



Wyoming Game and Fish Department

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May 12, 2026

MEMORANDUM

TO: Joint Travel, Recreation, Wildlife and Cultural Resources Committee

SUBJECT: WGFD Seminoe pumped storage project review and comments

Project Summary: The project is an open-loop design that generates power through the discharge of water from an upper reservoir to a lower reservoir, using the existing Seminoe Reservoir as the lower reservoir. The reservoirs would be accompanied by an underground powerhouse and water conveyance tunnels, an above-ground 24-foot diameter, 615-foot length, steel water conduit, access roads and tunnels, a 200-foot-long spillway and stilling basin, a bridge crossing the Kortess Reservoir below the Seminoe Dam, and an approximately 30-mile long, 500 kV power line connecting the project to the transmission grid via the Aeolus substation. The project also entails the relocation of one 230 kV and one 115 kV existing Western Area Power Administration transmission lines to accommodate the footprint of the upper reservoir. Construction is proposed for 5 continuous years.

The proponent (Black Canyon Hydro, LLC) has met with Wyoming Game and Fish Department (Department) since 2011 (wer12249.00). The Department has provided review and comments on numerous adaptive management plans and in meetings regarding the Department's concerns with the Project impacts to fisheries and wildlife. However, the proponent has not considered the opportunities to avoid and minimize the project's impacts and instead chosen on many concerns to go directly to mitigation.

Primary Remaining Concerns:

Big game concerns related to the continuous disturbance from year-round construction, over a 5-year or more period, within bighorn sheep, mule deer, and antelope crucial winter range, crucial year-long range, and parturition range. The Ferris-Seminoe bighorn sheep herd has year-round, high site fidelity to the project area and bighorn sheep are susceptible to stress which can result in disease outbreaks, reduced reproduction, and survival. Attempting to shift bighorn sheep to less preferred habitats, a mitigation strategy proposed by the Federal Energy Regulatory Commission (FERC) and the proponent, can result in; increased predation, reduced nutritional intake and physical condition, reduced reproduction and lamb survival, higher disease risks, elevated stress levels, reduced foraging time due to increased vigilance watching out for predators, and may lead to a population decline and ultimately extirpation of the herd.

The Ferris-Seminoe bighorn sheep herd is currently a robust herd, and based on disease surveillance data, the healthiest bighorn sheep herd in Wyoming. Impacts to bighorn sheep or other wildlife from construction activity may not be physically symptomatic for a biological monitor to detect. Stress-induced myopathy can occur a few hours to a few weeks after a stressful event. There are no known effective mitigation options that will adequately compensate

Seminole pumped storage project comments | May 12, 2026 |

for the direct and indirect impacts from the disturbance and loss of habitat for the Ferris-Seminole bighorn sheep herd. FERC directed the project proponent to include FERC's mitigation measures in their "Wildlife Seasonal Restriction Variance Plan" and deemed this plan to be adequate. The Department disagrees with FERC's finding that this plan will adequately mitigate the identified impacts, as these measures lack scientific evidence.

Sage-grouse concerns related to the development of a 30-mile long, 500 kV transmission line, predominantly through Core Area and in close proximity to several occupied leks. Additional work would be necessary to ensure compliance with the Greater Sage-Grouse Executive Order. A portion of the project transmission line and one access road would be located within 0.6 mile lek "No Surface Occupancy" (NSO) buffer for occupied Greater Sage-Grouse leks. The proponent should work with the Department to submit a Density and Disturbance Calculation Tool (DDCT) analysis and consider these concerns in order to ensure compliance with the Greater Sage-Grouse Executive Order.

Potential changes to water quality and physical aquatic habitat features that have the potential to negatively impact fisheries and recreational resources of the Seminole Reservoir, Kortes Reservoir, and the Class I Waters Blue Ribbon trout fishery of the Miracle Mile. The "Water Quality Adaptive Management Plan" (AMP) was developed by the project proponent as part of the state water permit issuance from DEQ. However, these fisheries and habitat concerns have not been fully addressed.

Changes to water temperatures, dissolved oxygen levels and water levels within the reservoirs are likely to result in impacts to fish life. These include walleye egg desiccation with water level fluctuations of 12-15 inches per day at average reservoir levels. Potential downstream temperature changes in the Miracle Mile could result in higher temperatures during some periods of time and colder temperatures during the winter which may result in deleterious ice formations. Walleye entrainment risks are high. Modeling indicates as many as 24,000 walleye may be entrained annually thus reducing walleye populations and reductions in angler opportunities.