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Wyoming Game & Fish Department

Re: Draft Elk Feedgrounds Management Plan

My comments on the Wyoming Game & Fish Department's (WG&F) draft elk feedgrounds plan are extensive. I found my review of the plan complicated by problems with the plan's organization and conflicting statements, as I will detail.

For example, the plan begins with the Message from the Director on page 3, in which it is stated: "We all have a goal to protect domestic livestock from diseases that are transmitted from wildlife, protect private property, provide elk hunting and viewing opportunities and mitigate interspecies competition." Yet nowhere in the document are these goals explicitly stated in the plan, and on 32, the document states a substantially different goal: "The **overall goal of this plan** is to encourage managers to continue to explore opportunities for elk to winter away from feedgrounds by increasing tolerance for elk on private, state, and federal lands while reducing reliance on supplemental feeding." (Emphasis added.) The Director's goals are apparently reflected in the five toothless "sideboards" introduced on the same page.

P14 last paragraph on page mentions wolves "could complicate" private livestock operations, which is a condescending word choice. WG&F should revise this section to describe the impacts of wolves on livestock operations. To summarize, I suggest: "Wolves can cause negative economic impacts to livestock producers, including from direct mortality to livestock as well as numerous other direct and indirect impacts. This may cause significant costs to affected producers as these costs are not equitably distributed across the livestock industry."

Overall, I believe the plan generally frames agricultural operations as an obstacle rather than a necessary partner to the plan's success. For example, on page 17, "Current social and economic values" only lists costs associated with agricultural operations – no social or economic values are included, even though the plan states that these "social and economic values ... must be thoroughly considered in the future management of western Wyoming elk." I suggest the Agricultural Operations section be substantially revised.

The other values listed (hunting, outfitting, wildlife-related tourism) are accompanied by statements of their importance and economic value, but the document does not provide the same treatment to its discussion of agricultural operations. In fact, the plan only includes economic figures for the **cost** of elk damage claims instead of reviewing the social and economic values associated with agricultural operations.

I suggest these additions to the Agricultural Operations section to address social and economic values associated with this sector:

“Wyoming’s 1.3 million cattle inventory had a value of \$1.75 billion in 2018. (WDA, 2021)¹

“The three counties where elk feedgrounds are located (Lincoln, Sublette and Teton) were home to a cattle inventory of 104,000 in 2021. In addition to cattle in these three counties, there are another 62,500 cattle in Park and Hot Springs counties, part of Wyoming’s Brucellosis Designated Surveillance Area. (WASS 2021)²

“Traditional cattle operations in this region, most of which involve large parcels of private land, utilize seasonal grazing on federal grazing allotments as interconnected and vital components of their operations. Private agricultural lands provide open space, connectivity for migrating herds, and a variety of ecosystem services.

“Livestock producers implement a variety of brucellosis prevention practices, including fencing haystacks, modifying winter feeding practices, delaying grazing on higher-risk pastures or allotments, engaging in active efforts to keep elk and cattle separate and allowing agency personnel to haze elk off private property during periods of high risk for disease transmission. Producers also provide animal health programs for their cattle that include administering calfhood and adult-booster brucellosis vaccinations, spaying heifers, as well as testing for brucellosis. In addition, some producers delay cattle grazing in areas and during the time when the risk of brucellosis transmission from elk is deemed higher, and may alter the class and timing of livestock grazing and calving in locations to reduce disease transmission risks. Producers routinely implement herd health practices that reduce their cattle’s susceptibility to infection (internal and external parasite controls, breeding soundness checks and testing, monitoring body condition and general herd health, etc.).

“Much of the costs incurred by cattle producers to reduce the risk of brucellosis to their herds are not compensated. The cost of ranch-level brucellosis management practices ranges from \$200 to \$18,000 per unit or year (Roberts 2011).³

“The Wyoming Livestock Board reported livestock producers filed 170 brucellosis risk assessments and 160 brucellosis herd management plans to mitigate the risk of brucellosis in Fiscal Year 2022, with 150,000 cattle vaccinated for brucellosis and more than 75,000 cattle tested for brucellosis the same year, with no cattle testing positive. Expenditures from federal and state animal health budgets for brucellosis testing and vaccination of cattle in western Wyoming totaled \$467,119 in FY22.”⁴

¹ Wyoming Department of Agriculture, located here: <https://wyoleg.gov/InterimCommittee/2021/05-2021052404-02WyomingDepartmentofAgriculturePRESO5-6-21.pdf>

² Wyoming Agricultural Statistics 2021, located here: https://www.nass.usda.gov/Statistics_by_State/Wyoming/Publications/Annual_Statistical_Bulletin/WY-2019-Bulletin.pdf

³ Roberts, T. W. 2011. Costs and expected benefits to cattle producers of brucellosis management strategies in the Greater Yellowstone area of Wyoming. Thesis, Department of Agricultural and Applied Economics, University of Wyoming, Laramie, Wyoming, USA.

⁴ Wyoming Livestock Board Annual Report FY22, available here: <https://wsb.state.wy.us/editable-page/home/downloadFile?filename=22%20-%20FY22%20Annual%20Report%20Final.pdf>

“Producers incur large regulatory costs to prevent brucellosis from getting into their herds and spreading beyond the Designated Surveillance Area of western Wyoming.

“When cattle contract brucellosis, federal policies require infected herds to be destroyed or quarantined and tested multiple times. Additionally, any herd that has come in contact with the infected cattle herd through animal commingling or exchange must be quarantined and tested. These and other brucellosis-related regulations impose direct costs on individual cattle producers, the livestock industry, and state and federal animal health agencies.”⁵

“While producers may receive payment for animals that are destroyed, producers whose herds are quarantined are not compensated for the extra costs they incur. “With or without compensation, herd quarantine or destruction can be costly and emotionally devastating for a producer. Based on preliminary estimates, a producer whose 400-head herd is quarantined for 1 to 6 months during the winter feeding season because it interacted with an infected herd could incur \$2,000 to \$8,000 in uncompensated costs. A producer whose herd actually contracts brucellosis could incur \$35,000 to \$200,000 in uncompensated costs, depending on whether the herd is destroyed and whether the producer receives compensation for the herd’s market value. Destruction of a herd is also costly for USDA-APHIS and the taxpayers who help fund them, particularly when destroyed herds are large.” (Schumaker et al. 2012)

“Most western Wyoming elk herds depend on habitat that includes private land, and as western communities deal with increasing human population and development, and land use change, the importance of private working lands in sustaining migratory connectivity is critical (Gigliotti et al., 2022).⁶

“Actions resulting in the reduction or elimination of livestock grazing may impact a ranch’s ability to be economically sustainable and may harm the agricultural infrastructure of a local community. Some ranchlands may be subdivided for residential use, while others may be kept intact or enlarged when purchased by non-traditional owners often more interested in their amenity values than livestock production. (Gosnell 2006)⁷

“Migratory elk herds can generate significant costs or disservices for landowners and communities, complicating management and conservation. These costs can include damage to crops and property, disease risk, competition with domestic livestock and opportunity costs of

⁵ Schumaker, Brant A., Dannele E. Peck, and Mandy E. Kauffman. "Brucellosis in the Greater Yellowstone area: disease management at the wildlife–livestock interface." *Human-Wildlife Interactions* 6.1 (2012): 48-63.

⁶ Gigliotti, L.C., W. Xu, G.R. Zuckerman, M.P. Atwood, E.K. Cole, A. Courtemanch, S. Dewey, J.A. Gude, P. Hnilicka, M. Hurley, M.J. Kauffman, K. Kroetz, A. Lawson, B. Leonard, D. MacNulty, E. Maichak, D. McWhirter, T.W. Mong, K. Proffitt, B. Scurlock, D. Stahler, and A.D. Middleton. 2022. Wildlife migrations highlight importance of both private lands and protected areas in the Greater Yellowstone Ecosystem. *Biological Conservation* 275:109752.

⁷ Hannah Gosnell, Julia H. Haggerty & William R. Travis (2006) Ranchland Ownership Change in the Greater Yellowstone Ecosystem, 1990–2001: Implications for Conservation, Society & Natural Resources, 19:8, 743-758, DOI: 10.1080/08941920600801181

land conservation, such as reduced production (e.g., timber, energy resources, agriculture) or foregone development. (Maher et al. 2023)”⁸

P23 Third full paragraph on the page refers to Dean et al. 2003, but this reference is not included in literature citations.

P24 notes that “most options were not widely pursued as action items” and “little change” occurred from BMAP development. Please explain why this plan and process will be any different.

P25 I’m not familiar with WG&F’s standard for literature citations in the plan, but for this section addressing CWD, I would encourage a primary citation to the work of the late Beth Williams (rather than papers which identify Williams as a coauthor). I suggest that in the Background and Transmission paragraph, a primary citation to Williams be included after the 4th sentence in which prions are introduced to the reader. I suggest:

Williams ES. Chronic Wasting Disease. *Veterinary Pathology*. 2005;42(5):530-549.

doi:10.1354/vp.42-5-530

<https://journals.sagepub.com/doi/full/10.1354/vp.42-5-530#bibr157-vp-42-5-530>

P26, second to last paragraph on page, last line, replace “adult male deer” with “adult mule deer.”

P28, second modeling bullet point. The model forecasts that CWD prevalence “may” reach 12%, not “would” reach this level as phrased in the plan. You may also want to add: “Forecasts for the Jackson elk herd suggest that the effects of CWD on population abundance are likely to be slow to develop and difficult to detect; there is strong overlap between predictive process distributions for populations with and without CWD.”

P29, top of the page, I suggest you add a new bullet point of information from the Maloney paper: “The authors noted that discontinuing feeding is expected to increase brucellosis and depredation costs for ranchers associated with elk using private lands.”

P32: This is where Elk and Feedground Management Direction is set forth, but oddly, it skips brucellosis management actions entirely and goes right to CWD and other diseases – except brucellosis. Although brucellosis management efforts were discussed back on pages 22-23, including the statement that feedgrounds “remain the primary tool for maintaining elk-cattle separation and preventing disease spillover” and describes a variety of elk-cattle segregation measures, **none of these actions are brought forward and continued as action items**. Any of these management actions that WG&F intends to carryover should be included as action items under the Management Direction portion of the plan.

P33-47: This section of the plan, the core for how the Department will move forward, could have used a more thorough review prior to release for public comment. It’s a hodgepodge of goals, strategies, actions, measures, and concerns in which value statements and strategies are mixed in

⁸ Maher, Samantha ML, et al. "Assessing the ecosystem services and disservices provided by migratory wildlife across the Greater Yellowstone Ecosystem." *Biological Conservation* 283 (2023): 110090.

with goals, and actions are confused with concerns, but actual concerns are neglected. As this section lacks both consistency in organization and vernacular, I suggest revisions to both.

P33 I suggest an additional strategy be included in the Elk Harvest strategy:
“Reassess and possibly reduce elk herd population levels to disease prevalence.”

P33: Public Education/Outreach, I suggest the goal statement be revised to make it a goal statement instead of a value statement. I suggest “Maintain a high level of public outreach regarding management of elk feedgrounds.”

Since strategies are the action items you’ll use to achieve the goal, revise the first bullet point to make it an actionable strategy, as in “Every five years, the Department will ...”

P34-36, in this section of the plan, the document abandons the Goal/Strategies structure and moves to Goal/Preventative Measures. For consistency, I suggest replacing “Preventative measures” with “Strategies.”

P34, Revise Goal statement to: “Prevent CWD from entering elk feedgrounds and provide an early detection system for the disease.”

Insert a new section between the Goal and Preventative measures:

“Strategies:

- The Department will seek to prevent CWD from entering the eld feedgrounds, and will implement programs for CWD prevention and early detection.
- If CWD is detected, the Department will attempt to manage the disease on the feedground to limit incidence and spread of CWD off of the feedgrounds.”

P35 Necrobacillosis section, the first sentence is indeed the goal but the second sentence should be deleted.

Insert a new section between Goal and Preventative measures:

“Strategies:

- To prevent necrobacillosis from occurring on feedgrounds, the Department will implement prevention measures and disease surveillance.
- If an outbreak occurs or is detected, the Department will attempt to control the disease.”

P36 section on mange has the same issues with goals and strategies. The first sentence is the goal.

Insert a new section between Goal and Preventative measures:

“Strategies:

- To prevent psoroptic mange from occurring on feedgrounds, the Department will implement prevention measures and disease surveillance.
- If an outbreak occurs or is detected, the Department will attempt to control the disease.”

P36 section on bTB has the same issue with goals and strategies.

Goal should be “Prevent bTB from entering the feedgrounds.”

P37 last line on page, please add nearby livestock producers and landowners to the groups to be involved.

P38, Disease research and coordination, revise the goal statement to: “Better understand the complex nature of feedgrounds, disease, and economics associated with these issues.” (I’m not really sure what “their economic value” refers to, so this should be clarified.)

Insert a new section below the Goal:

“Strategies:

- The Department will promote and actively engage in research opportunities and partner with appropriate entities to pursue research funding.”

The next paragraph can be added to this new Strategies section.

On the list of research priorities, I suggest adding two topics:

- How increased elk numbers on native winter range impacts sage grouse productivity and habitat
- Methods/innovations to reduce disease transmission risks from elk to livestock

P39, first full sentence on page: “Long-term alternatives for how elk are allowed to winter in western Wyoming will require changes in law, funding, and public attitude regarding disease, damage, and elk occupancy” is extremely vague. Two sentences later, the plan mentions “major shifts in current land use.” Please explain exactly what you mean. What specifically needs to be changed to address what issue should be action items.

What major shifts in current land use does this plan envision? Is WG&F’s vision to eliminate cattle operations in order to have widespread elk populations on former cattle grazing range? Is the plan’s vision to allow elk to populate rural residential subdivisions? Be more specific.

Page 39 moves away from the document’s prior use of “Strategies” to “actions.” For consistency, it would be better to revise the heading on this section as Strategies.

I request the addition of new strategies:

- “The Department will work to reduce or dispersing large groups of elk adjacent to and on private lands, and to continue to work toward preventing the commingling of elk and cattle during high-risk periods.”
- “To protect the economic interest and viability of the livestock industry, WG&F will work with livestock producers to reduce the risk of adverse effects of brucellosis (and other non-endemic diseases) transmitted by elk, and to minimize elk damage to private property.”

P39 The section for “concerns” includes a variety of bullet points.

Funding: I suggest that the 3rd sentence under the Funding bullet “It is the Department’s responsibility to promote best management practices for the long-term management of elk in a way that includes the agricultural community, accounts for interspecies competition, and emphasizes the reciprocal benefits to elk and the public” be revised to make it a Strategy and moved up under that section. I suggest the Strategy should be: “Promote best management practices for the long-term management of elk in a way that includes the agricultural community,

accounts for interspecies competition, and emphasizes the reciprocal benefits to elk and the public.”

The **Public Support** bullet states: “The Department must consistently promote cooperative winter elk use away from feedgrounds and encourage the positive prospects of doing this with the broader public.” This first sentence should be deleted as it suggests WG&F promote specific, positive messaging rather than science. In promoting only the “positive prospects,” WG&F would not be explaining the complexities of the situation or the possible adverse impacts.

The sentiment expressed in the first sentence under “Public support” is not a concern but is a Strategy. Delete the sentence from “concerns,” revise the wording to “Promote cooperative winter elk use away from feedgrounds” and place under the action items above, as a Strategy – unless the Department views it as already covered back on page 33, Public Education/Outreach.

P39 Balance with agricultural interests section. I don’t see how either of the two sentences included are “concerns.” I suggest deleting them and replacing them with “Because of the increased risk of adverse effects of brucellosis and other non-endemic disease transmitted by elk to cattle, increased elk damage to private property, and a reduction in the amount of acreage available for livestock grazing, the economic interest and viability of the livestock industry is a concern.” This would be consistent with the input provided by the Landowner Stakeholder Group’s list of top concerns: “Depredation and damage”; “brucellosis”; “loss of permitted grazing”; and “Land management: risk of giving authority to federal agencies around critical winter range.”

The first sentence says WG&F will “reassess its approach to addressing damage to agriculture.” How is this a “concern?” What specifically is the concern, or what specific element of agricultural damage are you seeking to reassess, why, and in what manner? What outcome are you seeking? Be specific, and if this is an action item, put it under Strategies.

The third sentence should be moved up under Strategies: “The Department will seek to promote and encourage changes in elk management that garner public support for funding, both governmental and private.”

I request an additional concern be added under the ag bullet: “Once elk begin using a private land refuge, additional elk are attracted to the area and tend to stay longer. As increasingly large groups of elk congregate on inaccessible private lands, transmission of brucellosis becomes more likely, and a new reservoir for the disease emerges. Allowing feedground-like elk densities, created by burgeoning elk populations, only continues the disease problems that feedgrounds helped to maintain. (Schumaker et al, 2012)”

P39: The Management Direction action items (starting on page 33) include goals and strategies that lack consistency in the language used. For example, the strategies set forth on pages 33-37 state “The Department will” do a variety of actions. The language changes on page 39, when the use of “must” suddenly enters the text. In the 3rd bullet point of actions to pursue native winter ranges, the word “must” is used three times in the last two sentences. Likewise, the first bullet under “public support” also begins with a “must” statement instead of “should.” I suggest that

the “musts” be replaced with “should” or “will” in these action items, if they are kept at all (which I don’t recommend).

I also recommend that WG&F review the entire document and reassess every time the use of “must” is used. “Must” means mandatory, and the use of this word sets these subjects on a higher level of obligation than “should” or “will,” providing an avenue to undercut the agency should it fail to abide by these requirements.

P40: Under “Livestock producer coordination and cooperation,” first full paragraph, 2nd sentence, the sentence should be revised as follows: Evaluation and implementation of the livestock management alternatives in this section are under the jurisdiction of individual livestock operators, ~~the Wyoming Livestock Board, the Wyoming State Veterinarian, and the U.S. Department of Agriculture Animal Plant Health Inspection Service Veterinary Services.~~ None of the agencies listed have any jurisdiction for the livestock management strategies included in the list; these decisions are entirely under the jurisdiction of the livestock producer.

The list of livestock management strategies (identified as “actions”) is extremely problematic and has WG&F overreaching on a topic it for which it little understands.

For example, the plan simplistically suggests producers convert from cow-calf operations. This suggestion neglects the complexities involved in cow-calf operations and why they are favored for many ranch families rather than stocker cattle. There are social dynamics within a cattle herd, and cow-calf herds provide optimal social conditions for cattle, promoting their overall welfare and productivity. (Jensen 2018.)⁹ Social associations are formed within herds, including strong maternal lineage connections, herd memories and behavioral characteristics. The plan recommends converting from cow-calf operations to stocker cattle, even though stocker cattle are less profitable than cow-calf-yearling operations. (Roberts 2011). Grouping unfamiliar cattle can result in increased aggression, social stress, and negative impacts on feed intake, and bringing naive young cattle into this predator-rich countryside can be a recipe for disaster. (Bøe et al, 2003)¹⁰

Stocker cattle that are foreign to this range behave differently than native cow-calf pairs raised in this system, and bring their own set of management challenges, including importing pathogens that may cause animal health issues.

Likewise, the suggestion of “shipping cattle” results in increased fossil fuel use and costs associated with trucking stock in and out of the county from out of state or from other areas. In

⁹ Margit B. Jensen, 6 - The role of social behavior in cattle welfare, Editor(s): Cassandra B. Tucker, In Woodhead Publishing Series in Food Science, Technology and Nutrition, *Advances in Cattle Welfare*, Woodhead Publishing, 2018, Pages 123-155, ISBN 9780081009383, <https://doi.org/10.1016/B978-0-08-100938-3.00006-1>. (<https://www.sciencedirect.com/science/article/pii/B9780081009383000061>)

¹⁰ Knut Egil Bøe, Gry Færevik, Grouping and social preferences in calves, heifers and cows, *Applied Animal Behaviour Science*, Volume 80, Issue 3, 2003, Pages 175-190, ISSN 0168-1591, [https://doi.org/10.1016/S0168-1591\(02\)00217-4](https://doi.org/10.1016/S0168-1591(02)00217-4).

addition, it's a sloppy word choice since many producers in this area don't "ship" cattle in the first place; we trail.

I suggest deleting both the Shipping and Conversion bullet points. These are decisions that are best left to individual livestock producers, and I believe it is inappropriate for WG&F to advise such specific actions to livestock producers on something for which the agency apparently has limited knowledge. This plan should not identify "conversion from cow-calf operations" as a management recommendation from WG&F. It would be far more appropriate to "Recommend that livestock producers assess the type and class of livestock on grazing ranges as they seek to lower the risk of disease spillover from elk to cattle, as well as assessing the timing of grazing to avoid areas during periods of higher risk of disease transmission."

The plan's livestock strategies also seem oblivious to domestic sheep grazing that occurs in Sublette County and Lincoln Counties and in areas near elk feedgrounds, so the suggestion to ship "livestock," alter livestock grazing practices, and convert livestock use to wildlife equally apply to domestic sheep. I don't believe that was the intention, and it is inappropriate for the plan to treat both classes of livestock as the same.

The recommended action "Pursuing voluntary allocation or conversion of AUMs" for wintering wildlife is also inappropriate. This is not a "livestock management strategy" but a strategy to eliminate livestock, and should be deleted from this plan.

Is the plan actually advocating allotment buyouts and closures? If so, state that clearly. Regardless, this action is not needed and would harm the livestock industry. Allocated grazing use on public lands allotments is much higher than actual use, and with the catastrophic die offs of mule deer and pronghorn antelope herds from the winter of 2022-2023, there is range and feed available for wildlife without WG&F proposing to eliminate livestock. Don't make this an "us against them" plan.

P41 In general, I disagree with WG&F encouraging elk with a high brucellosis-prevalence rate to spread out across the landscape. It is setting the livestock industry up for a terrible conflict, with WG&F already talking about getting rid of livestock grazing in some areas, and I believe this conflict is unnecessary.

I specifically oppose all the "federal, state and private land management coordination" strategies (termed "actions") in the plan when either the goal or outcome is to reduce or eliminate livestock use. WG&F should delete these items from the plan.

P42 I oppose the goal of having WG&F working with NGOs to "maximize opportunities" to increase elk occupancy on native winter ranges. I am weary of such private deal-making for the use of public lands.

Pages 41-47 have the same organizational problems as I've noted earlier, with a confusion of goals, strategies, actions, and I suggest you reorganize and clean up these sections. By page 48, the plan completely eliminates goal and strategy statements. These sections should be corrected and revised as well.

P48, Phase III refers to Appendix 1. Feedground “Stakeholder” Working Group Template, but the template calls it a FMAP “Working” Group Template and then continuously refers to “FWG.” Which one is it? The plan really doesn’t refer to a “Stakeholder” group other than on pages 48 and 51, and doesn’t lay out a stakeholder group process, even though page 8, Goals & Purpose states that this Plan “will drive the development of individual herd unit FMAPs *“that will be developed collaboratively with all stakeholders and the interested public on a localized scale.”* The plan seems unclear about the process to involve stakeholders, as the use of FWG on page 49 restricts FWG membership to WG&F personnel.

P49, Phase III, “HMAP” is used for the first time without an explanation of the acronym, and under FMAP, process, first sentence, please include the FWG acronym after the first use of the term.

P50-51, Goal 2, focuses on obstacles. By definition, an obstacle is something that blocks the way, preventing progress, and the plan provides examples of these obstacles as damage to private property and increase in brucellosis spillover to cattle. Using wording that associates private property owners and their livestock with obstacles is offensive and sloppy. Get rid of the word “obstacle” and replace it with “challenge” as in “a stimulating task.” Even the word “problem” would be better than the repeated use of “obstacle.” Brucellosis spillover to cattle is a problem. Increases in damage to private property is a problem. They aren’t obstacles.

P51 **Public involvement:** under this section, public involvement in the development of FMAPs is limited to review of what WG&F has internally determined to be “obstacles.” Yet only “local stakeholders” will review the obstacles and to “help determine potential solutions.” “Membership and stakeholder presentation will be approved by the Regional Supervisor.”

While I appreciate that WG&F wants only those actually affected by the plans to participate and come up with solutions, this is a far cry from public involvement and the development of FMAPs “developed cooperatively with all stakeholders” mentioned on page 8. These limitations are also at odds with the plan’s earlier claims that public outreach is “critical” to feedground management in the future. In essence, this phase of the plan is similar to BMAPs, which the document acknowledges resulted in little change.

I believe FMAPs need much more public involvement, including the use of local stakeholder groups (including inviting every local landowner/livestock producer to the table) to talk about problems and potential solutions, and helping to drive creation of the FMAPs. Then once the solution-finding stakeholder process (which needs better defined in the plan) has helped to draft the FMAP, the interested public needs to be informed and invited to provide input.

By definition, the stakeholders will be trying to deal with the most difficult issues, and once solutions have been identified, the public should – at the very least – be informed. It would be difficult to generate public support if the public doesn’t know what’s in the plan.

P51, Product. Is this “written plan” the final FMAP? If so, state that here.

P52 repeatedly refers to “FMAP working groups” but as stated on page 49, these working groups are restricted to internal participation.

P58, As I mentioned earlier, the Plan limits FWGs to internal personnel, but this template suggests “an external stakeholder” be included in the annual review. The involvement of stakeholders and the public is seriously lacking in this plan’s development and review of FMAPs.

Suggested revisions to the Template:

Habitat: delete the references to “ACCESS/acquisition,” and rephrase the sentence to “Describe FWG attempts to improve, acquire or lease habitat.”

Elk land use, rephrase the question, “Describe FWG attempts to encourage cooperative elk use on private lands.”

Add new components:

“Describe reported damages to private property since the last meeting.”

“Describe any disease transmission to livestock reported since the last meeting.”

“Describe any concerns with interspecies competition with other wildlife species.”

P 59, rephrase next question, “Describe FWG efforts to enhance habitat to increase the ability for elk to winter away from feedgrounds.”

Livestock producer, rephrase: “Describe FWG attempts to work with livestock producers on livestock management strategies to reduce conflict and disease transmission.”

Fed/state/NOG coordination, rephrase: “Describe FWG efforts to work on habitat improvements, access and acquisitions.”

Infectious disease status: Why is brucellosis not the first item/question on this list?

The plan has gone from the statement on page 22 that feedgrounds are the “primary tool” to preventing disease spillover due to brucellosis, to not even mentioning it in the FWG template.

P60 Rephrase to “Describe the FWG disease management and prevention efforts since the last meeting.”

I suggest the framework needs to be expanded to evaluate progress on the five-part goal identified by the Director on page 3:

Describe how the FMAP protects livestock from diseases that are transmitted from wildlife;

Describe how the FMAP protects private property;

Describe how the FMAP provides elk hunting and viewing opportunities; and

Describe how the FMAP mitigates interspecies competition.

Overall, I don’t believe this plan was refined enough to have been released for public review, and I’ve spent considerable time in going into some of the details why. I skipped over other problems because I have limited time to dedicate to review one document.

The plan focuses on WG&F working to acquire lands in western Wyoming that could be used for elk winter range when this hasn't been the agency's focus in the past. Management of other elk populations not using feedgrounds isn't focused in this manner, and I'm appalled that with the majority of the lands in these western counties already controlled by government, WG&F proposes that it needs more. This plan sets out places for elk to be the priority use, above other uses. I oppose that, and I support shared range, as we've practiced for eons.

Human population density, as well as the associated housing density within this region, are projected to steadily increase in the next few decades, and this plan seeks to take more private lands away from human use through acquisitions, which I oppose. The cost of living for working people will continue to rise and this region will become another haven for the rich while pushing less affluent people out.

Through this plan, it appears WG&F has already made the policy decision to seek to acquire winter range for elk rather than consider reducing elk numbers. That is a choice the agency has already made and buffering that decision with statements to "*maintain elk numbers in herd units with feedgrounds at publicly-supported, Commission- approved population objectives*" doesn't make that choice less visible. The plan doesn't specifically mention reassessing population numbers or reducing any elk herd unit toward a smaller population as primary options. It's all about increasing the range of elk, not reducing the population to meet existing range conditions without a drastic change in land use.

I believe WG&F jumped the gun in releasing this poorly written plan, creating further controversy regarding an already controversial subject. I believe the plan should be withdrawn in its entirety.

Should WG&F chose not to withdraw the plan, it should be substantially revised, with another round of public comment, before WG&F should even consider moving forward. Overall, I'm dismayed WG&F thought this draft met a professional standard for release to the public because it assuredly did not.

I'm especially disappointed with the plan's overall treatment and tone toward livestock production in these western counties. We (livestock producers and landowners) have legitimate concerns with this plan. We also have some ideas worth considering to accomplish some of WG&F's goals. We've been your partners on many important wildlife and habitat accomplishments, but the public wouldn't be able to tell that from this plan.

Sincerely,
Cat Urbigkit
Boulder, WY