



Providing leadership in conserving the natural resources in Weston County by providing information, education, and technical assistance to meet the needs of our users.

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September 10, 2023

RE: Wyoming Elk Feedgrounds Management Plan comments

Wyoming Game & Fish Department
5400 Bishop Blvd
Cheyenne, WY 82006

Director Nesvik,

Our comments are related to our mission as a conservation district. Wyoming State Statute provides guidance for conservation districts. Statute 11-16-103(b) states:

It is hereby declared to be the policy of the legislature to provide for the conservation of the soil, and soil and water resources of this state, and for the control and prevention of soil erosion and for flood prevention or the conservation, development, utilization, and disposal of water, and thereby to stabilize ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state.

Our responsibility lies in the conservation and protection of the state's natural resources as well as the stabilization of ranching and farming operations. While the lands under the jurisdiction of the district, and our district members, are not directly affected by the existence or changes to the elk feedgrounds, we are concerned about the implications of management decisions made elsewhere that might also influence decisions made locally. Thus, we feel it important to share our concerns as relating to the larger management of elk in Wyoming.

Elk Feedgrounds

We agree that human expansion and settlement of traditional elk summer ranges have affected elk migration and the number of elk that can be supported in the region where the elk feedgrounds are established. We appreciate that the plan admits that the creation and use of the feedgrounds have led to higher than normal elk numbers, that otherwise would be unsustainable on current native habitat.

As stated, 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. In order for this plan to be responsive enough to properly mitigate degradation of private and public lands when a feedground is closed, reevaluation of population targets must coincide with any change to a feedgrounds. Evaluating population targets every five years will not be sufficient if changes to the feedgrounds occurs on an alternate schedule or in between population evaluations timelines.

Feedground Management Action Plans (Phase III)

Under Elk Harvest Strategies, the goal is to "Maintain elk numbers in herd units with feedgrounds at publicly-supported, Commission approved population objectives using hunting as a primary tool." It is assumed that this implies that elk numbers will be maintained at current accepted levels, with the feedgrounds in place. As the plan indicates, elk numbers

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are artificially increased by the presence and use of the feedgrounds. If a feedground is closed, this artificial population target would no longer be sustainable. While several strategies are listed and currently in use to reduce and/or compensate for wildlife damage or degradation to private property, there also needs to be a mechanism to revisit the appropriate population target if one or more feedgrounds are closed. For the plan to meet its objectives of not increasing degradation to both private and public lands, these two processes must occur together.

Due to the artificial elk population sustained by the feedgrounds, an increase in degradation to private property due to a feedground closer is almost inevitable. While there is mention of the importance of a rapid and flexible response, having a plan to reevaluate the population numbers needs to also be listed as a step in the process. As well as a plan and tools identified to reduce population numbers to the new population target.

Disease Mitigation

We appreciate the many strategies listed to help managers mitigate disease spread in elk herds within the feedgrounds. Including manure reduction, substrate alteration, reduced feeding density, and population reductions. Closure is also listed as a possible necessary action to reduce disease spread in infected herds. We recommend that herd population due to the loss of the feedground also be considered in this instance in order to mitigate degradation to private land as well as the habitat on public lands surrounding the feedground.

Timely and Effective Response

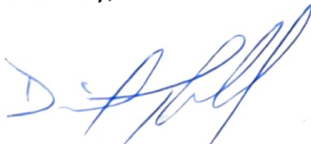
Though Northeast Wyoming does not have feedgrounds, there are multiple elk populations that are causing damage and degradation to private lands and are going largely unchecked for various reasons. The various strategies mentioned in this plan have been in use here to mitigate these populations through hunting programs, but so far have had little effect. Relying on these same strategies to respond to population reduction needs in the case of a feedground closer may not be as responsive as is necessary to mitigate the repercussions to surrounding habitat.

If the need to close a feedground is decided, either temporarily, or permanently, the response in addressing population concerns must also be quick and timely. Actions to appropriately mitigate potential damage to private land need to be quick and responsive to the level of degradation. Reviewing population numbers every five years is not responsive enough to respond to a closure due to a disease outbreak, for example. Ensure that the flexibility of this plan allows managers the freedom to address population concerns in a timely manner.

In Conclusion

This plan repeats the importance of flexibility and the importance of local public input and management. Combining this with the flexibility to consider the repercussions of decisions on the sustainable population and the need to reduce population numbers when necessary, will help to make this plan flexible enough to address feedground issues and concerns while also addressing habitat degradation concerns.

Sincerely,



David Tysdal

Chairman

Weston County Natural Resource District

Board of Supervisors

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