



WYOMING CHAPTER – THE WILDLIFE SOCIETY

wildlife.org/wyoming-chapter

October 22, 2019

Wyoming Legislative Service Office
200 West 24th Street
Cheyenne, WY 82002

RE: “Designation of migration corridors” bill

Dear Members of the Select Federal Natural Resource Management Committee:

On behalf of The Wyoming Chapter of the Wildlife Society (WY-TWS), please find the following comments on the “Designation of migration corridors” bill currently being considered by the Select Federal Natural Resource Management Committee. In light of the continuing pressures that result in lost, degraded, and/or fragmented wildlife habitat, efforts to proactively conserve and protect important habitat areas are critical to the long-term sustainability of our big game species. Robust populations of big game and the migrations that sustain these populations also are important to Wyoming’s economy and the quality of life for many residents. Therefore, we are appreciative of your attention to migration corridors. **However, because the bill does not require use of the best-available science, incorporate feedback from all stakeholder groups, or leverage the efforts of Governor Gordon’s advisory group on migration, we do not support the proposed designation process.**

The Wildlife Society is an international organization of wildlife professionals and students committed to addressing issues that affect the current and future status of wildlife in North America and throughout the world. The Wyoming Chapter is overseen by a volunteer-led executive board. WY-TWS is comprised of over 200 wildlife professionals who collectively promote awareness of and continued improvement in science-based wildlife management in Wyoming.

Wildlife researchers and managers recognize the importance of ensuring the ability of big game species to complete the biologically important spring and fall migrations to take advantage of limited resources and increase reproductive health. WY-TWS members have long been engaged on big game migration issues here in Wyoming. As far back as the mid-1980s, WY-TWS has worked alongside Wyoming Game and Fish Department in developing and updating seasonal range definitions that have been used with success in the state’s big game management efforts. The body of peer-reviewed research on big game migrations across the western landscape continues to grow and gain national attention, and much of the research has been conducted and published in peer-reviewed scientific journals by members of WY-TWS.

The position of The Wildlife Society is that the role of science in policy and decision-making is to inform the decision process, rather than to prescribe a particular outcome. Policy and decision-makers may make determinations that do not always provide maximum benefits or minimize impacts to wildlife and their habitats. Such determinations are appropriate if the best-available science and likely consequences from a range of management options have been openly acknowledged and considered.

Based on our collective scientific expertise, we believe that the proposed “Designation of migration corridors” bill is not in line with science-based wildlife management. Deferrals of land-use permits and mineral lease sales in certain corridors could help ensure functionality of migration corridors, yet this bill prohibits deferrals except when designated by the governor. Because of the documented effects of development on big game and their migrations, we do not support measures to prohibit deferrals in corridors.

Seasonal migration allows big game species to take advantage of abundant, high-quality food during the summer while reducing exposure to risky conditions such as harsh winters or predation.¹ In addition, the quality of an ungulate’s migration route can have direct effects on individual survival.² Scientists have demonstrated that species such as mule deer are incredibly faithful to their migration routes, with some individuals taking essentially the same path each year,³ even when encountering development that substantially alters habitat.⁴ This rigid behavior suggests a lack of ability to adjust migratory behaviors to accommodate changing landscapes. Evidence from bighorn sheep and moose populations suggests that if migration corridors are lost, it will take approximately 100 years for the population to redevelop migration.⁵ Furthermore, even species that are more flexible in their movements, such as elk, rely on migration to maintain robust populations.⁶

The effects of energy development on mule deer are significant and long-term. Oil and gas development was linked to a 36% decline in mule deer abundance over a 17-year study of nearly 200 deer.⁷ Further, when encountering disturbance to the landscape, mule deer migrate faster and stop less often to eat, which could cause them to miss foraging opportunities necessary to recover from harsh Wyoming winters.⁴ Migrations are crucial to maintaining the robust populations of big game in Wyoming, and taking actions to ensure continued functionality of these movements is essential to the continued existence of our revered big game populations.

Based on our collective experience participating in collaborative processes, we find the proposed bill is not sufficiently inclusive of all stakeholders, nor does it leverage

¹ J. M. Fryxell and A. R.E. Sinclair, “Causes and Consequences of Migration by Large Herbivores,” *Trends in Ecology and Evolution* 3, no. 9 (1988): 237–41, [https://doi.org/10.1016/0169-5347\(88\)90166-8](https://doi.org/10.1016/0169-5347(88)90166-8).

² Hall Sawyer et al., “All Routes Are Not Created Equal: An Ungulate’s Choice of Migration Route Can Influence Its Survival,” *Journal of Applied Ecology*, no. March (2019): 1860–69.

³ Hall Sawyer et al., “Migratory Plasticity Is Not Ubiquitous among Large Herbivores,” *Journal of Animal Ecology* 88 (2018): 450–60.

⁴ Teal B. Wyckoff et al., “Evaluating the Influence of Energy and Residential Development on the Migratory Behavior of Mule Deer,” *Ecosphere* 9, no. 2 (2018): e02113, <https://doi.org/10.1002/ecs2.2113>.

⁵ Brett R. Jesmer et al., “Is Ungulate Migration Culturally Transmitted? Evidence of Social Learning from Translocated Animals,” *Science* 361 (2018): 1023–25, <https://doi.org/10.5061/dryad.8165qv5>.

⁶ Matthew J. Kauffman et al., *Wild Migrations: Atlas of Wyoming’s Ungulates* (Corvallis, OR: Oregon State University Press, 2018).

⁷ Hall Sawyer et al., “Mule Deer and Energy Development—Long-Term Trends of Habituation and Abundance,” *Global Change Biology* 23, no. 11 (2017): 4521–29, <https://doi.org/10.1111/gcb.13711>.

representation from the scientific community. The proposed bill does not include a representative of the wildlife science community in the proposed working group structure. Scientific representation in the working groups and throughout the designation process will help to ensure that recommendations are made with consideration of the best-available science. Moreover, wildlife is held in trust for members of the public. Successful wildlife management hinges on incorporating stakeholders' desires in decisions related to wildlife, in tandem with science. Since the chairperson has the unilateral authority to appoint energy industry representatives to replace members that otherwise would be appointed to represent agriculture, conservation, sportspersons, recreation, and municipal government, there are no protections to maintain a voice for science, or other non-industry constituencies, in the group. Because of the importance of ensuring that science and all stakeholder groups have a role in determining the future of wildlife, we do not support trading a diverse constituency for individuals that only represent the interests of one group.

Wildlife management in North America is highly regarded across the world because of the forward-thinking philosophies that underlie our efforts; policies grounded in science that consider diverse stakeholder groups are integral to this high regard. **Given the concerns outlined here, we strongly recommend that members of the Committee vote against moving this bill forward and instead consider the recommendations from Governor Gordon's Migration Corridor Advisory Group that call for an Executive Order to identify policies for designating corridors.**

If you have any questions, please feel free to direct them to Rhiannon Jakopak, chair of the Legislative Affairs committee with WY-TWS. Thank you for your recognition of the importance of healthy wildlife populations to Wyoming's economy and people.

Sincerely,



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