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Dear Commission

I would like to comment on the Wyoming Elk Feedgrounds Management Plan. I am a fourth-generation rancher in Sublette County, and I served on the Elk Feedgrounds Public Collaborative. My family started ranching in the Upper Green River valley before most of the feedgrounds were established, when elk were still migrating to the desert. The reason feedgrounds were initially created was because of elk dying in the winter when their migrations were broken, which was primarily due to the cultivation of the valley. Later elk grounds were created to reduce the damage to private lands and stored crops.

Elk feedgrounds have served elk and man well for the 100+ years that feedgrounds have been in existence. Feedgrounds have helped maintain robust populations of elk for hunters, outfitters and sightseers, without the death loss that is associated with wintering on traditional winter ranges. Elk feedgrounds have eliminated much of the conflict between elk and agriculture, including conflict around winter range, brucellosis transmission, and property damage. We worry about our declining mule deer, but we want to set up elk for the same failure, while putting more pressure on mule deer from interspecies competition. Elk dominated the sagebrush flats of the Desert and Mesa during the settlement era, just look at the elk horn piles at the old homesteads, while the newer ranch houses have mule deer horn piles. Have we learned nothing in our 100+ years on this landscape?

Chronic Wasting Disease (CWD) is being used as a “straw-man” argument for the reason elk feedgrounds need to be eliminated, while the real goal appears to be elimination of certain land uses on the landscape. CWD has been in SE Wyoming deer herds since at least 1984, nearly 40 years. SE Wyoming has high density elk herds in the Iron Mountain area, with hundreds wintering together, without the use of elk feedgrounds. Elk populations in SE Wyoming are not being impacted by CWD. In fact, the elk population is so high in the Iron Mountain area that the Commission can’t find a solution to reduce elk numbers there. Groups would like to utilize CWD as a means to justify an end, which is the elimination of federal lands grazing and oil&gas exploration.

Elk feedgrounds are an essential component of preserving the custom and culture of the Upper Green River Valley, which includes ranching, oil&gas, wildlife conservation and hunting. These elk feedgrounds have been a win-win for wildlife and humans. The Wyoming Elk Feedgrounds Management Plan is not a feedground management plan, but a feedground closure plan. The plan portends to be long viewed, but it is short sighted. This plan makes blanket statements that will be utilized by federal land management agencies to push agricultural operations off of federal lands. This plan creates conflict and does not reduce conflict. To be clear, I did not get the opportunity to comment on this plan as a member of the Elk Feedgrounds Public Collaborative, until right now with the rest of the public. I do not support this plan, and will provide page by page comments on the plan.

On pages 3, in the “Message from the Director”, Director Nesvik states this “is not a feedground closure plan.” Two sentences later he states, “This plan creates a process and venue to discuss and analyze ways to reduce our reliance on supplemental feeding in places where it's feasible, and in a way that protects the values and objectives feedgrounds achieve today.” These two statements or goals are incongruent. The goal is clearly to reduce the reliance on supplemental feeding, which ultimately means closing feedgrounds. I have the utmost respect for Director Nesvik and the job he does leading the Wyoming

Game and Fish Department, but that should not be the goal of this management plan. In my opinion, the goal should be to reduce conflicts and challenges on individual elk feedgrounds, through a collaborative process with landowners, agriculture and other members of the local communities, when those challenges arise.

On Page 7, the Executive Summary states, “Swift and deliberate actions are necessary to limit future CWD transmission.” Why is swift action needed when there has been little impact to SE Wyoming elk from 40 years of CWD residing in the area, even though those elk are at high densities at times? CWD is a “Strawman”. The Federal Government has threatened to disallow elk feedgrounds on their lands, utilizing CWD as an argument. Frankly, this feedground management plan should be seeking ways to continue feeding elk even if the Feds kick elk feedgrounds off of their land. We should be looking for alternative feeding locations, not closures.

On Page 8, Goals and Purposes states, “The Plan and forthcoming individual Feedground Management Action Plans (FMAP) will provide the Department with direction to continue to look for opportunities that allow elk to winter away from feedgrounds.” I maintain that is part of a feedground closure plan.

The Goals and Objectives further state, “This vision must include processes whereby all private, state, and federal land managers work together in a unified approach to maintain publicly supported elk population objectives and hunter opportunities without causing unacceptable conflict with humans, livestock, or other wildlife species.” This is a great objective, but the challenge is this may not be an objective of federal land management agencies.

On Page 14, the plan state, “In the event of a large shift in elk distribution, it can be expected that wolves will likely follow their prey base. A change in elk and wolf distribution could complicate private livestock operations with additional predation on livestock in the vicinity.” I find the use of the word “complicate” to be a bit condescending, since we know more wolves in the low country will result in additional impacts to ranchers. No attempt was made in this plan to quantify the economic impacts to ranchers in Sublette County from closing feedgrounds. Pages 18 and 19 are replete with economic impact analysis related to the Department, communities, and tourism. But no analysis on economic impact to ranchers.

Pages 25 and 26 take up the issue of CWD, and states, “Regardless, endemic CWD will likely depress some cervid populations at an unknown but potentially significant level. As such, management efforts designed to reduce the spread and prevalence of CWD are warranted.” The plan also states, “However, in some southeastern Wyoming mule deer herds where the disease has long been established, CWD prevalence has either somewhat declined from peak levels and/or has remained relatively static, albeit at levels high enough to likely impact population performance.” We don’t even know if CWD is affecting deer populations in SE Wyoming, even though the disease has been there for around 40 years. Once again, CWD is a “Strawman” for land management goals.

Page 32, Elk and Feedground Management Direction, states, “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.” I disagree with this goal, and I do believe that clearly the “overall goal” of this plan is to close elk feedgrounds. Elk feedgrounds have nearly eliminated interspecies competition with elk and cattle for available forage on BLM low elevation livestock allotments. There has been virtually no conflict between

elk and cattle on these BLM livestock allotments where elk are fed, but this plan gives federal land managers a reason to restrict grazing in these BLM allotments.

The plan also states on Page 32, “The Department must strive to achieve this goal while staying within clearly established sideboards. The Department shall: Maintain publicly supported elk population objectives; Maintain hunting opportunity; Limit any increase in damage to private property; Limit any increase in disease transmission to livestock; Limit any increase in interspecies competition with other wildlife species.” The Department didn’t say they shall limit any increase in interspecies competition between elk and livestock. When you turn elk loose on the low elevation livestock allotments, then you will have interspecies competition between elk and livestock.

On Page 39, there are almost too many concerns to list. However two stand out. The plan states, “*The Department has identified the following actions to pursue native elk winter range*: Seek opportunities to acquire, through purchase, lease, or other elk occupancy agreements, lands that could be used as winter range for elk as an alternative to feedgrounds.” I have always advocated for the preservation of ranches and ranching, in order to preserve the working landscapes of the west, which preserve the vistas and wildlife we treasure. These working landscapes include cattle, sheep and ranchers. I worry about the state purchasing western Wyoming ranches for elk winter range, when elk and ranchers have coexisted extremely well together through the feeding of elk in the winter. This could have a huge impact on the ranching community.

The plan also states, “Changes to law, land development regulations, and city ordinances

- To garner the support needed to begin implementing necessary changes in our long term vision for elk wintering in western Wyoming, the Department will look for cooperative opportunities to influence positive changes to statutes, regulations, county land development regulations, and city ordinances in order to encourage and promote cooperative elk use on private lands.”

What laws does the Department wish to change? I think that should be revealed to the public.

Page 40 and 41 include Livestock producer coordination and cooperation. The plan states, *The Department has identified the following actions for voluntary livestock management strategies to reduce elk-livestock conflicts*: Shipping livestock to areas of low risk for conflict and damage; Exclusionary fencing to maintain separation of elk and livestock; Conversion from cow-calf operations; Incentivizing conflict-reduction management actions; Utilizing high-risk grazing areas after the peak brucellosis transmission period; Pursuing voluntary allocation or conversion of AUMs (Animal Use Month) for wintering wildlife on federal lands; Elk occupancy agreements on private lands.

The Department suggesting how livestock producers should operate or actually not operate, even if its voluntary, is a hard pill to swallow and not in their purview.

One of these strategies is particularly alarming and it states, “Pursuing voluntary allocation or conversion of AUMs (Animal Use Month) for wintering wildlife on federal lands.

- Currently, most public land allotments on BLM and USFS lands are stocked with livestock. Shifting elk winter use from feedgrounds to native winter ranges will only be successful if sufficient forage is available. The Department will work with federal land management agencies, local producers, the Wyoming State Livestock Board, and the Governor’s Office to determine areas where livestock AUMs can be adjudicated from livestock to wildlife use. This would allow additional residual forage to be left available, increasing the amount of time that wildlife can

subsist on native winter range and reducing the reliance on supplemental feed in the winter. Leaving additional forage on transition and winter ranges will also help in reducing inter-species competition in these seasonal ranges and allow for increased productivity of wildlife species utilizing these areas year-round.”

I believe the conversion of livestock AUMs to wildlife is a nail in the coffin of traditional ranching in Sublette County. I believe even suggesting it will give the federal land management agencies license to begin that process without producer support.

Page 41, Federal, state, and private land management coordination, states, “The Department has the opportunity to provide habitat management recommendations to federal partners through public land management planning processes such as USFS Forest Plans and BLM Range Management Plans.” The plan further states, “*The Department has identified the following actions to facilitate elk occupancy off elk feedgrounds: Actively participate in public land management planning processes by identifying and advocating for crucial native elk winter ranges through comment during USFS Forest Plans and BLM Range Management Plans.*”

I worry that this action plan gives the Department license to seek livestock allotments for wintering elk. This will embolden the federal land management agencies to reduce or eliminate livestock producer’s grazing on federal lands.

This plan will result in vastly reduced herds of elk. I serve on the Governor’s Brucellosis Coordination Team, and we have heard estimates on how far the elk herds would have to be reduced if feeding was eliminated. Are those estimates in this plan? You will not be able to maintain current herd objectives and eliminate elk feeding.

Every action in the Wyoming Elk Feedgrounds Management Plan is designed to eliminate the feeding of elk, which in my mind is clearly advocating for the closure of elk feedgrounds. Our current policy of feeding elk has resulted in over 100 years of successful wildlife management, with minimal conflict with livestock producers. We have a system that works. This plan will significantly impact livestock producers, hunters and outfitters in western Wyoming. To reiterate, in my opinion, the goal of this plan should be to reduce conflicts and challenges on individual elk feedgrounds, through a collaborative process with landowners, agriculture and other members of the local communities, **when** those challenges arise. I have supported, served and admired wildlife and ranching my entire life because they are truly compatible, but this plan is not compatible with the values of western Wyoming.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert Sommers". The signature is fluid and cursive, with a long horizontal stroke at the end.

Albert Sommers
Sommers Ranch