



April 26, 2024

BLM Rock Springs Field Office  
Attn: Jackalope Wind Energy Project Team  
280 Highway 191 North  
Rock Springs, WY 82901-3447

To Whom It May Concern:

Following are the Wyoming Department of Agriculture (WDA) Scoping comments regarding the Jackalope Wind Project (Project) in the Rock Springs Bureau of Land Management Field Office (BLM).

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 Scoping Notice indicates the Project will encompass 293,100 acres, with approximately 166,100 of these acres managed by the BLM. WDA supports private property rights and the decisions of private land owners. When the Project proponent works with the private landowners, WDA's comments pertain to both private and federal landowners in support of reducing the negative impacts to the livestock grazing permits, allotments, and industry.

The Project proposes 213 wind turbines to generate 600 megawatts of electricity. Each wind turbine will require an access road in addition to a number of main roads within the Project area. These roads lead to a number of negative impacts to livestock and wildlife. An increase in roads directly correlates with an increase in vehicular traffic. WDA urges the Project proponent to require speed limits to reduce or minimize potential collisions with livestock and wildlife.

The Project proponent must work with the livestock grazing permittees and landowners to compensate for injury and death due to collisions as a result of the project implementation. Additionally, increased traffic significantly increases dust. The dust negatively impacts livestock and wildlife by reducing palatability of forage, premature tooth wear, and cause respiratory problems. WDA urges the Project proponent to require dust abatement on all roads throughout the project area for the duration of the Project's timeline, not just during construction.

WDA urges BLM require a weed management plan and reclamation plan. Both plans should include short and long-term objectives and requirements. The Project proponent may want to work closely with livestock operators to assist in identification and location of weeds to ensure treatments are timely. The BLM Field Office has numerous livestock grazing permittees with domestic sheep grazing both BLM and private lands. It is imperative for the Project proponent to address treatment and eradication of halogeton in both the weed and reclamation plans to prevent death loss of domestic sheep.

WDA is insistent on BLM inventorying and mapping all range improvements across the project area prior to any further analysis. The Project is likely to conflict with numerous range improvements across the area and grazing allotments.

*Equal Opportunity in Employment and Services*

**BOARD MEMBERS**

Andrew Patrick, *District 1* • James Rogers, *District 2* • Kim Bright, *District 3* • Amanda Hulet, *District 4* • Mike Riley, *District 5*  
Jody Bagley, *District 6* • Larry Krause., *District 7*

**YOUTH BOARD MEMBERS**

Meredith Halweg, *Southeast* • Benjamin Anson, *Northwest* • Hadley Manning, *Southwest* • Lexi Bauder, *Northeast*

Examples of range improvements might include fences, stock tanks, pipelines, or other water impoundments. These improvements were likely located in their respective areas to increase distribution of livestock across the allotment, to address Land Health Standards (LHS), or reduce conflicts with livestock, wildlife, and wild horses.

During the initial development of the range of alternatives, the BLM must work closely with the Project proponent to avoid to the extent possible any range improvements. If the improvements are impacted, the analysis and subsequent implementation must include immediate replacement of the improvements with no financial or labor obligations assigned to the livestock operators.

Finally, as part of the analysis, WDA believes it is important to recognize the potential for indirect impacts to livestock grazing permittees. We urge the BLM to ensure the LHS are incorporated into documents and recognize the potential changes in livestock distribution and forage utilization after the Project implementation. If LHS change post Project implementation, BLM should not require livestock grazing permittees to single handedly address the LHS when these indirect impacts were incorporated into the National Environmental Policy Act decision.

In conclusion, we appreciate the opportunity to work with BLM as a Cooperating Agency for this project. We look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto  
Director

DM/jw

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