



Comment Concerning the Wyoming Game and Fish Department's Elk Feedgrounds Management Plan

Property and Environment Research Center (PERC)

Bozeman, Montana

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(via email)

The Wyoming Game and Fish Department (WGFD) has been supplementally feeding elk in western Wyoming for more than a century. As the strong tradition of agriculture continues in the state but the population and popularity of western Wyoming as a place to live and recreational destination has grown, so has the complexity of feeding elk. The population of western Wyoming has grown well beyond what those managers would have predicted when the elk feeding program began in 1909. More people live in the valleys and use the backcountry for year-round recreation than ever before. And in the past 100 years, brucellosis and chronic wasting disease have also come to the fore as another nuance of elk feedgrounds. All of this combines to make managing elk feedgrounds complex and controversial.

The Property and Environment Research Center (PERC) respectfully submits this comment on how WGFD can consider the potential for and availability of voluntary, privately-funded conservation programs to help reduce potential conflicts between elk and agricultural landowners as the Department implements its Elk Feedground Management Plan. PERC is the national leader in market solutions for conservation, and we have produced extensive work on how to conserve big game while respecting property rights and alleviating costs to landowners. We want to support healthy elk populations and the private lands that provide essential habitat at significant costs to landowners. Through research, law and policy, and innovative field conservation programs we have advanced wildlife conservation tools that can help achieve WGFD's elk management goals. Founded in 1980, PERC is nonprofit, nonpartisan, and proudly based in Bozeman, Montana.

We applaud the WGFD's work to create a long term plan to manage these feedgrounds for the coming years and decades. The plan recognizes several themes that arose from stakeholder discussions in preparation for the creation of the plan. One of these themes is that the plan remains "adaptable and multi-faceted" and fits within several sideboards that the stakeholder groups created. To achieve effective long term management of elk feedgrounds in this flexible manner, the WGFD must consider all available options, both private and public. One of the major concerns surrounding the potential closure of feedgrounds is the potential costs and risks to agricultural landowners who would face increased pressure from elk. To be clear, PERC is not commenting on—or supporting or opposing—closures of elk feedgrounds, we only seek to share tools to add to the menu of options for the WGFD to consider as they implement this plan. Our research and applied work on the ground has identified and implemented tools that can benefit private landowners as they deal with the consequences of elk on their property. Here, we highlight two of the tools we have developed that we think will be of interest to the WGFD and landowners.

Elk Occupancy Agreements

Elk occupancy agreements are a flexible conservation tool that pay landowners for conserving elk habitat on private lands. These can be tailored to meet the unique needs of landowners and the wildlife in an area. In partnership with landowners and other conservation NGOs in the Paradise Valley of Montana, PERC has developed an elk occupancy agreement that we think could be beneficial to consider in the future of Wyoming elk feedground management and landowner concerns. In the elk occupancy agreement pilot project, PERC has compensated a rancher to set aside valuable elk winter range, while continuing their agricultural operation. The project is fully voluntary and is funded entirely through private sources. This project funded a fence that splits 500 acres of grazeable rangeland off from the core of the ranch, separating cattle from elk, and provides for elk usage during the migration season. The landowner also agreed to improve the elk habitat on the 500 acre parcel by spraying cheatgrass and removing encroaching conifers.

By splitting this portion of land off from the core of the ranch, the agreement pays the landowner for shifting livestock grazing pressure away from the elk winter range parcel (except in emergencies) which creates an attractant for wintering elk, encouraging them to stay off of the hay meadows, ultimately resulting in reduced likelihood of cattle and elk interacting, and reduced chances of brucellosis transmission. As a result, the ranch can continue to feed cattle through the winter with fewer elk and cattle interactions and remain financially viable. So far, the agreement has also appeared to benefit neighboring landowners who have experienced reduced elk presence during the winter.

This model would effectively meet a number of the WGFD's overall goals, as well as specific projects that are considered in the elk feedground management plan. Elk occupancy agreements can help the Department to voluntarily and cooperatively work with agricultural producers to provide and improve elk habitat while also reducing conflict. These agreements can be designed to limit damage to private property and limit disease transmission between elk and livestock. PERC relied heavily on the ranch family in Paradise Valley to help with the design and implementation of the agreement. Elk occupancy agreements can also serve as a way for WGFD to expand lands that could provide winter range for elk, and PERC would be happy to work with private landowners to help identify properties that could be prioritized as winter range or serve to connect migrations to native winter ranges.

In PERC's experience, elk occupancy agreements are a good way to bring private resources to the table to benefit wildlife and landowners. The elk occupancy agreement in Montana was entirely privately funded, and there are likely to be private funders that are ready and willing to help bring this model to Wyoming. The agreement has been successful and in line with the agricultural and financial interests of the landowner, as well as the neighboring landowners who face less financial pressure from elk. Additionally, the agreement has been met with a wide range of public support. Thanks to the work of PERC and our partners, many in the local community have seen the potential benefits of elk occupancy agreements, and we would be interested in helping strategically expand this support in Wyoming.

In all, many of the overarching goals, and specific actions identified by the WGFD have already been implemented in PERC's elk occupancy agreement in the Paradise Valley of Montana. This elk occupancy agreement compensates the landowner for reducing their risks of a brucellosis transmission event. This voluntary, privately funded agreement stands as an exceptional model for how to manage landowner conflicts with elk.

Brucellosis Compensation Fund

One of the major controversies in elk management is the potential spread of disease. The spread of brucellosis from elk to cattle can spell financial ruin for agricultural producers. In addition to the elk occupancy agreement, PERC and partners have also created a financial tool to help address the costs of brucellosis in the Paradise Valley of Montana. Through the Paradise Valley Brucellosis Compensation Fund, eligible landowners can receive reimbursement up to 75 percent for any quarantine-related costs suffered as a result of a brucellosis transmission. Partial compensation is awarded in an effort to encourage landowners to take preventative measures to avoid a transmission event. This privately-funded tool is entering its first winter of operation, but has shown early promise for improving landowners' tolerance for elk on their property. The brucellosis compensation fund is a tool that PERC believes can address several of WGFD's overarching goals for the future of elk and feedgrounds, as well as some smaller goals and specific action items.

This type of fund can help maintain publicly supported elk objectives. If brucellosis risk becomes a major concern among landowners, there may be calls to reduce elk herd numbers far below objectives. If the costs that landowners must bear as a result of increased elk populations can be minimized, there may be an opportunity to increase tolerance and reduce the need to cull elk herds. A brucellosis fund can also help the WGFD achieve the goal of working cooperatively with agricultural producers. Though the fund is not intended to shift agricultural practices, reduce conflict, or prevent disease transmission, landowners may be more willing to have elk on their property if there is a backstop to prevent landowners from bearing the entire cost of brucellosis transmission. This model could potentially be expanded for other disease transmission risks.

PERC strongly believes that the elk occupancy agreement and brucellosis compensation fund offer an effective win-win solution for the future of elk feedground management in Wyoming. Further, while both of these programs are strong alone, there are opportunities to stack them and other available tools to create even more robust elk management surrounding feedgrounds in Wyoming.

Overall, we hope this comment gives the WGFD an understanding of the available opportunities for voluntary, privately funded conservation tools to address landowner concerns in the areas around elk feedgrounds. PERC would like to reemphasize our interest in being a part of these conversations. We are ready to share our experiences with elk conservation tools in Montana, and think of ways to apply these tools to Wyoming.

For questions or comments, please contact PERC's Director of Conservation, Travis Brammer at tbrammer@perc.org.