Wyoming
DEPARTMENT OF Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

November 4th, 2026

Ruth A. Miller
Lander Field Manager
Bureau of Land Management
Lander Field Office
1335 Main Street
Lander, Wyoming 82520

DOI-BLM-WY-R050-2026-0032-EA

Dear Ms. Miller,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Bureau of Land Management (BLM) proposed Whiskey Mountain Bighorn Sheep Conifer Removal for habitat enhancement project (Project).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA supports the efforts to improve bighorn sheep habitat through vegetation and timber management projects, while still meeting the multiple use mission including public lands grazing. We offer the following comments regarding the proposed project within Whiskey Mountain Area of Critical Environmental Concern (ACEC) and the Whiskey Mountain Wilderness Study Area (WSA).

The proposed project encompasses 190 acres within the ACEC and 35 acres within the WSA, where hand crews will cut and pile timber, followed by pile-burning operations accessed by motorized vehicles. However, the 2014 Lander BLM Resource Management Plan (RMP) Goal/Objective 6048 explicitly closed the WSA to motorized vehicles and closed the ACEC to motorized vehicles from December 1 to May 15. While administrative access for land management projects may be granted under RMP Goal/Objective 6029, the BLM must analyze the impacts to the designated areas for motorized vehicle use. Specifically, the BLM should incorporate detailed mitigation plans ensuring wilderness characteristics, vegetation, and rangeland health meet desired conditions within both the WSA and ACEC.

The EA should analyze potential impacts on livestock grazing allotments and management located within the proposed project area. The public notice document does not divulge the overlapping allotment acres with the WSA or the ACEC. Additionally, the EA should also identify and analyze the potential loss of forage and displaced livestock as a result of the project.

While the proposed activities may work towards meeting desired conditions for bighorn sheep habitat, the BLM must ensure the existing livestock grazing allotments, animal unit months (AUMs), and permitted seasons of use are not

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altered as a result of the project implementation. Furthermore, we encourage project implementation to avoid active livestock grazing management during the permitted dates of June 1 to June 30 and November 10 to December 9. Finally, the EA should inventory the livestock grazing infrastructure, such as fencing or water developments prior to project implementation, and ensure the infrastructure remains intact and viable well after the project is complete.

Recent local climatic conditions have seen abnormal drought and uncharacteristically low winter snowfall. Given these conditions, the WDA is concerned that conducting prescribed pile burns with inadequate snow cover potentially increases the risk of wildfire, resulting in burning residual forage and infrastructure in nearby livestock grazing allotments. The 2014 Lander RMP states under Goal/Objective 3009, "Implement post-treatment rest of treated areas from livestock grazing for two full growing seasons on all prescribed or wildland burn areas unless vegetation recovery dictates otherwise"

WDA opposes BLM mandating two-years' rest from livestock grazing for vegetation management projects, including wildfire. Research by Gates and Vermeire shows that site-specific monitoring, targeted grazing, and adaptive management based on plant recovery provide a more effective post-fire approach than an arbitrary two-year rest. Specifically, the empirical data does not support a mandatory two-growing-season deferment, as moderate grazing following fire did not compromise rangeland productivity or perennial grass health (Gates, 2017)[1]. The BLM must ensure the Proposed Decision precludes the grazing permittees from mandatory rest or AUM reductions as a result of unplanned wildfire or burn areas from the Project on livestock grazing allotments or infrastructure.

In conclusion, the WDA supports the Proposed Project as it will help the BLM reach RMP Goal SD: 11.2, "Maintain and improve winter bighorn sheep habitat," by enhancing crucial winter range and promote healthy forage for the Whiskey Mountain bighorn sheep herd, all while advancing multiple-use management on public lands.

The WDA appreciates the opportunity to comment on the scoping of the project and look forward to working with the Lander BLM Field Office on the continued development of the project. If you have any questions, please contact Holly Siebert, Senior Policy Analyst at 307-777-7024.

Sincerely,

Doug Miyamoto
Director

DM/hs

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association Wyoming
Wool Growers Association Wyoming
Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
Wyoming Game and Fish Department
Wyoming County Commissioners Association
Public Lands Council

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October 14, 2026

Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street NE - Room 1A,
Washington, DC 20426

To Whom It May Concern:

Following are the Wyoming Department of Agriculture's (WDA) Scoping comments for a Supplemental Environmental Impact Statement (SEIS) for Hydropower License for the Seminoe Pumped Storage Project - FERC Project No. 14787-004 Wyoming (Project).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA commented on the October 1, 2025 Draft Environmental Impact Statement and on the December 15, 2025 Alternative D request for comment. We offer the following specific comments and concerns regarding the SEIS and potential negative impacts from the Project on the livestock grazing industry:

1. Forage Loss & Permittee Protection
While the June 12, 2026 Final Environmental Impact Statement (FEIS) identifies livestock grazing allotments affected by the project, it fails to incorporate a required forage mitigation plan. Regardless of whether specific pastures are currently deferred or in non-use, those Animal Unit Months (AUMs) remain allocated under valid and existing grazing permits. The permittees retain the right to utilize the AUMs on these allotments. Any loss or temporary disruption of forage, no matter how small the percentage, is a direct impact resulting from the project's implementation. Therefore, the burden of mitigating forage loss must fall entirely on the project proponent, not the livestock grazing permittee. FERC must require the project proponent to mitigate both temporarily and permanently lost forage and establish clear reclamation timelines.

2. BLM Right-of-Way (ROW) & Range Infrastructure Impacts
The BLM must fully analyze Right-of-Way (ROW) impacts on BLM-administered allotments within the SEIS. Additionally, the BLM should conduct a comprehensive inventory of all range improvements, such as fences, water pipelines, and water improvements that could be damaged, altered, or restricted by the project or its ROW, and require the proponent to repair, replace, or mitigate any affected infrastructure.

3. Construction Timelines & Mitigation Measures
The EIS outlines a five-year construction schedule, however there is significant concern the construction delays could extend this timeline by several years, prolonging temporary forage loss and disrupting daily livestock grazing operations.

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The WDA urges the project proponent to update the construction timeline in the SEIS to accurately reflect realistic post-permitting schedules and build-out delays. Furthermore, the SEIS must detail specific construction mitigation measures tied directly to the requested ROW footprint to ensure construction activities do not interfere with daily livestock management.

4. Required Project-Specific Plans Prior to Ground Disturbance
To address these operational risks, the BLM must require the proponent to develop and implement binding, project-specific plans prior to ground disturbance, including:

- **Comprehensive Dust Mitigation Plan:** Heavy dust deposition severely degrades forage palatability and accelerates premature tooth wear in grazing livestock, leading to reduced animal performance and early herd culling.

- **Weed Mitigation Plan:** Construction equipment and ground disturbance risk introducing and spreading invasive noxious weeds across active allotments, degrading long-term rangeland vegetation productivity.

- **Livestock Safety & Construction Traffic Plan:** Increased heavy vehicle traffic within the ROW creates a direct risk of livestock collisions, injuries, and fatalities. The plan must establish mandatory speed limits, right-of-way protocols for livestock, and clear communication channels with permittees during active construction phases.

- **Post-Construction Reclamation Plan:** Disturbed areas within the ROW must be promptly stabilized and reseeded using a native grass and forage seed mix tailored to the ecological site. The plan must include explicit success criteria, monitoring protocols, and mandatory reseeding if initial native grass establishment fails, ensuring the site is fully restored to productive grazing conditions.

The WDA strongly encourages the Project addresses the identified impacts to the livestock grazing industry. To remedy these deficiencies, the SEIS for the project should incorporate a formal Livestock Forage Mitigation Plan. If you have questions, please contact Holly Siebert, Senior Policy Analyst at 307-777-7024

Sincerely,

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