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December 20, 2010

Mark Thonhoff
Pinedale Field Office
1625 West Pine Street
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Pinedale, WY 82941
Mark_Thonhoff@blm.gov

Dear Mr. Thonhoff:

Thank you for the opportunity to comment on the adaptive management changes to the wildlife monitoring and mitigation matrix presented by the University of Wyoming Cooperative Fish and Wildlife Research Unit (COOP). Wyoming Wildlife Federation takes an active role in our commitment to wildlife and habitat quality within the Pinedale Anticline and has reviewed the suggested changes.

The COOP reviewed three wildlife species - mule deer, antelope, and the sage grouse. They recommend removal of one monitoring and mitigation criteria from each species. For mule deer they would like to remove "avoidance distances" as a criterion and all the supporting matrix specifics. For antelope the COOP suggests removing the criterion "size of habitat fragments used" and for sage grouse removing criterion "nesting success and habitat selection".

WWF would like the criteria to be left in because they identify a separate trigger to measure and analyze. Although the criteria proposed for removal is in conjunction with population decline, they remain to be important triggers to identify and mitigate. If these separate triggers are taken out of the matrix, WWF would at least like to see the data for mule deer avoidance from well pads and roads, antelope habitat use, and changes in sage grouse nesting success be collected and measured.

Sincerely,

Joy Bannon
Field Director
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