



Wyoming  
DEPARTMENT OF Agriculture

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*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.*

January 11, 2024

Chad Hudson  
Forest Supervisor  
Bridger-Teton National Forest  
PO Box 1888  
Jackson, WY 83001

Dear Supervisor Hudson,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Dell Creek and Forest Park Elk Feedgrounds, Long-term Special Use Permits, Draft Environmental Impact Statement (DEIS).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

We appreciate the opportunity to serve as a Cooperating Agency on the development of the DEIS. The historical use of elk feedgrounds in Wyoming has and continues to serve multiple purposes, including but not limited to separating elk from cattle during winter with the intention of reducing disease transmission between species and reducing conflict between elk and private landowners.

WDA understands the potential impacts Chronic Wasting Disease (CWD) can have on wildlife across Wyoming. We support the efforts of the Wyoming Game and Fish Department (WGFD) to better understand how winter feeding of elk on feedgrounds and transmission of CWD interact. The Bridger-Teton National Forest's (BTNF) DEIS Proposed Action is to issue a long-term use 20-year permit to the Wyoming Game and Fish Commission (WGFC) for winter elk management. However, the BTNF does not identify the agency's Preferred Alternative. We offer the following comments to consider when selecting the Preferred Alternative and issuing the subsequent Draft Record of Decision (DROD).

**Wyoming BOA Policies:**

The WDA Board of Agriculture (BOA) developed and approved the following policy statements to guide the WDA pertaining to disease, elk and general wildlife management, as well as where agriculture, private lands, and livestock operations may overlap.

**Brucellosis**

The BOA supports the eradication of brucellosis in domestic animals and wildlife and supports the efforts of the Governor's Brucellosis Coordination Team (GBCT).

Reviewed/Retained: March 17, 2021

*Equal Opportunity in Employment and Services*

**BOARD MEMBERS**

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#### Migration Corridors

The BOA does not support any impacts or restrictions placed upon private lands based on the designation of a migration corridor.

Adopted: March 17, 2021

#### Elk Feedgrounds

BOA does not support the removal or closure of existing elk feedgrounds.

Adopted: March 17, 2021

#### Game & Fish Managing Herd Management Unit

The BOA supports management of wildlife herd units based on multiple use and habitat availability.

The BOA supports Game and Fish cooperating with landowners on setting initial population targets and hunting seasons.

The BOA wants the objectives to change before resource damage occurs and not be based on only public comments.

The BOA does not support the reduction of livestock numbers in support of maintaining or increasing herd unit objectives.

Reviewed/Retained: March 17, 2021

#### Wildlife Management

Recognizing that wildlife is important to the recreation and tourism industry, the BOA supports the healthy management of wildlife in the best interest of the state and agriculture community. Private land is a benefit to wildlife in the state. The BOA is working to find more common ground with state and federal wildlife managers.

Reviewed/Retained: March 17, 2021

#### **Comparison between Alternatives:**

Much of the document and comparison between alternatives is based on a model and the impacts of CWD on elk at current population levels. WDA believes the alternatives and respective analysis lacks information regarding if populations of elk are at or above herd unit objectives. Feedgrounds have allowed for the management of larger elk population, perhaps above objectives with supplemental feed rather than keeping populations within a modified objective based on a balance with native foraging elk found in other parts of Wyoming.

If CWD was not present, and the same alternatives were compared based on the assumptions above, one could conclude CWD would have less of an impact on a lower, naturally balanced elk population, with less density at the feedground. The DEIS only provides general information indicating 15 of 36 herd units across the state have CWD, but does not provide specific information such as where the 15 are located, how many of the 15 herd units are on the BTNF, and more specifically if the elk from Dell Creek and Forest Park have CWD.

Beyond CWD, the alternatives 2, 3, and 4 assume if the feeding of elk were eliminated or reduced, the elk would resume their historic migration routes. WDA believes this is incredibly speculative and little or no information is known what would occur. Elk could modify from a closed feedground to an active feedground, increasing the number of head being fed at neighboring feedgrounds. Another scenario is the elk with fidelity to Dell Creek or Forest Park eventually die off. The model and analysis is not capable of predicting with certainty what happens to individual animals.

**Bighorn Sheep:**

The DEIS states "In general, bighorn sheep herds that remain today are threatened by domestic livestock grazing, disease..." WDA urges the BTNF remove this statement, as domestic sheep allotments or cattle grazing do not overlap with bighorn sheep habitat. Further in the section it states: "The Dell Creek feedground does not overlap with any designated bighorn sheep habitat (WGFD 2012b, 2018b). However, there is winter habitat 9.5 miles west of Dell Creek. The Forest Park feedground is not near any designated bighorn sheep winter habitat (Figure 54)." WDA does not believe the DEIS should incorporate or analyze bighorn sheep given they are not in the project area or part of the Purpose and Need of the DEIS.

**Preferred Alternative:**

The National Environmental Policy Act (NEPA) develops the sideboards for the agency to decide which alternative to select in the DROD. Following the analysis, the BTNF would have the ability to choose an alternative or components from the range of alternatives to develop a Preferred Alternative. The Proposed Action provides the WGFC up to 20 years to manage winter elk herds with the existing infrastructure and permitted dates.

During the next 20 years, the WGFC could incorporate more monitoring, implement reduced feeding dates and quantities, reduce elk populations, modify herd unit objectives, or voluntarily implement components from the emergency feeding alternative. Given the WGFC has jurisdiction over wildlife management, and the decision is based on model predictions, we believe selecting the Proposed Alternative gives the widest flexibility for the WGFC to make decisions.

**Conclusion:**

Due to the many unknown scenarios of reducing or eliminating winter elk management on Dell Creek and Forest Park feedgrounds, WDA remains concerned how the livestock industry and private landowners will be impacted. The use of models does not provide a level of certainty regarding increases/decreases in transmission of brucellosis from elk to cattle near the project area, nor does it provide enough clarity how the elk acclimated to winter feeding would reinstate historic migration routes. We reiterate the BOA position and our support of the Proposed Action as the Preferred Alternative.

We look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto  
Director

DM/jw

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Association of Conservation Districts  
Wyoming Game and Fish Department  
Wyoming County Commissioners Association  
Public Lands Council