

The Honorable Mark Gordon, Governor of Wyoming  
State Capitol, 200 West 24<sup>th</sup> St.  
Cheyenne, WY 82002

February 3, 2020

Dear Governor Gordon,

On behalf of our members in Wyoming and across our nation, we applaud your efforts to develop a proposal for protection of migration corridors and are encouraged by the direction of the forthcoming executive order. We consider the following issues our highest priorities. These clarifications are crucial to achieving the executive order's goals and maintaining diversified stakeholder support.

**1. Explicitly define a regulatory framework for stopover and high use avoidance standards.**

Appendix C intends to limit disturbance in the most essential portions of corridors. To be effective, these intentions must be made more explicit. Permitting requirements should clearly establish the baseline that surface disturbance does not occur in designated stopovers unless scientific evidence can prove habitat functionality will not be negatively impacted. Additionally, the current standard for development restrictions in high use does not accurately reflect the scientific understanding of this habitat's function. This standard should limit surface disturbance so that movement is unimpeded regardless of whether this disturbance happens during migration "timeframes." The avoidance standard for high use sections would be better defined as "surface disturbance shall be limited to levels that do not diminish corridor functionality."

**2. Reinforce Wyoming Game and Fish Department authority to manage wildlife.**

This order provides an opportunity to acknowledge the Department's leadership. A new Whereas clause would reinforce their essential role. We suggest: "Whereas the Wyoming Game and Fish Department serves as the State's science-based wildlife management agency, and whereas fulfillment of their statutory authority includes providing scientific information and recommendations for the furtherance of big game conservation in all migration corridors."

**3. Ensure the identification process is aligned with scientific standards.**

Current research standards are to identify corridors after two years of collaring data. Expending state resources on scientifically unnecessary additional years of data collection is fiscally unwise and jeopardizes two ongoing studies being completed for priority herds (Carter Mountain pronghorn and eastern Greater Yellowstone Ecosystem mule deer).

Adding these revisions will ensure the executive order achieves the goals of migration corridor conservation and multiple use management. Thank you for your consideration.

Best regards,

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