

**Roundhouse Wind Energy Project
Wyoming Industrial Siting Council Docket DEQ/ISC 18-13
State Agency Comment Form**

Response required to Industrial Siting before *April 24, 2019*

Instructions:

- a. Your agency is required by W. S. 35-12-110(c) to provide this information.
- b. Please print or type.
- c. A letter providing all required information may substitute for this form.
- d. Use additional pages as necessary.
- e. Consider only the aspects of the project which are in your *agency's* area of expertise.

Name of Agency: **Wyoming Department of Agriculture**

This form was prepared by (name, title, and phone number):

**Chris Wichmann – Natural Resources and Policy Division Manager
307-777-6576**

From the expertise of the agency, should the Industrial Siting Council *deny* a permit for the construction and operation of the project?

1. The agency has no reason to recommend denial of a permit. Check here XXX
2. The agency recommends denial of the permit. Check here ___ and provide reasons:

It is the stance of the Wyoming Department of Agriculture (WDA) to support Wyoming's private landowners and agricultural industry in sustaining a viable agricultural industry and way of life. We believe the Project being developed on private lands enhances private landowners ability to maintain their way of life while allowing for the continuation of traditional agricultural practices.

We recommend the developer work closely with the landowners when identifying potential locations for the turbines and roads. It is important to fully understand the landowners' agricultural operations to help avoid impacting their management and operations.

We encourage emphasizing successful reclamation and monitoring to occur on disturbed lands. Monitoring vegetation and reclamation trends is key to ensuring successful management of the resources impacted by the proposed project. We appreciate that you will work with the landowners on developing appropriate seed mixes for reclaiming disturbed areas, and not default to agency specific mixes.

From the area of expertise within the agency, the Industrial Siting Council should consider the following as permit conditions on the construction or operation of the project (list):

The project area has major infestations of Dalmatian Toad Flax along with isolated areas of other identified weeds. It is imperative that these weeds do not continue to spread throughout the project area. WDA would suggest the Company make appropriate commitments to control Dalmatian Toad Flax and others throughout the project area. This would include washing all equipment prior to entering the project site. If work

occurs in or adjacent to infested areas then all equipment will be washed prior to moving into new areas of the project.

It is also a concern of ours that Cheatgrass is not addressed in the Weed Management Plan. Cheatgrass is on the Laramie County Weed and Pest – Declared List but is not identified or discussed in the Weed Management Plan. The WDA would strongly suggest the Company develop a plan to prevent, spread and control of Cheatgrass within the project area.

One area of concern regarding the proposed plan is the Weed Management Plan. The Plan lacks commitments and mitigation measures. The General Weed Management Practices located on Page 1401 only applies to “all phases of reclamation,” which may not include activities during construction, operation, pre-reclamation and decommissioning efforts. In addition, it states “Control weeds as needed...” is not a strong enough commitment. The WDA would like to have strong commitments from the company to require monitoring and weed management practices during the entire operations lifespan, including on all impacted sites throughout the project area.

In addition, knowing the amount of weed infestations that occur within the project area, we would recommend the Company voluntarily mitigate surface impacts by actively helping the local Weed and Pest agencies, lessees, and landowners by developing a plan and actively treating identified areas infested (mostly Dalmatian Toad Flax) throughout the project area, not just areas included in their reclamation efforts. Work closely with the local Weed and Pest to develop specific treatment plans and consider third party contractors.

We are aware there are several other weeds of concern in the project area and would like to have them acknowledged and accounted for in their weed management control plan, such as, Canada thistle, Musk thistle, Spotted Knapweed, Black Henbane, Common Mullein, Viper’s Bugloss and others.

We support the Laramie County Conservation Districts recommendations regarding management practices during construction, operation and decommissioning. And encourage the Company to work with both the local Weed and Pest and Conservation District.

Describe the regulatory jurisdiction which your agency has over aspects of the project.

1. If no regulatory authority, then check here XXX and do not complete the remaining statements.
2. Regulation is by the following statutes:
3. Attach a statement of your agency’s ability to regulate impacts of the project.