



Laramie Range Wind Project

CFACT Comments on Applications PZ-26-00072 & PZ-26-00073

Laramie County, Wyoming · Submitted September 29, 2026

For the official record: CFACT requests that the complete comment below be entered into the official record for both applications.

How many eagles is the County willing to kill?

An approval decision on this project would be premature, because a crucial piece of environmental data, the projected eagle kills from the project, is still in progress. Laramie County needs to decide how many eagles it is willing to kill. At issue is the proposed 650-megawatt Laramie Range Wind Project with potentially hundreds of eagle-killing turbines. This is a very large project.

The County is supposed to carefully consider the environmental impacts of the project, but there is a glaring gap in their information. The U.S. Fish and Wildlife Service (FWS) is supposed to predict the number of eagles killed by this project but has yet to do so. The County should wait for this crucial data.

Of particular concern are the golden eagles because Wyoming is central to their population. This population has reportedly declined by an incredible 30% since wind development began two decades ago.

FWS normally estimates the golden eagle death rate for a wind project when that project applies for a permit to kill eagles under the Eagle Protection Act. In this case, the County should ask FWS to do the calculations directly for them, not via the wind project developer. To the extent the developer's eagle-related data is being used, it needs to be verified.

The FWS uses what is called a Collision Risk Model to predict golden eagle deaths from a proposed wind turbine array. The model output is a probability distribution, not a single number of deaths. There is a probability for any given number of deaths.

For eagle-kill permitting purposes, the FWS uses the number of deaths with an 80% probability of occurring. The County might also want to consider numbers like the 50% and 30% death rates, which will be increasingly larger than the 80% rate. These lower-probability death rates are still serious likelihoods, calling for appropriate caution.

If the FWS will not provide these golden eagle death calculations, then Wyoming Game and Fish should develop them. The County must have the relevant eagle death data before it can make an informed decision on the huge Laramie Range Wind Project.

If it is proposed that an eagle detection system will be used in the project, this is unproven technology and the County should get the opinion of the U.S. Fish and Wildlife Service or WY Game and Fish on its feasibility and effectiveness before approving the project. The vendor claims are not credible.

Wind turbines killing eagles cannot be ignored. By approving a wind project like this, the County is signing a death warrant for eagles, and they should want to know how many eagle deaths they are approving.

Respectfully submitted,

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