Janet Milek <janet.milek@wyo.gov>

Draft Elk Feedground Mgt Plan

1 message

John Carter <jcoyote23@gmail.com> Thu, Sep 7, 2023 at 1:41 PM
To: WGFD Elk Feedground Info <wgf-elkfeedgroundinfo@wyo.gov>, Mark Gocke <mark.gocke@wyo.gov>, Brandon Scurlock <brandon.scurlock@wyo.gov>, brad.hovinga@wyo.gov

Attached are our comments on the Draft Plan. It needs a major rethink to address the forage capacity issue and the livestock industry basically taking most of the forage on the BTNF and in the valleys, leaving little for the elk and deer.

In these comments we reference our attached report that illustrates the depletion of forage in the Upper Green area and the failure of the agency and permittee monitoring to measure the actual amount of use or the current available forage.

We find also that current forage production is a fraction of potential due to the failure of the Forest Service and permittees to manage according to the best available science. Correcting these flaws in management would provide more than sufficient forage to support all feedground elk and allow the closure of the feedgrounds. WGFD, in its role, could work with the BTNF, NGOs, and Permittees to carry out this effort, providing actual data to support adjustment of elk population objectives and pursue the phaseout needed.

The Draft Plan did not address the concerns, science, and recommendations we and other NGOs provided in our comments. This should be corrected. Until these things are done, we cannot support the Plan as presented.

Sincerely,

John Carter, NGO stakeholder
Yellowstone to Uintas Connection
Kiesha's Preserve
Bondurant, Wy

2 attachments

Y2U Comment Draft Plan_Final_2023.pdf
689K

WWP_Y2U_Report_Upper Green_Elk Ridge_2023_04_13_2023_ Optimized.pdf

20562K

September 7, 2023

Wyoming Game and Fish Department
5400 Bishop Blvd.
Cheyenne, Wy 82006

Re: Draft Wyoming Elk Feedgrounds Management Plan

Submitted To: wgf-elkfeedgroundinfo@wyo.gov

Elk Feedgrounds Steering Team:

These comments on the Draft Plan are submitted on behalf of Yellowstone to Uintas Connection. We are a 501c3 organization (NGO) dedicated to protecting and restoring wildlife habitats and migration corridors in and connecting to the Greater Yellowstone Ecosystem. We are headquartered in Paris, Idaho with a satellite office in Bondurant, Wyoming. We also participated as Kiesha's Preserve, which is also an NGO representing our wildlife preserve and land ownership interests in the GYE.

We have been engaged in the stakeholder process and meetings. We previously submitted comments and engaged in email communication with members of WGFD regarding our concerns. We are part of the NGO stakeholder group. We are hereby incorporating by reference the detailed comments provided by Mr. Lloyd Dorsey and the Gallatin Wildlife Association. There is no need for us to repeat their excellent analyses.

In our prior comments, which were jointly submitted by several NGOs, we provided an analysis of the management situation, including the science relating to elk populations, their history and distribution, land ownership factors, management in other states that either do not feed or have phased out feeding, and diseases. We provided recommendations, including:

1. Phase out feedgrounds over five years.
2. Protect carnivores and scavengers for their role in helping to maintain healthy big game herds.
3. The Plan should call for protection of migration corridors and restoration of migratory behavior where feedgrounds have disrupted those.
4. Identify and commit to strategies that maintain or improve the quality and productivity of elk winter ranges.
5. Reserve forage on public lands for wildlife, de-emphasize vegetation treatments and adjust livestock grazing and intensity on public lands so adequate forage is available to support elk herd objectives.

We summarized elements of a phase out plan to include:

1. Evaluate summer and winter forage on elk parturition and winter range for the period of occupancy to determine the population size that can be supported.
2. Evaluate integrity and habitat capability of migration corridors to allow movement and provide adequate forage during migrations.
3. Adjust elk objectives to maintain elk herds within the capacity of natural habitats that can sustain them on a long-term basis.
4. Identify funding sources for regulation fencing around winter livestock feeding areas and haystacks.
5. Adjust livestock grazing (stocking rates, timing and duration of grazing, pasture rest and rotation plans) in parturition and wintering areas on public land to ensure sufficient forage is present to support elk herds at objective numbers.
6. Identify funding for voluntary retirement of public lands grazing permits in important habitat areas for elk, mule deer, and moose.
7. Controlled hunting is used to reduce elk numbers to meet herd objectives that are aligned with available habitat and forage.
8. Commitment to reduce elk feeding seasons to zero over five years.
9. Identify strategies to encourage elk to resume natural migratory patterns.

During this stakeholder process, WGFD has emphasized the need for a "publicly supported" plan. Unfortunately, we are concerned that the process has not been designed to address this purpose. Two groups, the guide-outfitters, and ranchers, are the dominant entities this plan appears to be designed to appease to the exclusion of science, facts, and true wildlife interests. At the August 30, 2023 meeting in Pinedale a guide outfitter threatened a "firestorm" if there was any consideration of a phase-out. WGFD depends on revenues from hunting licenses. Apparently, the outfitters are interested in continuing the largesse of huge guide fees for killing elk at a rate double that of areas where there are no feedgrounds. The feedgrounds have created a semi-domestic elk situation where these elevated and artificial hunting success rates are made possible.

Likewise, the livestock industry is in control of this situation where they are paid for depredation or damage to hay crops by elk, yet they cut and harvest the hay and graze the valleys to the bone after their cattle come off the National Forest. So, where are elk and other animals to find forage except these stored crops and livestock feeding areas? Mr. Dorsey, in his comments, used an example of this control from the stakeholder meeting in Jackson. "It was never more apparent how intimidated the Department is by the livestock industry as during the July 23 public meeting when 2 cattle ranchers (including one who said he no longer owns cows) took over the meeting, time and again browbeating the Department for their 'stupid' plan. They claimed that elk can't or won't migrate, 'don't go to the mountains anymore', and are only

'in the river bottom.' One rancher said this plan would destroy cattle ranching. The Department Regional Supervisors apologized repeatedly to the ranchers and said they didn't intend the plan to harm livestock interests and told them, 'we'll fix it.'"

It is clear where this process is headed. The State Livestock Board has the final say on any plan and several members of the State Wildlife Commission are ranchers, so clearly WGFD is placed in a position to placate the livestock industry as well as the guide-outfitters. WGFD should be free to use science to address this issue in a valid phase-out and setting of population objectives within the carrying capacity of the habitat but are prevented from doing so by these powerful interests. Perhaps the State Wildlife Commission and Livestock Board will relent and allow WGFD to pursue a valid process as we have outlined above in our Recommendations.

The plan did not conduct the analysis we requested, an analysis that would have provided the necessary facts to design an effective solution for naturally and free ranging elk herds as well as other big game animals, or for that matter, protecting predators and scavengers. We believe the collection of data and evaluation of habitat quality would provide the basis for determining the current and potential carrying capacity for elk, mule deer and moose. The public was given no set of options, no phase-out plan. The process was a top-down driven exercise in deflecting hard decisions for years or decades as diseases will likely accelerate. Without this analysis and a phase-out plan, our organization cannot support the current Draft Plan.

The 2004 WEST report[1] provided some guidance in addressing the capacity issue without reducing elk numbers, increasing damage to private property, or increasing brucellosis risk to livestock. Their analysis considered:

1. The average number of elk at each feedground,
2. the duration of feeding,
3. the amount of potential native range on public land within 5 miles,
4. potential damage to private property without the feedground, and
5. the potential of brucellosis transmission.

Our view is that determining the current carrying capacity for elk range is critical in setting elk population objectives and developing information that informs the process so that it is data based, rather than political.

[1] WEST. 2004. Summary of Elk Feedgrounds Operated by the Wyoming Game and Fish Department. Prepared for: Northern Rockies Natural Resource Center and National Wildlife Federation. Prepared by: Western EcoSystems Technology, Inc. Cheyenne, WY.

Our Current Forage Assessment Example

Over the past two years, we have been assessing the amount of forage and the levels of livestock use on the Bridger-Teton NF allotments in the Upper Green River area. These studies are in the Elk Ridge, Fisherman Creek, and Upper Green allotments.[2] They can be downloaded at the link provided to learn the details and methodology.

Figure 1 illustrates these allotments and their proximity to the elk feedgrounds. Note the five-mile buffer as described in the WEST report. Figure 2 shows the elk feedgrounds, elk parturition areas, allotments, and allotment status (active, vacant, or closed) on the Bridger Teton NF.

In our study, we clipped and weighed grazed and ungrazed paired plots which gave us an accurate estimate of use by livestock as well as the current production of forage. The purpose of the study was to obtain accurate determinations of utilization to compare with the data collected by the Forest Service, Sublette County Conservation District, and Permittees (SCCD).

Assessment of Current Production: The Elk Ridge Allotments were vacated from livestock grazing in 2016 and have not been grazed by livestock since. We were interested in determining how current production of herbaceous vegetation (forage) would compare with site potential. We found these sites were producing less than 25% of potential after five years' rest. The dominant bunchgrass which should be present was absent. According to the NRCS Ecological Site Descriptions, it should comprise a significant portion of forage production. In the actively grazed Upper Green allotment our ungrazed plots were producing less than 40% of potential. Bluebunch wheatgrass was also absent there.

Assessment of Utilization: Our measurement of paired plots in the Upper Green and Fisherman Creek allotments found 73.1% upland utilization and 75.5% riparian utilization. This is much greater than the 50% utilization standard provided in the 2019 Upper Green Record of Decision[3] or the 25% recommended[4] by range science. See our report for references and details.

---

[2] Carter, J. and Ratner, J. 2023. Surveys of Upper Green, Fisherman Creek, and Elk Ridge Allotment Complexes. Western Watersheds Project and Yellowstone to Uintas Connection. https://app.box.com/s/3duxx7o4fml2aqnmqkwpg00ayy6hkxpd

[3] Bridger Teton National Forest. 2019. Record of Decision Upper Green River Area Rangeland Project. Pinedale Ranger District. https://www.fs.usda.gov/project/?project=3049

[4] Carter, J. 2013. Utilization, Rest and Grazing Systems – A Review. Yellowstone to Uintas Connection. https://app.box.com/s/ngw6723dx52quxw2rd8u

The SCCD, Forest Service and Permittee (SCCD) joint monitoring of the Upper Green allotment in 2020 found an average of 9% utilization using stubble height of Idaho fescue, an increaser, as a key species. We calculated that forage production would need to be greater than 5,000 lb/acre to result in this low level of utilization. This is over three times the current level of production claimed by the BTNF in the Upper Green FEIS. The SCCD green line results in 2020 were 11.7" average height for ungrazed sedges and 9.4" for grazed sedges. This is approximately 8% utilization for the riparian areas. SCCD data was collected in dense willow stands where the sedges are protected from grazing.

Study Summary: According to our understanding of range science and plant physiology, the lowered production in these allotments is due to lack of rest, turning in livestock a month earlier than actual range ready time of mid- to late July, underestimating the forage consumption by cattle, over allocating forage to livestock, failing to collect forage production data, and failure to adjust stocking rates. Incorporating range science, representative, and accurate monitoring into management would result in a major reduction in season and numbers. We estimated that would be 31% of the current stocking rate. We proposed a data validation study to compare methods, key areas, and determine forage production and are awaiting a response from the BTNF, SCCD and Permittees.

The Draft Plan (p12) states, "The Commission recognizes the importance of supplying supplemental feed to elk at existing State feedgrounds and the NER and recognizes that without such feeding, the elk populations would have to be decreased to levels that could be supported by the limited native range forage." But, nowhere in the Draft Plan or in our stakeholder meetings has anyone addressed the elephant (or cow) in the room. That is that livestock, particularly cattle, are severely depleting the available forage base that could support wildlife.

Throughout, the plan emphasizes reducing damage to private property, i.e. elk foraging on private property or haystacks. While haystacks can be protected by fencing, the remaining area is depleted of forage by the harvest of hay and then by livestock coming off the Forest or BLM and eating what is left before it snows. There is little to nothing left for wildlife other than stored hay crops. One has to ask, when are the ranchers going to step up and provide forage?

There is another comparison one can make. Take the Upper Green allotments in which over 8,000 cow/calf pairs of cattle are grazed from June to October. Current forage consumption for today's cow and calf is approximately 50 pounds of air-dry forage per day.[5] This is based on a 1,200 pound cow and 400 pound calf consuming 3% of body weight per day. An average elk runs about 400 lbs. This approximation is based on the Rocky Mountain Elk Foundation weight

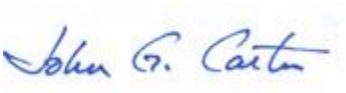
[5] Carter, J. 2016. Updating the Animal Unit Month. Yellowstone to Uintas Connection. https://app.box.com/s/zx4xjekrfuht2aq12soruw0qfil8hogk

for cow elk of 500 pounds[6], assuming the calves would bring the average down. If they consume the same 3% of body weight, this means that each cow/calf pair of cattle are consuming forage equivalent to about 4 elk. Extrapolating, this means the 8,000 cow/calf pairs of cattle grazing in the Upper Green allotments are equivalent to or displacing four times that, or 32,000 elk.

Regardless of the math, these figures point out an extraordinary fact. That there should be sufficient forage to support wildlife if livestock weren't consuming nearly all of it and it illustrates that the Forest Service, in particular, could easily support the numbers of elk that are being fed at feedgrounds if livestock use were controlled, rest was incorporated to restore production and stocking rates reduced.

These are the sad facts of our situation. Since the WGFD works with the Forest Service, BLM and Private landowners, there should be a study implemented to actually measure the amount of forage available for wildlife in the migration corridors, crucial ranges, parturition ranges and then set a scientifically defensible elk objective. If hunters want a higher number, then they need to come up with a funding plan to incentivize private landowners to provide what is needed.

Sincerely,



John Carter
Yellowstone to Uintas Connection
Kiesha's Preserve
PO Box 464
Bondurant, Wy 82922

[6] https://www.rmef.org/elk-facts/