



September 9, 2023

Wyoming Game and Fish Commission
5400 Bishop Boulevard
Cheyenne, WY 82006

Submitted via Stakeholder link

RE: Comments on Draft Wyoming Elk Feedground Management Plan

Dear Commission,

Sublette County Conservation District (SCCD) has the mandate to assist and promote the protection and preservation of public lands, natural resources, soil, water, and wildlife, the development of water and prevention of floods, stabilization of the ranching and agricultural industries, protection of the tax base, and providing for the public safety, health, and general welfare of the citizens within Sublette County. SCCD has the following comments as it relates to our mission on Draft Wyoming Elk Feedground Management Plan.

The Wyoming Game and Fish Department (WGFD) has utilized SCCD as one of the stake holders throughout the development of this draft plan. SCCD feels that the draft plan reads and can be perceived as if the WGFD is looking to close all feedgrounds. SCCD encourages the WGFD to be more clear and transparent with their ultimate intention in the final plan. With the long history of feeding elk, the population has increased due to this feeding far beyond the carrying capacity of the available winter range. WGFD needs to be cognizant of the fine balance on the landscape between forage production and rangeland health. Removal of feedgrounds from the landscape will have impacts on rangeland health that may be detrimental.

SCCD does not support the WGFD exploring options to buy out federal grazing permits or state grazing leases for the purpose of providing forage for elk. WGFD has artificially elevated elk populations through feedgrounds and if they are phased out then populations need to be lowered to pre-feedground levels or lower in order to not have negative impacts on the landscape, including private property.

On page 32 of the draft plan, SCCD encourages the addition of another sideboard. The proposed sideboard is to maintain or increase, but not decrease winter range ecological health and condition. The addition of this sideboard will help make sure that landscape health is taken into consideration when looking at feedgrounds and their future management.

On page 34 bullet 3, SCCD would encourage adding, "other treatment methods as better science becomes available." SCCD also encourages WGFD to make a clear statement in the plan stating that this plan can be adaptable to changing science and knowledge. Having a statement of this nature will give the WGFD the flexibility needed to adapt with changing times.

SCCD feels that the WGFD missed an opportunity in the plan to talk about local government partners, not only conservation districts, but County Commissions as well. SCCD hopes that being involved as stakeholders and then left out of the coordination of future plans and projects was an accidental oversight. Conservation Districts have a statutory obligation, summarized in the opening paragraph of this letter, and should play a large role in working with WGFD on the future of feedgrounds within their jurisdictional boundaries. SCCD encourages the WGFD to work closely with the conservation districts that have feedgrounds within their boundaries.

SCCD thanks the WGFD for the opportunity to comment on the Draft Wyoming Elk Feedground Management Plan and looks forward to the response to comments and the final plan. If you have any questions regarding our comments feel free to contact myself or Melanie Purcell our Wildlife and Habitat Program Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Henn", written over the word "Sincerely,".

Michael Henn
District Manager

Cc Wyoming Association of Conservation Districts
Sublette County Commission
Wyoming Department of Agriculture