



September 8, 2023

The Wyoming Game and Fish Department
Attn: Elk Feedground Stakeholder Group Steering Committee
5400 Bishop Blvd
Cheyenne, WY 82009

Submitted online via WYGFD webpage: [Wyoming Game and Fish Department - Feedgrounds public engagement](#)

RE: Wyoming Elk Feedgrounds DRAFT Management Plan Comment

Dear Elk Feedground Stakeholder Group Steering Committee,

The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, Montana. Its five field offices, strategically placed in Idaho, Wyoming, and on the Wind River Indian Reservation, create opportunities to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem (GYE) now, and for future generations. For more than 40 years, GYC and our 100,000 supporters from across the country have advocated for a science-driven, collaboration-focused, and forward-thinking approach to keeping lands wild, rivers free-flowing, and iconic wildlife moving throughout a connected and vibrant landscape. Elk habitat and elk populations are important to GYC supporters who enjoy wildlife viewing and hunting.

On behalf of the members and supporters of the Greater Yellowstone Coalition, please accept the following comments on the Wyoming Elk Feedground Draft Management Plan. If you have any questions or comments about the content of this letter, please feel free to reach out to me.

Sincerely,

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Summary

GYC has provided specific recommendations for improvements to the Plan, further outlined within our comments. These proposals coincide with our mission to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem, now and for future generations. GYC requests the Wyoming Game and Fish Department (Department) to consider the following recommendations:

- Established parameters for public support.
- Clearly defined timelines for the reduction of supplemental feeding efforts.
- A more proactive approach to CWD prevalence detection.
- Increased CWD surveillance and mandatory CWD sampling requirements.
- Exploring new and innovative funding opportunities for habitat improvements, disease mitigation, and conflict reduction.
- Increased collaborative efforts with federal agencies on land management planning processes that benefit habitat improvements, migration, and winter range protection.

History and Background

GYC has a long history of advocating for responsible management practices surrounding elk management and feedgrounds in northwest Wyoming. As an organization that applies the best available science in our decision-making, we are deeply concerned with the primary and lethal threat of Chronic Wasting Disease (CWD) and the associated impacts of the disease spreading through the ecologically and economically important ungulate populations of the Greater Yellowstone Ecosystem (GYE). We have advocated for and are developing strategies and solutions that may reduce artificial concentrations of elk while providing access to native winter range. GYC supports the phaseout of elk feedgrounds and reductions to the timing and duration of feeding programs to reduce the likelihood of CWD transmission among populations of fed elk. We have a history of providing comments on elk feedgrounds, which are available in the public record. Our organization has been an active member of the Elk Feedground Stakeholder Group since its inception, representing the NGO stakeholder group. We will continue to advocate for responsible, science-based management of Wyoming's iconic wildlife populations, while recognizing the complex pressures the Department faces. The social, cultural, political, economic, and biological complexities of elk feedgrounds in Wyoming require thoughtful decisions when addressing any changes to management practices.

GYC has supported innovative measures to provide access to more available native winter range and to reduce the impacts of disease on our prized ungulate herds. GYC is strategically working with the Department, livestock producers, private foundations, and other conservation organizations to establish voluntary, incentive-based agreements that expand access for elk on privately owned winter range. In partnership with LegacyWorks Group (LWG), GYC currently manages contracts for two elk occupancy agreements with landowners in Teton County. These voluntary agreements (often cost-sharing arrangements) incentivize livestock producers to move their cattle from areas of high risk for brucellosis transmission in Teton County to areas of low risk for transmission in Hot Springs County. GYC recognizes that moving cattle is not applicable in all circumstances but is one tool that can be utilized to expand winter range and minimize disease transmission potential. We are actively pursuing additional elk occupancy agreements in Sublette and Lincoln Counties that would create more available habitat and reduce conflicts with livestock producers.

In 2021, GYC and the Property and Environment Research Center (PERC) collaborated with a family in Paradise Valley on an elk occupancy agreement that resulted in the installation of 1.25 miles of wildlife friendly fence, excluding elk from cattle and creating 500 acres of elk winter range. GYC and PERC also partnered to develop the Paradise Valley Brucellosis Compensation Fund, a private fund which covers 50 to 75% of a rancher's quarantine related costs following a positive brucellosis test. GYC supports developing similar solutions for Wyoming's complex wildlife issues.

GYC supports the overall goal of the plan "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" (Plan, 32). The established sideboards of the Plan provide both opportunities and challenges. The Department must establish guidelines for what constitutes "public support." Public support will only become viable if specific measures are outlined to fund those actions. Landowners and producers must be aware of the broad suite of collaborative funding options that allow for tolerance of elk on private land.

The threat of rapid proliferation of CWD associated with feedgrounds is immediate. GYC is concerned with the long-term and adaptive management approach of the Plan while allowing the Department to address short-term opportunities to meet goals. While the practice of feeding elk cannot simply end overnight, clearly defined parameters must be established that are supported by the best available science. A long-term approach must coincide with the acknowledgement that "swift and deliberate actions are necessary to limit future CWD transmission" (Plan, 7). GYC recommends that the final adopted Plan contain a clearly defined timeline and progressive management aimed at eliminating artificial feeding of wildlife. Although elk feeding has occurred for over a century in northwest Wyoming, the time has come to adopt new and innovative strategies that prioritize science over historical trends and cultural biases.

Elk Feedground Disease Management

Wildlife management decisions made on or adjacent to elk feedgrounds have far-reaching consequences. Because of their significant annual migrations, elk that routinely utilize feedgrounds during the winter months have the potential to co-mingle with other populations of elk on their summer ranges (USGS). These far-reaching migratory patterns have repercussions for disease management in neighboring states or Wyoming herd units that do not contain elk feedgrounds. The Department must consider the broad distribution of feedground-dependant elk when addressing Feedground Management Actions Plans (FMAP) and future disease management strategies.

GYC commends the Department for acknowledging the threat of CWD to elk populations within the Plan. It is no surprise that "the prevalence of CWD in captive elk and deer has been found to be much higher (59-100%) than for free-ranging animals. This is thought to be due to an increased opportunity for animal-to-animal transmission and/or exposure to an increasingly contaminated environment" (Plan, 27). It is clear that if elk are continually concentrated on feedgrounds during the winter months, increased potential for disease transmission will occur.

The Plan states that "the prolonged congregation of wildlife, repeated over time, increases the likelihood and risk of infectious disease transmission and potentially increases stress" (Plan, 20). With so many elk in Teton, Lincoln, and Sublette Counties congregating on elk feedgrounds during the winter months, increasing CWD sampling efforts will lead to a better understanding of the reality of prevalence amongst the iconic elk herds of northwest Wyoming.

GYC recommends a more proactive approach to detecting CWD prevalence. The Plan clearly states that "elk populations will begin declining due to CWD somewhere between 7% (Galloway et al.

2021) and 13% (Monello et al. 2014)” (Plan, 35). Waiting for a herd unit to reach 10% prevalence of CWD for three consecutive years before considering the process of closing a feedground is unacceptable, as this timeframe will lead to reactionary protocol that is too late for pragmatic action. The Department should reconsider assessing the potential of feedground closure below the CWD prevalence level of 7%, which would provide agency staff time to adjust management protocol before an irreversible level is reached.

Additionally, GYC recommends increased CWD surveillance and mandatory CWD sampling requirements across northwest Wyoming. Specifically, we would urge the Department to implement mandatory CWD sampling requirements for all herd units that contain elk feedgrounds. Mandatory CWD sampling is already required on the National Elk Refuge (Refuge) and Grand Teton National Park (Grand Teton), along with six deer hunt areas. The Idaho Department of Fish and Game (IDFG) has implemented mandatory sampling of all deer, elk, and moose within their CWD Management Zone. This action would inevitably require additional capacity at the Department’s Wildlife Health Laboratory. It will also require additional strategic funding sources to accommodate a significantly larger sample size. With increased mandatory sampling the Department will be able to make impactful disease management decisions at lower prevalence, thus offering the State a better chance at protecting this economically and culturally significant resource.

Funding

New and innovative strategies for the management of elk in Teton, Lincoln, and Sublette Counties will undoubtedly require significant additional funding. If the reliance on elk feedgrounds is decreased, the potential for conflict will place stress on landowners near or adjacent to current feedgrounds. Fence and property damage, exclusionary fencing of hay, and costs associated with brucellosis transmission to cattle are some of the financial burdens that will be put on producers as elk management practices adapt. Significant additional funding will be needed for habitat improvement projects such as prescribed burns, forest thinning, planting of sagebrush, and mitigating invasive species, to provide the quality habitat necessary for a broader and more natural distribution of elk.

GYC recommends that the Department explores innovative funding opportunities to mitigate damage to private property, expand habitat improvement projects on both private and federal land, and pursue innovative agreements that benefit elk habitat and livestock producers. Collaborating with federal agencies, NGO partners, private foundations, individual donors, and the general public for creative funding solutions will be a crucial step in securing large scale funds to implement the tactics and strategies proposed in the Plan.

There are many funding sources currently available for such projects. The Wyoming Wildlife and Natural Resources Trust (WWNRT), Natural Resources Conservation Services (NRCS), Farm Service Agency (FSA) and Conservation Districts all provide funding to mitigate conflicts and increase wildlife permeability across the landscape. The USDA-Wyoming Big Game Partnership Pilot incorporates dedicated funding for big game conservation through the Environmental Quality Incentives Program (EQIP), the Agricultural Conservation Easement Program (ACEP), and the Grassland Conservation Reserve Program (Grassland CRP). NGOs such as GYC and LegacyWorks Group (LWG) are actively working with private foundations to provide funding to livestock producers through cooperative elk occupancy agreements that would reduce conflict, increase available winter range habitat, and decrease reliance on elk feedgrounds.

Public Support

Wyoming's wildlife is a public resource, belonging to every resident. Although elk are managed by the Department, they are valued beyond the hunting community. People from across the globe travel to northwest Wyoming to view wildlife, hunt, and experience the wonders of the GYE. If the goals of the Plan are to be adopted and supported, broad public support although desired, may be difficult to achieve. Public support must be defined and then sampled in a scientific and statistically valid manner. Without defining public support, the entire Plan will be subject to political scrutiny.

The Department must focus on public support from livestock producers if successful implementation of the Plan is to be achieved. In order to fulfill the objective of providing additional private land winter range it is critical that landowners and livestock producers are provided adequate opportunities for engagement and fair compensation they will inevitably incur. As a constituency that carries significant political power within the state, the effectiveness of the Plan will depend on endorsement from ranchers and landowners that reside near or adjacent to elk feedgrounds. The phaseout of feedgrounds will undoubtedly place a burden on these producers, who will need reassurance that their livelihoods will not be jeopardized by any change in the Department's management strategies.

The Plan states that "the Department has an obligation to provide timely, accurate, and unbiased information about elk feedgrounds to the public" (Plan, 47). This unbiased and timely information should also extend to the topics of feedground phaseout and reduced reliance on supplemental feeding. The Department should explore broadening public outreach and data collection surrounding elk feedground management. Public surveys are an invaluable tool when gauging interest in changes to wildlife management. Hunter surveys, which are issued every year by the Department, help guide management protocol, the timing and duration of hunting seasons, and future quotas. The Utah Division of Wildlife Resources (DWR) used results from extensive public surveys to adopt new regulations on the usage of trail cameras on public land (Utah DWR). Similarly, the Michigan Department of Natural Resources (DNR) utilized a standardized survey to gauge public support for antler point restrictions in specific deer management areas (Michigan DNR). Similar surveys should be employed as the Department gauges public support of feedground management decisions, direction, and methods.

Partnerships and Collaboration

Wyoming is a national leader in big game migration research, migration corridor identification, and an early adopter of corridor designations. The partnerships between the Department, the University of Wyoming, the United States Geological Survey (USGS), and NGOs demonstrate a commitment to complex natural resource management. This collaborative approach must be maintained if the state desires lasting, durable solutions for elk management and disease mitigation.

Partnership between the Department and federal agencies will be a critical component to ensuring the long-term goal of maintaining ungulate populations and mitigating conflict. Many of the elk in northwest Wyoming utilize the quality habitat of the 3.4 million-acre Bridger-Teton National Forest (BTNF) for summer, winter, and transitional ranges. Maintaining, protecting, and improving the exceptional habitat of the BTNF will decrease the reliance of elk on private land, minimizing conflict and saving Department resources. We encourage the Department to explore opportunities on adjacent public lands to improve habitat for ungulates.

The upcoming revision of the BTNF Forest Plan will provide direction for the administrative protections and landscape management prescriptions for decades to come. This provides the

Department the opportunity to secure policies and actions that support the goals outlined in this Plan. GYC would encourage the Department to actively engage in this process. Additional seasonal closures, winter range habitat improvements, migration route preservation, and allotment retirements will be considered throughout this comprehensive plan revision.

References

1. Kauffman, M.J., Copeland, H.E., Berg, J., Bergen, S., Cole, E., Cuzzocreo, M., Dewey, S., Fattebert, J., Gagnon, Gelzer, E., Geremia, C., Graves, T., Hersey, K., Hurley, M., Kaiser, J., Meacham, J., Merkle, J., Middleton, A., Nuñez, T., Oates, B., Olson, D., Olson, L., Sawyer, H., Schroeder, C., Sprague, S., Steingisser, A., Thonhoff, M., 2020, *Ungulate Migrations of the Western United States, Volume 1: U.S. Geological Survey Scientific Investigations Report 2020–5101*, 119 p., [Ungulate Migrations of the Western United States, Volume 1 \(usgs.gov\)](https://pubs.usgs.gov/of/2020/5101/)
2. *DWR Proposes Changes to Trail Camera Use, Black Bear and Cougar Hunting.* [DWR proposes changes to trail camera use, black bear and cougar hunting \(utah.gov\)](https://www.utah.gov/newsroom/2022/04/20/dwr-proposes-changes-to-trail-camera-use-black-bear-and-cougar-hunting/)
3. *Department of Natural Resources Wildlife Division: Guidelines for Initiation, Evaluation, and Review of Mandatory Antler Point Restrictions.*