimrose
<i>Oxalis dillenii</i>	Woodsorrel
<i>Pinus ponderosa</i>	Ponderosa pine
<i>Pseudotsuga menziesii</i>	Douglas-fir
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Agrostis scabra</i>	Ticklegrass
<i>Andropogon gerardii</i>	Big bluestem
<i>Anisantha tectorum</i> ( <i>Bromus tectorum</i> )	Cheatgrass
<i>Aristida purpurea</i>	Three-awn
<i>Bouteloua curtipendula</i>	Side-oats grama

Scientific Binomial (Synonym)	Common Name
<i>Bromopsis inermis</i> ( <i>Bromus inermis</i> )	Smooth brome
<i>Chondrosium gracile</i> ( <i>Bouteloua gracilis</i> )	Blue grama
<i>Critesion jubatum</i> ( <i>Hordeum jubatum</i> )	Foxtail barley
<i>Elymus elymoides</i> ( <i>Sitanion hystrix</i> )	Bottletail squirreltail
<i>Hesperostipa comata</i> ( <i>Stipa comata</i> )	Needle-and-thread
<i>Koeleria macrantha</i> ( <i>Koeleria pyramidata</i> )	Junegrass
<i>Muhlenbergia montana</i>	Mountain muhly
<i>Nassella viridula</i> <i>Stipa viridula</i>	Green needlegrass
<i>Pascopyrum smithii</i> <i>Agropyron smithii</i>	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Schizachyrium scoparium</i> ( <i>Andropogon scoparius</i> )	Little bluestem
<i>Pulsatilla patens</i> <i>Anemone patens</i>	Pasque flower
<i>Amelanchier utahensis</i>	Serviceberry
<i>Cerasus pumila</i> subsp. <i>bessyei</i> ( <i>Prunus pumila</i> var. <i>bessyi</i> )	Sand cherry
<i>Crataegus erythropoda</i>	Hawthorn
<i>Drymocallis fissa</i> ( <i>Potentilla fissa</i> )	Cinquefoil
<i>Oreobatus deliciosus</i> ( <i>Rubus deliciosus</i> )	Boulder raspberry
<i>Padus virginiana</i> ( <i>Prunus virginiana</i> )	Chokecherry
<i>Potentilla hippiana</i>	Woolly cinquefoil
<i>Potentilla ovina</i>	Potentilla
<i>Potentilla recta</i>	Sulfur cinquefoil
<i>Rosa arkansana</i>	Prairie rose
<i>Rosa woodsii</i>	Woods rose
<i>Galium aparine</i>	Catchweed bedstraw
<i>Galium septentrionale</i>	Northern bedstraw
<i>Commandra umbellata</i>	Bastard-toadflax
<i>Penstemon secundiflorus</i>	Penstemon
<i>Penstemon virgatus</i>	Penstemon
<i>Verbascum blattaria</i>	Moth mullein
<i>Verbascum thapsus</i>	Common mullein
<i>Viola nuttallii</i>	Yellow prairie violet
<b>Upland Shrubland</b>	
<i>Cerastrium strictum</i>	Mouse-ear
<i>Eremogone fendleri</i>	Desert sandwort
<i>Paronychia jamesii</i>	James' nailwort
<i>Rhus aromatica</i> var. <i>trilobata</i>	Skunkbrush
<i>Toxicodendron rydbergii</i>	Poison ivy
<i>Lomatium orientale</i>	Lomatium

Scientific Binomial (Synonym)	Common Name
<i>Achillea lanulosa</i>	Yarrow
<i>Acosta diffusa</i> ( <i>Centaurea diffusa</i> )	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Antennaria rosea</i>	Pussytoes
<i>Artemisia frigida</i>	Fringed sagebrush
<i>Artemisia ludoviciana</i>	Prairie sagewort
<i>Aster porteri</i>	White aster
<i>Carduus nutans</i>	Musk thistle
<i>Cirsium undulatum</i>	Wavyleaf thistle
<i>Gallardia aristata</i>	Blanketflower
<i>Grindelia squarrosa</i>	Curlycup gumweed
<i>Gutierrezia sarothrae</i>	Broom snakeweed
<i>Helianthus rigidus</i>	Stiff sunflower
<i>Heterotheca villosa</i> ( <i>Chrysopsis villosa</i> )	Hairy golden aster
<i>Lactuca serriola</i>	Prickly lettuce
<i>Liatis punctata</i>	Dotted gayfeather
<i>Oligosporus dracunculus</i> ( <i>Artemisia dracunculus</i> )	Wild tarragon
<i>Senecio crassulus</i>	Butterweed
<i>Solidago missouriensis</i>	Prairie goldenrod
<i>Solidago mollis</i>	Soft goldenrod
<i>Solidago speciosa</i> var. <i>pallida</i>	Goldenrod
<i>Tragopogon dubius</i>	Goatsbeard
<i>Cynoglossum officinale</i>	Houndstongue
<i>Alyssum</i> sp.	Alyssum
<i>Erysimum capitatum</i>	Western wallflower
<i>Sisymbrium altissimum</i>	Tumbling mustard
<i>Echinocereus viridiflorus</i>	Hen-and-chicks
<i>Opuntia polyacantha</i>	Plains prickly pear
<i>Campanula rotundifolia</i>	Common harebell
<i>Symphoricarpos occidentalis</i>	Western snowberry
<i>Bassia sieversiana</i> ( <i>Kochia scoparia</i> )	Kochia
<i>Carex brevior</i>	Sedge
<i>Carex filifolia</i>	Thread-leafed sedge
<i>Euphorbia esula</i>	Leafy spurge
<i>Dalea purpurea</i> ( <i>Petalostemon purpurea</i> )	Purple prairie clover
<i>Oxytropis lambertii</i>	Lambert locoweed
<i>Psoralidium tenuiflora</i>	Slimflower scurfpea
<i>Thermopsis divaricarpa</i>	Prairie goldenpea
<i>Pneumonanthe affinis</i> ( <i>Gentiana affinis</i> )	Bottle gentian
<i>Ribes cereum</i>	Wax current

Scientific Binomial (Synonym)	Common Name
<i>Delphinium nuttallianum</i>	Blue larkspur
<i>Hypericum perforatum</i>	St. Johnswort
<i>Leucocrinum montanum</i>	Sand lily
<i>Linum lewisii</i>	Perennial flax
<i>Calylophus serrulatus</i>	Shrubby evening-primrose
<i>Pinus ponderosa</i>	Ponderosa pine
<i>Andropogon gerardii</i>	Big bluestem
<i>Anisantha tectorum (Bromus tectorum)</i>	Cheatgrass
<i>Bromopsis inermis (Bromus inermis)</i>	Smooth brome
<i>Bouteloua curtipendula</i>	Side-oats grama
<i>Chondrosium gracile (Bouteloua gracilis)</i>	Blue grama
<i>Critesion jubatum (Hordeum jubatum)</i>	Foxtail barley
<i>Elymus canadensis</i>	Canada wild rye
<i>Elymus elymoides (Sitionion hystrix)</i>	Bottlebrush squirreltail
<i>Hesperostipa comata (Stipa comata)</i>	Needle-and-thread
<i>Koeleria macrantha (Koeleria pyramidata)</i>	Junegrass
<i>Muhlenbergia montana</i>	Mountain muhly
<i>Nassella viridula (Stipa viridula)</i>	Green needlegrass
<i>Pascopyrum smithii (Agropyron smithii)</i>	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa pratense</i>	Kentucky bluegrass
<i>Schizachyrium scoparium (Andropogon scoparius)</i>	Little bluestem
<i>Sorghastrum nutans</i>	Indian-grass
<i>Eriogonum umbellatum</i>	Wild buckwheat
<i>Pterogonum alatum (Erigeron alatum)</i>	Winged buckwheat
<i>Amelanchier utahensis</i>	Serviceberry
<i>Cerasus pumila subsp. besseyi (Prunus pumila var. besseyi)</i>	Sand cherry
<i>Crataegus erythropoda</i>	Hawthorn
<i>Padus virginiana (Prunus virginiana)</i>	Chokecherry
<i>Potentilla ovina</i>	Potentilla
<i>Potentilla recta</i>	Sulfur cinquefoil
<i>Prunus americana</i>	Wild plum
<i>Rosa arkansana</i>	Prairie rose
<i>Rosa woodsii</i>	Woods rose
<i>Commandra umbellata</i>	Bastard-toadflax
<i>Castilleja sessiliflora</i>	Downy paintbrush
<i>Linerea genestifolia subsp. dalmatica (Linerea dalmatica)</i>	Dalmatian toadflax
<i>Penstemon secundiflorus</i>	Penstemon
<i>Penstemon virgatus</i>	Penstemon

Scientific Binomial (Synonym)	Common Name
<i>Verbascum thapsus</i>	Common mullein
<b>Palustrine Emergent Wetland</b>	
<i>Breea arvensis</i> ( <i>Cirsium arvense</i> )	Canada thistle
<i>Cardamine breweri</i>	Bittercress
<i>Neolepia campestre</i> ( <i>Lepidium campestre</i> )	Fieldcress
<i>Symphoricarpos occidentalis</i>	Western snowberry
<i>Carex nebrascensis</i>	Nebraska sedge
<i>Eleocharis palustris</i>	Spikerush
<i>Scirpus pallidus</i>	Bulrush
<i>Juncus arcticus</i>	Rush
<i>Juncus balticus</i>	Baltic rush
<i>Juncus effusus</i>	Rush
<i>Juncus longistylis</i>	Rush
<i>Juncus tenuis</i>	Rush
<i>Juncus torreyi</i>	Torrey's rush
<i>Marrubium vulgare</i>	Horehound
<i>Mentha arvensis</i>	Fieldmint
<i>Epilobium cilatum</i>	Willow herb
<i>Oenothera villosa</i>	Common evening-primrose
<i>Andropogon gerardii</i>	Big bluestem
<i>Anisantha tectorum</i> ( <i>Bromus tectorum</i> )	Cheatgrass
<i>Critesion jubatum</i> ( <i>Hordeum jubatum</i> )	Foxtail barley
<i>Koeleria macrantha</i> ( <i>Koeleria pyramidata</i> )	Junegrass
<i>Pascopyrum smithii</i> ( <i>Agropyron smithii</i> )	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Polypogon monspeliensis</i>	Rabbitfoot grass
<i>Schizachyrium scoparium</i> ( <i>Andropogon scoparius</i> )	Little bluestem
<i>Geum aleppicum</i>	Yellow avens
<i>Padus virginiana</i> subsp. <i>melanocarpa</i> ( <i>Prunus virginiana</i> )	Chokecherry
<i>Galium aparine</i>	Catchweed bedstraw
<i>Populus angustifolia</i>	Narrowleaf cottonwood
<i>Salix amygdaloides</i>	Peach-leaf willow
<i>Salix exigua</i>	Sandbar willow
<i>Veronica peregrina</i>	Purslane speedwell
<i>Typha latifolia</i>	Common cattail
<i>Typha angustifolia</i>	Narrow-leaved cattail
<b>Riparian Fringe Wetland</b>	
<i>Lomatium orientale</i>	Lomatium

Scientific Binomial (Synonym)	Common Name
<i>Asclepias speciosa</i>	Showy milkweed
<i>Achillea lanulosa</i>	Yarrow
<i>Acosta diffusa (Centaurea diffusa)</i>	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Ambrosia trifida</i>	Giant ragweed
<i>Arnica fulgens</i>	Arnica
<i>Artemisia ludoviciana (Populus deltoides)</i>	Prairie sagewort
<i>Aster ericoides</i>	White aster
<i>Breea arvensis (Cirsium arvense)</i>	Canada thistle
<i>Brickellia eupatorioides</i>	Brickellia
<i>Carduus nutans</i>	Musk thistle
<i>Cichorium intybus</i>	Chicory
<i>Conyza canadensis</i>	Horseweed
<i>Erigeron divergens</i>	Spreading fleabane
<i>Gaillardia aristata</i>	Blanketflower
<i>Grindelia squarrosa</i>	Curlycup gumweed
<i>Helianthus annuus</i>	Common sunflower
<i>Heterotheca villosa (Chrysopsis villosa)</i>	Hairy golden aster
<i>Lactuca serriola</i>	Prickly lettuce
<i>Liatis punctata</i>	Dotted gayfeather
<i>Onopordum acanthium</i>	Scotch thistle
<i>Ratibida columnifera</i>	Prairie coneflower
<i>Senecio crassulus</i>	Butterweed
<i>Senecio integerrimus</i>	Grousel
<i>Solidago missouriensis</i>	Prairie goldenrod
<i>Tragopogon dubius</i>	Goatsbeard
<i>Cynoglossum officinale</i>	Houndstongue
<i>Nasturtium officinale</i>	Watercress
<i>Alyssum minus</i>	Alyssum
<i>Neolepia campestre (Lepidium campestre)</i>	Fieldcress
<i>Noccaea montana</i>	Wild candytuft
<i>Rorippa sinuata</i>	Spreading yellowcress
<i>Sisymbrium altissimum</i>	Tall tumbled mustard
<i>Thlaspi arvense</i>	Field pennycress (Fanweed)
<i>Opuntia macrorhiza</i>	Plains prickly pear
<i>Campanula rotundifolia</i>	Common harebell
<i>Lobelia siphilitica</i>	Blue cardinal flower
<i>Symphoricarpos occidentalis</i>	Western snowberry
<i>Saponaria officinalis</i>	Bouncing Bet
<i>Bassia sieversiana (Kochia scoparia)</i>	Kochia

Scientific Binomial (Synonym)	Common Name
<i>Chenopodium album</i>	Common lambsquarters
<i>Tradescantia occidentalis</i>	Spiderwort
<i>Maianthemum stellatum (Smilacina stellata)</i>	False solomon's seal
<i>Convolvulus arvensis</i>	Field bindweed
<i>Carex hystericina</i>	Sedge
<i>Carex languinosa</i>	Sedge
<i>Carex nebrascensis</i>	Nebraska sedge
<i>Carex utriculata (Carex rostrata)</i>	Sedge
<i>Eleocharis palustris</i>	Spikerush
<i>Dalea purpurea (Petalostemon purpurea)</i>	Purple prairie clover
<i>Glycyrrhiza lepidota</i>	American licorice
<i>Lupinus argenteus</i>	Silver lupine
<i>Medicago sativa</i>	Alfalfa
<i>Melilotus officinalis</i>	Yellow sweetclover
<i>Psoraleidum tenuiflora</i>	Slimflower scurfpea
<i>Thermopsis rhombifolia</i>	Prairie goldenpea
<i>Ribes aureum</i>	Golden current
<i>Phacelia heterophylla (Phacelia hastata)</i>	Scorpionweed
<i>Hypericum perforatum</i>	St. Johnswort
<i>Iris missouriensis</i>	Wild iris
<i>Juncus nodosus</i>	Knotted rush
<i>Carex simulata</i>	Rush
<i>Juncus articulates</i>	Rush
<i>Juncus balticus</i>	Baltic rush
<i>Juncus bufonius</i>	Toad rush
<i>Juncus effusus</i>	Rush
<i>Juncus ensifolius</i>	Rush
<i>Juncus longistylis</i>	Rush
<i>Juncus sp.</i>	Rush
<i>Marrubium vulgare</i>	Horehound
<i>Mentha arvensis</i>	Fieldmint
<i>Monarda fistulosa</i>	Bee balm
<i>Nepeta cataria</i>	Catnip
<i>Lemna turionifera</i>	Duckweed
<i>Calylophus serrulatus</i>	Shrubby evening-primrose
<i>Epilobium ciliatum</i>	Willow herb
<i>Gaura parviflora</i>	Smallflower gaura
<i>Oenothera villosa</i>	Common eveningprimrose
<i>Oxalis dillenii</i>	Woodsorrel
<i>Argemone polyanthemos</i>	Prickly poppy

Scientific Binomial (Synonym)	Common Name
<i>Pinus ponderosa</i>	Ponderosa pine
<i>Plantago lanceolata</i>	English plantain
<i>Plantago major</i>	Common plantain
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Agrostis gigantea (Agrostis alba)</i>	Redtop
<i>Agrostis scabra</i>	Ticklegrass
<i>Andropogon gerardii</i>	Big bluestem
<i>Anisantha tectorum (Bromus tectorum)</i>	Cheatgrass
<i>Bromopsis inermis (Bromus inermis)</i>	Smooth brome
<i>Buchloë dactyloides</i>	Buffalograss
<i>Critesion jubatum (Hordeum jubatum)</i>	Foxtail barley
<i>Dactylis glomerata</i>	Orchard grass
<i>Danthonia spicata</i>	Poverty oatgrass
<i>Elymus trachycaulus (Agropyron caninum)</i>	Slender wheatgrass
<i>Festuca pratensis</i>	Meadow fescue
<i>Glyceria grandis</i>	Tall mannagrass
<i>Glyceria striata</i>	Fowl mannagrass
<i>Hesperostipa comata (Stipa comata)</i>	Needle-and-thread
<i>Koeleria macrantha (Koeleria pyramidata)</i>	Junegrass
<i>Lophopyrum elongatum (Agropyron elongatum)</i>	Tall wheatgrass
<i>Muhlenbergia filiformis</i>	Pull-up muhly
<i>Muhlenbergia montana</i>	Mountain muhly
<i>Panicum virgatum</i>	Switchgrass
<i>Elymus canadensis</i>	Canada wild rye
<i>Pascopyrum smithii (Agropyron smithii)</i>	Western wheatgrass
<i>Phleum pratense</i>	Common Timothy
<i>Poa compressa</i>	Canada bluegrass
<i>Poa fendleriana</i>	Muttongrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Schizachyrium scoparium (Andropogon scoparius)</i>	Little bluestem
<i>Sorghastrum nutans</i>	Indian-grass
<i>Spartina pectinata</i>	Prairie cordgrass
<i>Sporobolus airoides</i>	Alkaline sacatone
<i>Sporobolus cryptandrus</i>	Sand dropseed
<i>Rumex crispus</i>	Curly dock
<i>Clematis ligusticifolia</i>	Virgin's bower
<i>Agrimonia striata</i>	Agripmony
<i>Geum macrophyllum</i>	Large-leaved avens
<i>Padus virginiana (Prunus virginiana)</i>	Chokecherry
<i>Potentilla hippiana</i>	Woolly cinquefoil

Scientific Binomial (Synonym)	Common Name
<i>Potentilla recta</i>	Sulfur cinquefoil
<i>Rosa sayi (Rosa acicularis)</i>	Prickly wild rose
<i>Galium aparine</i>	Catchweed bedstraw
<i>Populus deltoides</i>	Plains cottonwood
<i>Salix alba var. vitellina</i>	Golden osier
<i>Salix amygdaloides</i>	Peach-leaf willow
<i>Salix exigua</i>	Sandbar willow
<i>Salix fragilis</i>	Crack willow
<i>Verbascum blattaria</i>	Moth mullein
<i>Verbascum thapsus</i>	Common mullein
<i>Mimulus glabratus</i>	Monkeflower
<i>Veronica peregrina</i>	Purshlane speedwell
<i>Typha angustifolia</i>	Narrow-leaved cattail
<i>Typha latifolia</i>	Common cattail
<b>Groundwater Seep Wetland</b>	
<i>Apocynum cannabinum</i>	Indian hemp
<i>Asclepias speciosa</i>	Showy milkweed
<i>Arnica fulgens</i>	Arnica
<i>Acosta diffusa (Centaurea diffusa)</i>	Diffuse knapweed
<i>Aster adscendens (Aster chilensis)</i>	Aster
<i>Breea arvensis (Cirsium arvense)</i>	Canada thistle
<i>Carduus nutans</i>	Musk thistle
<i>Helianthus annuus</i>	Common sunflower
<i>Solidago serotinoidea</i>	Goldenrod
<i>Xanthium strumarium</i>	Cocklebur
<i>Cynoglossum officinale</i>	Houndstongue
<i>Symphoricarpos occidentalis</i>	Western snowberry
<i>Bassia sieversiana (Kochia scoparia)</i>	Kochia
<i>Carex languinosa</i>	Sedge
<i>Carex nebrascensis</i>	Nebraska sedge
<i>Carex utriculata (Carex rostrata)</i>	Sedge
<i>Dipsacus fullonum (Dipsacus sylvestris)</i>	Common teasel
<i>Hippochaete laevigata (Equisetum laevigatum)</i>	Smooth scouring rush
<i>Amorpha fruticosa</i>	False indigo
<i>Glycyrrhiza lepidota</i>	American licorice
<i>Melilotus albus</i>	White sweetclover
<i>Melilotus officinalis</i>	Yellow sweetclover
<i>Hypericum perforatum</i>	St. Johnswort
<i>Iris missouriensis</i>	Wild iris
<i>Juncus balticus</i>	Baltic rush

Scientific Binomial (Synonym)	Common Name
<i>Juncus effusus</i>	Rush
<i>Marrubium vulgare</i>	Horehound
<i>Mentha arvensis</i>	Fieldmint
<i>Oenothera villosa</i>	Common evening-primrose
<i>Plantago lanceolata</i>	English plantain
<i>Agrostis gigantea</i> ( <i>Agrostis alba</i> )	Redtop
<i>Bromopsis inermis</i> ( <i>Bromus inermis</i> )	Smooth brome grass
<i>Critesion jubatum</i> ( <i>Hordeum jubatum</i> )	Foxtail barley
<i>Dactylis glomerata</i>	Orchard grass
<i>Nassella viridula</i> ( <i>Stipa viridula</i> )	Green needlegrass
<i>Panicum capillare</i>	Witchgrass
<i>Panicum virgatum</i>	Switchgrass
<i>Pascopyrum smithii</i> ( <i>Agropyron smithii</i> )	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Spartina pectinata</i>	Prairie cordgrass
<i>Geum macrophyllum</i>	Large-leaved avens
<i>Prunus americana</i>	Wild plum
<i>Rosa sayi</i> ( <i>Rosa acicularis</i> )	Prickly wild rose
<i>Rosa woodsii</i>	Woods rose
<i>Salix exigua</i>	Sandbar willow
<i>Verbascum blattaria</i>	Moth mullein
<i>Verbascum thapsus</i>	Common mullein
<i>Typha angustifolia</i>	Narrow-leaved cattail
<i>Typha latifolia</i>	Common cattail
<b>Seasonal Pond</b>	
<i>Achillea lanulosa</i>	Yarrow
<i>Acosta diffusa</i> ( <i>Centaurea diffusa</i> )	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Aster porteri</i>	White aster
<i>Breca arvensis</i> ( <i>Cirsium arvense</i> )	Canada thistle
<i>Conyza canadensis</i>	Horseweed
<i>Erigeron divergens</i>	Spreading fleabane
<i>Grindelia squarrosa</i>	Curlycup gumweed
<i>Helianthus annuus</i>	Common sunflower
<i>Lactuca serriola</i>	Prickly lettuce
<i>Oligosporus campestris</i> ( <i>Artemisia campestris</i> )	Western sagewort
<i>Xanthium strumarium</i>	Cocklebur
<i>Alyssum minus</i>	Alyssum
<i>Descurainia sp.</i>	Tansy mustard

Scientific Binomial (Synonym)	Common Name
<i>Neolepia campestre</i> ( <i>Lepidium campestre</i> )	Fieldcress
<i>Sisymbrium altissimum</i>	Tumbling mustard
<i>Thlaspi arvense</i>	Fanweed
<i>Calochortus gunnisonii</i>	Mariposa lily
<i>Carex nebrascensis</i>	Nebraska sedge
<i>Carex utriculata</i> ( <i>Carex rostrata</i> )	Sedge
<i>Eleocharis palustris</i>	Spikerush
<i>Dalea purpurea</i> ( <i>Petalostemon purpurea</i> )	Purple prairie clover
<i>Glycyrrhiza lepidota</i>	American licorice
<i>Erodium cicutarium</i>	Filaree
<i>Juncus balticus</i>	Baltic rush
<i>Juncus effusus</i>	Rush
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Anisantha tectorum</i> ( <i>Bromus tectorum</i> )	Cheatgrass
<i>Bromopsis inermis</i> ( <i>Bromus inermis</i> )	Smooth brome
<i>Critesion jubatum</i> ( <i>Hordeum jubatum</i> )	Foxtail barley
<i>Distichlis spicata</i>	Salt-grass
<i>Koeleria macrantha</i> ( <i>Koeleria pyramidata</i> )	Junegrass
<i>Pascopyrum smithii</i> ( <i>Agropyron smithii</i> )	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Persicaria 21aculate</i> ( <i>Polygonum persicaria</i> )	Lady's thumb
<i>Persicaria pennsylvanica</i> ( <i>Polygonum pennsylvanicum</i> )	Pennsylvania smartweed
<i>Rumex crispus</i>	Curly dock
<i>Agrimonia striata</i>	Agrimony
<i>Verbascum blattaria</i>	Moth mullein
<i>Typha angustifolia</i>	Narrow-leaved cattail
<i>Typha latifolia</i>	Common cattail
<b>Disturbed</b>	
<i>Yucca glauca</i>	Yucca
<i>Paronychia jamesii</i>	James' nailwort
<i>Amaranthus retroflexus</i>	Redroot pigweed
<i>Lomatium orientale</i>	Lomatium
<i>Apocynum cannabinum</i>	Indian hemp
<i>Asclepias speciosa</i>	Showy milkweed
<i>Achillea lanulosa</i>	Yarrow
<i>Acosta diffusa</i> ( <i>Centaurea diffusa</i> )	Diffuse knapweed
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Artemisia frigida</i>	Fringed sagebrush
<i>Artemisia ludoviciana</i>	Prairie sagewort

Scientific Binomial (Synonym)	Common Name
<i>Aster ericoides</i>	White aster
<i>Breea arvensis</i> ( <i>Cirsium arvense</i> )	Canada thistle
<i>Carduus nutans</i>	Musk thistle
<i>Centaurea maculosa</i>	Spotted knapweed
<i>Cichorium intybus</i>	Chicory
<i>Conyza canadensis</i>	Horseweed
<i>Dyssodia papposa</i>	Fetid marigold
<i>Erigeron divergens</i>	Spreading fleabane
<i>Grindelia squarrosa</i>	Curlycup gumweed
<i>Gutierrezia sarothrae</i>	Broom snakeweed
<i>Helianthus annuus</i>	Common sunflower
<i>Lactuca serriola</i>	Prickly lettuce
<i>Liatris punctata</i>	Dotted gayfeather
<i>Ratibida columnifera</i>	Prairie coneflower
<i>Solidago spathulata</i>	Goldenrod
<i>Sonchus arvensis</i>	Field sow thistle
<i>Taraxacum officinale</i>	Common dandelion
<i>Xanthium strumarium</i>	Cocklebur
<i>Lithospermum incisum</i>	Narrowleaf gromwell
<i>Alyssum alyssoides</i>	Pale alyssum
<i>Cardaria draba</i>	Whitetop
<i>Sisymbrium altissimum</i>	Tumbling mustard
<i>Bassia sieversiana</i> ( <i>Kochia scoparia</i> )	Kochia
<i>Chenopodium murale</i>	Nettleleaf goosefoot
<i>Kochia scoparia</i> ( <i>Bassia sieversiana</i> )	Summer cypress
<i>Salsola australis</i> ( <i>Salsola iberica</i> )	Russian-thistle
<i>Salsola iberica</i>	Russian-thistle
<i>Teloxys botrys</i>	Woodseed
<i>Convolvulus arvensis</i>	Field bindweed
<i>Carex brevior</i>	Sedge
<i>Chamaesyce glyptosperma</i> ( <i>Euphorbia glyptosperma</i> )	Ridgeseed spurge
<i>Euphorbia esula</i>	Leafy spurge
<i>Tithymalus brachyceras</i>	Spurge
<i>Astragalus cicer</i>	Cicer milkvetch
<i>Medicago sativa</i>	Alfalfa
<i>Melilotus albus</i>	White sweetclover
<i>Melilotus officinalis</i>	Yellow sweetclover
<i>Oxytropis lambertii</i>	Lambert locoweed
<i>Psoraleidum tenuiflora</i>	Slimflower scurfpea
<i>Trifolium pratense</i>	Red clover

Scientific Binomial (Synonym)	Common Name
<i>Hypericum perforatum</i>	St. Johnswort
<i>Juncus longistylis</i>	Rush
<i>Leucocrinum montanum</i>	Sand lily
<i>Linum lewisii</i>	Perennial flax
<i>Calylophus serrulatus</i>	Shrubby evening-primrose
<i>Gaura parviflora</i>	Smallflower gaura
<i>Oxalis dillenii</i>	Woodsorrel
<i>Plantago lanceolata</i>	English plantain
<i>Plantago major</i>	Common plantain
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Andropogon gerardii</i>	Big bluestem
<i>Anisantha tectorum (Bromus tectorum)</i>	Cheatgrass
<i>Aristida purpurea</i>	Three-awn
<i>Bouteloua curtipendula</i>	Side-oats grama
<i>Bromopsis inermis (Bromus inermis)</i>	Smooth brome grass
<i>Buchloë dactyloides</i>	Buffalograss
<i>Chondrosium gracile (Bouteloua gracilis)</i>	Blue grama
<i>Critesion jubatum (Hordeum jubatum)</i>	Foxtail barley
<i>Dactylis glomerata</i>	Orchard grass
<i>Echinochloa crusgalli</i>	Barnyard grass
<i>Elymus elymoides (Sitanion hystrix)</i>	Bottletail squirreltail
<i>Elymus trachycaulus (Agropyron caninum)</i>	Slender wheatgrass
<i>Elytrigia dasystachyum (Agropyron dasystachyum)</i>	Thickspike wheatgrass
<i>Eragrostis cilianensis</i>	Stinkgrass
<i>Festuca ovina</i>	Sheep fescue
<i>Hesperostipa comata (Stipa comata)</i>	Needle-and-thread
<i>Koeleria macrantha (Koeleria pyramidata)</i>	Junegrass
<i>Lophopyrum elongatum (Agropyron elongatum)</i>	Tall wheatgrass
<i>Muhlenbergia montana</i>	Mountain muhly
<i>Panicum capillare</i>	Witchgrass
<i>Panicum virgatum</i>	Switchgrass
<i>Pascopyrum smithii (Agropyron smithii)</i>	Western wheatgrass
<i>Poa compressa</i>	Canada bluegrass
<i>Poa fendleriana</i>	Muttongrass
<i>Poa pratensis</i>	Kentucky bluegrass
<i>Schizachyrium scoparium (Andropogon scoparius)</i>	Little bluestem
<i>Setaria viridis</i>	Green floxtail
<i>Sporobolus cryptandrus</i>	Sand dropseed
<i>Thinopyrum intermedium (Agropyrum intermedium)</i>	Intermediate wheatgrass
<i>Triticum aestivum</i>	Wheat

Scientific Binomial (Synonym)	Common Name
<i>Rumex crispus</i>	Curly dock
<i>Potentilla hippiana</i>	Wooly cinquefoil
<i>Rosa arkansana</i>	Prairie rose
<i>Commantra umbellata</i>	Bastard-toadflax
<i>Verbascum blattaria</i>	Moth mullein
<i>Verbascum thapsus</i>	Common mullein
<i>Leiostemon ambiguum</i>	
<i>Physalis virginiana</i>	Virginia ground-cherry
<i>Solanum rostratum</i>	Buffalobur
<i>Verbena bracteata</i>	Prostrate verbena
<i>Viola nuttallii</i>	Yellow prairie violet

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**APPENDIX D**  
**WILDLIFE SPECIES RECORDED IN THE VICINITY OF NWTC**

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## Appendix D

### Wildlife Species Recorded in Vicinity

Common Name	Scientific Binomial
<b>Mammals</b>	
Thirteen-lined ground squirrel (burrows only)	<i>Spermophilus tridecemlineatus</i>
Deer Mouse	<i>Peromyscus maniculatus</i>
Mexican Woodrat	<i>Neotoma mexicana</i>
Prairie Vole	<i>Microtus ochrogaster</i>
Meadow Vole	<i>Microtus pennsylvanicus</i>
Western Harvest Mouse	<i>Reithrodontomys megalotis</i>
Desert cottontail	<i>Sylvilagus audubonii</i>
Masked Shrew	<i>Sorex cinereus</i>
Myotis bats* (acoustical monitoring)	<i>Myotis sp.</i>
Big brown bat (acoustical monitoring)	<i>Eptesicus fuscus</i>
Fringed myotis (acoustical monitoring)	<i>Myotis thysanodes</i>
Silver-haired bat (acoustical monitoring)	<i>Lasionycteris noctivagans</i>
Hoary bat (acoustical monitoring)	<i>Lasiurus cinereus</i>
Eastern red bat (acoustical monitoring)	<i>Lasiurus borealis</i>
Coyote (scat only)	<i>Canis latrans</i>
American elk	<i>Cervus canadensis</i>
Mule deer (beds)	<i>Odocoileus hemionus</i>
<b>Amphibians</b>	
Boreal chorus frog	<i>Pseudacris maculata</i>
Woodhouse's toad (deceased)	<i>Bufo woodhousii</i>
<b>Reptiles</b>	
Bull snake (observed on road)	<i>Pituophis catenifer</i>
<b>Terrestrial Arthropods</b>	
Checkered white	<i>Pontia protodice</i>
Western white	<i>Pontia occidentalis</i>
Cabbage white	<i>Pieris rapae</i>
Orange sulphur	<i>Colias eurytheme</i>
Dainty sulphur	<i>Nathalis iole</i>
Gray hairstreak	<i>Strymon melinus</i>
Aphrodite fritillary	<i>Speyeria aphrodite</i>
Common wood nymph	<i>Cercyonis pegala</i>

\*Included in this group may be one or more of the following species: western small-foot myotis, western long-eared myotis, little brown bat, and long-legged myotis.



**APPENDIX E**  
**ENVIRONMENTAL PERMITS, NOTIFICATIONS, AND**  
**REGISTRATIONS**



## APPENDIX E

### ENVIRONMENTAL PERMITS, NOTIFICATIONS, AND REGISTRATIONS

NWTC site operations and/or implementation of the Proposed Action involve or may involve permits, notifications, and registrations of the types listed in NREL's Environmental Performance Report 2011 (NREL 2011). Additional project-specific permits may be associated with the Proposed Action. Both current and potential permits, notifications, and registrations are listed in the table below.

#### Environmental Permits, Notifications, and Registrations applicable to NWTC

Type	Location/ Description	Category	Issuing Agency	ID #	Permit or Registration Status
Current Site-Wide Permits, Notifications, and Registrations (NREL 2011)					
Air	Laboratory-wide servicing of CFC-containing equipment	Notification	CDPHE Air Pollution Control Division	647	Completed
Air	NWTC Site 4.0 diesel-fired emergency generator	Permit	CDPHE Air Pollution Control Division	10JE1712	Active
Drinking water system	NWTC drinking water system ID number	Registration	CDPHE Water Quality Control Division	CO0230860	In Effect; Does Not Expire
Hazardous waste	NWTC RCRA hazardous waste generator status EPA ID	Notification	CDPHE Hazardous Materials and Waste Management Division	COD983802448	Completed
Storm Water	NWTC pedestrian safety construction project	Permit	EPA	COR10ES2F	Active
Storm Water	NWTC dynamometer expansion construction project	Permit	EPA	COR10EP6F	Active
Storm Water	NWTC site entrance construction project	Permit	EPA	COR10E06F	Active
Potential Project-specific Permits, Notifications, and Registrations associated with Proposed Action					
Aboveground Tanks	Some aboveground tanks containing chemicals, oils, fuels, and other fluids require registration,	Registration	Colorado Department of Labor, Division of Oil and Public Safety	NA	NA

Type	Location/ Description	Category	Issuing Agency	ID #	Permit or Registration Status
Air	For fugitive construction dust, depending upon duration and area of disturbance	Permit	CDPHE Air Pollution Control Division	NA	NA
Air	For proposed standby generators, depending upon pollutants and emissions.	Permit	CDPHE Air Pollution Control Division	NA	NA
Air	For minor HAPs sources depending upon emissions	Permit	CDPHE Air Pollution Control Division	NA	NA
Airport height restrictions	New turbines and towers require coordination to address FAA requirements associated with Jefferson County Airport height restrictions and Form 7460-1, Notice of Proposed Construction or Alteration may be required.	Notification	FAA	NA	NA
Geology	Notification of Surface Development may be required to mineral estate owners	Notification	Jefferson County Clerk	NA	NA
Groundwater	For activities that could impact groundwater, e.g., drinking water, groundwater monitoring, or geothermal installations	Permit	State of Colorado Office of State Engineers	NA	NA
Storm Water	For construction sites, depending upon area disturbed. A Notice of Intent must be filed under the Construction General Permit.	Notification	EPA	NA	NA
Waste Management	Notification to DOE's emergency notification system is required for spills exceeding a reporting threshold.	Notification	DOE	NA	NA
Wetlands	Clean Water Act, Section 404 permits could be required for certain actions involving "wetlands" and other waters of the United States	Permit	USACE	NA	NA

Type	Location/ Description	Category	Issuing Agency	ID #	Permit or Registration Status
Wildlife	For activities that may affect a listed species, the agency is required to consult with the USFWS. Incidental take permit could be required.	Permit	USFWS	NA	NA
Wildlife	For “taking” of eagles, permit is required by Bald and Golden Eagle Protection Act	Permit	USFWS	NA	NA
Wildlife	For measurable negative impact on migratory birds, EO 13186 requires the responsible agency to consult with the USFWS and obtain a Migratory Bird Depredation Permit.	Permit	USFWS	NA	NA

Reference: NREL Environmental Performance Report 2011, Annual Site Environmental Report per the U.S. Department of Energy Order 231.1B



**APPENDIX F**  
**CONSULTATION LETTERS**





## Department of Energy

Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

August 20, 2013

Donna Warren  
Manager, Environmental Policy Team  
AJV-114  
Federal Aviation Administration  
800 Independence Ave SW  
Room 422  
Washington, DC 20591

SUBJECT: NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION  
PROPOSED IMPROVEMENTS FOR THE  
DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY  
CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY,  
GOLDEN, CO (DOE/EA-1914)

Dear Ms. Warren:

The U.S. Department of Energy (DOE) is notifying the Federal Aviation Administration (FAA), under the National Environmental Policy Act (NEPA), of the proposed improvements to the National Wind Technology Center (NWTC). The NWTC is located in Jefferson County, Colorado (Figure 1). The mailing address for the NWTC is 18299 West 20<sup>th</sup> Avenue, Louisville, CO 80027. DOE is completing a Site-Wide Environmental Assessment (EA) of the NWTC to include analysis of potential environmental impacts due to continued operations and future site development.

### **Background**

Currently, four utility-scale turbines over 200 feet above ground level (AGL) are located at the NWTC. In addition, six meteorological towers over 199 feet AGL are onsite. Several other mid-scale and small-scale turbines exist onsite. For each structure, per the requirements outline in CFR Title 14 Part 77.9, a FAA Form 7460-1 (Notice of Proposed Construction or Alteration) was completed by NREL Environmental personnel and submitted to the FAA Obstruction Evaluation Group for a hazard determination. **Table 1** presents the existing turbines and meteorological towers; as well as, respective heights of the structures.

**Table 1. Existing Turbines and Meteorological Towers at the NWTC**

Size Range	Number of Turbines	Hub Height (feet)	Rotor Blade Diameter (feet)	Max. Rotor Blade Tip Height (feet) <sup>a</sup>	Max. Height Meteorological Towers (feet)
Utility-scale	4	262 to 295	253 to 331	459	443
Mid-scale	3	75 to 120	62 to 138	189	262
Small-scale	9	30 to 80	7 to 28	94	262

<sup>a</sup> Maximum height from ground to tip of rotor blade at highest point of rotation.

**Project Description**

The Proposed Action would add wind turbines and meteorological towers to potentially include any combination of up to seven large utility-scale wind turbines, up to seven mid-scale turbines and thirty meteorological towers at the NWTC, as described below in **Table 2**. In addition, several small-scale turbines are proposed.

**Table 2. Total Proposed Wind Turbines and Meteorological Towers at the NWTC**

Size Range	Max. Number of Turbines	Max. Hub Height (feet)	Max. Rotor Blade Diameter (feet)	Max. Rotor Blade Tip Height (feet) <sup>a</sup>	Max. Height Meteorological Towers (feet) <sup>b</sup>
Utility-scale	7	328	492	574	656
Mid-scale	7	295	331	462	545
Small-scale	20	80	62	112	262

<sup>a</sup> Maximum height from ground to tip of rotor blade at highest point of rotation.

<sup>b</sup> Assumes meteorological tower height is 82 feet (25 meters) above maximum rotor height.

For this proposed action, three additional utility-scale turbines, four additional mid-scale turbines and eleven meteorological towers would potentially be greater than 200 feet AGL. The turbines and towers could be located anywhere within the boundary of the NWTC.

Since the specific locations of the turbines have not been selected, the boundaries of NWTC are shown on Figure 1 (attached), using latitude/longitude coordinates to complete a polygon that would enclose the potential turbine locations.

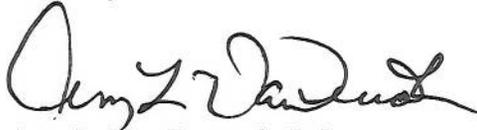
**Table 3. NWTC Boundary Coordinates**

Potential Turbine Boundary	Latitude	Longitude
NW Point A	N 39 degrees 54' 50.34"	W 105 degrees 14' 11.53"
NE Point B	N 39 degrees 54' 50.57"	W 105 degrees 13' 6.32"
S Point C	N 39 degrees 54' 24.68"	W 105 degrees 14' 11.06"
S Point D	N 39 degrees 54' 24.33"	W 105 degrees 13' 40.16"
S Point E	N 39 degrees 54' 16.62"	W 105 degrees 13' 40.24"
S Point F	N 39 degrees 54' 20.60"	W 105 degrees 13' 20.16"

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For each structure, per the requirements outline in CFR Title 14 Part 77.9, a FAA Form 7460-1 (Notice of Proposed Construction or Alteration) would be completed by NREL Environmental personnel and submitted to the FAA Obstruction Evaluation Group for a hazard determination.

We appreciate your continued coordination regarding projects at NREL, and we look forward to working with the FAA in the future. Please feel free to contact me at 720-356-1568 if you have any questions regarding this project.

Sincerely,

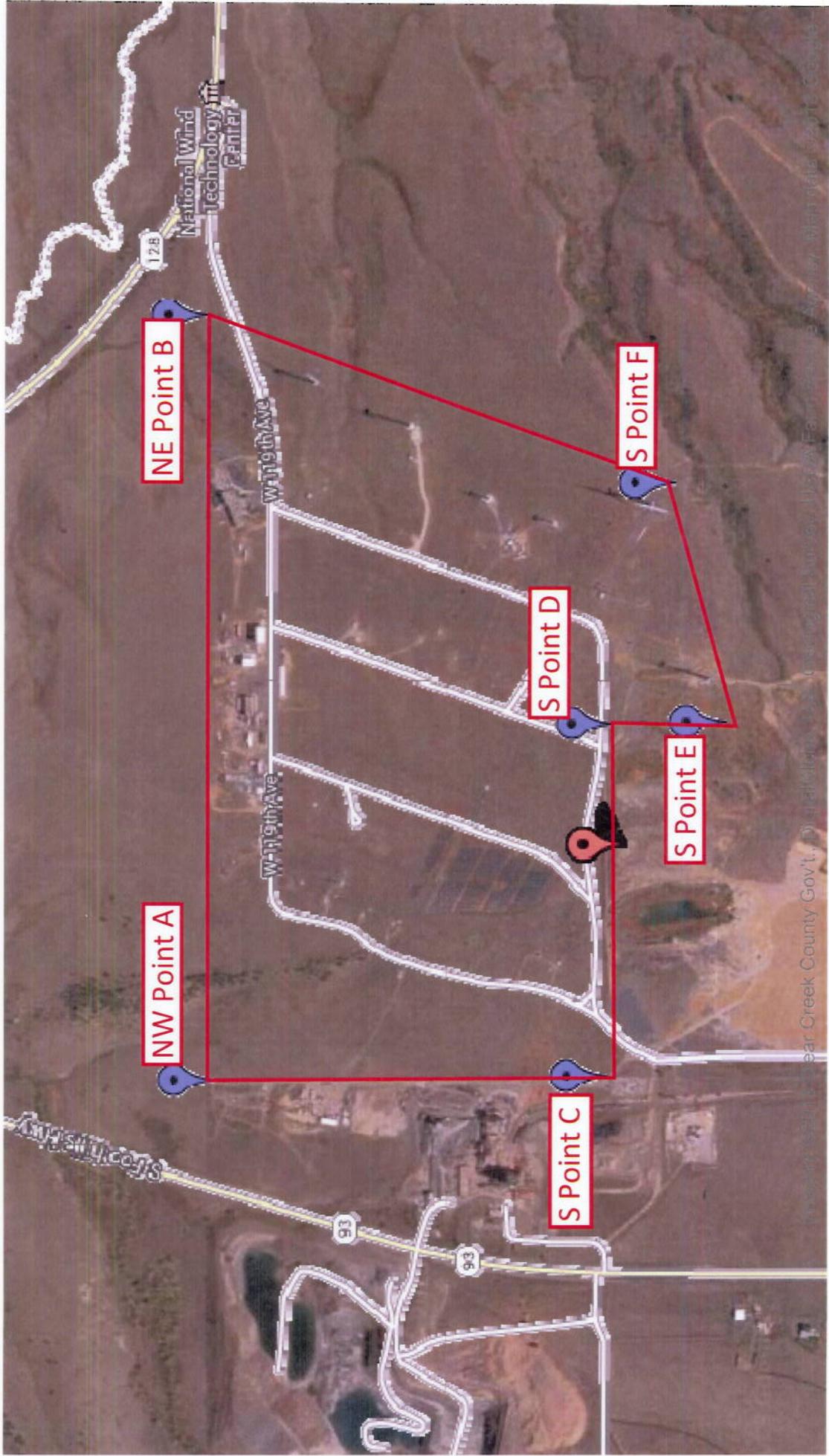


Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Enclosures: Figure 1  
FAA Form 7460-1

cc: Chris Cody, FAA  
Donna O'Neill, FAA

Figure 1 - Polygon of NWTC Property Boundary (Approximate)



## NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

### §77.13 Construction or alteration requiring notice.

(a) Except as provided in §77.15, each sponsor who proposes any of the following construction or alteration shall notify the Administrator in the form and manner prescribed in §77.17.

(1) Any construction or alteration of more than 200 feet in height above the ground level at its site.

(2) Any construction or alteration of greater height than imaginary surface extending outward and upward at one of the following slopes:

(i) 1 00 to 1 for horizontal distance of 20,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a)(5) or this section with at least one runway more than 3,200 feet in actual length, excluding heliports.

(ii) 50 to 1 for horizontal distance of 10,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a)(5) of this section with its longest runway no more than 3,200 feet in actual length, excluding heliports.

(iii) 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area of each heliport specified in paragraph (a)(5) of this section.

(3) Any highway, railroad, or other traverse way for mobile objects, of a height which, if adjusted upward 17 feet for an Interstate Highway that is part of the National System of Military and Interstate Highways where overcrossings are designed for a minimum of 17 feet vertical distance, 16 feet for any other public roadway, 10 feet or the height of the highest mobile object that would normally traverse the road, whichever is greater, for a private road, 23 feet for a railroad, and for a waterway or any other traverse way not previously mentioned, an amount equal to the height of the highest mobile object that would normally traverse it, would exceed a standard of paragraph (a)(1) or (2) of this section.

(4) When requested by the FAA, any construction or alteration that would be in an instrument approach area (defined in the FAA standards governing instrument approach procedures) and available information indicates it might exceed a standard of Subpart C of this part.

(5) Any construction or alteration on any of the following airports (including heliports):

(i) An airport that is available for public use and is listed in the Airport Directory of the current Airmen's Information Manual or in either the Alaska or Pacific Airmen's Guide and Chart Supplement.

(ii) An airport under construction, that is the subject of a notice or proposal on file with the Federal Aviation Administration, and except for military airports, it is clearly indicated that airport will be available for public use.

(iii) An airport that is operated by an armed force of the United States.

(b) Each sponsor who proposes construction or alteration that is the subject of a notice under paragraph (a) of this section and is advised by an FAA regional office that a supplemental notice is required shall submit that notice on a prescribed form to be received by the FAA regional office at least 48 hours before the start of construction or alteration.

(c) Each sponsor who undertakes construction or alteration that is the subject of a notice under paragraph (a) of this section shall, within 5 days after that construction or alteration reaches its greatest height, submit a supplemental notice on a prescribed form to the FAA regional office having jurisdiction over the region involved, if –

(1) The construction or alteration is more than 200 feet above the surface level of its site; or

(2) An FAA regional office advises him that submission of the form is required.

### §77.15 Construction or alteration not requiring notice.

No person is required to notify the Administrator for any of the following construction or alteration:

(a) Any object that would be shielded by existing structures of a permanent and substantial character or by natural terrain or topographic features of equal or greater height, and would be located in the congested area of a city, town, or settlement where it is evident beyond all reasonable doubt that the structure so shielded will not adversely affect safety in air navigation.

(b) Any antenna structure of 20 feet or less in height except one that would increase the height of another antenna structure.

(c) Any air navigation facility, airport visual approach or landing air, aircraft arresting device, or meteorological device, of a type approved by the Administrator, or an appropriate military service on military airports, the location and height of which is fixed by its functional purpose.

(d) Any construction or alteration for which notice is required by any other FAA regulation.

### §77.17 Form and time of notice

(a) Each person who is required to notify the Administrator under §77.13 (a) shall send one executed form set of FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. Copies of FAA Form 7460-1 may be obtained from the headquarters of the Federal Aviation Administration and the regional offices.

(b) The notice required under §77.13 (a)(1) through (4) must be submitted at least 30 days before the earlier of the following dates –

(1) The date the proposed construction or alteration is to begin.

(2) The date an application for a construction permit is to be filed.

However, a notice relating to proposed construction or alteration that is subject to the licensing requirements of the Federal Communications Act may be sent to the FAA at the same time the application for construction is filed with the Federal Communications Commission, or at any time before that filing.

(c) A proposed structure or an alteration to an existing structure that exceeds 2,000 feet in height above the ground will be presumed to be a hazard to air navigation and to result in an inefficient utilization of airspace and the applicant has the burden of overcoming that presumption. Each notice submitted under the pertinent provisions of this part 77 proposing a structure in excess of 2,000 feet above ground, or an alteration that will make an existing structure exceed that height, must contain a detailed showing directed to meeting this burden. Only in exceptional cases, where the FAA concludes that a clear and compelling showing has been made that it would not result in an inefficient utilization of the airspace and would not result in a hazard to air navigation, will a determination of no hazard be issued.

(d) In the case of an emergency involving essential public services, public health, or public safety that required immediate construction or alteration, the 30 day requirement in paragraph (b) of this section does not apply and the notice may be sent by telephone, telegraph, or other expeditious means, with an executed FAA Form 7460-1 submitted within five (5) days thereafter. Outside normal business hours, emergency notices by telephone or telegraph may be submitted to the nearest FAA Flight Service Station.

(e) Each person who is required to notify the Administrator by paragraph (b) or (c) of §77.13, or both shall send an executed copy of FAA Form 7460-2, Notice of Actual Construction or Alteration, to the Manager, Air Traffic Division, FAA Regional Office having jurisdiction over the area involved.

Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office Obstruction Evaluation Service, AJR-322  
2601 Meachum Boulevard  
Fort Worth, TX 76193  
Fax: 817-838-1991  
Phone: 817-838-1990

Website: <https://oeaaa.faa.gov>

## INSTRUCTIONS FOR COMPLETING FAA FORM 7460-1

**PLEASE TYPE or PRINT**

**ITEM #1.** Please include the name, address and phone number of a personal contact point as well as the company name.

**ITEM #2.** Please include the name, address and phone number of a personal contact point as well as the company name.

**ITEM #3.** New Construction would be a structure that has not yet been built.

Alteration is a change to an existing structure such as the addition of a side mounted antenna, a change to the marking and lighting, a change to power and/or frequency, or a change to the height. The nature of the alteration shall be included in **ITEM #21 "Complete Description of Proposal"**.

Existing would be a correction to the latitude and/or longitude, a correction to the height, or if filing on an existing structure which has never been studied by the FAA. The reason for the notice shall be included in **ITEM #21 "Complete Description of Proposal"**.

**ITEM #4.** If Permanent, so indicate. If Temporary, such as a crane or drilling derrick, enter the estimated length of time the temporary structure will be up.

**ITEM #5.** Enter the date that construction is expected to start and the date that construction should be completed.

**ITEM #6.** Please indicate the type of structure. **DO NOT LEAVE BLANK.**

**ITEM #7.** In the event that obstruction marking and lighting is required, please indicate type desired. If no preference, check "other" and indicate "no preference" **DO NOT LEAVE BLANK.** **NOTE:** High Intensity lighting shall be used only for structures over 500' AGL. In the absence of high intensity lighting for structures over 500' AGL, marking is also required.

**ITEM #8.** If this is an existing tower that has been registered with the FCC, enter the FCC Antenna Structure Registration number here.

**ITEM #9 and #10.** Latitude and longitude must be geographic coordinates, accurate to within the nearest second or to the nearest hundredth of a second if known. Latitude and longitude derived solely from a hand-held GPS instrument is **NOT acceptable**. A hand-held GPS is only accurate to within 100 meters (328 feet) 95 percent of the time. This data, when plotted, should match the site depiction submitted under **ITEM #20**.

**ITEM #11.** NAD 83 is preferred; however, latitude and longitude may be submitted in NAD 27. Also, in some geographic areas where NAD 27 and NAD 83 are not available other datums may be used. It is important to know which datum is used. **DO NOT LEAVE BLANK.**

**ITEM #12.** Enter the name of the nearest city and state to the site. If the structure is or will be in a city, enter the name of that city and state.

**ITEM #13.** Enter the full name of the nearest public-use (*not private-use*) airport or heliport or military airport or heliport to the site.

**ITEM #14.** Enter the distance from the airport or heliport listed in #13 to the structure.

**ITEM #15.** Enter the direction from the airport or heliport listed in #13 to the structure.

**ITEM #16.** Enter the site elevation above mean sea level and expressed in whole feet rounded to the nearest foot (e.g. 17'3" rounds to 17' 17'6" rounds to 18"). This data should match the ground contour elevations for site depiction submitted under **ITEM #20**.

**ITEM #17.** Enter the total structure height above ground level in whole feet rounded to the next highest foot (e.g. 17'3" rounds to 18"). The total structure height shall include anything mounted on top of the structure, such as antennas, obstruction lights, lightning rods, etc.

**ITEM #18.** Enter the overall height above mean sea level and expressed in whole feet. This will be the total of **ITEM #16 + ITEM #17**.

**ITEM #19.** If an FAA aeronautical study was previously conducted, enter the previous study number.

**ITEM #20.** Enter the relationship of the structure to roads, airports, prominent terrain, existing structures, etc. Attach an 8-1/2" x 11" non-reduced copy of the appropriate 7.5 minute U.S. Geological Survey (USGS) Quadrangle Map MARKED WITH A PRECISE INDICATION OF THE SITE LOCATION. To obtain maps, contact USGS at 1-800-435-7627 or via internet at "<http://mapping.usgs.gov>". If available, attach a copy of a documented site survey with the surveyor's certification stating the amount of vertical and horizontal accuracy in feet.

### **ITEM #21.**

- For transmitting stations, include maximum effective radiated power (ERP) and all frequencies.
- For antennas, include the type of antenna and center of radiation (Attach the antenna pattern, if available).
- For microwave, include azimuth relative to true north.
- For overhead wires or transmission lines, include size and configuration of wires and their supporting structures (Attach depiction).
- For each pole/support, include coordinates, site elevation, and structure height above ground level or water.
- For buildings, include site orientation, coordinates of each corner, dimensions, and construction materials.
- For alterations, explain the alteration thoroughly.
- For existing structures, thoroughly explain the reason for notifying the FAA (e.g. corrections, no record or previous study, etc.).

**Filing this information with the FAA does not relieve the sponsor of this construction or alteration from complying with any other federal, state or local rules or regulations. If you are not sure what other rules or regulations apply to your proposal, contact local/state aviation and zoning authorities.**

**Paperwork Reduction Work Act Statement:** This information is collected to evaluate the effect of proposed construction or alteration on air navigation and is not confidential. Providing this information is mandatory for anyone proposing construction or alteration that meets or exceeds the criteria contained in 14 CFR, part 77. We estimate that the burden of this collection is an average 19 minutes per response. An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control number for this collection is 2120-0001. Comments concerning the accuracy of this burden and suggestions for reducing the burden should be directed to the FAA at: 800 Independence Ave. SW, Washington, DC 20591, Attn: Information Collection Clearance Officer, ABA-20



**Date:** July 11, 2013

**Type of Notification:** NEW

**Project:** Department of Energy's National Wind Technology Center  
Long-Term Site Improvements (5-10 years)

**County:** Jefferson

**State:** Colorado

**Project Sponsor:** U.S Department of Energy: Energy Efficiency and Renewable Energy

**DOE NEPA** Lori Gray  
**Compliance Officer:** Phone: (720) 356-1568

**DOE Mailing**  
**Address:** Department of Energy-Golden Field Office  
c/o Lori Gray  
1617 Cole Blvd  
Golden, CO 80401

**Facility Location:**  
**GPS Coordinates**  
**(Main Bldg):** N 39 degrees 54' 47.35" and W 105 degrees 13' 21.78"

**Street Address:** 18299 West 120th Avenue  
Louisville, CO 80027

**Turbine & Meteorological Tower Description:**

**Table 1. Total Proposed Wind Turbines and Meteorological Towers at the NWTC**

Size Range	Output	Max. Number of Turbines	Max. Hub Height (meters)	Max. Rotor Blade Diameter (meters)	Max. Rotor Blade Tip Height (meters) <sup>a</sup>	Max. Height Meteorological Towers (meters) <sup>b</sup>
Utility-scale	1 MW to 5 MW	7	100	150	175	200
Mid-scale	100 kW to 1 MW	7	90	101	141	166
Small-scale	1 W to 100 kW	20	24	19	34	80

<sup>a</sup> Maximum height from ground to tip of rotor blade at highest point of rotation.

<sup>b</sup> Assumes up to 30 meteorological towers.

**Monitoring Equipment Description:**

Meteorological tower data collection could be used in combination with remote sensing devices, such as LIDAR or sound detection and ranging (SODAR) equipment. SODAR is a meteorological instrument used as a wind profiler to measure the scattering of sound waves by atmospheric turbulence. SODAR systems are used to measure wind speed at various heights above the ground, and the thermodynamic structure of the lower layer of the atmosphere. SODAR systems are like radar (radio detection and ranging) systems except that sound waves rather than radio waves are used for detection. LIDAR is a remote sensing technology that measures distance by illuminating a target with a laser and analyzing the reflected light.

Up to 10 cube-shaped or trailer-mounted LIDAR and/or SODAR devices would be installed at various field test sites at any one time.

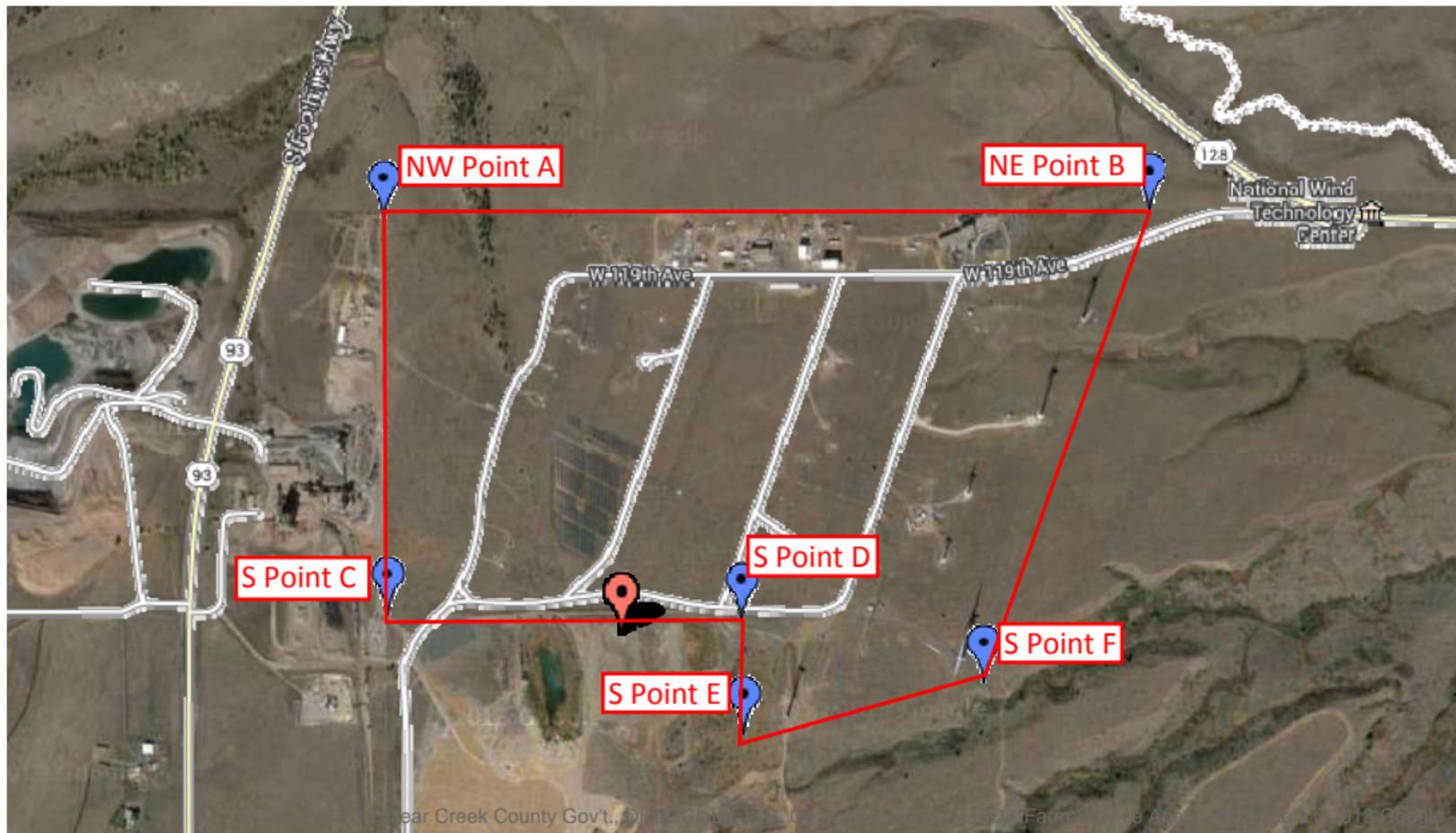
**Proposed Locations (Facility Boundary Points):**

The specific locations of the turbines, meteorological towers and monitoring equipment have not been selected. Locations could be anywhere within the boundaries of the facility. Using latitude/longitude coordinates, a polygon was created to enclose the potential locations.

Potential Turbine Boundary	Latitude	Longitude
NW Point A	N 39 degrees 54' 50.34"	W 105 degrees 14' 11.53"
NE Point B	N 39 degrees 54' 50.57"	W 105 degrees 13' 6.32"
S Point C	N 39 degrees 54' 24.68"	W 105 degrees 14' 11.06"
S Point D	N 39 degrees 54' 24.33"	W 105 degrees 13' 40.16"
S Point E	N 39 degrees 54' 16.62"	W 105 degrees 13' 40.24"
S Point F	N 39 degrees 54' 20.60"	W 105 degrees 13' 20.16"

**Maps:** PLEASE SEE ATTACHED (Figure 1)

Figure 1 - Polygon of NWTC Property Boundary (Approximate)



**Submitted to:**

Edward Davison

Email: [edavison@ntia.doc.gov](mailto:edavison@ntia.doc.gov)

Work Phone: (202) 482-5526

National Telecommunications & Information Administration (NTIA)

Domestic Spectrum Policies & IRAC Support Division (DSID)

&

Joyce C. Henry

Email: [jhenry@ntia.doc.gov](mailto:jhenry@ntia.doc.gov)

Work Phone: (202) 482-1850/51

National Telecommunications & Information Administration (NTIA)

Office of Spectrum Management/HQ



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

SEP 10 2013

Ms. Lori Gray  
US Department of Energy-Golden Field Office  
1617 Cole Blvd.  
Golden, CO 80401

Re: National Wind Technology Project: Jefferson County, CO

Dear Ms. Gray:

In response to your request on July 11, 2013, the National Telecommunications and Information Administration provided to the federal agencies represented in the Interdepartment Radio Advisory Committee (IRAC) the plans for the National Wind Technology Center Project, located in Jefferson County, Colorado.

After a 45+ day period of review, there was one agency, the **Department of the Navy**, who had issues with turbine placement in this area. Comments from the DON reviewer are as follows:

Research reveals possible harmful impact to the Department of the Navy systems. Point of contact for these comments is Mr. Ken Stowe, NMSC, DISA, phone, 301-225-3833, or fax 301-225-0583, e-mail [ken.stowe@navy.mil](mailto:ken.stowe@navy.mil), or [kenneth.stowel@navy.smil.mil](mailto:kenneth.stowel@navy.smil.mil).

While the other IRAC agencies did not identify any concerns regarding radio frequency blockage, this does not eliminate the need for the wind energy facilities to meet any other requirements specified by law related to these agencies. For example, this review by the IRAC does not eliminate any need that may exist to coordinate with the Federal Aviation Administration concerning flight obstruction.

Thank you for the opportunity to review these proposals.

Sincerely,

Karl B. Nebbia  
Associate Administrator  
Office of Spectrum Management

**From:** [Stowe, Ken L CIV NMSC](#)  
**To:** ["Joyce Henry"](#)  
**Cc:** [Pearce, Elvira CIV NMSC](#); [Copeland, Guy G CIV NMSC](#); [Potter, Russell W. CIV NMCSO NW](#)  
**Subject:** RE: [faslist] ^^WindMill Action Item^^: National Wind Technology Project: Jefferson County, CO  
**Date:** Monday, December 16, 2013 12:33:46 PM

---

Good Afternoon Joyce,

Please be advised that after further analysis, my research reveals no possible harmful impact to the Department of the Navy systems.

Thank You,

Mr. Ken Stowe  
Frequency Assignment Subcommittee Rep  
Navy & Marine Corps Spectrum Center (NMSC)  
Defense Information System Agency  
6916 Cooper Avenue  
ATTN: NMSC SMO 41518  
P.O. Box 549  
Ft. Meade, MD 20755-0549  
COM: (301) 225-3833  
DSN: 375-3833  
FAX: 301-225-0583  
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CLASSIFICATION: UNCLASSIFIED For Official Use Only



**Department of Energy**  
Golden Field Office  
15013 Denver West Parkway  
Golden, Colorado 80401

October 22, 2013

Susan Linner, Colorado Field Supervisor  
U.S. Fish and Wildlife Service  
P.O. Box 25486  
Denver Federal Center  
(MS 65412)  
Denver, Colorado 80225

**SUBJECT: INITIATION OF INFORMAL SECTION 7 CONSULTATION, COMPLIANCE WITH MIGRATORY BIRD TREATY ACT & BALD AND GOLDEN EAGLE PROTECTION ACT - PROPOSED IMPROVEMENTS FOR THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY, GOLDEN, CO (DOE/EA-1914)**

Dear Ms. Linner:

The U.S. Department of Energy (DOE) is initiating informal consultation pursuant to the requirements under Section 7(a)(2) of the Endangered Species Act and the U.S. Fish and Wildlife Service (USFWS) implementing regulations (50 CFR part 402). DOE is also coordinating with your office, as required under the National Environmental Policy Act (NEPA) for the proposed improvements to DOE's National Wind Technology Center (NWTC) at the National Renewable Energy Laboratory (NREL). The NWTC is located in Jefferson County, Colorado.

DOE is currently preparing a Site-Wide Environmental Assessment (EA) of the continued operation and future site development of the NWTC.

A Notice of Scoping for this Site-Wide EA was sent to you to in September 2012. DOE requested that interested parties provide comments, during a 30-day public comment period, on any potential issues or impacts of implementing the Proposed Action, at that time. Due to input received during the scoping period, the Proposed Action description has been revised. A revised Proposed Action is provided in **Attachment I**.

Periodically, surveys are conducted to identify plant and animal species on or near the NWTC to provide data for environmental impacts analysis. A list of surveys is presented in **Table 1** below.

**Table 1. Surveys**

Type of Survey	Duration	Locations
Raptor Surveys (Monahan, 1996)	17 months	Various vantage points on perimeter or interior roads
Bird and Bat Use and Fatalities Survey (Schmidt et al. 2003)	One year	<ul style="list-style-type: none"> <li>• Six locations on the NWTC</li> <li>• Five locations on Rocky Flats</li> <li>• Seven locations on Boulder County open space</li> </ul>
NWTC Site-Wide EA (2002)	Pre-2002	Summary of various studies
April 2010 Fixed-Point Raptor Migration Survey (Eco-Logic 2011)	One month April 2010	One point at western edge of NWTC
Avian Use of NWTC - Fixed Point (Tetra Tech, 2011a)	One year Jan 2010 - 2011	<ul style="list-style-type: none"> <li>• 6 locations on NWTC</li> <li>• 3 locations on Rocky Flats National Wildlife Refuge</li> <li>• 3 locations on City of Boulder Open Space</li> </ul>
Bird and Bat Mortality Surveys (Tetra Tech, 2011a, 2011b)	One year Aug 2010 - Sep 2011	Around all aerial structures at NWTC
Breeding Bird Surveys (Tetra Tech, 2011a)	May 2011 - Jun 2011	East-west transects, 100 meters apart, across the entire NWTC site
Migratory Nesting Bird Surveys (NREL EHS)	Continuous	NWTC Site
Wetlands Delineation (NREL EHS, 2012)	One-time event	NWTC Site
Wildlife Surveys (Walsh, 2011)	Jul 2010 - May 2011	NWTC Site

Seven parcels of land totaling approximately 69 acres, or 22 percent of the site, have been designated as conservation management areas at the NWTC. These areas protect the site's natural resources and, in the westernmost area, prevent land development within critical wind corridors (upwind fetch areas) as shown on **Figure 3 (Attachment I)**. Designation of specific conservation management areas provides continued protection of the site's unique natural resources. Development at the NWTC is not allowed in drainages, hillside seeps, a seasonal pond, remnant tallgrass prairie within mesic mixed grassland, a prairie dog re-location area, areas designated as ancient soils, or an area designated as critical habitat for the Preble's meadow jumping mouse (the Preble's mouse), a federally listed threatened mammal species.

NREL manages the NWTC to minimize disturbance in these areas and implements protection measures if disturbance occurs, under NREL's natural resource conservation procedure. The procedure outlines further natural resource commitments, such as:

- Preserving existing vegetation;
- Minimizing adverse impacts to natural habitat;
- Practicing sustainable landscaping;
- Performing restoration with native seed mixes;
- Driving on designated roadways;
- Performing ground nesting bird surveys before any activities take place;
- No harming policy for nesting and roosting raptors, bats, snakes, prairie dogs and other wildlife;
- Installing wildlife friendly fencing and corridors; and,
- Practicing weed control.

The Jefferson County Nature Association surveys all of the properties surrounding Rocky Flats and assesses each for weed control. The Jefferson County Nature Association provides an annual report to the Rocky Flats Trustee Council. NWTC land managers have worked closely with the Jefferson County Nature Association and have met with the Jefferson County Weed Coordinator regarding the weed control program at NREL. Of the 16 properties, the NWTC had the best control of noxious weeds and was given the highest rating of "Very Good".

#### **Identified Species at the NWTC**

The USFWS has identified four birds, two fish, three plants, one invertebrate, and four mammal species federally classified as threatened, endangered, proposed, or candidate species under the ESA that could potentially occur in Jefferson and Boulder Counties (USFWS 2013a). In addition, bald and golden eagles have been identified with the potential to occur and are protected under the Bald and Golden Eagle Protection Act. In 2013, species were identified using the USFWS's Information, Planning and Conservation System (IPaC). Species that have the potential to occur at the NWTC are identified in **Table 2**.

Critical habitat for the Preble's mouse was designated by USFWS in the southeastern portion of NWTC as presented in **Figure 3 (Attachment I)**.

**Table 2. Federally Protected Species Found in Jefferson & Boulder Counties, Colorado**

Common Name	Scientific Name	Status	Potential to occur at NWTC
<b>Plants</b>			
Ute ladies' tresses	<i>Spiranthes diluvialis</i>	FT	Yes
Colorado butterfly plant	<i>Gaura neomexicana</i> ssp. <i>coloradensis</i>	FT	Yes
Western prairie fringed orchid	<i>Platanthera praeclara</i>	FT	No
<b>Invertebrates</b>			
Pawnee montane skipper	<i>Hesperia leonardus montana</i>	FT	Yes
<b>Fish</b>			
Greenback cutthroat trout	<i>Oncorhynchus clarki stomias</i>	FT	No
Pallid sturgeon	<i>Scaphirhynchus albus</i>	FE	No
<b>Birds</b>			
Least tern	<i>Sternula antillarum</i>	FE	No
Mexican spotted owl	<i>Strix occidentalis lucida</i>	FT	No
Piping plover	<i>Charadrius melodus</i>	FT	No
Whooping crane	<i>Grus americana</i>	FE	No
Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA	Yes
Golden eagle	<i>Aquila chrysaetos</i>	BGEPA, FSOC	Yes
<b>Mammals</b>			
Preble's meadow jumping mouse	<i>Zapus hudsonius preblei</i>	FT	Yes
Canada lynx	<i>Lynx canadensis</i>	FT	No
Gunnison's prairie dog	<i>Cynomys gunnisoni</i>	FC	No
North American wolverine	<i>Gulo gulo luscus</i>	PT	No
Sources: USFWS 2013a Status Codes: BGEPA = Bald and Golden Eagle Protection Act FC= Federal Candidate FE = Federally Listed Endangered FSOC = Federal Species of Concern FT = Federally Listed Threatened PT = Proposed Threatened			

**Federally Threatened and Endangered Species**

*Ute ladies'-tresses orchid and Colorado butterfly plant.* Two federally listed threatened plant species, Ute ladies'-tresses orchid and Colorado butterfly plant have the potential to occur at the NWTC. Although marginal habitat for both Ute ladies' tresses and the Colorado butterfly plant occur at NWTC, no species were found during two consecutive years of surveys in 2000 and 2001, as documented in the 2002 NWTC Site-Wide EA. The subsequent 2010-2011 vegetation surveys did not identify individuals of these species (Walsh, 2011). For Ute ladies'-tresses orchid, ephemeral drainages and wetlands on NWTC generally have dense, overgrown vegetation and are not suitable habitat for this species. DOE has concluded that the Proposed Action will *not affect* these listed species as they have not been identified onsite. However, periodic plant surveys are conducted at the

NWTC and if these species are identified, proper management practices would be used and their existence would be documented.

***Pawnee Montane Skipper.*** A member of the butterfly family, the Pawnee montane skipper is a subspecies only occurring in the South Platte Canyon River drainage system in Colorado, which includes portions of Jefferson County, south of the NWTC. Listed as threatened under the ESA in 1987, this skipper occurs in dry, open, ponderosa pine woodlands and has the potential to occur in the northwestern portion of NWTC, in the ponderosa pine area. This area is protected within the designated conservation management area onsite and no activities are being proposed in this area. DOE has concluded that the Proposed Action will *not affect* these listed species as any habitat that would support these two species is within the designated conservation management area and the Proposed Action would not take place in this area.

***Preble's Meadow Jumping Mouse.*** The federally threatened Preble's mouse is the only federally listed species known to occur in close proximity to the NWTC. The Preble's mouse only occurs in Colorado and Wyoming. Historically, they occurred from the Front Range of Colorado east to the South Platte River, and from Colorado Springs north to the North Platte River in Wyoming.

Although the Preble's mouse has not been captured or detected on NWTC during surveys, it does have the potential to occur on the riparian fringe wetlands on the southeastern portion of NWTC. Creeks located east of the NWTC are known to be inhabited by this mouse farther downstream, offsite on the adjacent Rocky Flats Wildlife Refuge. Critical habitat for the Preble's mouse was designated by USFWS in a small area (0.5 acre) in southeastern portion of NWTC. This area is under protection within a NREL conservation management area, since it is considered critical habitat. The habitat designated by USFWS offsite includes the stream width plus 394 feet on either side (Federal Register 50 CFR Part 17). No ground-disturbing activities are proposed within 2,500 feet of or within the critical habitat for the Proposed Action in this protected area, as shown on **Figure 2** and **Figure 3**.

DOE has concluded that the Proposed Action *may affect but is not likely to adversely affect* this listed species or its critical habitat. The Preble's critical habitat on the NWTC is protected in a conservation management area, and the Preble's mouse has not been identified onsite during small mammal surveys. However, periodic animal surveys are conducted at the NWTC and if Preble's are identified, proper management practices would be continued and their existence would be documented.

#### **Bald and Golden Eagle Protection Act & Migratory Bird Treaty Act**

***Bald Eagle.*** Although not federally listed under the ESA, the bald eagle remains protected under the Bald and Golden Eagle Protection Act (BGEPA). The bald eagle migrates during the spring and fall, but generally it follows the major river systems of the state or the hogback (a steep ridge) west of the NWTC. Eagles are typically attracted to large open-water bodies and, due to lack of current suitable habitat at the NWTC, any occurrences would likely involve transient or hunting individuals. Historically, bald eagles have been observed in transit to roosting areas. In addition, a pair of bald eagles was observed nesting in a plains cottonwood stand in the Coal Creek drainage channel approximately 2.5 miles northeast of the NWTC. Local ornithologists report five breeding bald eagle pairs existed in Boulder County during 2008-2010 surveys, including the Coal Creek pair (Hallock and Jones 2010). A nesting pair also exists at Standley Lake located 3.8 miles from the NWTC in Jefferson County. The closest nest is 2.5 miles (or 13,200 feet) northeast of the NWTC.

**Golden Eagle.** Golden eagles use a wide range of habitats including pinyon-juniper woodlands, sagebrush, and grasslands, usually in higher elevations of the western U.S. They build large nests in high places (mainly cliffs) to which they may return for several breeding years. Although golden eagles breed primarily in mountainous habitats in Colorado, there is some limited breeding in the northeastern portion of the state. In winter, golden eagles range widely and occur commonly throughout Colorado. During April 2010, Dinosaur Ridge Raptor Migration Station observers tallied seven golden eagles in migration over the I-70/Morrison Hogback viewing station, located approximately eight miles southwest of the NWTC. Any occurrences at the NWTC would likely involve transient or hunting individuals.

The Proposed Action could have minor impacts on migratory birds, bald eagles and golden eagles due to ground disturbing activities and additional aerial structures at the site. Two types of impacts could affect avian species: some loss of habitat in the Proposed Action footprint and potential collisions with the wind turbines and meteorological tower guy wires.

The loss of habitat from implementing the Proposed Action includes xeric mixed grassland that could be potential foraging habitat for prey species or raptors. There would be a small increase in impervious surface areas of approximately 5 acres for new construction and 7.5 acres for proposed wind turbine towers and associated structures. Installing an electrical substation would increase the impervious surface area by approximately 1.25 acres. The total increase is estimated at 13.75 acres or 4.5% of the total NWTC land area of 305 acres.

As the number, size, and overall operational time of turbines increases and more and taller meteorological towers and guy wires are added at the NWTC, the annual rate of fatalities could increase incrementally relative to current conditions. Development of the site could increase fatalities in proportion to the numbers of turbines. In surveys conducted on NWTC in 2010 to 2011, a total of five avian carcasses were found. Avian fatalities were found in every season except winter. These fatalities included black-billed magpie, mourning dove, red-winged blackbird, an unknown sparrow, and an unknown passerine. No raptors carcasses were observed.

For comparison purposes, wind turbines have been considered less significant than other human-caused deaths of birds. Mortalities caused by house cats and collisions with buildings, vehicles, and communication towers are all estimated to have caused billions of avian deaths while wind turbine collisions remain in the thousands. As a reference, airplane strikes have been estimated to be just less than wind turbines in terms of numbers of avian mortalities.

Several variables are involved when considering avian mortality rates for *commercial* wind farms. The NWTC is not a *commercial* wind farm and is considered a research site with relatively small numbers of turbines compared to typical wind farms. In addition, red or dual red and white strobe-like or flashing lights, not steady burning lights, would be added to wind turbines and permanent meteorological towers in accordance with FAA safety requirements and the USFWS land-based wind energy guidelines. The aerial structures at the NWTC pose a negligible threat to resident and migratory birds, including raptors.

The closest bald eagle nest is 2.5 miles (or 13,200 feet) northeast of the NWTC and natural landscape buffers exist between the NWTC and the nesting site. In accordance with the National Bald Eagle Management Guidelines (USFWS 2007), no activities can be conducted within 660 feet of a bald eagle nest; therefore, no impacts to the closest nest are expected as a result of the Proposed Action. If an eagle is injured or a carcass is observed, USFWS will be contacted for additional consultation in accordance with the BGEPA.

No long-term or sustained avian population impacts are likely given industry history and available NWTC site mortality data. For these reasons, long- and short-term, negligible adverse impacts on the bird population would be anticipated from implementing the Proposed Action.

DOE has concluded that there would be *no effect* to the following species:

- Ute ladies'-tresses orchid;
- Colorado butterfly plant; and,
- Pawnee Montane Skipper.

DOE has concluded that the Proposed Action *may affect but is not likely to adversely affect* the Preble's mouse or its designated critical habitat.

We are requesting concurrence from your office with the conclusions in this letter. If USFWS has any concerns or would like additional information please contact me via e-mail at [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov) or by phone at 720-356-1666. In addition, you may mail comments to:

Department of Energy-Golden Field Office  
c/o Amy Van Dercook  
15013 Denver West Parkway  
Golden, Colorado 80401

Please provide acknowledgement of this request within 30 days of the receipt of this letter to assist us in moving the consultation process forward. DOE will include this correspondence in an appendix to the EA. The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Amy L. Van Dercook, P.G.

NEPA Document Manager

U.S. Department of Energy-Golden Field Office

Attachment I – Project Background & Description  
Figures 1 & 2  
Figure 3

## ATTACHMENT I

### **SITE BACKGROUND AND DESCRIPTION**

The National Renewable Energy Laboratory (NREL) is the premier DOE national laboratory dedicated to the research, development, and deployment of renewable energy and energy efficiency technologies. As depicted in **Figure 1**, NREL is comprised of three main sites: 1) South Table Mountain (STM); 2) Denver West Office Park (DWOP); and 3) the National Wind Technology Center (NWTC). Other facilities include the Renewable Fuels and Lubricants (ReFUEL) Research Laboratory and Joyce Street facilities. Details regarding NREL's mission and research programs are available on the NREL website at: <http://www.nrel.gov>.

The 305-acre NWTC is located in northwest Jefferson County, Colorado, approximately 16 miles northwest of Denver. The site is south of Colorado State Highway 128 and directly east of aggregate mining and processing facilities on the east side of Colorado State Highway 93 between Golden and Boulder, Colorado.

There are currently seven major buildings located on the NWTC site that house research and administrative functions and include:

- Administration Building, Building 251;
- Structural Testing Laboratory (STL), Building 254;
- Test Preparation Building (Quonset Hut), Building 260;
- 2.5 MW Dynamometer Test Facility, Building 255;
- 5.0 MW Dynamometer Test Facility, Building 258;
- Distributed Energy Resources Test Facility (DERTF), Building H-1; and,
- Blade Test Facility, Building 252.

All seven major buildings are located in the Research and Support Facilities area on the northern portion of the site along the main east-west road (West 119<sup>th</sup> Ave).

Several smaller access control, support, and testing facilities are also located on the NWTC site. These include the Site Entrance Building (SEB) or Guard Post, the electrical switchgear buildings, several trailers, and several data sheds. Currently, the total area of all buildings at the NWTC is approximately 1.3 acres.

The NWTC's existing turbine test sites currently support four megawatt (MW)-scale turbines ranging in output from 1.5 to 3 MW, three mid-scale turbines, ranging from 100 kilowatt (kW) to 600 kW, and nine small wind turbines ranging in size from 1 kW to 8 kW.

In 2002, DOE released a final Site-Wide EA for the NWTC (DOE/EA-1378) evaluating the potential impacts of site operations and short-term and long-term improvements. A Finding of No Significant Impact (FONSI) was signed by DOE on May 31, 2002.

The subject of this Site-Wide EA includes the proposed action discussed below which would support DOE's mission in the Research & Development of energy efficiency and renewable energy technologies by providing enhanced research and support capabilities to adequately continue state-of-the-art wind energy research. The mission of EERE's Wind Energy Program is to help the United States attain the substantial economic, environmental, and energy security benefits likely to result from expanding the domestic and worldwide use of wind energy by fostering a world-class domestic wind industry. The program focuses on research, testing and field verification work needed by U.S. industry to fully develop advanced, affordable, reliable wind energy technologies, and on coordination with partners and

stakeholders to overcome barriers to wind energy implementation. EERE's principal research to accomplish this goal is conducted at the NWTC.

## **PROPOSED ACTION AND ALTERNATIVES**

The following presents a summary of the Proposed Action and No Action alternative descriptions for the current draft Environmental Assessment.

### **Proposed Action**

Under the Proposed Action, DOE proposes to improve the site and operations within the current 305-acre NWTC site. New buildings and additions to existing buildings are proposed at the NWTC site, as well as infrastructure upgrades to roads, electrical power, water supply, and sewer lines. This proposed action would include adding multiple turbines with associated meteorological towers, access roads, data sheds, and infrastructure. New wind turbines would vary in size from small generating capacity (up to 100 kW), to mid-range (up to 1 MW), to large utility-scale (1-5 MW) turbine installations. Future facility construction, research, development and testing proposed for the NWTC is dependent on changing federal budgets and priorities. The details provided in this assessment are the best estimates that can be made at this time. **Figure 2** presents proposed improvements at the site.

### **New Construction**

The Proposed Action for new construction would provide for additional facilities at the NWTC, as described below.

*Wind Turbine Component Research and Testing Facility.* DOE would construct a 40,000 square foot facility that would be located west of Building 251. The facility is envisioned as a comprehensive R&D laboratory that would address advanced capabilities in the wind industry.

*Grid Storage Test Capabilities.* DOE would construct MW-Scale Energy Storage Test Platform areas, south of 119th Avenue and at the north end of Row 3. Grid integration testing would provide the capability to perform comprehensive MW-scale grid integration tests by interconnecting dynamometers, turbines, solar systems, and other devices to a grid simulator and energy storage devices. Both mobile and permanent energy storage test facilities would be developed to house and test innovative energy storage devices.

*Staging and Maintenance Warehouse.* DOE would construct a warehouse up to 40,000 square feet, west of the Building H-1 in the northwest corner of the site. This facility would be used to support indoor staging of test projects and maintenance of equipment.

*Modifications of Existing Buildings.* Modification of existing infrastructure includes upgrades to the Administration Building 251, STL Building 254, DERTF Building H-1, and 2.5 MW Dynamometer Building 255. Other modifications such as adding a cool roof to an existing building and expansion of buildings to accommodate new research and operations may be required.

### **Wind Turbines and Meteorological Towers**

The Proposed Action would provide additional wind turbines and modify the number of existing field test sites and associated infrastructure to potentially include any combination of up to 7 (including the 4 currently onsite) large utility-scale wind turbines (1 to 5 MW), up to 7 (including the 3 currently onsite) mid-scale turbines (each rated from 100 to 1 MW), and up to 20 (including the 9 currently onsite) small wind turbines (each rated from 1 W to 100 kW). Under the Proposed Action, up to a total of 30 meteorological towers (and associated infrastructure) would be installed onsite, including the 19 that currently exist. **Figure 2** presents proposed improvements at the site.

Currently, approximately 22 test sites are configured on the NWTC property. Under the Proposed Action, some test sites could be combined to create larger test sites that would support utility-scale turbines, or subdivided to create more numerous smaller test sites to accommodate small and mid-scale turbines. It is not anticipated that the maximum number of turbines would be present onsite at one time, since turbines are erected for testing purposes, and then removed when testing is completed.

### **Infrastructure Upgrades**

*Electrical.* The current NWTC electrical generation capacity is 11.2 MW. Turbine operations are being curtailed to stay below an existing 10 MW limit in accordance with Xcel Energy requirements. Assuming wind technology development continues its current trend toward larger turbines, the projected maximum NWTC electrical generation capacity for the 5- to 10-year timeframe is estimated to increase up to 50 MW as additional turbines are added and smaller turbines are replaced with larger units.

To accommodate an increase to 50 MW, the existing site electrical infrastructure would need to be upgraded to add an additional 40 MW of generation capacity. NREL would work with a local utility provider for the design and installation of an on-site substation to increase the site-generated power from distribution voltage (13.2kV) to transmission voltage (115kV). Then, power generated at the NWTC would be connected via overhead transmission lines to interconnect with existing transmission lines and a local utility provider's switchyard or substation.

*Other Infrastructure Upgrades.* Other upgrades to the facility would include drinking water system upgrades, fire suppression system upgrades, sanitary waste upgrades, road improvements, and data/telecommunications improvements.

*Routine Technical Tasks for Research and Site Maintenance Activities.* These tasks include loading equipment, preparing for tests, moving parts, installing and removing turbines, monitoring, cleaning facilities and equipment, maintaining landscape features, snowplowing, performing pest management, and maintaining buildings and infrastructure.

### **Development of a Reasonable Range Of Alternatives**

Under the No Action Alternative, NREL would continue current operations and activities at NWTC.

Figure 1. Vicinity Map

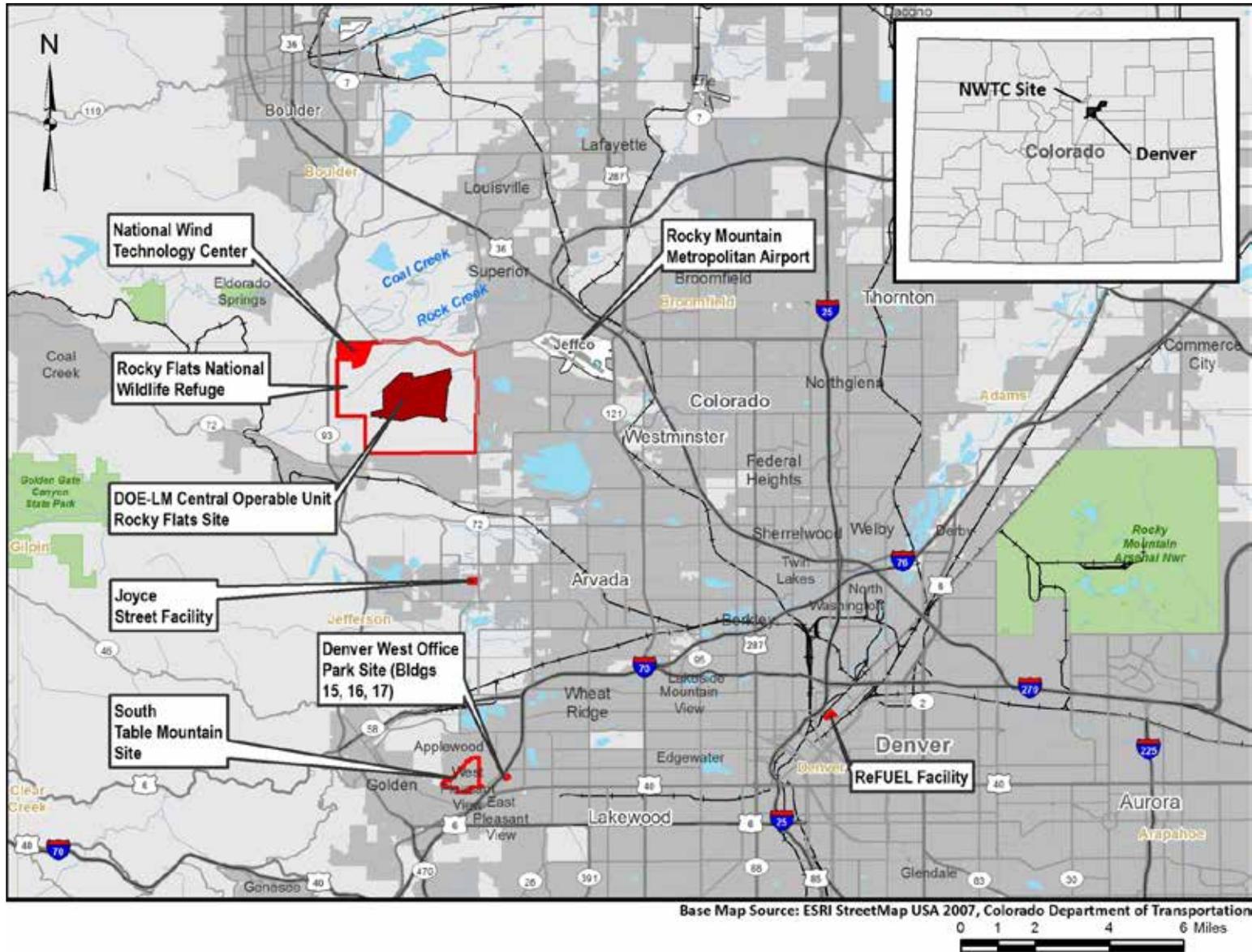


Figure 2. Proposed Improvements

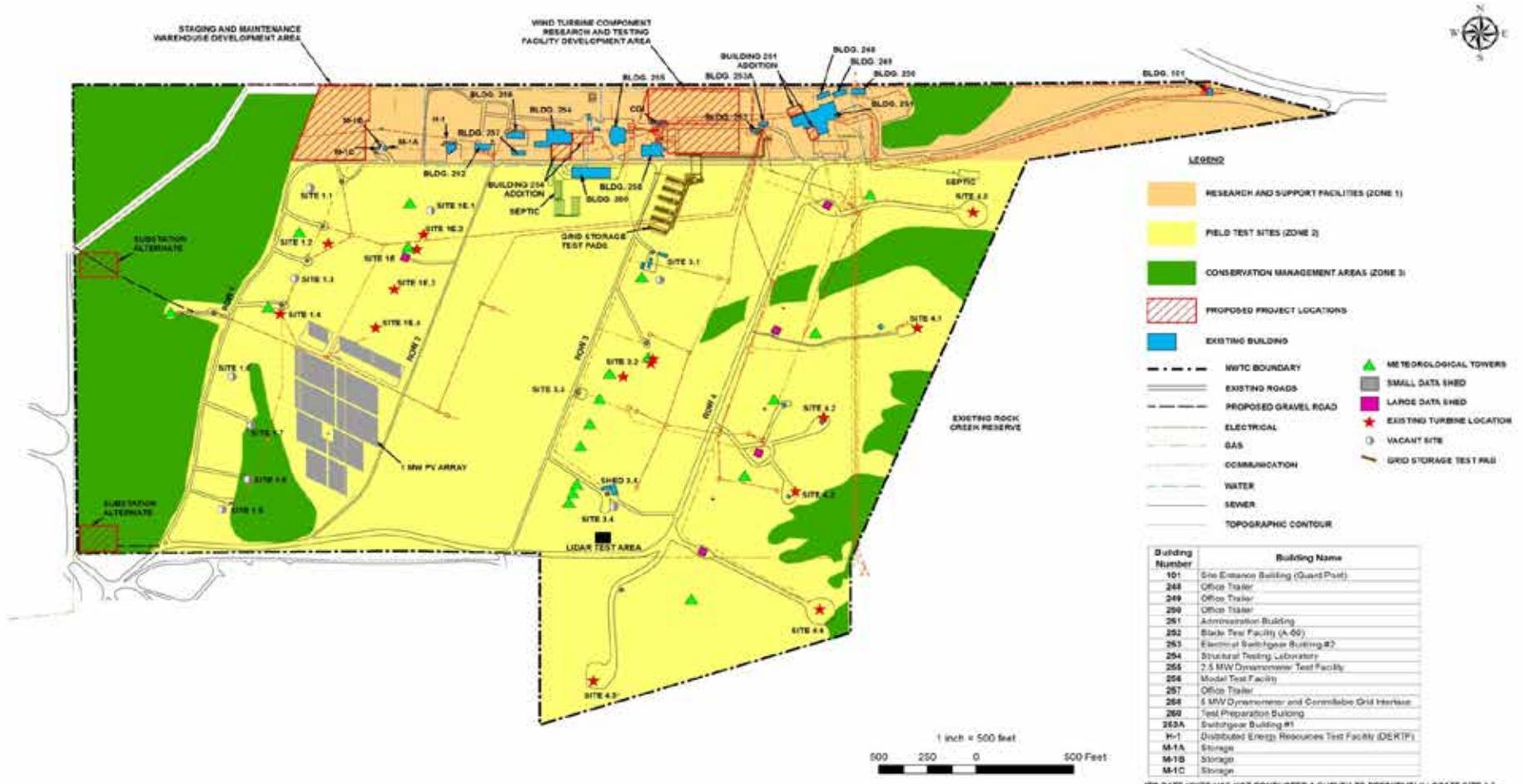


Figure 3. Conservation Management Areas within NWTC Boundaries





Department of Energy  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

July 17, 2013

Oglala Sioux Tribe  
Bryan Brewer, Sr., President  
PO Box 419  
Pine Ridge, SD 57770

SUBJECT: INITIATION OF SECTION 106 CONSULTATION PROCESS FOR THE SITE-WIDE ENVIRONMENTAL ASSESSMENT AT THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY IN GOLDEN, CO (DOE/EA-1914)

Dear Mr. Brewer:

The U.S. Department of Energy (DOE) is completing a Site-Wide Environmental Assessment (EA) of the National Wind Technology Center (NWTC) to include analysis of potential environmental impacts due to continued operations and future site development. A Notice of Scoping was sent to you in October 2012. DOE requested that interested parties provide comments, during a 30-day public comment period, on the scope of the Proposed Action, at that time. The Proposed Action has been revised since the Notice of Scoping was posted. The revised Proposed Action is provided in **Attachment I**.

The EA is being prepared to meet the requirements of the National Environmental Policy Act (NEPA) of 1969. The EA will address the potential effects of the Proposed Action on the natural and human environment, including cultural resources. DOE is initiating consultation and requesting information your tribe may have on properties of traditional and cultural significance within the vicinity of the NWTC and any comments or concerns you have on the potential for this Proposed Action to affect those properties.

Three cultural resource surveys have been conducted at the NWTC since its establishment in the 1970s. These surveys identified five cultural resources: three historic sites and two historic isolated finds. All were recommended not eligible for National Register nomination. A letter, dated November 2, 2001, from DOE to the Colorado State Historical Preservation Office (SHPO) established that the NWTC had 100 percent survey coverage for cultural resources as a result of these three studies and that no cultural resources would be affected. The most recent survey identified a 6.5-acre area in the northwest portion of the NWTC as having a higher potential for prehistoric archaeological resources and recommended further inspection should ground-disturbing activity become a possibility in that area. There are no activities proposed in the 6.5-acre area for this Proposed Action. If any unexpected discoveries are made during the implementation of the Proposed Action, construction would cease and NWTC personnel would follow procedures to contact their "on call" local archaeological consulting firm.

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Per the regulations of the Advisory Council on Historic Preservation at 36 CFR Sections 800.2(c)(5) and 800.4(a)(3), DOE is inviting your tribe to participate in the consultation process. This information is being requested to aid in the preparation of the EA and to meet our obligations under Section 106 of the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act of 1990. Specifically, I am requesting information you may have on properties of traditional religious and cultural significance within the vicinity of the Proposed Action and any comments or concerns you have on the potential for this Proposed Action to affect those properties. If you have any such information, require additional information, or have any questions or comments about the Proposed Action, please contact me via e-mail at [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov) or contact me by phone at 720-356-1666. In addition, you may mail comments to:

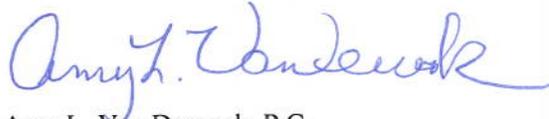
Department of Energy-Golden Field Office  
c/o Amy Van Dercook  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

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DOE will address issues and include copies of all correspondence with your tribe in an appendix to the EA. A Notice of Availability will be sent to you to notify you when the Draft EA has been posted for review and commenting. At this time, we anticipate a 30-day public comment period for this Proposed Action.

The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Attachment I – Proposed Action  
Figures 1 & 2

## ATTACHMENT I

### **SITE BACKGROUND AND DESCRIPTION**

The National Renewable Energy Laboratory (NREL) is the premier DOE national laboratory dedicated to the research, development, and deployment of renewable energy and energy efficiency technologies. As depicted in **Figure 1**, NREL is comprised of three main sites: 1) South Table Mountain (STM); 2) Denver West Office Park (DWOP); and 3) the National Wind Technology Center (NWTC). Other facilities include the Renewable Fuels and Lubricants (ReFUEL) Research Laboratory and Joyce Street facilities. Details regarding NREL's mission and research programs are available on the NREL website at: <http://www.nrel.gov>.

The 305-acre NWTC is located in northwest Jefferson County, Colorado, approximately 16 miles northwest of Denver. The site is south of Colorado State Highway 128 and directly east of aggregate mining and processing facilities on the east side of Colorado State Highway 93 between Golden and Boulder, Colorado.

There are currently seven major buildings located on the NWTC site that house research and administrative functions and include:

- Administration Building, Building 251;
- Structural Testing Laboratory (STL), Building 254;
- Test Preparation Building (Quonset Hut), Building 260;
- 2.5 MW Dynamometer Test Facility, Building 255;
- 5.0 MW Dynamometer Test Facility, Building 258;
- Distributed Energy Resources Test Facility (DERTF), Building H-1; and,
- Blade Test Facility, Building 252.

All seven major buildings are located in the Research and Support Facilities area on the northern portion of the site along the main east-west road (West 119<sup>th</sup> Ave).

Several smaller access control, support, and testing facilities are also located on the NWTC site. These include the Site Entrance Building (SEB) or Guard Post, the electrical switchgear buildings, several trailers, and several data sheds. Currently, the total area of all buildings at the NWTC is approximately 1.3 acres.

The NWTC's existing turbine test sites currently support four megawatt (MW)-scale turbines ranging in output from 1.5 to 3 MW, three mid-scale turbines, ranging from 100 kilowatt (kW) to 600 kW, and nine small wind turbines ranging in size from 1 kW to 8 kW.

In 2002, DOE released a final Site-Wide EA for the NWTC (DOE/EA-1378) evaluating the potential impacts of site operations and short-term and long-term improvements. A Finding of No Significant Impact (FONSI) was signed by DOE on May 31, 2002.

The subject of this Site-Wide EA includes the proposed action discussed below which would support DOE's mission in the R&D of energy efficiency and renewable energy technologies by providing

enhanced research and support capabilities to adequately continue state-of-the-art wind energy research. The mission of EERE's Wind Energy Program is to help the United States attain the substantial economic, environmental, and energy security benefits likely to result from expanding the domestic and worldwide use of wind energy by fostering a world-class domestic wind industry. The program focuses on research, testing and field verification work needed by U.S. industry to fully develop advanced, affordable, reliable wind energy technologies, and on coordination with partners and stakeholders to overcome barriers to wind energy implementation. EERE's principal research to accomplish this goal is conducted at the NWTC.

## **PROPOSED ACTION AND ALTERNATIVES**

The following presents a summary of the Proposed Action and No Action alternative descriptions.

### **Proposed Action**

Under the Proposed Action, DOE proposes to improve the site and operations within the current 305-acre NWTC site. New buildings and additions to existing buildings are proposed at the NWTC site, as well as infrastructure upgrades to roads, electrical power, water supply, and sewer lines. This proposed action would include adding multiple turbines with associated meteorological towers, access roads, data sheds, and infrastructure. New wind turbines would vary in size from small generating capacity (up to 100 kW), to mid-range (up to 1 MW), to large utility-scale (1-5 MW) turbine installations. Future facility construction, research, development and testing proposed for the NWTC is dependent on changing federal budgets and priorities. The details provided in this assessment are the best estimates that can be made at this time. **Figure 2** presents proposed improvements at the site.

### **New Construction**

The Proposed Action for new construction would provide for additional facilities at the NWTC, as described below.

*Wind Turbine Component Research and Testing Facility.* DOE would construct a 40,000 square foot facility that would be located west of Building 251. The facility is envisioned as a comprehensive R&D laboratory that would address advanced capabilities in the wind industry.

*Grid Storage Test Capabilities.* DOE would construct MW-Scale Energy Storage Test Platform areas, south of 119th Avenue and at the north end of Row 3. Grid integration testing would provide the capability to perform comprehensive MW-scale grid integration tests by interconnecting dynamometers, turbines, solar systems, and other devices to a grid simulator and energy storage devices. Both mobile and permanent energy storage test facilities would be developed to house and test innovative energy storage devices.

*Staging and Maintenance Warehouse.* DOE would construct a warehouse up to 40,000 square feet, west of the DERTF in the northwest corner of the site. This facility would be used to support indoor staging of test projects and maintenance of equipment.

*Modifications of Existing Buildings.* Modification of existing infrastructure includes upgrades to the Administration Building 251, STL Building 254, DERTF Building H-1, and 2.5 MW Dynamometer Building 255. Other modifications such as adding a cool roof to an existing building and expansion of buildings to accommodate new research and operations may be required.

## **Wind Turbines**

The Proposed Action would provide additional wind turbines and modify the number of existing field test sites and associated infrastructure to potentially include any combination of up to 7 (including the 4 currently onsite) large utility-scale wind turbines (1 to 5 MW), up to 7 (including the 3 currently onsite) mid-scale turbines (each rated from 100 to 1 MW), and up to 20 (including the 9 currently onsite) small wind turbines (each rated from 1 W to 100 kW). Under the Proposed Action, up to a total of 30 meteorological towers (and associated infrastructure) would be installed onsite, including the 19 that currently exist. These numbers would be considered totals, which include the existing turbines and meteorological towers. **Figure 2** presents proposed improvements at the site.

Currently, approximately 22 test sites are configured on the NWTC property. Under the Proposed Action, some test sites could be combined to create larger test sites that would support utility-scale turbines, or subdivided to create more numerous smaller test sites to accommodate small and mid-scale turbines. It is not anticipated that the total number of turbines would be present onsite at one time, since turbines are erected for testing purposes, and then removed when testing is completed.

## **Infrastructure Upgrades**

*Electrical.* The current NWTC electrical generation capacity is 11.2 MW. Turbine operations are being curtailed to stay below an existing 10 MW limit in accordance with Xcel Energy requirements. Assuming wind technology development continues its current trend toward larger turbines, the projected maximum NWTC electrical generation capacity for the 5- to 10-year timeframe is estimated to increase up to 50 MW as additional turbines are added and smaller turbines are replaced with larger units.

To accommodate an increase to 50 MW, the existing site electrical infrastructure would need to be upgraded to add an additional 40 MW of generation capacity. NREL would work with Xcel Energy for the design and installation of an on-site substation to increase the site-generated power from distribution voltage (13.2kV) to transmission voltage (115kV). Then, power generated at the NWTC would be connected via overhead transmission lines to interconnect with existing Xcel Energy transmission lines or an Xcel switchyard or substation.

*Other Infrastructure Upgrades.* Other upgrades to the facility would include drinking water system upgrades, fire suppression system upgrades, sanitary waste upgrades, road improvements, data/telecommunications improvements.

*Routine Technical Tasks for Research and Site Maintenance Activities.* These tasks include loading equipment, preparing for tests, moving parts, installing and removing turbines, monitoring, cleaning facilities and equipment, maintaining landscape features, snowplowing, performing pest management, and maintaining buildings and infrastructure.

## **Development of a Reasonable Range Of Alternatives**

Under the No Action Alternative, NREL would continue current operations and activities at NWTC.

Figure 1. Vicinity Map

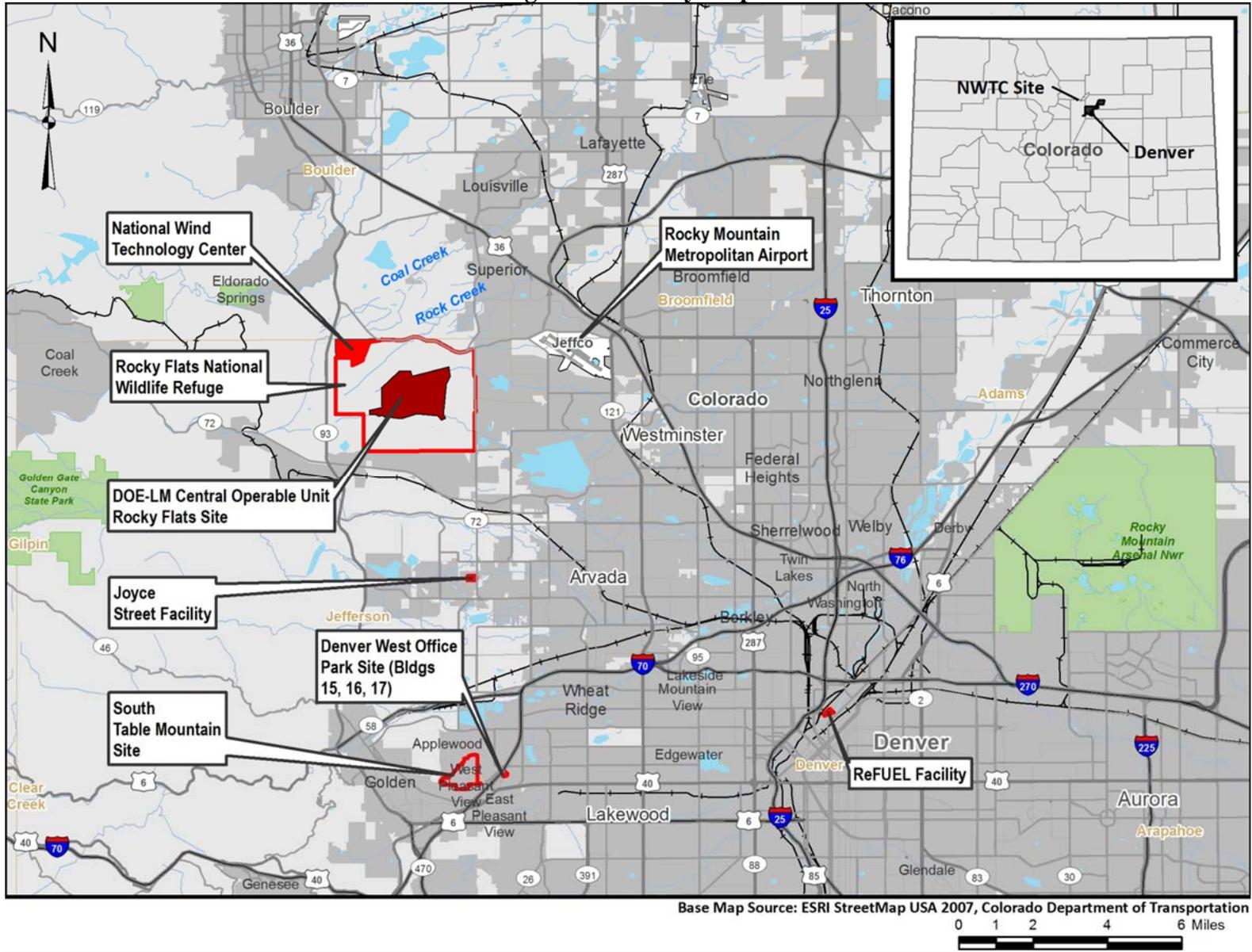
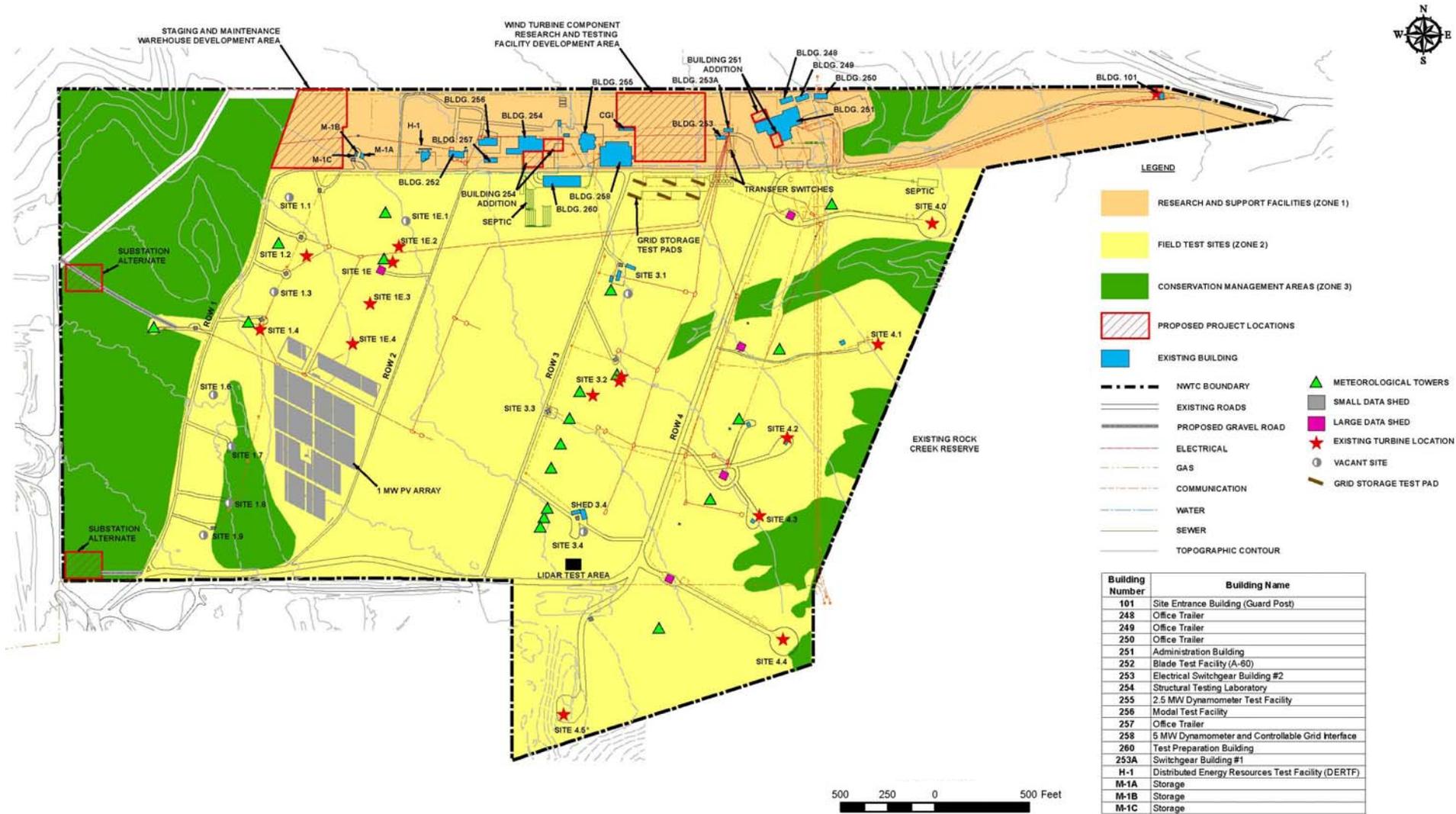


Figure 2. Proposed Improvements





Department of Energy  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

July 17, 2013

Oglala Sioux Tribe  
Wilmer Mesteth, THPO  
PO Box 419  
Pine Ridge, SD 57770

SUBJECT: INITIATION OF SECTION 106 CONSULTATION PROCESS FOR THE SITE-WIDE ENVIRONMENTAL ASSESSMENT AT THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY IN GOLDEN, CO (DOE/EA-1914)

Dear Mr. Mesteth:

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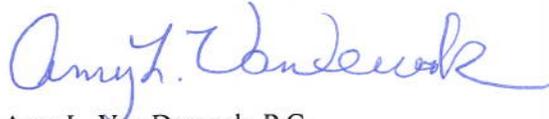
Department of Energy-Golden Field Office  
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Sincerely,



Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Attachment I – Proposed Action  
Figures 1 & 2



Department of Energy  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

July 17, 2013

Southern Ute Tribe  
Jimmy R. Newton, Jr., Chairperson  
P.O. Box 737  
Ingacio, CO 81137

SUBJECT: INITIATION OF SECTION 106 CONSULTATION PROCESS FOR THE SITE-WIDE ENVIRONMENTAL ASSESSMENT AT THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY IN GOLDEN, CO (DOE/EA-1914)

Dear Mr. Newton:

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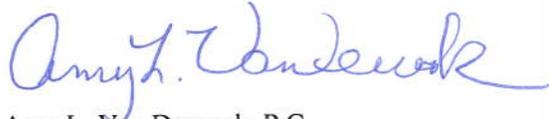
Department of Energy-Golden Field Office  
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NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Attachment I – Proposed Action  
Figures 1 & 2



**Department of Energy**  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

July 17, 2013

Ute Mountain Ute Tribal Council  
Gary Hayes, Chairman  
P.O. Box 248  
Towaoc, CO 81334

**SUBJECT: INITIATION OF SECTION 106 CONSULTATION PROCESS FOR THE SITE-WIDE ENVIRONMENTAL ASSESSMENT AT THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY IN GOLDEN, CO (DOE/EA-1914)**

Dear Mr. Hayes:

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5JF1014	Listed	Yes	Rocky Flats Plant-Demolished
5JF1227	Listed	Yes	Rocky Flats Plant-Demolished
5JF2431	Eligible - field	No	stone circles
5JF2432	Unevaluated	Yes	cairns
5JF2435	Unevaluated	Yes	rubble mound
5BL3139	Unevaluated	No	historic foundation
5BL3140	Unevaluated	No	mine
5BL3141	Eligible - field	partial	McKenzie Ditch
5BL3142	Eligible - field	No	Eggleston Reservoir Filler Ditch #3
5BL3144	Eligible - field	Yes	historic foundation
5BL3145	Eligible - field	Yes	Eggleston Reservoir Filler Ditch #4
5BL3153	Eligible - field	Yes	stone circles
5BL3428	Unevaluated	Yes	homestead
5BL4102	Unevaluated	No	historic features

Per the regulations of the Advisory Council on Historic Preservation at 36 CFR Sections 800.2(c)(5) and 800.4(a)(3), DOE is inviting your tribe to participate in the consultation process. This information is being requested to aid in the preparation of the EA and to meet our obligations under Section 106 of the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act of 1990. Specifically, I am requesting information you may have on properties of traditional religious and cultural significance within the vicinity of the Proposed Action and any comments or concerns you have on the potential for this Proposed Action to affect those properties. If you have any such information, require additional information, or have any questions or comments about the Proposed Action, please contact me via e-mail at [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov) or contact me by phone at 720-356-1666. In addition, you may mail comments to:

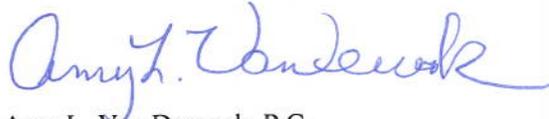
Department of Energy-Golden Field Office  
c/o Amy Van Dercook  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

Please provide your response to this inquiry within 30 days of the receipt of this letter to assist us in moving the process forward. If a reply is not received within 30 days, then DOE will assume that you have no issues, questions or concerns related to the Proposed Action.

DOE will address issues and include copies of all correspondence with your tribe in an appendix to the EA. A Notice of Availability will be sent to you to notify you when the Draft EA has been posted for review and commenting. At this time, we anticipate a 30-day public comment period for this Proposed Action.

The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Attachment I – Proposed Action  
Figures 1 & 2



Department of Energy  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

July 17, 2013

Ute Mountain Ute Tribe  
Mr. Terry Knight, THPO  
PO Box 468  
Towaoc, CO 81334

SUBJECT: INITIATION OF SECTION 106 CONSULTATION PROCESS FOR THE  
SITE-WIDE ENVIRONMENTAL ASSESSMENT AT THE DEPARTMENT OF  
ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE  
NATIONAL RENEWABLE ENERGY LABORATORY IN  
GOLDEN, CO (DOE/EA-1914)

Dear Mr. Knight:

The U.S. Department of Energy (DOE) is completing a Site-Wide Environmental Assessment (EA) of the National Wind Technology Center (NWTC) to include analysis of potential environmental impacts due to continued operations and future site development. A Notice of Scoping was sent to you in October 2012. DOE requested that interested parties provide comments, during a 30-day public comment period, on the scope of the Proposed Action, at that time. The Proposed Action has been revised since the Notice of Scoping was posted. The revised Proposed Action is provided in **Attachment I**.

The EA is being prepared to meet the requirements of the National Environmental Policy Act (NEPA) of 1969. The EA will address the potential effects of the Proposed Action on the natural and human environment, including cultural resources. DOE is initiating consultation and requesting information your tribe may have on properties of traditional and cultural significance within the vicinity of the NWTC and any comments or concerns you have on the potential for this Proposed Action to affect those properties.

Three cultural resource surveys have been conducted at the NWTC since its establishment in the 1970s. These surveys identified five cultural resources: three historic sites and two historic isolated finds. All were recommended not eligible for National Register nomination. A letter, dated November 2, 2001, from DOE to the Colorado State Historical Preservation Office (SHPO) established that the NWTC had 100 percent survey coverage for cultural resources as a result of these three studies and that no cultural resources would be affected. The most recent survey identified a 6.5-acre area in the northwest portion of the NWTC as having a higher potential for prehistoric archaeological resources and recommended further inspection should ground-disturbing activity become a possibility in that area. There are no activities proposed in the 6.5-acre area for this Proposed Action. If any unexpected discoveries are made during the implementation of the Proposed Action, construction would cease and NWTC personnel would follow procedures to contact their "on call" local archaeological consulting firm.

The Area of Potential Effect (APE) for this Proposed Action was established by completing a viewshed analysis for historic properties around the NWTC within a two-mile radius from the highest proposed wind turbine. A review of Colorado Office of Archaeology and Historic Preservation’s database indicates 20 sites within a two mile radius. Of those, two are listed on the National Register of Historic Places (NRHP), eight are eligible for the NRHP, and ten are unevaluated. Five of these sites are not within the viewshed, three are partially within it, and 12 are fully within the viewshed. These sites are summarized in the table below.

**Table 1. Eligibility of National Registry of Historic Properties within a Two Mile Radius**

Site Number	Eligibility	Visible	Site Description
5JF318.7	Eligible - official	partial	South Boulder Diversion Canal
5JF318.8	Eligible - official	partial	South Boulder Diversion Canal
5JF475	Unevaluated	Yes	cairn
5JF476	Unevaluated	Yes	cairn
5JF478	Unevaluated	Yes	cairn
5JF479	Unevaluated	Yes	cairn
5JF1014	Listed	Yes	Rocky Flats Plant-Demolished
5JF1227	Listed	Yes	Rocky Flats Plant-Demolished
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5BL4102	Unevaluated	No	historic features

Per the regulations of the Advisory Council on Historic Preservation at 36 CFR Sections 800.2(c)(5) and 800.4(a)(3), DOE is inviting your tribe to participate in the consultation process. This information is being requested to aid in the preparation of the EA and to meet our obligations under Section 106 of the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act of 1990. Specifically, I am requesting information you may have on properties of traditional religious and cultural significance within the vicinity of the Proposed Action and any comments or concerns you have on the potential for this Proposed Action to affect those properties. If you have any such information, require additional information, or have any questions or comments about the Proposed Action, please contact me via e-mail at [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov) or contact me by phone at 720-356-1666. In addition, you may mail comments to:

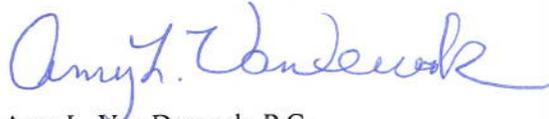
Department of Energy-Golden Field Office  
c/o Amy Van Dercook  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

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DOE will address issues and include copies of all correspondence with your tribe in an appendix to the EA. A Notice of Availability will be sent to you to notify you when the Draft EA has been posted for review and commenting. At this time, we anticipate a 30-day public comment period for this Proposed Action.

The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Attachment I – Proposed Action  
Figures 1 & 2



Department of Energy  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

July 17, 2013

Ute Indian Tribe  
Irene Cuch, Chairperson  
P.O. Box 190  
Ft. Duchesne, UT 84026

SUBJECT: INITIATION OF SECTION 106 CONSULTATION PROCESS FOR THE SITE-WIDE ENVIRONMENTAL ASSESSMENT AT THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY IN GOLDEN, CO (DOE/EA-1914)

Dear Ms. Cuch:

The U.S. Department of Energy (DOE) is completing a Site-Wide Environmental Assessment (EA) of the National Wind Technology Center (NWTC) to include analysis of potential environmental impacts due to continued operations and future site development. A Notice of Scoping was sent to you in October 2012. DOE requested that interested parties provide comments, during a 30-day public comment period, on the scope of the Proposed Action, at that time. The Proposed Action has been revised since the Notice of Scoping was posted. The revised Proposed Action is provided in **Attachment I**.

The EA is being prepared to meet the requirements of the National Environmental Policy Act (NEPA) of 1969. The EA will address the potential effects of the Proposed Action on the natural and human environment, including cultural resources. DOE is initiating consultation and requesting information your tribe may have on properties of traditional and cultural significance within the vicinity of the NWTC and any comments or concerns you have on the potential for this Proposed Action to affect those properties.

Three cultural resource surveys have been conducted at the NWTC since its establishment in the 1970s. These surveys identified five cultural resources: three historic sites and two historic isolated finds. All were recommended not eligible for National Register nomination. A letter, dated November 2, 2001, from DOE to the Colorado State Historical Preservation Office (SHPO) established that the NWTC had 100 percent survey coverage for cultural resources as a result of these three studies and that no cultural resources would be affected. The most recent survey identified a 6.5-acre area in the northwest portion of the NWTC as having a higher potential for prehistoric archaeological resources and recommended further inspection should ground-disturbing activity become a possibility in that area. There are no activities proposed in the 6.5-acre area for this Proposed Action. If any unexpected discoveries are made during the implementation of the Proposed Action, construction would cease and NWTC personnel would follow procedures to contact their "on call" local archaeological consulting firm.

The Area of Potential Effect (APE) for this Proposed Action was established by completing a viewshed analysis for historic properties around the NWTC within a two-mile radius from the highest proposed wind turbine. A review of Colorado Office of Archaeology and Historic Preservation’s database indicates 20 sites within a two mile radius. Of those, two are listed on the National Register of Historic Places (NRHP), eight are eligible for the NRHP, and ten are unevaluated. Five of these sites are not within the viewshed, three are partially within it, and 12 are fully within the viewshed. These sites are summarized in the table below.

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5JF476	Unevaluated	Yes	cairn
5JF478	Unevaluated	Yes	cairn
5JF479	Unevaluated	Yes	cairn
5JF1014	Listed	Yes	Rocky Flats Plant-Demolished
5JF1227	Listed	Yes	Rocky Flats Plant-Demolished
5JF2431	Eligible - field	No	stone circles
5JF2432	Unevaluated	Yes	cairns
5JF2435	Unevaluated	Yes	rubble mound
5BL3139	Unevaluated	No	historic foundation
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5BL3144	Eligible - field	Yes	historic foundation
5BL3145	Eligible - field	Yes	Eggleston Reservoir Filler Ditch #4
5BL3153	Eligible - field	Yes	stone circles
5BL3428	Unevaluated	Yes	homestead
5BL4102	Unevaluated	No	historic features

Per the regulations of the Advisory Council on Historic Preservation at 36 CFR Sections 800.2(c)(5) and 800.4(a)(3), DOE is inviting your tribe to participate in the consultation process. This information is being requested to aid in the preparation of the EA and to meet our obligations under Section 106 of the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act of 1990. Specifically, I am requesting information you may have on properties of traditional religious and cultural significance within the vicinity of the Proposed Action and any comments or concerns you have on the potential for this Proposed Action to affect those properties. If you have any such information, require additional information, or have any questions or comments about the Proposed Action, please contact me via e-mail at [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov) or contact me by phone at 720-356-1666. In addition, you may mail comments to:

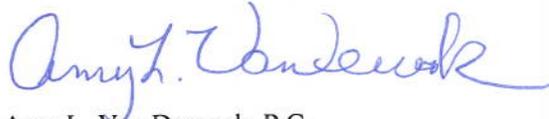
Department of Energy-Golden Field Office  
c/o Amy Van Dercook  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

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DOE will address issues and include copies of all correspondence with your tribe in an appendix to the EA. A Notice of Availability will be sent to you to notify you when the Draft EA has been posted for review and commenting. At this time, we anticipate a 30-day public comment period for this Proposed Action.

The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

Attachment I – Proposed Action  
Figures 1 & 2



**Department of Energy**  
Golden Field Office  
1617 Cole Boulevard  
Golden, Colorado 80401-3393  
August 21, 2013

Edward C. Nichols  
State Historic Preservation Officer  
History Colorado, Civic Center Plaza  
1560 Broadway  
Suite 400  
Denver, CO 80202

**SUBJECT:** INITIATION OF THE SECTION 106 CONSULTATION FOR PROPOSED IMPROVEMENTS AT THE DEPARTMENT OF ENERGY'S NATIONAL WIND TECHNOLOGY CENTER AT THE NATIONAL RENEWABLE ENERGY LABORATORY IN GOLDEN, CO (DOE/EA-1914)

Dear Mr. Nichols:

The U.S. Department of Energy (DOE) is initiating consultation pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its associated implementing regulations codified at 36 CFR Part 800 while also coordinating with your office as required under the National Environmental Policy Act (NEPA) for the proposed improvements to DOE's National Wind Technology Center (NWTC). The NWTC is located in Jefferson County, Colorado.

### **Background**

Most recently, the operation of the NWTC was analyzed by DOE pursuant to NEPA in an EA document entitled *Final Site-Wide Environmental Assessment of National Renewable Energy Laboratory's National Wind Technology Center (DOE/EA-1378) May 2002* (available at [http://www.eere.energy.gov/golden/NREL\\_Enviro\\_NEPA.aspx](http://www.eere.energy.gov/golden/NREL_Enviro_NEPA.aspx)). DOE issued a Finding of No Significant Impact (FONSI) for the EA, which determined that the NWTC could be operated and improved without significant impacts.

During the EA process, DOE consulted with various agencies and stakeholders, including your office, as documented by a letter dated January 1, 2002. Your office concurred with DOE's determination that no historic properties onsite would be affected by the 2002 Proposed Action.

DOE is currently preparing a Site-Wide Environmental Assessment (EA) of the continued operation and future site development of the NWTC. A Notice of Scoping was sent to your office in October 2012. DOE requested that interested parties provide comments, during a 30-day public comment period, on any potential issues or impacts of implementing the Proposed Action, at that time. Due to input received during the scoping period, the Proposed Action description has been revised. A revised **Proposed Action** is located in **Attachment I**.

### **Undertaking**

The Proposed Action at the NWTC meets the definition of an undertaking as defined in 36 CFR 800.16(y).

### **NWTC Property**

As presented in the 2002 NWTC EA, three cultural resource surveys have been conducted at the NWTC since its establishment in the 1970s. These surveys identified five cultural resources: three historic sites and two historic isolated finds. All were recommended not eligible for National Register nomination. A letter, dated November 2, 2001, from DOE to your office established that the NWTC had 100 percent survey coverage for cultural resources as a result of these three studies and that no cultural resources would be affected. The most recent survey identified a 6.5-acre area in the northwest portion of the NWTC as having a higher potential for prehistoric archaeological resources and recommended further inspection should ground-disturbing activity become a possibility in that area. There are no activities proposed in the 6.5-acre area for this Proposed Action. If any unexpected discoveries are made during the implementation of the Proposed Action, construction would cease and NWTC personnel would follow procedures to contact their "on call" local archaeological consulting firm.

### **Area of Potential Effect**

The Area of Potential Effect (APE) for this Proposed Action was established by completing a viewshed analysis for historic properties around the NWTC within a two-mile radius from the highest proposed wind turbine. The viewshed analysis for historic properties around the NWTC was conducted from a point in the center of Row 4 at an elevation of 574 feet above the ground surface (**Figure 3, Attachment I**). Row 4 is typically where the utility-scale turbines are located. The elevation represents the height of a 5 MW turbine from the ground to the tip of the rotor blade at the highest point of rotation to simulate the rotor sweep of the largest proposed wind turbine.

### **Identification of Historic Properties within APE**

A review of the Colorado Office of Archaeology and Historic Preservation's Compass database indicates there are 18 sites within the two mile radius. Of those, one is listed on the National Register of Historic Places (NRHP), seven are eligible for the NRHP, and 10 are unevaluated. Five of these sites are not within the viewshed, two are partially within it, and 11 are within the viewshed. Information concerning these sites is summarized in **Table 1**.

**Table 1. Eligibility of National Registry of Historic Properties within a Two Mile Radius**

Site Number	Eligibility	Visible	Site Description
5JF318.7 5JF318.8	Eligible - official	partial	South Boulder Diversion Canal
5JF475	Unevaluated	Yes	cairn
5JF476	Unevaluated	Yes	cairn
5JF478	Unevaluated	Yes	cairn
5JF479	Unevaluated	Yes	cairn
5JF1014 5JF 1227	Listed	Yes	Rocky Flats Plant (This has been demolished and restored to native grassland; however, Rocky Flats is still NRHP-listed. This site has two site numbers.)
5JF2431	Eligible - field	No	stone circles
5JF2432	Unevaluated	Yes	cairns
5JF2435	Unevaluated	Yes	rubble mound
5BL3139	Unevaluated	No	historic foundation
5BL3140	Unevaluated	No	mine
5BL3141	Eligible - field	partial	McKenzie Ditch
5BL3142	Eligible - field	No	Eggleston Reservoir Filler Ditch #3
5BL3144	Eligible - field	Yes	historic foundation
5BL3145	Eligible - field	Yes	Eggleston Reservoir Filler Ditch #4
5BL3153	Eligible - field	Yes	stone circles
5BL3428	Unevaluated	Yes	homestead
5BL4102	Unevaluated	No	historic features

Per 36 CFR 800.4, DOE is required to identify all properties listed, or eligible for listing in the NRHP which may be affected by the proposed undertaking. The only site within the proposed APE that is currently listed on the National Register is the former Rocky Flats Plant, located southeast of the NWTC. The former plant has been demolished and the area has been restored to prairie grasslands.

**Assessment of Historic Properties Affected**

No direct or indirect cultural resource impacts are anticipated from the new construction of facilities and infrastructure improvements on- or off-site.

No direct impacts from the construction and operation of turbines and meteorological towers are anticipated; however, indirect visual impacts on historical sites within the APE were identified. Therefore, a photographic simulation was prepared to assess any impacts.

The NWTC is characterized by buildings and facilities in the northern portion of the site and meteorological towers and wind turbines interspersed among natural conditions throughout the rest of the site. The majority of the site is undeveloped and retains a natural feel. The dominant visual features at the NWTC are the wind turbines and meteorological towers. **Figure 4-1, Attachment II** presents a location map showing three vantage points, where photographs were taken. Photographs are provided

in the **Photographic Log, Attachment II**. As a conservative approach, the vantage points are approximately one mile (or less) from the NWTC property line. **Figures 4-2 to 4-4** present photographs of the existing conditions found at the NWTC from surrounding representative vantage points that would be typical of the views expected near the NWTC. Vantage Point 1 is near the intersection of Hwy 93 and 128 looking south toward the NWTC from the Greenbelt Plateau Trailhead, Vantage Point 2 is from the west side of Hwy 93 looking east toward the NWTC from the Flatirons Vista Trail, and Vantage Point 3 is from Hwy 128 east of the site entrance looking west toward the NWTC. **Figures 4-5 to 4-7** present visual simulations of what the proposed turbines and meteorological towers would look like from different vantage points surrounding the NWTC. The proposed turbines and meteorological towers would be consistent with the existing turbines in the area and would not appreciably alter existing conditions.

#### **Assessment of No Adverse Effect**

All previously recorded historic properties and features identified within the APE would not be directly affected by any of the construction or operation activities of this undertaking including new construction, infrastructure, turbines and meteorological towers. No indirect effects are anticipated from new construction and infrastructure improvements. Indirect visual impacts from the turbines and meteorological towers have the potential to affect some historic properties; however, the structures appear consistent with the existing turbines in the area and would not appreciably alter existing conditions. In addition, it is not anticipated that the maximum number of turbines would be present onsite at one time, since turbines are erected for testing purposes, and then removed when testing is completed. Since the turbines are test articles and individually will only be up for a period of years, they are not considered permanent features.

DOE requests concurrence with a finding of no adverse effect for the proposed undertaking. Again, we appreciate your continued coordination regarding projects at NREL, and we look forward in the successful completion of the Section 106 process with your office. If you require additional information, or have any questions or comments about the Proposed Action, please contact me via e-mail at [amy.vandercook@go.doe.gov](mailto:amy.vandercook@go.doe.gov) or contact me by phone at 720-356-1666. In addition, you may mail comments to:

Department of Energy-Golden Field Office  
c/o Amy Van Dercook  
1617 Cole Boulevard  
Golden, Colorado 80401-3393

The DOE Golden Field Office welcomes your input throughout our NEPA Process.

Sincerely,



Amy L. Van Dercook, P.G.  
NEPA Document Manager  
U.S. Department of Energy, Golden Field Office

cc: Jefferson County Historical Commission  
Jefferson County Historical Society

Attachments

## ATTACHMENT I

### **SITE BACKGROUND AND DESCRIPTION**

The National Renewable Energy Laboratory (NREL) is the premier DOE national laboratory dedicated to the research, development, and deployment of renewable energy and energy efficiency technologies. As depicted in **Figure 1**, NREL is comprised of three main sites: 1) South Table Mountain (STM); 2) Denver West Office Park (DWOP); and 3) the National Wind Technology Center (NWTC). Other facilities include the Renewable Fuels and Lubricants (ReFUEL) Research Laboratory and Joyce Street facilities. Details regarding NREL's mission and research programs are available on the NREL website at: <http://www.nrel.gov>.

The 305-acre NWTC is located in northwest Jefferson County, Colorado, approximately 16 miles northwest of Denver. The site is south of Colorado State Highway 128 and directly east of aggregate mining and processing facilities on the east side of Colorado State Highway 93 between Golden and Boulder, Colorado.

There are currently seven major buildings located on the NWTC site that house research and administrative functions and include:

- Administration Building, Building 251;
- Structural Testing Laboratory (STL), Building 254;
- Test Preparation Building (Quonset Hut), Building 260;
- 2.5 MW Dynamometer Test Facility, Building 255;
- 5.0 MW Dynamometer Test Facility, Building 258;
- Distributed Energy Resources Test Facility (DERTF), Building H-1; and,
- Blade Test Facility, Building 252.

All seven major buildings are located in the Research and Support Facilities area on the northern portion of the site along the main east-west road (West 119<sup>th</sup> Ave).

Several smaller access control, support, and testing facilities are also located on the NWTC site. These include the Site Entrance Building (SEB) or Guard Post, the electrical switchgear buildings, several trailers, and several data sheds. Currently, the total area of all buildings at the NWTC is approximately 1.3 acres.

The NWTC's existing turbine test sites currently support four megawatt (MW)-scale turbines ranging in output from 1.5 to 3 MW, three mid-scale turbines, ranging from 100 kilowatt (kW) to 600 kW, and nine small wind turbines ranging in size from 1 kW to 8 kW.

In 2002, DOE released a final Site-Wide EA for the NWTC (DOE/EA-1378) evaluating the potential impacts of site operations and short-term and long-term improvements. A Finding of No Significant Impact (FONSI) was signed by DOE on May 31, 2002.

The subject of this Site-Wide EA includes the proposed action discussed below which would support DOE's mission in the Research & Development of energy efficiency and renewable energy technologies by providing enhanced research and support capabilities to adequately continue state-of-the-art wind energy research. The mission of EERE's Wind Energy Program is to help the United States attain the substantial economic, environmental, and energy security

benefits likely to result from expanding the domestic and worldwide use of wind energy by fostering a world-class domestic wind industry. The program focuses on research, testing and field verification work needed by U.S. industry to fully develop advanced, affordable, reliable wind energy technologies, and on coordination with partners and stakeholders to overcome barriers to wind energy implementation. EERE's principal research to accomplish this goal is conducted at the NWTC.

## **PROPOSED ACTION AND ALTERNATIVES**

The following presents a summary of the Proposed Action and No Action alternative descriptions for the current draft Environmental Assessment.

### **Proposed Action**

Under the Proposed Action, DOE proposes to improve the site and operations within the current 305-acre NWTC site. New buildings and additions to existing buildings are proposed at the NWTC site, as well as infrastructure upgrades to roads, electrical power, water supply, and sewer lines. This proposed action would include adding multiple turbines with associated meteorological towers, access roads, data sheds, and infrastructure. New wind turbines would vary in size from small generating capacity (up to 100 kW), to mid-range (up to 1 MW), to large utility-scale (1-5 MW) turbine installations. Future facility construction, research, development and testing proposed for the NWTC is dependent on changing federal budgets and priorities. The details provided in this assessment are the best estimates that can be made at this time. **Figure 2** presents proposed improvements at the site.

### **New Construction**

The Proposed Action for new construction would provide for additional facilities at the NWTC, as described below.

*Wind Turbine Component Research and Testing Facility.* DOE would construct a 40,000 square foot facility that would be located west of Building 251. The facility is envisioned as a comprehensive R&D laboratory that would address advanced capabilities in the wind industry.

*Grid Storage Test Capabilities.* DOE would construct MW-Scale Energy Storage Test Platform areas, south of 119th Avenue and at the north end of Row 3. Grid integration testing would provide the capability to perform comprehensive MW-scale grid integration tests by interconnecting dynamometers, turbines, solar systems, and other devices to a grid simulator and energy storage devices. Both mobile and permanent energy storage test facilities would be developed to house and test innovative energy storage devices.

*Staging and Maintenance Warehouse.* DOE would construct a warehouse up to 40,000 square feet, west of the Building H-1 in the northwest corner of the site. This facility would be used to support indoor staging of test projects and maintenance of equipment.

*Modifications of Existing Buildings.* Modification of existing infrastructure includes upgrades to the Administration Building 251, STL Building 254, DERTF Building H-1, and 2.5 MW Dynamometer Building 255. Other modifications such as adding a cool roof to an existing building and expansion of buildings to accommodate new research and operations may be required.

### **Wind Turbines and Meteorological Towers**

The Proposed Action would provide additional wind turbines and modify the number of existing field test sites and associated infrastructure to potentially include any combination of up to 7 (including the 4 currently onsite) large utility-scale wind turbines (1 to 5 MW), up to 7 (including the 3 currently onsite) mid-scale turbines (each rated from 100 to 1 MW), and up to 20 (including the 9 currently onsite) small wind turbines (each rated from 1 W to 100 kW). Under the Proposed Action, up to a total of 30 meteorological towers (and associated infrastructure) would be installed onsite, including the 19 that currently exist. **Figure 2** presents proposed improvements at the site.

Currently, approximately 22 test sites are configured on the NWTC property. Under the Proposed Action, some test sites could be combined to create larger test sites that would support utility-scale turbines, or subdivided to create more numerous smaller test sites to accommodate small and mid-scale turbines. It is not anticipated that the maximum number of turbines would be present onsite at one time, since turbines are erected for testing purposes, and then removed when testing is completed.

### **Infrastructure Upgrades**

*Electrical.* The current NWTC electrical generation capacity is 11.2 MW. Turbine operations are being curtailed to stay below an existing 10 MW limit in accordance with Xcel Energy requirements. Assuming wind technology development continues its current trend toward larger turbines, the projected maximum NWTC electrical generation capacity for the 5- to 10-year timeframe is estimated to increase up to 50 MW as additional turbines are added and smaller turbines are replaced with larger units.

To accommodate an increase to 50 MW, the existing site electrical infrastructure would need to be upgraded to add an additional 40 MW of generation capacity. NREL would work with Xcel Energy for the design and installation of an on-site substation to increase the site-generated power from distribution voltage (13.2kV) to transmission voltage (115kV). Then, power generated at the NWTC would be connected via overhead transmission lines to interconnect with existing Xcel Energy transmission lines or an Xcel switchyard or substation.

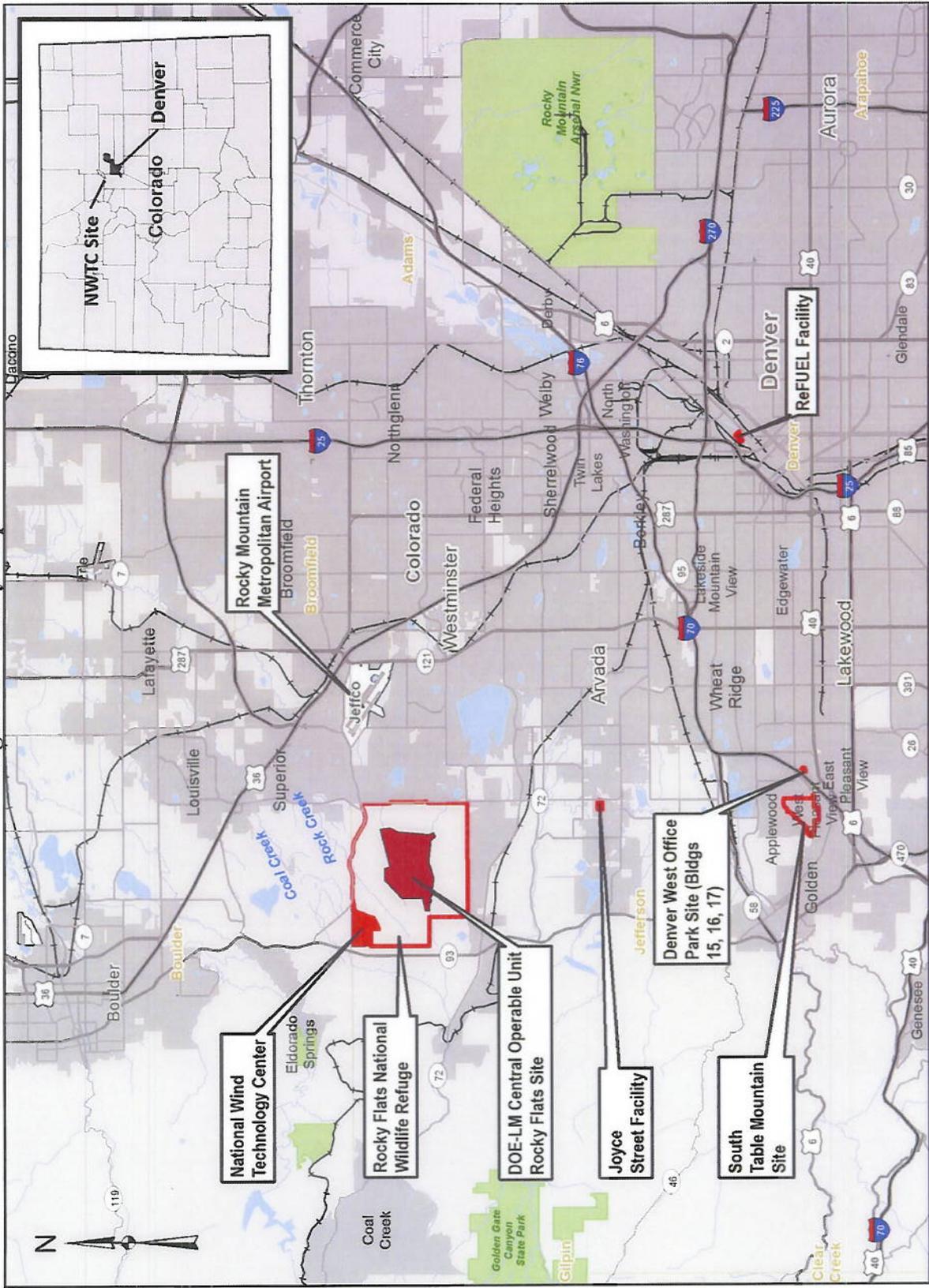
*Other Infrastructure Upgrades.* Other upgrades to the facility would include drinking water system upgrades, fire suppression system upgrades, sanitary waste upgrades, road improvements, and data/telecommunications improvements.

*Routine Technical Tasks for Research and Site Maintenance Activities.* These tasks include loading equipment, preparing for tests, moving parts, installing and removing turbines, monitoring, cleaning facilities and equipment, maintaining landscape features, snowplowing, performing pest management, and maintaining buildings and infrastructure.

### **Development of a Reasonable Range Of Alternatives**

Under the No Action Alternative, NREL would continue current operations and activities at NWTC.

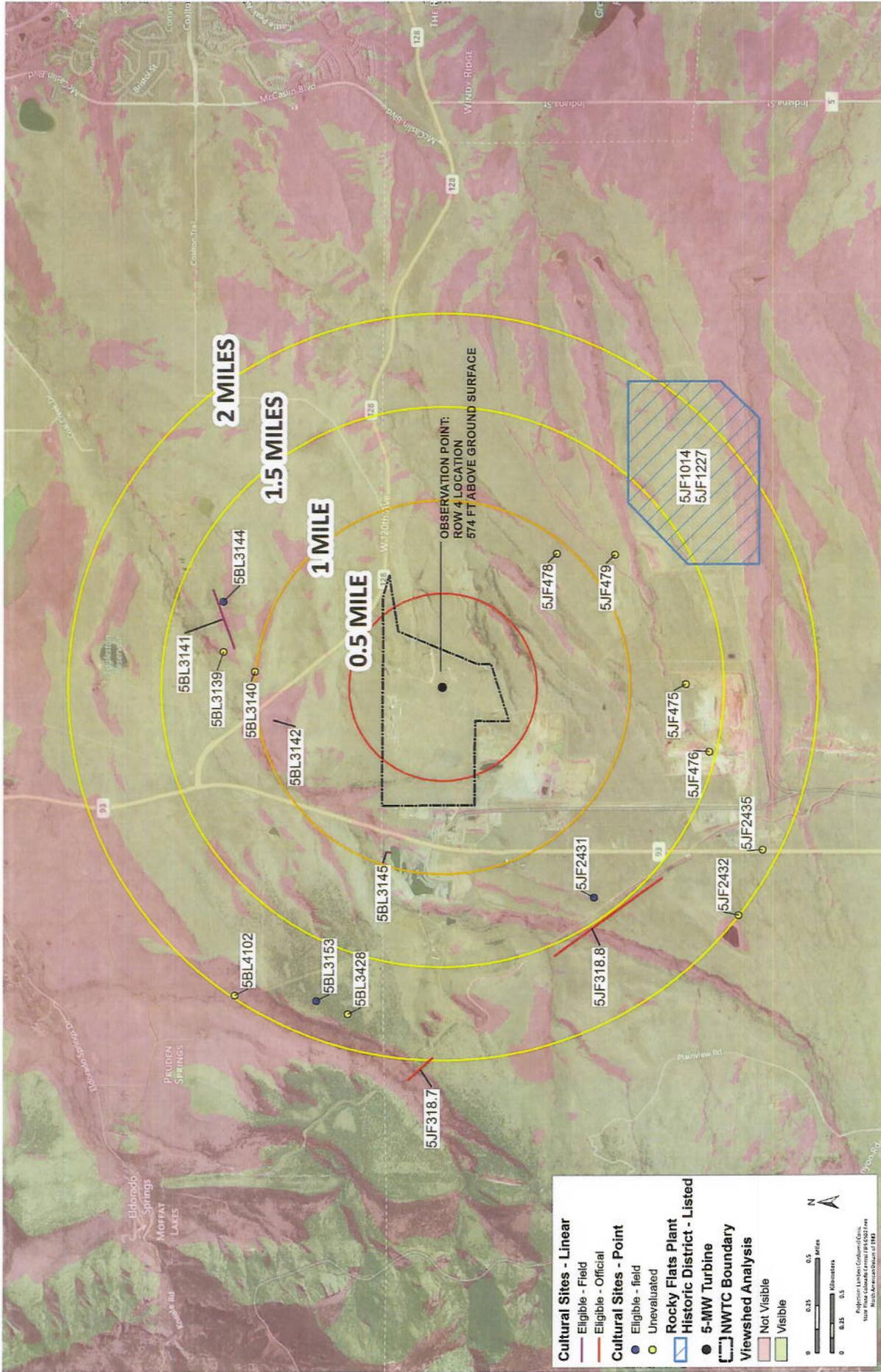
Figure 1. Vicinity Map



Base Map Source: ESRI StreetMap USA 2007, Colorado Department of Transportation



Figure 3. Viewshed Analysis



**ATTACHMENT II**

**Figure 4-1. Location Map of Vantage Points**



Source: HI 2010 Microsoft Corporation and its subsidiaries

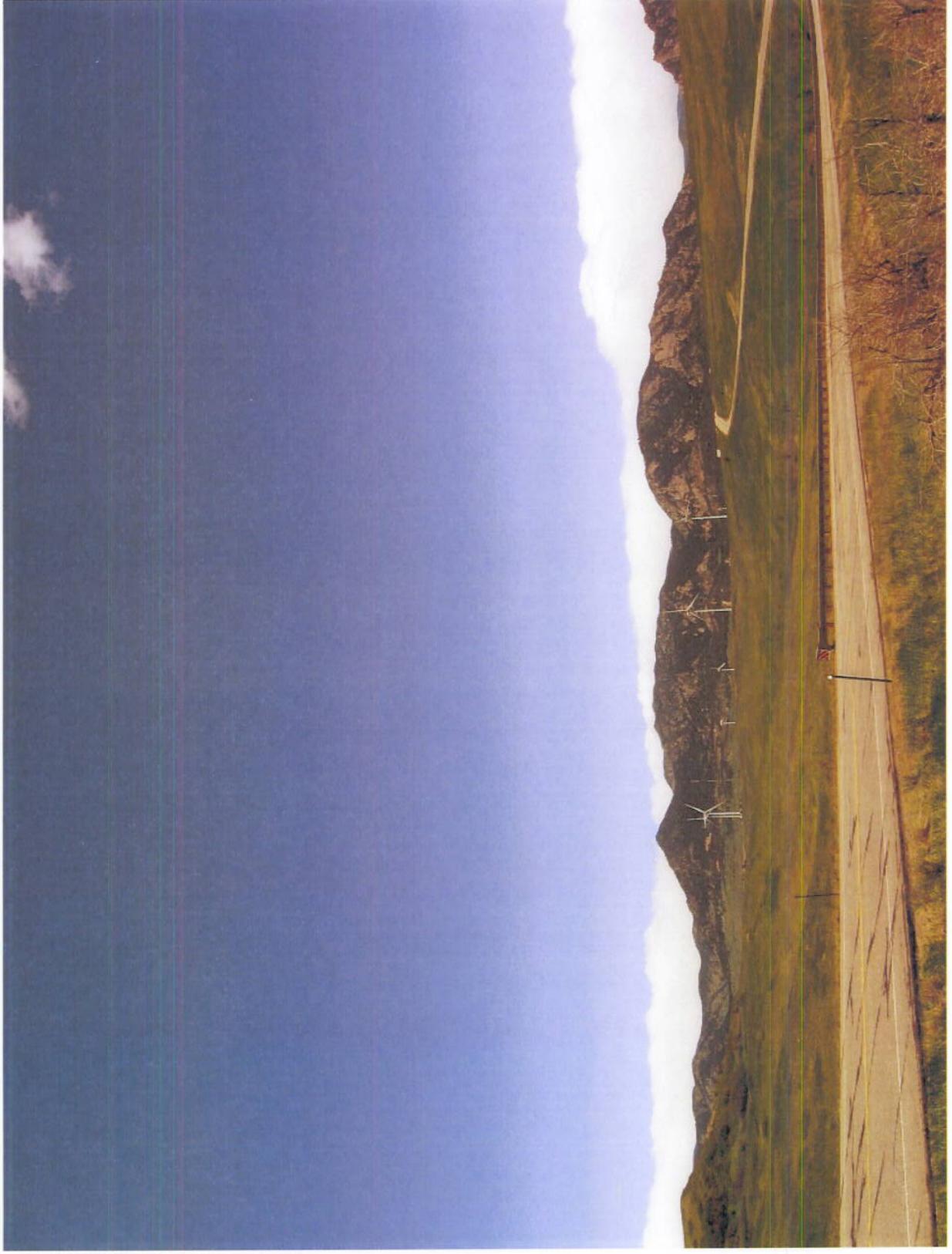
**Figure 4-2. View of the NWTTC from the Greenbelt Plateau Trailhead (Vantage Point 1).**



**Figure 4-3. View of the NWTTC from the Flatirons Vista Trail (Vantage Point 2).**



**Figure 4-4. View of the NWTC from Hwy 128 west of the site entrance (Vantage Point 3).**



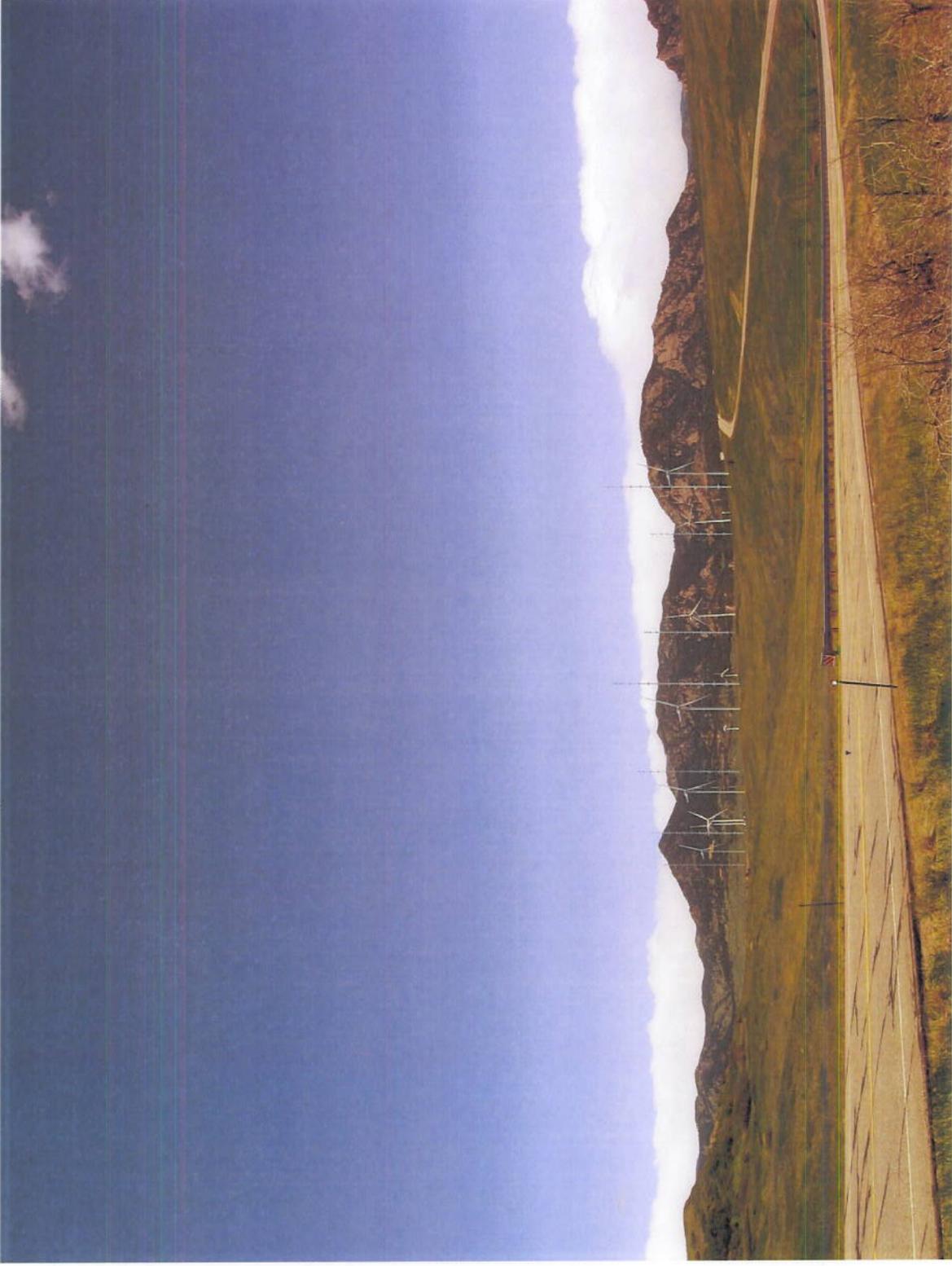
**Figure 4-5. Photosimulation of proposed turbines and associated meteorological towers from Greenbelt Plateau Trailhead (Vantage Point 1).**



**Figure 4-6. Photosimulation of proposed turbines and associated meteorological towers from Flatirons Vista Trail (Vantage Point 2).**



**Figure 4-7. Photosimulation of proposed turbines and associated meteorological towers from Hwy 128 west of the site entrance (Vantage Point 3).**





September 9, 2013

Amy L. Van Dercook  
NEPA Document Manager  
U. S. Department of Energy  
Golden Field Office  
1617 Cole Boulevard  
Golden, CO 80401-3393

Re: Initiation of the Section 106 Consultation for the Proposed Improvements at the Department of Energy's National Wind Technology Center at the National Renewable Laboratory in Golden, Colorado (DOE/EA-1914) (CHS #64586)

Dear Ms. Van Dercook:

Thank you for your correspondence dated August 21, 2013 (received by our office on August 27, 2013) regarding the subject undertaking.

Based on the documentation provided which addresses both your responsibilities under the National Historic Preservation Act and the National Environmental Policy Act, we concur with your determination that the proposed undertaking will result in no adverse effect per 36 CFR 800.5(b).

Please remember that the consultation process does involve other consulting parties such as local governments and Tribes, which as stipulated in 36 CFR 800.3 are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations. This letter does not end the 30-day review period provided to other consulting parties and we recommend that you include the Boulder County Historic Preservation Advisory Board (c/o Denise Grimm, Land Use Department, P.O. Box 471, Boulder, CO 80306) to the list of consulting parties, if not already included.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4) in consultation with our office.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Mark Tobias, Section 106 Compliance Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto:mark.tobias@state.co.us).

Sincerely,

Edward C. Nichols  
State Historic Preservation Officer  
ECN/MAT