



USDA Bridger-Teton National Forest
Chad Hudson – Forest Supervisor
340 N. Cache Street
Jackson, WY 83001

The North American Pronghorn Foundation seeks to enhance pronghorn populations and habitat through advocacy, stewardship, stakeholder partnerships and our hunting heritage. We are the only conservation organization on the continent dedicated entirely to the conservation of pronghorn and their habitat throughout North America.

The Bridger-Teton National Forest (BTNF, Forest) encompasses 3.4 million public land acres in northwest Wyoming adjacent to Grand Teton and Yellowstone National Parks and the Shoshone and Caribou-Targhee National Forests. The sheer size of this National Forest means that it encompasses a wide array of landscapes and ecologies from alpine meadows to sagebrush basins. Although pronghorn do not frequent large acreages of the Bridger-Teton, this multi-use public landscape holds vital sections of migration corridors that are vital to their future in the American west, which includes the longest land animal migration in the lower-48, the “Path of the Pronghorn”.

This critical migration allows the Sublette herd to escape harsh winter conditions through shifts to lower altitude and more sheltered winter range. Further, vital for fawning, the varied elevations and forb emergence of this protected corridor, ensures steady nutrient availability for lactating mothers during the spring enhancing fawn survival.

While the Draft Assessment acknowledges this world-renowned migration corridor and previous policy language to protect it (see supplemental assessment information). NAPF would like to impress upon the USFS the critical role the Bridger-Teton National Forest plays in not only protecting crucial portions of the corridor, but also its role as an influential partner in potential improvements along the entire migratory route. Management actions and policies that allow for more plasticity of the corridor itself may promote more flexibility in future decision making involving cooperative efforts with local stakeholders, increase the number of animals able to use the corridor, and allowing the Sublette herd to be more resilient to future mortality events.

The Path of the Pronghorn is not wholly contained within the Bridger-Teton boundary. However, it is a sum of its parts, all of which are equally integral to maintaining the entirety of the corridor. This means USFS collaboration with stakeholders will prove to be vitally important to ensuring the future of this wonder of the west.

Further, the forest plan revision should include a complete accounting of all species migration data published by the USGS and other cooperating state and federal agencies. As Bridger-Teton is truly multi-use, all those uses must be represented and accounted for to ensure that reasonable management decisions are made. If all available migration data is not included in the plan revision, the revision will make incompletely informed assumptions that will result in decreased wildlife capacity. Without a complete accounting for these pathways, the significance of roadless areas, wilderness protections, and heavy human use areas cannot be accurately

assessed. Because not all portions of a landscape are equally productive or important to wildlife in general, and pronghorn specifically, the health of each component landscape and ecology must be understood (forest health, sage-steppe health etc...) to determine what management actions are required.

The North American Pronghorn Foundation strongly urges the plan revision to include a high degree of focus and importance on this unique migration corridor and relevant migration data. This would include further migration corridor analysis and data collection for proactive management to ensure the corridor is supported into the future. Roads, fences, human development, energy development, active forest management, and erosion mitigation or riparian repair should all be reviewed and considered to ensure pronghorn migrations through the Bridger-Teton can be durable and lasting.

The demands we place on the Bridger-Teton National Forest are at an all-time high, and more than ever, we must ensure that our understanding of the complete use of this jewel of Wyoming is as complete as possible. It is a critical area to safeguarding pronghorn's place in the future of North America, not just its history. The plan revision, if not accounting for pronghorn needs now and into the future, could negatively impact and cause irreparable harm to a huge number of one of North America's most iconic species.

Thank you for involving the public with comment period to help guide the forest plan revision. We look forward to participating in this process in its entirety.

Brock Wahl
Chairman
North American Pronghorn Foundation

