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May 1, 2025

Wyoming Game and Fish Commission
5400 Bishop Blvd
Casper, WY 82604

Re: Sublette Antelope Migration Corridor Designation

Dear Wyoming Game and Fish Commissioners,

The Jackson Hole Wildlife Foundation (JHWF) appreciates this opportunity to provide comments on the consideration of designating the Sublette Antelope Migration Corridor under the Migration Corridor Executive Order 2020-1.

JHWF is a 501(c)(3) nonprofit established in 1993. We work to help communities live more compatibly with wildlife. That means putting science to work on the ground, implementing projects that protect wildlife and their habitat, and bringing people together to make conservation something we all have a hand in. A key focus is protecting migration corridors by conserving vital habitat through science-based, collaborative efforts. We lead volunteer-driven, hands-on projects—like fence removal and modification, highway and traffic mitigation, and habitat restoration—that deliver real, lasting benefits for wildlife across the landscape, including within the Sublette Antelope herd.

We support the Wyoming Game and Fish Department (WGFD) moving forward towards designation of the Sublette Antelope herd's Migration Corridor under the Governor's Executive Order 2020-1. The Sublette Antelope herd is one of the most studied wildlife populations in the world, including some of the most rigorous GPS collar data to demonstrate land use, reliance on habitat, and impacts of development. This level of knowledge provides more than ample insight regarding the importance of protecting this migration corridor.

The Sublette Antelope Herd is among the largest in the world. In 2022, managers estimated the population at over 43,000 animals, most of those individuals making migrations from winter ranges in the Upper Green River Valley to higher latitudes and elevations each spring to access abundant nutrition. However, in one single winter, the herd was reduced in half by a combination of factors that caused the death of ~20,000 individual animals. Deep winter snow and a novel disease were compounded by difficulties for this naturally nomadic species to move across the landscape to safer and more snow-free winter habitats.

The gravity of this event demonstrates the vulnerability of this herd to massive die-offs. Without impediments on the landscape like natural resource development, fences, roads and cars, and housing developments, this herd most certainly would have been more resilient to the impacts of winter 2022-23. Recognized expert on the Sublette Antelope Herd, Dr. Hall Sawyer, recently summed up the situation, “We often assume that anytime we have a tough winter, that mass mortality with deer and pronghorn is unavoidable ... but the fact is, **if these animals can move freely across these landscapes, the likelihood of them dying is drastically reduced. It’s the antidote to these mortality events everyone is so concerned about.**”

From the decades of abundant research and published literature on this herd we know that antelope may avoid areas of surface disturbance from petroleum extraction as well as areas of roads and housing development (Seidler et al. 2014, Sawyer et al. 2019). We also know from these many studies that avoidance can be compounded by additional infrastructure like fences and human disturbance (e.g., Seidler et al. 2014, Aikens et al. 2025). This is especially true within migration corridors where animals are using specific areas to move and migrate.

Governor Mead’s Executive Order 2020-1 aims to preserve long term functionality of migration corridors in Wyoming to maintain viable mule deer and antelope populations and we applaud these efforts. This herd is “highly valued ... and contributes significantly to the economy and reputation of Wyoming.” The WGFD holds a vital role in managing wildlife for the benefit of all Wyomingites. With that responsibility comes the opportunity for the Wyoming Game and Fish Commission to thoughtfully consider the Sublette Antelope Herd Migration Corridor designation, guided by the Department’s mission and a strong foundation of scientific research. The Governor’s Order appropriately protects private landowner interests and rights, which is also beneficial to wildlife migration in most cases. The Commission’s decision to recommend the designation of the corridor to the Governor will recognize those rights and can encourage and support improved permeability on private property.

The effort to designate this migration corridor comes at a critical time when 1) the herd is recovering from the catastrophic events of winter 2022-23, 2) the pace of renewable energy installation, petroleum extraction, and rural development is increasing rapidly, 3) opportunities for positively influencing regional federal government planning are happening (e.g., the Bridger-Teton Forest Plan and the BLM Resource Management Plan), and 4) important state owned land parcels are increasingly being scrutinized for optimal gains. Considering these opportunities and challenges it will be in the state’s best interest to designate this corridor with an understanding that the Sublette Herd will gain additional protections through designation. This will provide a higher level of protection while emphasizing the leadership role of Wyoming’s Game and Fish agency.

We support the work WGFD has done to research and present the recommendations in the Biological Risk and Opportunity Assessment, and **we support not only the designation of the fully modeled corridor map for the entirety of the Sublette Herd but also recommend retaining all 12 bottlenecks in the designation.** This is because the Sublette Antelope herd, as described by WGFD, has less than 10% interchange with nearby herds, hence it can be managed as one contiguous herd. To sustain the ecological integrity of this herd, all “segments” need protection. We would also appreciate the Commission considering expanding the bottlenecks designation at both the Black Fork and Big Piney bottlenecks to

reflect the full geography of animal use (based on GPS radio collar data). This will provide emphasis for the long-term conservation of these antelope in areas with higher levels of industrial development.

Jackson Hole Wildlife Foundation is a proud partner of Wyoming Game and Fish. This designation process and the state's interest in protecting the Sublette Antelope Herd Migration Corridor strengthens our ability to conserve wildlife by bolstering our relationships with other agencies, private landowners, nonprofit partners, and businesses and by providing not only language to craft win-win outcomes but also providing a clear commitment by WGFD to protect this herd. Together, we can continue to collaborate to preserve the long-term health of our native wildlife populations.

Sincerely,

Renee Seidler

Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation

References

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- Sawyer, H., J.P. Beckmann, R.G. Seidler, and J. Berger. 2019. Long-term effects of energy development on winter distribution and residency of pronghorn in the Greater Yellowstone Ecosystem. *Conservation Science and Practice*, 10.1111/csp2.83.
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