

January 5, 2010

Mr. Caleb Hiner, RMP Project Lead
BLM Worland Field Office
P.O. Box 119
Worland, WY 82401-0119

Re: Key Nongame Wildlife Areas for the Bighorn Basin RMP Revision

Dear Mr. Hiner,

The following comments are submitted on behalf of the Wyoming Outdoor Council for consideration during the revision of the Bighorn Basin Resource Management plan and associated environmental impact statement. The boundaries of the Key Nongame Wildlife Areas (KNWA) discussed herein were developed by the Wyoming Game and Fish Department's (WGFD) nongame program. These nongame areas are considered to be very important because they are very speciose and provide important habitat to nongame species that have been designated by the WGFD as Species with Greatest Conservation Need (SGCN). Many of these species have been declining in recent years, thus it is incumbent upon the BLM to formulate management strategies that will ensure the continued vitality of these species. We ask that these areas be withdrawn from surface disturbing activities and closed to future leasing when appropriate. Alternatively, areas that are already leased should be managed to protect these priceless resources from continued overutilization and climate change. Specific steps might include: preventing new road or infrastructure construction, non-chemical invasive species control, and better grazing management. These measures are especially critical along riparian corridors and in wetland or wet meadow habitats which are known to support the broadest array of nongame species.

I have enclosed two maps that reference each of the areas discussed in these comments. The first map, the **BighornBasinSpecialPlaces&NongameAreas.pdf** shows how these KNWAs are often consistent with the special places that the Greater Yellowstone Coalition has developed. The second map, **BighornBasinCrucial&Nongame.pdf** demonstrates that these areas are important to big game species in addition to nongame species. For your convenience, I have also enclosed a GIS shapefile that delineates each of these areas.

KEY NONGAME WILDLIFE AREAS

1. Wind River Canyon

This area was selected by the WGF D because of a high concentration of bat roosts and adjacent foraging habitat along the rim and to the north and east of Wind River Canyon. This area is also an important grebe, Common loon, and waterfowl staging area. WY Gap classifies a large portion of the area as having a moderate to high ranking for species diversity. There are 18 bird and 9 mammal species on the state's SGCN list that are found in this area. The SGCN bird species found here include: American white pelican, Bald eagle, Barrow's goldeneye, Black-backed woodpecker, Boreal owl, Clark's grebe, Common loon, Forster's tern, Franklin's gull, Great blue heron, Greater sandhill crane, Lesser scaup, Northern pintail, Peregrine falcon, Redhead, Short-eared owl, Western Grebe, and Virginia rail. The SGCN mammal species found here include: Big brown bat, Little brown bat, Long-eared myotis, Long-legged myotis, River otter, Silver-haired bat, Spotted bat, Townsend's Big-eared bat, and the Western Small-footed myotis.

In addition to these nongame species, you will find that the eastern portion of this area encompasses overlapping crucial winter ranges for American pronghorn, Rocky mountain elk, and Mule Deer.

2. Beartooth

This area was selected by the WGF D because of the spruce fir forest and associated boreal wildlife. WY Gap classifies a large portion of the area as having a moderate to high ranking for species diversity. The SGCN list includes 12 bird and 23 mammal species. The SGCN bird species found here include: American three-toed woodpecker, Barrow's goldeneye, Black-backed woodpecker, Boreal owl, Greater sandhill crane, Harlequin duck, Great gray owl, Lesser scaup, Northern goshawk, Northern pygmy-owl, Peregrine falcon, and Trumpeter swan. The SGCN mammal species found here include: American water shrew, Big brown bat, Canada lynx, Dwarf shrew, Fringed myotis, Grizzly bear, Hoary bat, Little brown myotis, Long-eared myotis, Long-legged myotis, Moose, Northern flying squirrel, Preble's shrew, River otter, Spotted bat, Townsend's big-eared bat, Vagrant shrew, Water shrew, Water vole, Western heather vole, Western small-footed myotis, and the Wolverine.

In addition to these nongame species, you will also find that a significant portion of this area is used as a crucial winter range by American pronghorn, Mule deer, and Rocky mountain elk.

3. Heart Mountain/Chapman Bench

This area was selected by the WGF D because it is one of few areas in Wyoming with concentrations of Mountain plover and Long-billed curlew. The SGCN list includes five bird and 8 mammal species. The SGCN bird species include: Brewer's sparrow, Greater sage-grouse, Long-billed curlew, Mountain Plover, and the Peregrine falcon. The SGCN mammals include: Big brown bat, Little brown myotis, Long-eared myotis, Long-legged

myotis, Olive-backed pocket mouse, Pallid bat, Spotted bat, and the Western small-footed myotis.

In addition to these nongame species, you will also find that a significant portion of this area is used as a crucial winter range by Mule deer, Bighorn sheep, and Rocky mountain elk.

4. Yellowtail

This area was selected by WGFD because of the large amount of intact riparian cottonwood and associated species. WY Gap classifies a large portion of the area as moderate to highest ranking for species diversity. The SGCN list includes nine bird and seven mammal species. The SGCN bird species include: American bittern, Bald eagle, Black-crowned night-heron, Great blue heron, Lewis's woodpecker, Peregrine falcon, Swainson's hawk, Virginia rail, and the Yellow-billed cuckoo. The SGCN mammal species include: Bighorn sheep, Big brown bat, Little brown bat, Long-legged myotis, Long-eared myotis, Townsend's Big-eared bat, and the Western small footed myotis.

In addition to these nongame species, this area is also a crucial winter range for Bighorn sheep, Rocky mountain elk, Mule deer, and American pronghorn.

5. Bighorn River

This area was selected by the WGFD because it is an important bat roosting areas. WY Gap classifies a large portion of the area as the highest ranking for species diversity. The SGCN list includes eight bird and eleven mammal species. The SGCN bird species include: American bittern, Bald eagle, Black-crowned night heron, Great blue heron, Lewis's woodpecker, Swainson's hawk, Virginia rail, Yellow-billed cuckoo. The SGCN mammal species include: Bighorn sheep, Big brown bat, Hoary bat, Little brown bat, Long-legged myotis, Long-eared myotis, Spotted bat, Silver-haired bat, Townsend's Big-eared bat, Vagrant shrew, and Western small footed myotis.

In addition to these nongame species, this area is also a crucial winter range for Mule deer, and American pronghorn

6. Medicine Lodge

This area was selected primarily because of important bat and passerine habitat. The riparian habitats in this area are extremely rich in bird diversity and densities, possibly due to the relatively mild climate. WY Gap classifies the area as varying greatly from the lowest to the highest ranking of species richness. The SGCN list includes four bird and nine mammal species. The SGCN bird species include: Lewis's woodpecker, Merlin, Peregrine falcon, and Willow flycatcher. The SGCN mammal species include: Big brown

bat, Hoary bat, Little brown myotis, Long-eared myotis, Long-legged myotis, Pallid bat, Silver-haired bat, Vagrant shrew, and Western small-footed myotis.

In addition these SGCN species, this area encompasses crucial winter ranges for Rocky Mountain elk, and Mule deer. In addition, this area is home to three Wilderness study areas, the Nature Conservancy's Ten Sleep preserve, and one state park. The drier upland areas along entire bighorn front host many populations of Chuckar and Gray partridge, which are a very important recreational hunting resource for residents in the Bighorn basin and other parts of Wyoming. This area has some of the most unique landscapes and diverse wildlife populations in Wyoming and thus deserves strong protection.

I appreciate your time and consideration. Please contact me if you have questions or need further information.

Sincerely,

Nathan Maxon
Energy and Public Lands Fellow
Wyoming Outdoor Council
262 Lincoln Street
Lander, WY 82520
307-399-9515 ext. 15
nathan@wyomingoutdoorcouncil.org