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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

September 8, 2023

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

To Whom It May Concern,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Wyoming Game and Fish Department's (WGFD) Wyoming Elk Feedgrounds Draft Management Plan (Plan).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

WDA appreciates the ability to provide comments on the Draft Plan prior to a Final Plan and subsequent implementation to address the potential ramifications of elk management on and around the elk feedgrounds, including private landowners and agricultural producers.

The Wyoming Board of Agriculture's (BOA) updated policy positions related to elk feedgrounds, brucellosis, herd management units, and no net loss of Animal Unit Months (AUMs) were approved on March 17, 2021 and are stated below:

- BOA does not support the removal or closure of existing elk feedgrounds.
- The BOA supports the eradication of brucellosis in domestic animals and wildlife and supports the efforts of the Governor's Brucellosis Coordination Team (GBCT).
- The BOA supports management of wildlife herd units based on multiple use and habitat availability.
- The BOA supports Game and Fish cooperating with landowners on setting initial population targets and hunting seasons.
- The BOA wants the objectives to change before resource damage occurs and not be based on only public comments.
- The BOA does not support the reduction of livestock numbers in support of maintaining or increasing herd unit objectives.
- Grazing is a tool to enhance natural resources to meet desired goals. Therefore, the BOA desires grazing land management to protect the no net loss of AUMs. No net loss includes, but not limited to drought, the ability to sell permits, and historical sites.

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We encourage WGFD to consider incorporating the BOA's policy position by proposing alternative methods to manage elk on and around feedgrounds and ensure the cumulative impacts of the Plan on neighboring agricultural operations are fully considered.

The Plan includes a section on the economic impact to the WGFD and communities focused primarily around elk hunting licenses. WDA believes the Plan should include an economic impact analysis on the agriculture industry divulging the incurred expenses as a result of Plan decisions and implementation. More specifically, the decision to reduce elk feeding early due to disease, or potentially close a feedground, given it is highly probable the private landowners and agricultural producers will have to modify their operations to address the influx of elk onto their property. WDA is happy to assist the WGFD in gathering any additional information they may need to bolster the economic impact analysis.

An additional area of concern the Plan should address, are the impacts related to habitat enhancement projects on both private and federal lands and livestock grazing allotments or leases. While we support vegetative management projects, many of them require modification of livestock management prior to or after project implementation. We do not support inclusion of statements such as "typically including livestock rest or deferment," (pg. 46) or expecting livestock grazing permittees to reduce AUMs or vacating the allotments to incorporate a vegetation management project.

While the Plan proposes ideas of shifting elk from feedgrounds and dispersing the herds to other areas, it neglects to identify when it is appropriate to reduce elk population objectives. When winter habitat is the limiting factor for elk, we believe it could be beneficial to find the ecological balance between elk populations and habitat by modifying existing population objectives through broad public input.

If populations were strategically reduced, the impacts to private landowners may be less onerous if elk were to come off feedgrounds. The WGFD mentioned they would consider the need for closure of feedground as soon as possible if Chronic Wasting Disease reaches or exceeds 10% for three consecutive year" (pg. 35). This should cause concern to private landowners for a number of reasons if a feedground were proposed to close, and as mentioned earlier, directly conflicts with the BOA policy related to feedground closures.

We are primarily concerned with elements of the Plan which conflict with BOA policy, relating to no net loss of AUMs for domestic livestock grazing. The Plan states in a number of places where the WGFD would "pursue voluntary allocation or conversion of AUMs for wintering wildlife on federal lands," and "maximize opportunities with willing lessees to rest or retire public land grazing allotments in key locations on native elk winter ranges" (pg. 41).

Wyoming's livestock producer's use of federal grazing AUMs have been significantly diminished over the past several decades. For this reason, the BOA opposes any permanent reallocation of livestock AUMs for any other purposes. Furthermore, the Plan states "The Department will work with federal land management agencies, local producers, the Wyoming Livestock Board, and the Governor's Office to determine areas where livestock AUMs can be adjudicated from livestock to wildlife use" (pg. 41). WDA would request inclusion in the list of entities interested in federal AUM conversions.

.. All of these statements cause the WDA great concern. This is yet another reason why WDA urges the Plan to include a comprehensive economic impact analysis to the agriculture industry.

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We request the WGFD to work closely with WDA in any decisions where elk management will negatively impact private landowners and federal lands grazing permittees.

We appreciate the opportunity to provide comments on the Draft Plan and look forward to working closely with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Miyamoto", is written over a horizontal line.

Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
Wyoming Game and Fish Department
Wyoming County Commissioners Association
Public Lands Council