

Wyoming Native Plant Society
P.O. Box 2449, Laramie, WY 82073

Ms. Rhiannon Jakopak
Wyoming Game & Fish Department
5400 Bishop Blvd
Cheyenne, WY 82006

20 July 2026

Dear Ms. Jakopak,

We are pleased to submit comments on behalf of Wyoming Native Plant Society (WYNPS) regarding the Draft 2027 Statewide Wildlife Action Plan prepared by Wyoming Game and Fish Department. Including plant species in Wyoming's SWAP process is a great stride as stated in our first SWAP comments submitted on 15 March 2025. We later provided technical information regarding species- and habitat-based challenges on 30 June 2025. The current Draft 2027 SWAP document as posted with a 13 May 2026 date is a far bigger document than anything we have reviewed to date, containing goals, objectives, species details and implementation details. Our comments aim to address the full scope of plant-related subject matter.

We appreciate inclusion of WYNPS as interested public in SWAP communications over the past year. We are the only organization in the state with plant conservation central to our mission and at a statewide scale. We are venue for professional botanists, ecologists and other resource professionals, and a large contingent of interested public. The strengths and weaknesses of the treatment for rare plants in the Draft Wyoming SWAP are detailed in four main points and accompanying recommendations.

First, it is appropriate to present how plant criteria for the SGCN list were determined. There is a matrix of two factors describing the basis for SGCN recognition among plant species (p. 27) that are highly abbreviated compared to criteria for animal species (pp. 25-27). They have the effect of focusing on rare species whose distributions are restricted or centered in Wyoming – a group that definitely warrants inclusion. We note that the animal list criteria include threats and trends, and if there are Wyoming plants meeting such criteria, they warrant inclusion. For example, over 90% of the Wyoming Basin Ecoregion is in Wyoming and there were said to be over 200 rare plants in this ecoregion (Rowland et al. 2005). The rare plants in this Ecoregion tend to be specialists and if they are immediately threatened or if they and their habitat are in decline, then these criteria need to be added noting that Wyoming plants warrant this review in the future.

In another kind of case, over a decade ago there was a widespread promotion of commercial collecting involving purple coneflower (*Echinacea angustifolia*) for its medicinal use. While closer evaluation of this threat determined that commercial propagation can avert the impacts, it is a native species present in approaching half of Wyoming that WOULD have been appropriate for SGCN status had this common wildflower been at risk of extinction in Wyoming. As such, expansion of the plant criteria would be appropriate to address as a SWAP goal such that native plant species subject to major population or habitat declines or immediate threats would also be considered for SWAP inclusion. Threats and trends data are particularly difficult to acquire for plants but the need will not be addressed unless it is identified in the Final SWAP.

Second, one of the two existing criteria for SGCN plants pertains to the Wyoming contribution rank, but this criterion has not been presented to the state botany community except in WYNDD documents or partner meetings. If it is a factor for animals then it warrants better description in the Final SWAP if not more public information. It is recommended that it at least be presented in articles of the WYNPS newsletter if not also presented in some form at appropriate conferences of Wyoming botanists. It would be constructive to compare the Wyoming contribution rank with criteria used by federal land managing agencies in Wyoming.

Third, while the majority of SGCN species on the draft Wyoming plant list have a longstanding track record of documentation based on systematic field surveys, as reflected in over 40 years of articles about what have been called “species status reports” in WYNPS newsletters, there are also some that are species that are newcomers or else formerly tracked species that have not had information compiled on them in recent years that may simply need more compilation and synthesis work. There are also species that may need genetics work or just voucher review work before their distribution and/or Srank data can be considered complete. The treatment of draft SGCN species creates mistaken impressions that work on nearly all of them is starting from scratch and potentially undermines the credibility of the list. Separate species comments are attached for placing them into categories of well-documented or not.

Finally, we agree that there are insufficient funding and resources available for conservation of plant species on the Draft SGCN list. This is where a collaborative effort between WYNDD, Wyoming Native Plant Society, agencies, and like-minded groups can create a State Plant Conservation Action Plan. It may address SGCN listed actions and is far beyond the scope of SGCN to provide a conservation vision and build consensus in the state that plant conservation warrants expanded work... and accompanying funding.

One minor edit needed in the Draft SWAP is easy to address – the only photographs of plants in the entire document are on p 24 and do not show photogenic species. The two particular images are cropped so much that they do not even show diagnostic characteristics of the two species. Any ambiguity re. native plants in this document is to be avoided so as not to convey impressions that SGCN plant species are unidentifiable or worse, that so-called weeds are going onto the SGCN list.

A more basic point is the number of native plant species in the state. Pages 9 and 153 refer to 4000 native vascular plants in the Wyoming flora. However, the accepted rough tally is 2500 unique native vascular plants. The 4000 tally might have come from spreadsheet exports that tally both the accepted species names and accepted infraspecies names such as the working checklist of the Wyoming flora posted online by Rocky Mountain Herbarium. In the case of Ponderosa pine it appears as both *Pinus ponderosa* and *P. ponderosa* var. *scopulorum* i.e., two different taxonomically-accepted levels that should be tallied as a single entity in the state, not as two separate entities.

We appreciate that SGCN species conservation is being addressed in tandem with vulnerable habitats occupied by SGCN species. Land plants and many aquatic plants are rooted-in-place but

their habitats can be impacted and rendered unsuitable by activities that do not kill (harm) individual plants outright.

In closing, we send both praise and concern for the Draft SWAP as a sound start but still flawed if not counterproductive as a product to advance plant species conservation in Wyoming. We call for a sound SGCN plant list framework and provisions for updating the list. Provisions for addressing Wyoming plant conservation priorities and actions will be addressed in a future State Plant Conservation Plan.

Thank you for this opportunity to comment on the Draft SWAP.

Sincerely,

Bonnie Heidel, Conservation Committee Chair
Wyoming Native Plant Society