



Wyoming Game and Fish Department

Conserving Wildlife, Serving People

Governor Mark Gordon • Director Angi Bruce

Commissioners

Ashlee Lundvall, President

Mark Jolovich, Vice President

Rusty Bell

Bill Mai

Carlisle "Fonzy" Haskell

John Masterson

Kenneth D. Roberts

December 31, 2025

WER12249.25

Federal Energy Regulatory Commission

Black Canyon Hydro, LLC

rPlus Hydro, LLLP

DEIS Seminoe Pumped Storage Project

Project No. 14787-004

Carbon County

Secretary Debbie-Anne Reese

Federal Energy Regulatory Commission

Office of Energy Projects

Division of Hydropower Licensing

888 First Street NE, Room 1A

Washington, D.C. 20426

Dear Secretary Reese,

The Wyoming Game and Fish Department (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Seminoe Pumped Storage Project (Project). The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The Department continues to have serious concerns with the proposed Project due to the potential and predicted impact to a fishery of national importance and the direct and indirect loss of bighorn sheep, mule deer, antelope, and sage-grouse habitat functionality. We have articulated our concerns to the Project proponent and Federal Energy Regulatory Commission (Commission) through numerous exchanges and yet our most significant concerns, direct and in-direct impacts to the Ferris-Seminoe bighorn sheep herd and the fisheries of Seminoe Reservoir, Kortess Reservoir and the Miracle Mile segment of the North Platte River continue to be inadequately addressed or disregarded in the DEIS.

The Ferris-Seminoe bighorn sheep herd is a population of great importance to the State of Wyoming due to its clean health status. This is currently the only herd we would consider as a source population if future reintroduction or supplemental transplants were to be completed. Bighorn sheep are extremely susceptible to environmental and anthropogenic stressors, which can culminate in herd level, stress-induced, mortality events. Given the Project's intense level of proposed construction activities and the duration of these activities, we do not support the Commission's granting of a variance to our recommended timing stipulations for the crucial winter and parturition ranges. Furthermore, bighorn sheep have very specific habitat requirements which

the minimization and mitigation measures proposed in the DEIS will not be able to adequately compensate. Bighorn sheep habitat is irreplaceable.

Seminole Reservoir, Kortes Reservoir, and the Miracle Mile are important fisheries to the State of Wyoming. Although stocked annually, much of the trout and walleye populations are naturally maintained through yearly spawning. Changes to water quality, including temperature, dissolved oxygen, turbidity, and water levels resulting from the operation of the project, pose a potentially serious risk to both the long-term health of the fisheries, as well as, the sustainability of fishing-based recreation. The Project's Water Quality Adaptive Management Plan (AMP) does not include specific procedures and control measures for immediate action if a threshold is met. Given that assurances have not been provided within the AMP, the fish residence study was limited in scope, and the Project's potential negative impacts to the Miracle Mile's Blue-Ribbon Fishery and the wild walleye population in Seminole Reservoir, the proponent's minimization and mitigation measures proposed in the DEIS are not adequate.

Finally, The Project proponent's Alternative D has created new concerns for the Department. Alternative D was submitted to the Commission well into the DEIS public review process on December 15, 2025. The newly submitted and revised materials include changes to both the Project configuration and implementation. These changes to the Project may have different impacts to fish, wildlife, and their habitats that have not been fully evaluated by the Commission, or included in the analysis, findings, or conclusions presented in the current DEIS. The late submission of the materials does not allow adequate time for the Department to fully review and provide informed comments, and furthermore, even understand how the Commission will consider or incorporate Alternative D into the current DEIS. The Department respectfully requests the Commission provide an additional public comment period if the Commission decides to incorporate Alternative D and revised materials into their analysis for this Project.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Will Schultz, Habitat Protection Program Supervisor, at 307-777-4587.

Sincerely,

A handwritten signature in cursive script, appearing to read "Angi Bruce".

Angi Bruce
Director
Wyoming Game and Fish Department

AB/ws/ac

Secretary Reese
December 31, 2025
Page 3 of 3 – WER 12249.25 Cover Letter

cc: U.S. Fish and Wildlife Service
Chris Wichmann, Wyoming Department of Agriculture