



November 4, 2024

Federal Energy Regulatory Commission
Office of Energy Projects
Electronic Submission

RE: Seminole Pumped Storage Project (P-147871-004)

Dear Acting Secretary Reese,

The Wyoming Wild Sheep Foundation (WY-WSF) is submitting comments regarding the proposed Seminole Pumped Storage Project (SPSP) and its potential impacts on the Seminole-Ferris Bighorn Sheep herd. We hope these comments will help inform the FERC's continued analyses of the licensing of the SPSP.

Ferris-Seminole Bighorn Sheep Herd:

The proposed project site, construction impact area, and adjacent areas are important habitats for the Ferris-Seminole bighorn sheep herd. Bighorn sheep have been identified as a Tier II Species of Greatest Conservation Need (SGCN) by the Wyoming Game and Fish Department (WGFD). The Ferris-Seminole herd is a rare success story in that bighorn sheep were successfully reintroduced to the area and continue to expand. This herd is one of the healthiest in the state and is currently the only viable source population for future reintroductions and herd augmentations in Wyoming. However, bighorn sheep are susceptible to various respiratory pathogens that can cause large-scale die-offs. As such, it is paramount that bighorn sheep in this herd remain healthy and have access to their most crucial habitats without long-term stress that could make them more susceptible to disease and die-offs.

BIGHORN SHEEP HABITAT:

Unfortunately, the WGFD's seasonal range maps have not been updated to include GPS collar data collected over the past 15 years and do not accurately reflect all areas bighorn sheep are utilizing as their population has expanded in this area. However, these data are available and published in a Bighorn Sheep Habitat and Suitability Research Brief by Wagler & Monteith 2021. GPS collar data collected from Ferris-Seminole Bighorn Sheep from 2009-2021 show that the area proposed for the SPSP upper reservoir, the road that will be used to transport excavation spoil, and the area identified for spoil deposition are all in areas important to this herd. Although the footprint of the upper reservoir will displace bighorn sheep use in that area, we are most concerned with the long-term impacts of prolonged construction activities on herd health.

The temporary construction area on the northwest side of the dam, the construction associated with the access bridge, the portion of the Seminole Road proposed for spoil transport, and the area

identified for spoil deposition are all within WGFD's identified crucial winter-year-long bighorn sheep range, which is described as by the WGFD as follows:

“Crucial range describes any specific range or habitat component that is the determining factor in a population’s ability to maintain and reproduce itself at the population objective over the long-term. The Wyoming Game and Fish Commission’s Mitigation Policy identifies big game crucial habitats as mitigation category Vital. Vital habitats are those that directly limit a wildlife population. Impacts to this habitat could result in a significant local - or landscape -level decline in species distribution, abundance, or productivity. Restoration or replacement is difficult and may not be possible, or may only be possible in the very long term. The Department is directed by the Commission to recommend no significant declines in species distribution, abundance, or loss of habitat function.”

This area is also identified in the WGFD 2020 Statewide Habitat Plan as a Crucial Habitat Priority Area, which is defined as:

“Crucial Habitat Priority Areas are based on significant biological or ecological values. These are areas that need to be protected or managed to maintain viable healthy populations of terrestrial and aquatic wildlife for the present and future. They represent habitat values and identify where those values occur on the landscape. Examples of values include crucial winter range, sage grouse core area seasonal habitats, Species of Greatest Conservation Need (SGCN) diversity and uniqueness, quality and condition of vegetative communities, quality of watershed hydrologic function, etc. The Department will concentrate habitat protection and management activities in these areas.”

Given the bighorn sheep's status as a *Species of Greatest Conservation Need* and that these areas proposed for prolonged construction activities are within areas identified as a *Vital Mitigation Category* and *Crucial Habitat Priority Area* that will impact the sheep when they are at their most vulnerable, we highly recommend if a FERC license is issued for the SPSP, the WGFD seasonal use timing stipulations for big game crucial winter range and winter-yearlong range be adhered to.

DISEASE & DUST ABATEMENT

Due to the known issues with respiratory disease in bighorn sheep, excessive dust in the air from excavation, construction activities, and traffic could impact the respiratory health of the herd and make them more susceptible to disease outbreaks and potential die-offs. As such, dust abatement steps must be taken during construction activities and for traffic associated with the project.

RECREATION/HUNTING

Given the prolonged construction activity associated with the SPSP, there will likely be several years where this project will impact bighorn sheep hunting in the area. Bighorn sheep hunting licenses vary from year to year based on management needs. Bighorn sheep ram licenses are a once-in-a-lifetime tag in Wyoming, and the Ferris-Seminole herd is a highly coveted area. Although relatively few bighorn sheep ram tags are issued in this area, disturbances from construction activities will impact hunters, guides, and outfitters. We recommend that construction activities be limited during bighorn sheep hunting season to have a lower impact on hunting in the area and allow the herd to be managed effectively through hunter harvest.

The Ferris-Seminole bighorn sheep herd is not just important to the ecology of the Seminole Reservoir area, but also to the continued viability of bighorn sheep across the state of Wyoming. On behalf of the WY-WSF, please consider the impacts to the bighorn sheep as you analyze licensing for this project and how these impacts might best be mitigated. Thank you for the opportunity to comment and share information that may be helpful in your analyses.

Sincerely,



Katie Cheesbrough
Executive Director
Wyoming Wild Sheep Foundation
katie@wyomingwildsheep.org
307-399-4383