



Cheyenne-High Plains Audubon Society
P.O. Box 2502
Cheyenne, WY 82003

September 7, 2026

Mayor Patrick Collins & City Council Members
City of Cheyenne
2101 O'Neil Avenue Room 310
Cheyenne, WY 82001

RE: PUC-26-209/HR Ranch Road
Planning Commission Public Hearing on September 8, 2026

Dear Mayor Collins and Members of Cheyenne City Council,

The Cheyenne-High Plains Audubon Society (CHPAS) Board of Directors is ***against changing the proposed zoning designation on Section 31 T14N, R65W*** from City AG to City BP as requested by the owner, HR Land Company. Construction of any kind on this property would be immediately adjacent to an Important Bird Area (IBA) located on Wyoming Hereford Ranch property.

About CHPAS: The Cheyenne-High Plains Audubon Society has served southeastern Wyoming communities since 1974. Our nonprofit organization promotes the conservation and appreciation of birds and wildlife through education, science, advocacy, and habitat stewardship. We offer a variety of programs, field trips, and engagement opportunities to our neighbors throughout southeastern Wyoming at no cost. At CHPAS, we believe that healthy lands for birds and wildlife are of great value to our communities. Additionally, we are an independent affiliated chapter of the National Audubon Society, an organization that has worked on behalf of birds and wildlife for 120 years.

Birds and Wyoming: The Wyoming's State Wildlife Action Plan (SWAP), overseen by Wyoming Game and Fish Department, is a comprehensive strategy to maintain the health and diversity of wildlife within the state. The draft 2027 SWAP has identified Species of Greatest Conservation Need (SGCN), which “warrant additional conservation attention through targeted conservation efforts, increased funding, and considerations in land use and development planning”. Among these are 89 bird species – many of which are found in the area where zoning changes are being considered.

Excerpts from the draft 2027 SWAP:

“Human activities have contributed to the declines of many bird species in Wyoming and globally (Lees et al. 2022). Habitat loss, modification, and degradation are among the most pervasive challenges facing birds, including Wyoming’s SGCN (Lees et al. 2022, North American Bird Conservation Initiative 2025). In addition to the indirect effects of habitat loss, direct mortality caused by human activities has contributed to bird population declines across species.”

Birds in general reflect the overall health of the lands around them. The number of breeding adult birds has declined about 30% since 1970. This means that in less than a single lifetime, North America has 3 billion fewer birds today. This massive decline is widespread and includes even common species. Among

the hardest-hit habitats are grasslands, such as found in eastern Wyoming, where populations have dropped by 53% (that is more than 720 million fewer birds).

Background: Wyoming Hereford Ranch is designated as a state Important Bird Area (IBA). Coordinated by BirdLife International, with National Audubon Society serving as the lead for the United States, the IBA Program is a global initiative which aims at identifying and conserving the most important places for bird populations. Areas in southeastern Wyoming were identified and evaluated by a committee of avian and conservation experts. Based on scientifically defensible data-driven evaluations of bird populations and habitat, two locations met the criteria in Cheyenne; Lions Park and Wyoming Hereford Ranch (WHR).

The WHR IBA is designated an IBA of State-level Significance because it:

- 1) Provides essential habitat for Species of Conservation Concern¹.
- 2) Contains a rare, unique or exceptional representative habitat/ecological community.
- 3) Regularly holds significant concentrations of congregatory² birds.

Joseph Sloan Hales, M.D. worked with National Audubon Society and third-party expert ornithologists to evaluate the WHR for consideration as an IBA. Because of the significance listed above, this area was designated in 2007. Since that time Dr. Hales and his family have been constant partners with CHPAS in an effort to improve and protect this area.

Two thousand acres comprise the IBA area, with trails and paths open to the public throughout the year. The WHR IBA is a popular recreational destination, for birders and those looking to enjoy nature/the outdoors. WHR currently attracts 275 species of birds³, enjoyed by local community members and visitors from across the country. During the years 2025 and 2026 (to 08/31/26) 36 states⁴ and international visitors from Canada, Italy, and French Polynesia visited the ranch; many of these to bird. The state and city highlight⁵ the WHR to local visitors, taking great pride in the years of work put forward by the Hales family to make this area valuable to birds and the public.

The IBA includes Herbaceous Upland and Grasslands, Wetlands and Wooded Wetlands, Pastureland, and native Short-grass Prairie. The riparian areas, especially in our high-elevation area, provide vital ecological and biological value to southeastern Wyoming.

The ranch provides important nesting, feeding, migration and wintering habitat for birds. Wetland irrigated meadows and woody riparian habitats attract a great variety of birds, especially during spring migration. The range of species that depend on this area, as it currently is, is remarkable - from wading

¹ Source: U.S. Geological Survey. Accessed 09.04.26 at <https://www.usgs.gov/programs/cooperative-research-units/science/species-conservation-concern>

² Species that gather in globally significant numbers at a particular site and at a particular time in their life cycle for feeding, breeding or resting (during migration). Source: <https://biodiversitya-z.org/content/congregatory-species>

³ Source: Cornell University eBird. Accessed 09.06.26 at <https://ebird.org/hotspot/L272183>

⁴ Visitors were from the following states: Alaska, Arizona, California, Colorado, Connecticut, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Texas, Utah, Virginia, Washington, Wisconsin, and Wyoming.

⁵ Featured by Visit Cheyenne WY. Accessed 09.04.26 at <https://www.cheyenne.org/listing/wyoming-hereford-ranch/2148/>

birds to shorebirds to hummingbirds to New World sparrows. The wooded riparian area adjacent to the ranch headquarters is well known for its warbler species. Over half of the species of warblers found in North America have been documented in this area.

Mature cottonwoods and willows growing along Crow Creek act as a magnet for migrating birds. The months of May and June, as well as August and September, are particularly busy as birds use this area to rest and gain strength to continue their journey northward or to the south.

The WHR will only become more important a refuge as high density housing and commercial enterprises continue to move into the area. Because of the proximity of Cheyenne, threat of development is the primary concern to this area that is so important to so many bird species throughout the year.

Compromised habitat (loss and fragmented habitat), noise, and other forms of disturbance will dramatically reduce the quality of the habitat at the WHR for birds and could cause bird populations to be further compromised. The development in adjacent lands will impact the quality of the avian habitat at the WHR and visitor experiences.

Concerns: *It is critical that the parcel in question remain zoned as City AG.* The proposed zone change will place heavy equipment and traffic within less than 0.2 miles of the designated Important Bird Area for many months and possibly several years.

Building a data center on the property raises concerns about water quantity/quality and air quality, as well as light and noise impacts.

Crow Creek runs through the IBA and provides water to those living southeast of Cheyenne. Contamination of the creek – which we have already seen happen recently from a nearby data center – or impacts to water flow could have serious effects on the WHR property as well as a wide range of birds and wildlife that depend on this water source in our arid region.

Data centers are also known to produce emissions during operation and cooling processes. The Wyoming Outdoor Council⁶ reports that gas turbines can emit nitrogen oxides, particulate matter, and volatile organic compounds that impact respiratory health. These emissions could be detrimental to both people and wildlife residing in the area.

In addition, data centers continuously emit noise and light pollution. Data centers use extremely large arrays of industrial fans to facilitate air cooling. Continuous operation of a fan array and power generators will result in chronic, broadband (and low-frequency) noise source completely unnatural to this landscape. Fan impellers create specific whines and tonal drone sounds that travel hundreds of feet or up to a mile. Low-frequency noise travels farther, penetrates buildings more easily, resists conventional insulation, and is most noticeable at night when background sound drops and the cooling systems keep running at full capacity. The addition of constant low-frequency noise has caused sleep and health problems in people that live near data centers, causing resident pushback⁷. This constant noise is also expected to negatively impact breeding birds, who use vocalizations to attract mates, and we fear could

⁶ Wulf, Jocelyn (2026). Data Center Policy in Wyoming: Needs and Considerations for Responsible Development. Wyoming Outdoor Council.

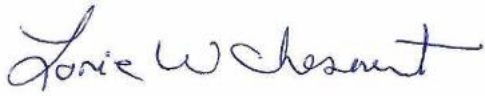
⁷ Source: Environmental and Energy Study Institute. Accessed 09.06.26 at <https://www.eesi.org/articles/view/communities-are-raising-noise-pollution-concernsabouth-data-centers>

reduce the overall quality of this habitat for birds. We are concerned that given the proximity to the data center, the long-term value of the WHR to birds may be compromised.

CHPAS has invested *thousands of hours of citizen science and reporting*, as well as nearly *one thousand hours of work* improving bird habitat, in partnership with the ranch. This land is not expendable and should be respected as the local treasure that it truly is, providing uniquely important bird habitat and an outstanding location for people to enjoy nature.

The CHPAS Board of Directors requests that Council retain the current zoning designation as City AG to help preserve this landmark for southeastern Wyoming. We ask that public health, which includes the ecologic and community benefits provided by the adjacent WHR, be seriously considered and recognized as an obligation to protect.

Sincerely,

A handwritten signature in blue ink that reads "Lorie W Chesnut". The signature is fluid and cursive, with the first name "Lorie" being more prominent.

Lorie Wayne Chesnut, DrPH, MPH
Chapter President

2026/2027 CHPAS Board of Directors: Lorie Wayne Chesnut, President; Grant Frost, Vice President; Chuck Seniawski, Treasurer; Kirk Miller, Secretary. Board Members: Pete Arnold, Barb Gorges, Mark Gorges, Vicki Herren, Wanda Manley, Dennis Saville, Kurt Warmbier.