



August 9, 2024

Dear Wyoming Game and Fish Commissioners,

On behalf of the undersigned organizations, we are writing to voice our support for the Wyoming Game and Fish Department recommendation to map and formally recognize the Upper Wind River Mule Deer Migration Corridor. Of our organizations' thousands of members and supporters, the majority reside in Wyoming and are deeply invested in the long-term health of our wildlife populations and the habitat they rely on.

The importance of mapping habitat and making those maps readily available to the public cannot be understated. Knowing how many animals there are and where they move are fundamental to successful population management. Identifying the highest value habitat that wildlife populations rely on allows wildlife managers to focus habitat improvements and conservation efforts effectively. In freely sharing this vital knowledge with the public, the Department will make it easier for private landowners, NGOs, county government, and land managers to target conservation efforts where they can do the most good. Especially in the vicinity of Dubois, where impacts on private land have been identified as a primary threat to connectivity for this migration corridor, empowering landowners to undertake voluntary, incentive-based habitat improvement projects can play an important role in maintaining connectivity for migrating mule deer.

The threat evaluation for this migration corridor is compelling, boasting a robust sample size, nearly ten years of data, and a reasonable analysis of existing threats. Spanning three counties, two river basins, some of western Wyoming's most remote high elevation terrain, and reaching into Grand Teton National Park, the Upper Wind River Mule Deer Migration Corridor is emblematic of the awe-inspiring seasonal movements for which many of Wyoming's big game herds are famous. Over 75 percent of collared animals tracked for this analysis are migratory, showing a vulnerability in this population to significant declines if connectivity within the corridor were to break down. As this threat evaluation is finalized, we believe addressing the below recommendations will result in even stronger conservation benefits for mule deer using this migration corridor.

1. Incorporation of all route data

We believe the accuracy of the modeled corridor can be improved by incorporating all available migration route data. Requiring a threshold of at least two deer traversing a route before including it in the mapped corridor means omitting valuable, relevant information gleaned from collared animals. Given their social nature and extreme fidelity to migratory routes, it is highly likely that if one collared mule deer travels a migratory pathway, she has other deer with her following that same route. By updating the modeled corridor to include routes used by individual mule deer it will better reflect the habitat this herd relies on for its seasonal movements and hew more faithfully to the science.

2. Prioritization of funding through NRCS and other sources

Because the chief threats to this migration corridor occur on private lands, we strongly recommend that the Department ensure this migration corridor be prioritized for EQIP funding from NRCS through the USDA Migratory Big Game Initiative. All migration corridors represent irreplaceable habitat our big game herds require to access seasonal ranges and sustain robust populations. It would be unfortunate, and potentially detrimental to efforts to conserve the functionality of this migration, if it were not prioritized for funding due to its being an “identified” corridor versus being a “designated” corridor. If there is any chance an identified corridor would not be prioritized for habitat improvement funding through NRCS, we recommend the Department pursue full designation.

3. Potential for residential development on state lands

The threat assessment singles out residential development and subdivision as the most concerning threat for this migration corridor. While Wyoming’s Mule Deer and Antelope Migration Corridor Protection executive order does not govern development on private land, residential development can occur on state lands. The Office of State Lands and Investments has the ability to lease state lands for residential development and may be directed to do so by the legislature at their upcoming session. Were the draft bill for housing on government lands (25LSO-0024) to be enacted as currently written, important habitat on state lands around Dubois could be at increased risk of residential development, including parcels within the Upper Wind River Mule Deer Migration Corridor. In the case of housing developments on state lands, an identified corridor will offer no protection under the executive order, whereas a designated corridor would offer protection. Hemmed in as it is by public lands, space for human habitation is limited in Dubois. As demand for housing continues to surge in the coming

decades, pressure to lease state lands for residential development will only increase. Having the protections afforded by full designation of this corridor in place will help ensure important habitat on state lands remains safe.

4. Recognition of bottlenecks

As noted above, one of the chief benefits of formally recognizing and mapping this migration corridor is the opportunity it provides for better decision making on the part of landowners, county governments, and other entities. While the draft map for the Upper Wind River Mule Deer Migration Corridor gives the public an excellent understanding of where high, medium, and low use portions of the corridor occur, there is no information regarding bottlenecks. Having bottlenecks formally identified and mapped during the identification process would afford the public a more complete picture of where the highest value habitat occurs and lead to more informed decisions around habitat improvements and land use.

Again, we are strongly supportive of efforts by the Department to map this migration corridor and share data with the public. As Baba Dioum famously put it, “in the end we will conserve only what we love, we will love only what we understand, and we will understand only what we are taught.” What better way to light that spark than by telling the story of the varied terrain and great distances Wyoming’s big game herds travel during migration at every opportunity, engendering appreciation for and pride in Wyoming’s wildlife. After recognizing the Upper Wind River Mule Deer Migration Corridor, ideally via designation, we encourage the Department to continue its important work mapping and making data available to the public for other herds and migrations across Wyoming.

Thank you for the opportunity to provide comment and for your efforts to safeguard Wyoming’s exceptional wildlife habitat, ensuring mule deer have the chance to thrive in our great state.

Sincerely,



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