



COALITION OF LOCAL GOVERNMENTS

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FORT BRIDGER, WY 82933

COUNTY COMMISSIONS FOR SWEETWATER, LINOCLN, AND UINTA, AND CONSERVATION DISTRICTS FOR
LINCOLN, LITTLE SNAKE, STAR VALLEY, SUBLETTE, SWEETWATER, AND UINTA - WYOMING

January 16, 2024

VIA: Project Webpage

Chad Hudson, Forest Supervisor
Randall Griebel, Ecosystem Staff Officer
Bridger-Teton National Forest
340 North Cache St.
P.O. Box 1888
Jackson, WY 83001

Re: Comments on the Draft Environmental Impact Statement for the Dell
Creek and Forest Park Elk Feedgrounds Long-Term Special Use Permits
Project

Dear Mr. Hudson and Mr. Griebel,

The Coalition of Local Governments (CLG or Coalition) submits the following comments on the Draft Environmental Impact Statement (DEIS) for the Dell Creek and Forest Park Elk Feedgrounds Long-Term Special Use Permits Project. The Coalition supports the proposed alternative of the Wyoming Game and Fish Commission's (WGFC) to continue its long-term use of both the Dell Creek and Forest Park elk feedgrounds on the Bridger-Teton National Forest. The elk feedgrounds help to maintain the elk populations in the area and prevent conflicts with and the spread of brucellosis to nearby livestock located on private lands. As the agency who has authority over wildlife in Wyoming, the Wyoming Game and Fish Department (WGFD) and the WGFC are in the best position to determine whether these feedgrounds are still necessary.

The feedgrounds in the Bridger-Teton National Forest are even more important during harsh winters, like the one Wyoming experienced this past year. The WGFC reported in March of 2023 that in the Jackson and Pinedale regions, there was more than 50 percent mortality of collared mule deer fawns and they plan to see above-average mortality for both mule deer and pronghorn. These same mortality rates for mule deer and pronghorn are occurring throughout Wyoming. The larger ungulates, such as elk and

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moose, will likely experience average mortality this winter, but WGFC is responding to an increased number of elk causing damage to private lands as they seek forage at livestock feeding operations.

The majority of the impacts did not vary much between alternatives, and specifically the “alternatives did not drive large differences in CWD [chronic waste disease] prevalence rates, deaths from CWD, or deaths over time across entire herd units.” DEIS at 56. The same is true in relation to the risk of brucellosis transfer between elk and cattle, and overall difference in estimated elk population size. *Id.* at 62, 65-66. These points alone should encourage the continued use of the elk feedgrounds at this time. In addition, even under the cumulative impacts where the BLM assumes no feeding in all 18 feedgrounds in the five herd units the difference is only a “slightly greater elk population size and lower CWD prevalence” at the end of the 20-year permitting period. *Id.* at S-4, 74-80. The cumulative impacts analysis also does not appear to consider that five of the elk feedgrounds on the National Forest are still permitted through 2028. *Id.* at 3, 18, 72. While the question of whether additional permitting will be approved for these five feedgrounds remains to be seen, the cumulative impact analysis should have considered that these permits will at least be in place through 2028 instead of only considering the scenarios of applying the same proposed alternatives for the two feedgrounds at issue across the board to all feedgrounds within the five herd units. This has inappropriately skewed the cumulative impact analysis.

The Coalition appreciates the opportunity to comment and continues to support the continuation of the Dell Creek and Forest Park Elk Feedgrounds.

Sincerely,

A handwritten signature in black ink that reads "Eric South". The signature is written in a cursive, flowing style.

Eric South, Chairman
Coalition of Local Governments