



# Wyoming Department of Agriculture

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September 26, 2005

Bison and Elk MP/EIS  
Laurie Shannon, Project Manager  
National Elk Refuge  
PO Box 510  
Jackson, WY 83001

Dear Ms. Shannon:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Draft Bison and Elk Management Plan and Environmental Impact Statement.

Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal will have major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We appreciate the opportunity to comment on the Bison and Elk Management Plan (Plan). We understand the difficulty creating a plan to manage the existing elk and bison populations, manage the future herds, and maintain a brucellosis free status. We commend the U.S. Fish & Wildlife Service (USFWS) and the National Park Service (NPS) for their efforts and proposals provided in the Plan. We offer the following comments and recommendations on population, migration routes, and disease transmission.

### **Reducing Elk and Bison Populations**

The current elk and bison populations on the National Elk Refuge (NER) are exceedingly higher than natural population levels. We support the USFWS and the NPS decision for the Proposed Action—Alternative 4, Restore Habitat, Improve Forage and Phase Back Supplemental Feeding. Alternative 4 will accomplish the Wyoming Game and Fish Department's (WGFD) elk herd objective of 11,029 head, which we view as an acceptable level.

Hunting is an important tool in managing elk populations. We strongly urge the USFWS and NPS to work more closely with the WGFD on hunting regulations. We remain unclear of the WGFD Commission's recommendation and choice of alternatives for the Plan. The WGFD receives a substantial amount of money from elk hunters. For that reason, the WGFD

Commission may choose to allow an increase in elk and bison populations, which we highly discourage. The increase in elk populations will not meet the goals of the USFWS or NPS on the Plan.

The emphasis and trend for many hunters is to harvest a bull elk versus a cow elk. We emphasize the implementation of a plan to reduce cow elk versus bull elk in the Jackson herd. The WGFD must consider methods to increase the harvest of cow elk. We recommend the following methods to obtain the goal of 11,029 head.

- Reduce fee for licenses: We recommend the elk license fee for in-state and out-of-state hunters be reduced or removed all together. This fee change would be for cow tags specifically in the Jackson herd. Many out-of-state hunters required to pay the \$400 license fee want to shoot a large bull and cannot justify harvesting a cow elk. This incentive will create a demand for meat hunters in the Jackson area.
- Implement new regulations: We recommend the WGFD implement regulations similar to the "point system," where an individual hunter can gain preference for an area, bull tag, etc. This regulation would require elk hunters to take cow elk prior to the issuance of a bull elk tag. We strongly urge the conversion from head hunting to meat hunting. The hunter must exhibit physical evidence of a successful cow elk hunt to the WGFD.
- Export live elk and bison: States surrounding Wyoming are involved in exporting wildlife such as elk and bison to other states like Kentucky. Wyoming was not included in this project. We highly recommend the state of Wyoming become involved in the export of disease free animals to increase genetic diversity, while also reducing the Jackson herds.

### **Considering Migration Routes**

The Plan addresses the migration of elk and calls for a reduction in supplemental feeding on the NER to make elk and bison seek other winter forage. The result is either elk starving or migrating to private and state lands outside of the Jackson area. We cannot support the Plan if the WGFD does not have strong support and understanding by private landowners and the public of the additional elk inevitably migrating to state feedgrounds. We question the ability for the state to take on the increased cost and burden of feeding thousands of additional elk. We believe the USFWS needs to work closely with WGFD to take a more proactive approach to resolve issues on private and public lands in the Plan. We suggest the following to alleviate the NER herd relocating to the twenty-two state feedgrounds and private ranch lands.

- Work with WGFD to set population standards: Each state feedground must have a population maximum limit. The WGFD will monitor winter feedground populations and harvest elk when standards exceed.
- Provide incentives for private landowners: Private landowners are stewards of the land who provide critical wildlife habitat. We encourage the USFWS and WGFD to work with landowners to provide incentives for providing grass banks or additional forage in strategically placed areas for wintering elk.
- Work with private landowners with new calving plans: Private landowners may benefit from altering calving locations as elk begin to migrate outside the Jackson area and onto private lands. Altering calving grounds may reduce the habituation of elk to return year after year to the same calving grounds in search of supplemental feed.

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### **Preventing Disease Transmission**

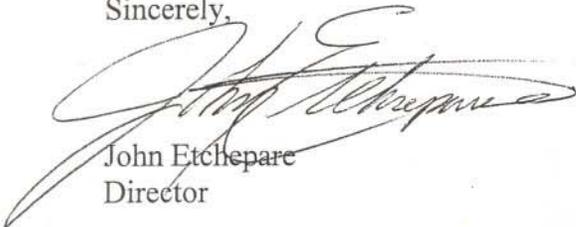
The recent decision for the WGFD to capture and test elk for brucellosis is a positive step towards controlling the spread of the disease. We are actively involved in the Brucellosis Task Force and strongly support the capture of elk. As long as there are elk and bison fed on feedgrounds, they will transmit diseases to livestock. The state of Wyoming and the ranchers must achieve brucellosis free status in the near future to offset the fear from cattle buyers outside of Wyoming. We offer the following ideas to reduce disease transmission between elk, bison, and cattle.

- Provide fencing to private landowners: Landowners willing to allow elk on private lands and grass banks during the winter could be provided eight-foot fencing surrounding their calving grounds to prevent commingling of elk and cattle during the calving season. The USFWS, WGFD, or other wildlife supporting groups could supply the fence and assist ranchers with this expense.
- Capture and test elk on NER: The NER is an ideal location for capturing, testing, and vaccinating elk and bison for brucellosis. Testing in early winter to prevent cows from aborting calves and passing on the disease is encouraged.

We sincerely appreciate the efforts of the USFWS and NPS in the approach to manage elk and bison on the NER and in Grand Teton National Park. The decreased populations are an important step in reducing brucellosis and other diseases such as chronic wasting disease. We encourage a collaborative, proactive approach with the WGFD, private landowners, and state agencies, such as the WDA, to guide in the management of elk and bison as they migrate outside of the Jackson area.

Thank you for the opportunity to comment.

Sincerely,



John Etchepare  
Director

JE/jw

Cc: Governor's Planning Office  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Rocky Mountain Farmers Union  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Game and Fish Department