

January 16, 2020

Wyoming Governor Mark Gordon  
c/o Renny MacKay  
Policy Director  
[renny.mackay@wyo.gov](mailto:renny.mackay@wyo.gov)  
Capitol Building  
200 W. 24th St.  
Cheyenne, WY 82002

**RE: Wyoming Migration Corridor Protection, Draft Executive Order**

Dear Mr. MacKay and Governor Gordon –

Thank you for being a national leader on big game migration corridors. The State of Wyoming needs direction on how to manage these vital habitats and we are appreciative that you convened an advisory group to tackle this topic and are now considering an Executive Order. Please accept the following comments and recommendations from the undersigned sportsmen organizations.

We are fortunate in Wyoming to have abundant natural resources, including energy and wildlife. Proper planning and policy are needed to ensure that we have a strong energy economy and continued robust wildlife. We appreciate that you are committed to finding that balance for big-game migration corridors. We share your goal that the Executive Order will result in a long-term, durable solution for our wildlife and economy.

The comments are structured to first highlight our highest priority recommendations and then detail all of our specific recommendations.

**Highest Priority Recommendations**

- The Executive Order should apply to all scientifically-defensible big-game migrations, and not be limited to mule deer and pronghorn. Application to all big-game, except bison, will allow the Executive Order to stay current as science evolves, eliminating the need to amend the Executive Order in the future. (See Recommendation #1, within the Whereas Clause Section)
- The Executive Order should confirm that the Wyoming Game and Fish Department (WGFD) will continue to perform their statutory mandate mission to provide scientifically-sound information, and to recommend appropriate land management actions in areas outside of designated corridors to state and federal land managers. (See Recommendation #4, within the Whereas Clause Section).

- The Executive Order should include language regarding coordination with federal government agencies, similar to what was included in Executive Order 2019-3 “Greater Sage Grouse Core Area Protection” to ensure consistency with the direction of this Executive Order. (See Recommendation #7, within the Therefore Clauses Section)
- We recommend that the Executive Order in Appendix C use the word “shall” in places that currently have “should”. For example, in Appendix C the language for High Use: Surface disturbance and human presence ~~should~~ shall be limited to levels that do not cause avoidance of migrating animals. (See Recommendations #1 and #2 within Appendix C)

### **Specific Recommendations and Justifications**

#### **WHEREAS Clauses**

Recommendation #1: Amend the second whereas clause to read, “WHEREAS, migration corridors are essential to the maintenance of viable ~~mule deer and antelope~~ big game populations.”

Justification: The draft Executive Order uses the terms “big game” and “mule deer and antelope” interchangeably, which creates significant confusion to which species this Executive Order applies. As described later in these recommendations, the Governor should add a definition of “big game” that is consistent with the existing statutory definition in Wyo. Stat. §23-1-101(a)(1), and ensure this Executive Order apply to all Wyoming ungulates, except bison.

Biologists have and are studying several ungulate species and their movement patterns, and it is reasonable to expect published studies that will identify new corridors as well as associated threats for multiple ungulate species. The recently published book Wild Migrations, for example, presents our current state of knowledge on Wyoming ungulates and demonstrates the need to conserve corridors for all of these species. Using big game to set the scope of the Executive Order will keep it current as science evolves and eliminate the administrative burden of amending the Executive Order in the future.

Additionally, there is no need to be concerned that designations will proceed without adequate scientific justification. First, the WGFD must develop sufficient data to warrant a designation. Absent such information, no designation could occur. Second, the Wyoming Game and Fish Commission must formally nominate a corridor for designation, which it could decline for a variety of reasons, including lack of scientific justification. Third, whether or not data exists that would qualify a corridor for designation under this Executive Order, the Governor retains the authority to decline to designate a corridor for any reason.

Recommendation #2: Amend the fourth whereas clause to read, “WHEREAS, land associated with migration corridors provide the state and nation with multiple-use and industrial opportunities that are integral to Wyoming’s revenues, jobs, and way of life.”

Justification: Multiple-use in federal law already includes “industrial” uses, making the term redundant. Additionally, its inclusion as a separate category could be viewed as giving it more importance over other uses, such as recreation or conservation.

Recommendation #3: Amend the sixth whereas clause to include private landowners and sportsmen. “Whereas, county governments, private landowners, and sportsmen play a significant role in land use planning and in conserving wildlife habitat and open spaces, and...”

Justification: Private landowners provide a significant role for open space in Wyoming and sportsmen provide funding and support for wildlife.

Recommendation #4: Add a new whereas clause that acknowledges the WGFD’s mandate to manage big game populations in Wyoming. Possible language could include, “Whereas the Wyoming Game and Fish Department has the statutory authority to manage big game populations, and whereas fulfillment of that authority includes providing scientifically-sound information and recommendations to land managers and regulators for the furtherance of big game conservation whether or not a corridor is formally designated.”

Justification: WGFD is mandated to manage our state’s wildlife and plays an important role in big game migration management and conservation. The agency’s mission and work is to provide scientifically-defensible information and recommendations regarding our wildlife and their habitat here in Wyoming.

### **THEREFORE Clauses**

Recommendation #1: Amend the first sentence in the third bullet of the Therefore clause to read, “Each executive branch agency in Wyoming shall exercise its legal and regulatory authorities to protect and further the annual movement of ~~mule deer and antelope~~ big game between seasonal ranges in their respective migration corridors.”

Justification: As discussed in recommendation two of the Whereas clause section this Executive Order should apply to all big game, as the term is currently defined in Wyoming statute.

Recommendation #2: The first clause of the fourth bullet equates “disturbance” to “unsuitable,” which creates confusion. The Executive Order should clarify the distinction and application of the two terms.

Justification: First, it is unclear what “unsuitable” means. The routes used by ungulates and the science that identify a migration corridor does not include areas that wildlife are not using and therefore, “unsuitable” might not apply. The language suggests that there are two types of “unsuitable” habitats for ungulate migration—(1) areas that are naturally unsuitable that would not be included in identified corridors, and (2) areas that are unsuitable due to human caused action. This raises a couple of concerns.

First, the use of “or” in the last clause suggests that they have different meanings, which creates an inconsistency, and therefore an ambiguity with the first clause of the sentence. To clarify, the terms should have different meanings because practically, “disturbed” lands do not necessarily prevent ungulate migration. Second, locating proposed disturbances within already disturbed or unsuitable areas ignores the potential impact on in-tact, and important adjacent habitat.

For example, if an agency permits an oil pad in unsuitable habitat, but associated roads and transmission lines bisect important migration habitat, siting in this location may cause undesired harm to the corridor. Additionally, since “disturbed” habitat does not necessarily correlate to negative migration effects, encourage siting on these locations could have unintended negative consequences. For example, perhaps a “disturbed” area is actually of vital importance to migrating animals. A policy that directs siting to those locations could create an additive disturbance that could then make an area unsuitable for migration. In such cases, it might be more appropriate to site this project someplace else, even if it means disturbing additional acres. Siting should take into consideration surrounding habitat and aim to minimize migration disruption, and we recommend amending this section to reflect this.

Recommendation #3: Amend the sixth bullet to read, “~~Any s~~Surface-disturbing activities may require ing a state-issued permit within designated corridors. ~~should~~ in such cases, the state agency shall only issue a permit ~~be permitted~~ in a manner that maintains the continued functionality of a designated migration corridor.”

Justification: Using passive voice in the clause creates language confusion with the term “permitted.” It is unclear whether “permitted” means allowed in a general sense, or allowed through the issuance of a permit. Making the sentence active as written above eliminates confusion. Also, the express intent of the Executive Order is to maintain continued functionality of a corridor. To better achieve this goal, we recommend changing “should” to “shall” here, and elsewhere in the Executive Order as noted in these recommendations. “Should” creates agency discretion, and in turn makes the Executive Order a guidance document rather than a directive. The Executive Order retains flexibility to deviate from its terms, but rightfully, that decision is left with the Governor, not the agency (see bullet 10 in the Therefore clause, as well as the exception process described in the second paragraph of Appendix C in the draft Executive Order).

Recommendation #4: Amend the seventh bullet to read: “Any state-permitted activity that occurs within designated corridors during the migration period ~~should~~ shall be conditioned in a manner that maintains the continued functionality of a designated migration corridor.”

Justification: We recommend adding “that occurs” for additional clarity. For the reasons laid out in the prior recommendation, we also recommend changing “should” to “shall” to make maintenance of designated corridors mandatory, not discretionary, though subject to a Governor-granted exception.

Recommendation #5: Amend the ninth bullet to remove “recreational.”

Justification: As stated in Appendix C, all impacts should be addressed, not just recreation.

Recommendation #6: Amend the tenth bullet to read: “...as well as the perspective of area working groups, as appointed by the Governor in consultation with commissioners of relevant counties and agencies. Any deviation from the management direction contained...”

Justification: We recommend adding “and agencies” to incorporate commissioners and staff such as those with the WGFD who will have direct information and knowledge regarding their district.

Recommendation #7: Add a statement acknowledging the need for state and federal agency coordination similar to language within Executive Order 2019-3 “Greater Sage Grouse Core Area Protection”. For example, “State agencies are directed to work collaboratively with federal land management agencies, including the Bureau of Land Management and U.S. Forest Service, to ensure a uniform and consistent application of this Executive Order to conserve big game migration corridors.”

Justification: For the Executive Order to be successful in conserving big game migration corridors, coordination needs to occur between state and federal managers and regulators. This is particularly true in a state like Wyoming that has joint state and federal permitting for some land uses, where upfront coordination ensures that clear expectations are provided to regulated industries at the earliest stage.

## **Appendix A Definitions**

Recommendation #1: Add a definition of “Big game.”

Justification: The term “big game” is used throughout the Executive Order. However, without a definition one does not definitively know to what species it refers. For purposes of consistency with existing law, the definition should mirror the definition of “big game animal” in Wyo. Stat. §23-1-101(a)(1), which states, “Big game animal means antelope, bighorn sheep, deer, elk, moose, or mountain goat.”

Recommendation #2: In the definition of “Big Game Migration Corridor” explain the difference between a “population” and a “subpopulation” for purposes of this Executive Order.

Recommendation #3: In the “Identified Migration Corridor” definition, we recommend removing the last sentence.

Justification: The Wyoming Game and Fish Department identifies habitat and describes its wildlife use. They will do the same with the science that identifies migration corridors. The Executive Order should be specific to designating migration corridors.

Recommendation #4: Clarify the definition of “Stopover area.”

Justification: The existing definition of “stopover area” is ambiguous, and will likely invite contentious debates upon application. To ensure consistent and predictable application of the Executive Order, the definition should be able to answer some of the following questions: (1) What does “majority of the time” mean? Does it mean annually, or over the course of several years? Does it literally mean 50.1% of the time for a day, a week, a month, or during the entire migration cycle? What’s the timeframe? Just while the majority of animals are using the area? When any migrating animals are using the area? (2) “High use”, “medium use”, and “low use” areas are defined by a percentage of the sampled population. In the context of “stopover areas” what does “used by ...sampled population” mean? What is the subpopulation? Do all of the sampled animals in the subpopulation have to use it to qualify as a stopover area? Is there a certain percentage? Can you have “high use” “medium use” and “low use” stopover areas? We are also curious why “sampled population is used in the definitions of “high use areas” “medium use areas” and “low use areas”, while “sampled subpopulation” is used for stopover areas?

Recommendation #5: Clarify the definition of “Bottleneck.”

Justification: Like “stopover areas,” the definition of “bottleneck” is too ambiguous. It is unclear whether any migrating animals being restricted constitutes a bottleneck, or whether it applies to the “sampled population” or “sampled subpopulation.” If it means the “sampled population” or “subpopulation” what percentage of those populations must use the areas for it to qualify as a “bottleneck?” Since the Executive Order mandates no surface occupancy in bottlenecks, having a clear definition of a bottleneck will be critical to avoiding future debate when implementing the Executive Order.

Recommendation #6: Amend the first sentence of the definition of “Science Behind Identifying Designating a Big Game Migration Corridor,” to read “Big game migration corridors are defined designated using...” and remove the entire definition from the definitions section.

Justification: First, change “defined” to “designated” to better reflect the technical processes laid out in the Executive Order. There is not a process to “define” a corridor, only “identify” and “designate.” Second, the definitions section should only define specific terms that are used in the Executive Order to add clarity. “Science Behind Identifying Big Game Migration Corridor” is not a term used anywhere in the Executive Order, making its inclusion in the definitions section confusing and unnecessary. Instead, it lays out a process, which is best included in Appendix B. We propose language changes to Appendix B to incorporate the directives in this definition in the next section (Recommendation #4).

Recommendation #7: Amend the term “Avoidance” to explain what biological avoidance actually is. Then, amend the existing definition to read, “A determination of whether avoidance occurs is made by the Wyoming Game and Fish Department, based on the best available science, to ensure that no negative impacts occur to a migration corridor.

Justification: The current definition does not actually explain what “avoidance” is in the biological sense.

### **Appendix B Corridor Designation Process**

Recommendation #1: Change “limitations of human use” to “limits human use in an effort” in the third sentence of the first paragraph.

Justification: This recommendation is made to correct language confusion.

Recommendation #2: Amend the second sentence of paragraph two to read: “A summary of results of agency research will be available to the public so long as such release complies with the Wyoming Public Records Act, §Wyo. Stat. Ann. §16-4-201 et seq.”

Justification: Any release of WGFD records must comply with the Wyoming Public Records Act, and there are express reasons a record may not be released.

Recommendation #3: In the last sentence of the second paragraph change “collaring of a representative sample of animals from the herd” to “collaring of a representative sample of animals from the herd, as determined by WGFD.”

Justification: We propose this change to remove any suggestion from interested parties that the WGFD failed to collar enough animals. We should ensure WGFD has the discretion as the agency with the expertise and management authority to determine how many collared animals are enough to constitute a “representative sample.”

Recommendation #4: Amend paragraph two to incorporate the intent of the unneeded definition of “Science Behind Identifying a Big Game Migration Corridor” from the definitions section. Further amend the section to reflect that identification of a corridor will rely upon the best

scientific data available, as determined by the Wyoming Game and Fish Department, otherwise data sufficiency fights are sure to ensue.

For example, the paragraph could read as follows: “Wyoming statute gives the Wyoming Game and Fish Department (WGFD) authority for the management of Wyoming’s wildlife. Therefore, WGFD shall lead the state effort to research big game migration. Designation of a corridor shall be based upon the best available science, as determined by the Wyoming Game and Fish Department. For purposes of designating a corridor, best available science includes collecting animal location and fine-scale movement data for a minimum of three years using Global Positioning Satellite (GPS) or other satellite collar technology. It can also include, at the WGFD’s discretion, local knowledge of WGFD personnel, landowners, hunters, and other stakeholders. A summary of results of agency research will be available to the public so long as the information is not specific enough...” Then amend the next sentence to read, “Additionally, the following corridor identification process shall occur prior to initiating the process to formally designate a migration corridor.”

Justification: Making the above changes will help alleviate the confusion between the terms “designate” and “identify.” Further, it clarifies that as the agency with statutory management authority to manage wildlife, determining the best available science for purposes of corridor identification and designation should be given to WGFD.

Recommendation #5: Amend the second sentence of bullet one to read, “Prior to formally recommending the designation of a migration corridor, WGFD shall prepare and provide the following information to the Wyoming Game and Fish Commission for purposes of considering whether to nominate a migration corridor for formal designation.”

Justification: There are two purposes for this amendment. First, this Executive Order should only be establishing a process for formally designating migration corridors, and conditioning the actions that can occur within those formally designated corridors. As written, the Executive Order dictates how the WGFD should identify a corridor, even though identifying a corridor does not trigger any regulatory mechanism. The Executive Order should simply reflect what information the WGFD must provide before a corridor can be nominated for formal designation. This edit reflects that intent.

Second, in its current form, the language simply says certain information “shall be provided.” However, it fails to say whom WGFD should provide this information to, and for what purpose. The amended language clarifies this ambiguity.

Recommendation #6. Provide clarity to bullets two through four to better articulate the process.

Justification: This Executive Order should not concern itself with the process that the WGFD uses to identify a migration corridor. It should only address how an identified corridor becomes a formally designated corridor. This should be clear. For example, bullet



three should clearly state that the WGFD should present the Biological Risk Assessment and the information from bullet 1(a)-(f) to the Commission along with a recommendation that the Commission initiate its process for formally considering whether to nominate the corridor for designation. Bullet four should clearly state that the Commission takes public comment and either declines to pursue designation, or develops a recommendation for the Governor to consider formal designation.

Recommendation #7: Amend bullet five to add additional clarity on both membership of the area working groups, and leadership of the working groups.

Justification: The last sentence of bullet five arguably only guarantees membership on the working groups to county commissioners (though Appendix F appears to guarantee landowner participation as well), which we suspect is not the intent. The clause “if affected” modifies both “tribes” and “representatives of affected interests and industries,” suggesting that if no one is affected, the commissioners will be the only representatives on the area working group. Also, it is unclear what “affected interests and industries” means. If interpreted narrowly (which paragraph 14 of the Therefore Clause contemplates), affected could be interpreted to mean individuals residing in the county or counties where the corridor exists that also have financial interests in the corridor. If interpreted more broadly, “affected” could include people residing in other counties, or even other states that use lands in the corridor for recreation, or other purposes, and whose recreation, or other uses could be affected by a designation. Consequently, a better and more consistent definition of “affected interests and industries” is necessary to guarantee fair representation from diverse interests on any working group established through this Executive Order.

The area working group members could mirror that of a Federal Advisory Committee Act (FACA) that requires the committee memberships to be "fairly balanced in terms of the points of view represented and the functions to be performed." Selection of committee members is made based on the FACA's requirements and the potential member's background and qualifications.

Finally, the Executive Order does not contemplate who will chair a working group. Understandably, the Governor will need to appoint someone. It might be tempting to appoint a local elected official like a county commissioner, or even a regional supervisor from the WGFD. However, we recommend that the Governor should appoint a disinterested third party that does not reside within the county or counties where the corridor exists. This will remove any accusations of political interference, or accusations of predetermining an outcome, and thereby allow the working group to operate openly and collaboratively.

Recommendation #8: Bullet 5(a) references a “set period of time” for the area working groups to make their recommendation. In order to incentivize a timely review, and to avoid unnecessary

delay in the process, we recommend the Executive Order set a specific limit on the amount of time the group has. We offer 120 days for your consideration. If necessary, an option can be added to allow for the working group to request an additional amount of time from the Governor.

Justification: Time limits set expectations for efficient and timely reviews and prevent unnecessary delays.

Recommendation #9: In bullet 5(a)(vi), clarify that all meetings of the area working groups shall be conducted in public, and in conformance with Wyoming's Open Meetings Act, prior to the public meetings currently referenced in this section.

Justification: The designation process has the potential for controversy. If that process occurs behind closed doors, it will only amplify any controversy. Migration corridors are designated to protect a public resource (wildlife), so the public should be invited to observe the working group discussions, and be provided an opportunity for public comment at the end of each meeting.

### **Appendix C: New Infrastructure, Recreational Use and Development Conditions**

Recommendation #1: In the first paragraph, change "state regulatory agencies should support" to "state regulatory agencies shall support."

Justification: The word "should" provides the agencies discretion to allow development that could jeopardize the continued function of the migration corridors. As mentioned previously, this Executive Order should clearly direct agencies to act in ways that ensure the continued function of the corridors. As noted previously, the Executive Order has an off ramp. Bullet #10 of the Therefore clause, as well as paragraph two of Appendix C authorizes the Governor to grant exceptions to the regulatory mechanisms, making language that provides agency discretion unnecessary and potentially preventing the Executive Order from meeting its stated intent of conserving corridor functionality.

Recommendation #2: Change all references of "should" to "shall" in "High Use", "Stopovers with High Use," and "Low and Medium Use and Stopovers Within."

Justification: For the reasons explained several times in these comments, the Executive Order should not afford deference to agencies to allow development that causes avoidance or threatens the functionality of the corridor. The Executive Order must serve as a directive to agencies, so "shall" is more appropriate. Any deviation from this strict policy directive is a political decision that should be addressed only by the Governor, as provided in the Executive Order.

In at least one instance, the Executive Order takes this more direct approach. The restrictions for development within "Bottlenecks" in Appendix C says, "[n]o new surface

development shall be permitted within bottlenecks, and state agencies shall...” Since this clause uses “shall” it gives more credence to the argument that “should” is discretionary.

Recommendation #3: Stopovers should be an independent category and not combined with low and medium use.

Justification: The value of stopover areas deems it necessary for them to have their own management policy. The importance of these habitats was expressed by the Migration Corridor Advisory Group as well as noted in WGFD Ungulate Migration Corridor Strategy:

“Sawyer and Kauffman (2011) found that approximately 95% of the migratory period is spent foraging at stopover areas. Habitat quality is higher in stopover habitat than in the area between stopover sites. In this study, deer used the same stopover areas between years during all migratory periods. Avoidance of disturbance on and around stopover areas was important to migrating ungulates while disturbance in the areas between stopover areas was tolerated.”

#### **Appendix D: Maps**

Recommendation #1: This is the only place in the Executive Order that references “two identified corridors.” The first Therefore clause formally designates three migration corridors, but it does not officially recognize any identified corridors. Since this Executive Order is intended to establish the regulatory framework for corridor designation, but leaves corridor identification to the Wyoming Game and Fish Department, it might be unnecessary to include maps to identified corridors in this Executive Order.

#### **Appendix E: Valid Existing Rights**

Recommendation #1: In the third paragraph, third sentence, “As projects are completed, total disturbance areas will be recorded by proponents....” Change “areas” to “acres.”

Justification: Acres is more specific and will give the agencies, the public, and the proponents the most accurate level of disturbance.

Recommendation #2: In the fourth paragraph, second sentence, please clarify the meaning of the sentence – “Leasable, locatable, and saleable non-coal mining operations non-coal solid mineral mining activities within a permit boundary approved prior to February 1, 2020 are not subject to this Executive Order.”

#### **Appendix F: Private Land Ownership**

Recommendation #1: In the first sentence, delete “and antelope.”

Justification: The Wyoming Game and Fish Department, along with other western state wildlife agencies identify antelope as ungulates, so including “and antelope” is unnecessary and redundant.

Recommendation #2: In the first sentence of the second paragraph, consider changing “shall use existing research and knowledge” to “shall use existing and future research and knowledge.”

Justification: Management decisions should not be limited to what we know today, but should allow for the discovery and use of new information in the future. This recommended change ensures that flexibility exists to use new information as it becomes available, and eliminates any confusion that research is limited to research existing at the time the Executive Order is signed.

Recommendation #3: Amend the “Recognition” section to simply reflect that landowner contributions to conservation are appreciated. Move the remainder of the clause to Appendix B, and amend to clarify whether notification to landowners is required at the “identification” phase, or the “designation” phase.

Justification: For ease of interpretation and implementation, all of the requirements for designating migration corridors should be located in the same place, in this case Appendix B. Further, the Executive Order should remain focused on establishing a process and requirements for the designation process, not the identification process. The current language confuses the two.

Recommendation #4: Amend the “Coordination” section from saying, “include federal, state, and local conservation funds” to stating, “include federal, state, local, private, or other conservation funds...”

Justification: Many non-government, quasi-government organizations, and private corporations may offer or support landowner-focused programs. This Executive Order should reflect the myriad of resources available to help support conservation on private lands.

## **Appendix G: Research**

Recommendation #1: Remove all suggested research topics.

Justification: Some of the suggestions seem reasonable, however, directing the priorities of scientific research is unnecessary, and could have unintended consequences. For example, point four is particularly concerning. It suggests that functionality of corridors for pronghorn and mule deer could be used as a basis to reduce elk numbers. In effect, the language presumes favoring mule deer and pronghorn health over elk health. This would be very controversial, particularly in the hunting community. If suggested research

topics remain, the Governor's Office should include additional qualifying language that specifies research topics are not limited to those listed, nor are the listed topics mandated or prioritized over other, non-listed topics.

Thank you, Governor Gordon, for the opportunity to comment on your draft Wyoming Migration Corridor Protection Executive Order. If you have questions or would like clarification on anything in these comments, please contact Joy Bannon at (307) 287-0129.

Sincerely,

<b>Bowhunters of Wyoming</b> Harvey Dalton <a href="mailto:daltonh@wyoming.com">daltonh@wyoming.com</a>
<b>Mule Deer Foundation</b> Shawn Blajszczak <a href="mailto:shawn@muledeer.org">shawn@muledeer.org</a>
<b>Muley Fanatic Foundation 10 County Chapter</b> Jared Oakleaf <a href="mailto:never.sky.lined@gmail.com">never.sky.lined@gmail.com</a>
<b>Muley Fanatic Foundation Southeast Chapter</b> Jeff Cowley <a href="mailto:sewymuleyfanatic@gmail.com">sewymuleyfanatic@gmail.com</a>
<b>Muley Fanatic Foundation</b> Josh Coursey <a href="mailto:josh@muleyfanatic.org">josh@muleyfanatic.org</a>
<b>National Wildlife Federation</b> David Willms <a href="mailto:willmsd@nwf.org">willmsd@nwf.org</a>
<b>Theodore Roosevelt Conservation Partnership</b> Nick Dobric <a href="mailto:ndobric@trcp.org">ndobric@trcp.org</a>
<b>Western Bear Foundation</b> Joe Kondelis <a href="mailto:joek@westernbearfoundation.org">joek@westernbearfoundation.org</a>

**Wyoming Backcountry Hunters and Anglers**

Brien Webster

[webster@backcountryhunters.org](mailto:webster@backcountryhunters.org)

**Wyoming Wild Sheep Foundation**

Kurt Eisenach

[keyes555@msn.com](mailto:keyes555@msn.com)

**Wyoming Wildlife Federation**

Joy Bannon

[joybannon@wyomingwildlife.org](mailto:joybannon@wyomingwildlife.org)