



Janet Milek <janet.milek@wyo.gov>

Fwd: Feedground Comments

Brad Hovinga <brad.hovinga@wyo.gov>

Fri, Aug 25, 2023 at 7:40 AM

To: Benjamin Wise <benjamin.wise@wyo.gov>, Jared Rogerson <jared.rogerson@wyo.gov>, Samantha Allen <samantha.allen@wyo.gov>, Cheyenne Stewart <cheyenne.stewart@wyo.gov>, Mark Gocke <mark.gocke@wyo.gov>, Tara Kuipers Consulting LLC <tara@tarakuipersconsulting.com>, Janet Milek <janet.milek@wyo.gov>, Hank Edwards <hank.edwards@wyo.gov>, Raymond Bredehoft <raymond.bredehoft@wyo.gov>, Gary Hornberger <gary.hornberger@wyo.gov>, Dave Hyde <dave.hyde@wyo.gov>, Jordan Kraft <jordan.kraft@wyo.gov>, Brandon Scurlock <brandon.scurlock@wyo.gov>, John Lund <john.lund@wyo.gov>

FYI

----- Forwarded message -----

From: **Carlin Girard** <carlin@tetonconservation.org>

Date: Thu, Aug 24, 2023 at 11:48 AM

Subject: Feedground Comments

To: Brad Hovinga <brad.hovinga@wyo.gov>, Brandon Scurlock <brandon.scurlock@wyo.gov>

Hello Brandon and Brad,

I provided the attached comments via the survey form, but also thought I would send them your way in document form as well. These were not approved by my Board due to the timeframe, just FYI. They are my comments as a staff member.

I thought the plan really sets a vision for the future that is based on best available data and not public sentiment or political will. I am proud of WGFD staff for taking that tact, but also imagine it will run aground on public sentiment and political will as a result. Such is life, thanks for taking the high road.

I look forward to seeing where this heads and how Conservation Districts can help see the vision through. Sincerely,

Carlin Girard

Executive Director | Teton Conservation District

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Brad Hovinga
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Shared via Survey Form and sent directly to Brad Hovinga and Brandon Scurlock

August 24, 2023

RE: Comments on the Draft Wyoming Elk Feedground management Plan

Dear Elk Feedground Management Plan Team,

Introduction

Teton Conservation District (TCD) has gratefully participated as a stakeholder in the crafting of the Wyoming Elk Feedground Management Plan (the Plan) and has provided a review of the document. Generally, TCD appreciates the forthright tone and the clear acknowledgement for the need to protect agricultural operations, and also wildlife populations amidst increasingly detrimental influx of disease, namely chronic wasting disease. The following comments have two components: 1) A statement about Conservation District's potential roll in this plan's implementation, and 2) line-by line comments pertaining to the Plan.

Wyoming Conservation Districts are overseen by the Wyoming Agricultural Commission but have significant autonomy because Conservation District Board of Supervisors are locally elected officials.

By Wyoming Statute, Conservation Districts are established, in part, to provide oversight of range management practices, help establish soil, water, and vegetation demonstration projects and best practices, and conduct research. While Conservation Districts are required to work in cooperation with governing agencies at all times, Statute 11-16-132 states that, "Agencies of the state, county or any political subdivision of the state which have jurisdiction over or are charged with the administration of any state, county or other publicly owned lands lying within the boundaries of any district organized hereunder, shall cooperate to the fullest extent with the supervisors of the district to effect the programs and operations undertaken by the supervisors under this act..." The guiding statutes of Conservation Districts place them in a unique position to work on natural resources planning efforts, as well as cooperate with government agencies working with private landowners.

The Wyoming Elk Feedground Management Plan has direct implications on natural resources and agricultural operations; but also, the plan sits at the nexus between government action that affects natural resources and agricultural operations on private lands. As a result, the plan should have a more clearly defined role for how Conservation Districts are envisioned to cooperate.

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Some examples could include sponsoring or leading the identified research efforts, assisting agricultural operators adapting to changing feedground management, or supporting wildlife habitat enhancement, to name a few.

The following comments pertain relate to specific sections of the plan.

- 1) Goals and Purpose, Page 8, directs the Department, "...to look for opportunities that allow elk to winter away from feedgrounds. This in turn, will reduce their reliance on supplemental feeding to manage the distribution and prevalence of CWD and other diseases..." And additionally states that ..."supplemental feeding is likely not sustainable." These statements are strong and set a clear overarching objective, which much of the plan is based upon. Clarity like this provides value to the Department as well as the public. If this is the route that has been identified, retaining strong and clear language such as this is worthwhile.
- 2) Wyoming Elk Feedgrounds, page 10, first sentence, the usage of 'Native grass' may be incorrect. Perhaps 'Pasture grass' is a better term for the grass that has been sown and cultivated, such as smooth brome.
- 3) Table 1, Page 13, the National Elk Refuge is not listed in the table, and although it isn't a state run feedground, it is part of the Jackson Herd Unit, and seemingly rounds out the enumeration of elk on feedgrounds per Herd Unit.
- 4) Historical Winter Range and Elk Migration, page 14 second paragraph identifies feedgrounds with adjacent winter range capable of supporting wintering elk in low snow years. Horse Creek, Camp Creek, Dog Creek, Alkali, Patrol Cabin, and perhaps some other feedgrounds similarly can support large numbers of elk on low snow years on native winter range.
- 5) Large carnivore relationship and reliance on elk populations, page 14, does not make any statement about levels of predation associated with feedground elk, and seems like an omission. Between calves, and sick and injured elk, there seems to be strong data that wolves can kill a significant amount of elk in short time periods, let alone seasons. Even without qualifying this as good or bad, no mention of predation levels seems like an oversight.
- 6) Elk and Feedground Management Direction, page 32, last sideboard, "Limit any increase in interspecies competition with other wildlife species," presents a very real challenge as stated. Perhaps softening the wording to "Always consider potential increases in interspecies competition with other wildlife species," is more attainable. It presents a paradox if there is always an attempt to limit interspecies competition, when a fundamental goal is to increase elk's reliance on native forage that is also being utilized

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by other species. The point is important, but not worth hamstringing the actionability of the plan.

- 7) Elk harvest strategies, page 33, consider the principal of party hunting for private land elk reduction hunts. If the goal is to increase harvest efficiently, perhaps providing more leeway for experienced hunters to fill tags is a potential option. This is not recommended for fair chase normal hunts, only when conflict or population management is paramount.
- 8) CWD feedground management, page 34, consider providing more leeway to landowners to kill sick animals for testing as CWD becomes more abundant. It would seem that there is very little detriment to quickly removing and testing sick animals.
- 9) CWD feedground management, page 35, there is a noticeable lack of best practices for Department staff, especially disease and feedground staff, that are likely to come into contact with CWD. It is worth identifying and highlighting best practices for Department staff that handle sick animals so that transmission of CWD and other diseases between feedgrounds and handled animals remains as low as possible, as does human contact with diseases. This is a strong suggestion to add emphasis for Department staff moving among locations and handling sick animals to clearly establish protocols to reduce potential cross contamination and human health issues through proper handling and quarantine techniques.
- 10) General comment about disease outreach and communication, consider adding more information about protocols for communication about the presence of diseases, especially new ones, or changing prevalence among Department Agriculture, Department of Health, Emergency Management, UW extension, Conservation Districts, and producers. Often no one hears about diseases until far after they are identified, and this could be remedied.
- 11) Elk habitat acquisition, access, and land use, pages 38-40, does not really address recreational opposition to winter range designation. There should be a stronger plan, based on recent experiences in Bridger Teton and in Grand Teton, that establishes a strategy to communicate to the outdoor recreation community, because they are often the largest opposition to winter range closures, especially skiers and snow machines.
- 12) Livestock producer coordination and cooperation, page 40, uses a negative stance in the framing of the goal by saying, "...designed to reduce conflict and disease transmission." However, this could be framed in an affirmative by stating something more like, "...incentivizing practices that support elk winter utilization without livestock conflict and disease transmission."
- 13) Livestock producer coordination and cooperation, page 41, could include a few more actions, especially in instances where feedground management changes result in increased disease risk to producers. For instance, paying for herd replacement following

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- brucellosis infection, storing genetic material of cow calf lineage, and having more oversight of milk pasteurization.
- 14) Federal, state, and private land management coordination, page 41 and 42, could include more actions. For instance, re-establishing historical migration routes to unused or under utilized winter range, predator control, recreation management, limiting human development activities, and listing Conservation Districts as a potential partner.
 - 15) Feedground management alterations, Page 45, states that “Using additional heavy equipment for operating feedgrounds would not appreciable reduce CWD transmission.” This final statement after three paragraphs of potential benefits seems imbalanced and perhaps too emphatic. Replacing ‘would’ with ‘may’ could reduce this statement’s contradictory tone.
 - 16) Feedground management alterations, page 45, could include potential for private land feeding locations, and emergency feeding locations. Also, the National Elk Refuge and Grand Teton National Park both have large areas that could provide a hay crop, if harvested. Finally, regarding carcass disposal, there is a statement that “all of which are not feasible at this time.” Again, this is quite emphatic, given that there is an incinerator in operation in Teton County currently for carcass disposal and other options are not that hard to imagine working.
 - 17) Feedground phase out, page 47, second paragraph, “...successful implementation would require a combination...” is strong wording given the list that follows. Perhaps changing it to, ‘could include’ would allow for greater flexibility when needed.
 - 18) Feedground Management Action Plans, page 48, consider adding a statement about balanced approaches. Given the likelihood that on some feedgrounds very little or one small change might occur, whereas in other cases, large changes could occur, a balanced approach between the changes to the feedground actions and the mitigation strategies to address livestock conflict and disease transmission seems warranted. For example, if a feedground were to close outright, perhaps the adjacent private landowner would be given the full suite of options for mitigation strategies and highway crossings would be put in place, whereas, if a feedground changed its feeding timing only, maybe the mitigation strategies implemented would be simpler and less exhaustive. Also, why are the FMAP’s at the Herd Unit scale, not the feedground scale? The feedgrounds seem to be the absolute focal point of the plan, not the Herd Units.
 - 19) Feedground Management Action Plans, page 52, there is virtually no mention of a ranked or prioritized implementation strategy, which leaves a lot of work out in front of the Department with very little guidance about where to start. Adding a section about overall

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prioritization for FMAP creation and strategy implementation seems warranted during this phase, not once the FMAPs are being created.

Carlin Girard
Executive Director

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